



PLANNING COMMITTEE REPORT

Development Management Service
 Planning and Development Division
 Environment and Regeneration Department
 PO Box 333
 222 Upper Street
 LONDON N1 1YA

PLANNING COMMITTEE		AGENDA ITEM NO:
Date:	5 December 2017	NON-EXEMPT

Application number	P2017/3103
Application type	Full Planning Permission
Ward	Bunhill
Listed building	Within vicinity of the Honourable Artillery Company and its playing fields are located to the north of the Site, beyond Chiswell Street and include the Grade II* listed Armoury House and Grade II listed Finsbury Barracks.
Conservation area	Within 50 metres of the Bunhill Fields and Finsbury Square Conservation Area
Development Plan Context	<ul style="list-style-type: none"> - Bunhill and Clerkenwell Core Strategy Key Area - Finsbury Local Plan (FLP) Area - Employment Priority Area (Offices) - Central Activities Zone - City Fringe Opportunity Area - Moorfields Archaeological Priority Area - Within 50 metres of the Bunhill Fields and Finsbury Square Conservation Area - Crossrail Safeguarding Direction
Licensing Implications	Not Applicable
Site Address	20 Ropemaker Street, 101-117 Finsbury Pavement and 10-12 Finsbury Street, London, EC2Y 9AR.
Proposal	Demolition of the existing buildings and erection of a 27-storey building (part 10, part 15, part 20, part 25, part 27-storeys) with 3 basement levels to provide for 63,507 square metres (GIA) of office floorspace (Use Class B1(a)) and 1,222 square metres (GIA) of flexible retail/professional services/restaurant/café floorspace (Use Class A1/A2/A3) along with associated access and servicing arrangements, cycle parking, refuse storage and landscaping works.

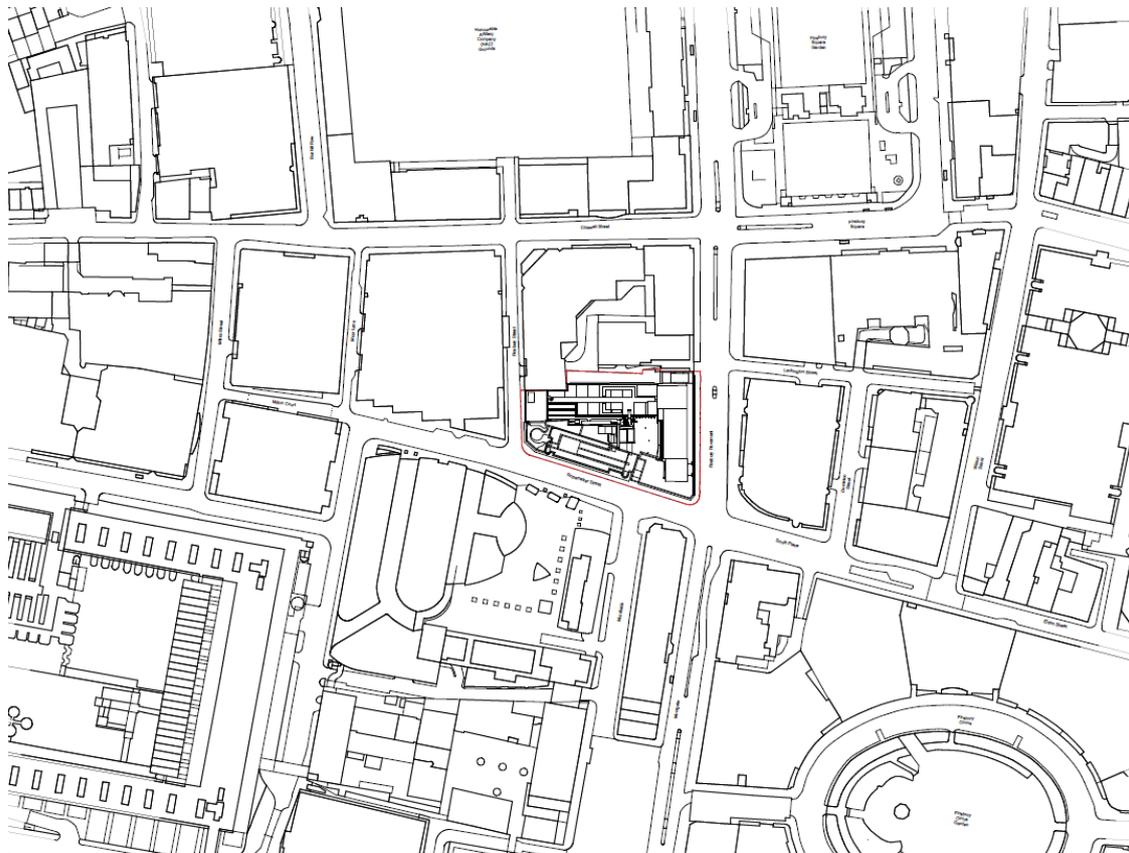
Case Officer	John Kaimakamis
Applicant	Gerald Eve
Agent	c/o Agent

1. RECOMMENDATION

The Committee is asked to resolve to **GRANT** planning permission:

1. subject to the conditions set out in Appendix 1;
2. conditional upon the prior completion of a Deed of Planning Obligation made under section 106 of the Town and Country Planning Act 1990 securing the heads of terms as set out in Appendix 1; and
3. subject to any direction by the Mayor of London to refuse the application or for it to be called in for the determination by the Mayor of London.

2. SITE PLAN (site outlined in red)





3. PHOTOS OF SITE/STREET





4. SUMMARY

- 4.1 The proposal seeks demolition of the existing buildings and erection of a 27-storey building (part 10, part 15, part 20, part 25, part 27-storeys) with 3 basement levels to provide for 63,520 square metres (GIA) of office floorspace (Use Class B1(a)) and 1,222 square metres (GIA) of flexible retail/professional services/restaurant/café floorspace (Use Class A1/A2/A3). The proposal also includes within the office floorspace the provision of 955 square metres (GIA) of office floorspace at first floor level that would be suitable for occupation by micro and small enterprises by virtue of its size and design. Public realm improvements are proposed along the two frontages of the site with the introduction of a placemaking tree at the junction of Ropemaker Street and Finsbury Pavement as well as the widening of both footway pavements.
- 4.2 Subject to a contribution towards securing offsite housing provision (the contribution accounts for an equivalent 20% of the uplift in office floorspace) and amounts to £4,639,680, the development of a mixed use Class A1/A2/A3 and Class B1 office scheme on this highly accessible site in an Employment Priority Area designated specifically for offices in the CAZ is considered to be

acceptable in land use terms. The provision of high quality Class B1 office accommodation would be consistent with the aims of the development plan.

- 4.3 It is considered that although the proposed development is taller than the existing buildings on the site, the architectural approach is supported with use of materials that are respectful to the context of the area. Additionally, the stepped massing approach successfully integrates with the scale of existing buildings in the area, namely the heights of Ropemaker Place/City Point and the lower rise context to the east and north. The amendments throughout the pre-application stage to the western most element have resulted in further improvement to the resultant skyline composition in views from the HAC grounds, forming an appropriate book end to Ropemaker Place. The proposed scheme also activates the ground floor with retail uses along Finsbury Pavement and the entrance lobby areas along Ropemaker Street.
- 4.4 Sections 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 require decision-makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings, and to the desirability of preserving or enhancing the character or appearance of a conservation area. Paragraph 134 of the NPPF states that 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 securing its optimum viable use.
- 4.5 Whilst there will be some harm to the Bunhill Fields and Finsbury Square conservation areas and the setting of the Honourable Artillery Company (GII* listed), this is considered to fall within the 'less than substantial harm' category of the NPPF. The site is also designated within an area considered appropriate for tall buildings above 30m due to the potential for the public benefit to outweigh potential harm. Council's Design and Conservation officers are of the view that the level of public benefit provided by the proposals far outweigh the 'less than substantial harm' to the heritage assets.
- 4.6 In particular, the scheme would deliver a significant amount of new and upgraded office floorspace in the CAZ along with floorspace for small and micro enterprises (a benefit as this provision is not required by planning policy) alongside public realm improvements.
- 4.7 No part of the development would result in unacceptable adverse impacts in terms of loss of daylight, sunlight, outlook, sense of enclosure or privacy that would justify refusing planning permission.
- 4.8 Subject to appropriate conditions, including submission of a feasibility study for connection to Citigen, the development would comply with relevant planning policies relating to sustainability and energy efficiency.
- 4.9 The proposed development would be serviced on-site and subject to appropriate conditions would have no adverse impacts on the local road network. The refuse/recycling and servicing arrangements are considered to

be acceptable. The provision of secure cycle storage and showering and changing facilities for staff would encourage sustainable travel.

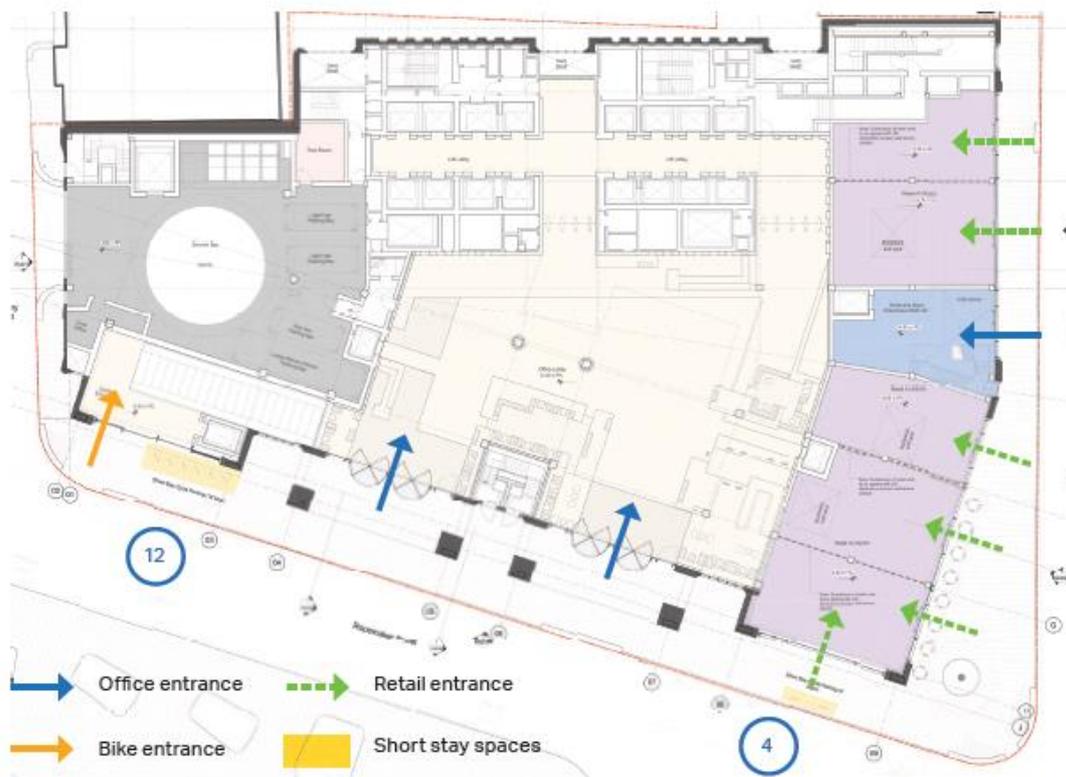
- 4.10 In addition to the Mayoral and Islington Community Infrastructure Levy, the application is supported by a comprehensive s106 planning agreement and contributions related to and mitigating impacts of the scheme. For these reasons and all the detailed matters considered in this report, the scheme is acceptable subject to conditions, informatives and the s106 legal agreement.

5. SITE AND SURROUNDING

- 5.1 The application site is located on the northern side of Ropemaker Street between Finsbury Street and Finsbury Pavement. The existing buildings on site comprise of Arbuthnot House, 15-24 Ropemaker Street, and Finsbury Court, 101-117 Finsbury Pavement and 10-12 Finsbury Street. The existing buildings are predominantly in office use (class B1) with retail units on ground floor. 10-12 Finsbury Street also contains two caretaker's flats.
- 5.2 The existing buildings on site vary in height from 7 to 9 storeys. Adjoining the site to the north are similarly sized office buildings (which include banking and cafe/bars at ground floor level) at 125 and 131 Finsbury Pavement (rising in height to 36m). The building at 125 Finsbury Pavement has an interesting angular façade, with an upper level turret feature. This building would share a party wall with the proposed development.
- 5.3 Opposite the site to the east (across Finsbury Pavement), at 70 Finsbury Pavement is a building known as the Helicon, a mixed use building including retail and banking uses at ground floor and office uses above (46m). South of the site are 8 storey buildings (rising in height to 28m) on either side of Moorfields. Moorgate Underground and Train station is approximately 125m south of the site (along Moorfields).
- 5.4 The Honourable Artillery Company and its playing fields are located to the north of the Site, beyond Chiswell Street and include the Grade II* listed Armoury House and Grade II listed Finsbury Barracks.
- 5.5 To the west of the site, across Finsbury Street is a 20 storey (96m) office building called Ropemaker Place (with a street address of 25 Ropemaker Street). To the southwest of the site is a building known as City Point, which is a 36 storey (127m) office building with various retail and café spaces at ground floor level. This building is set within an open area of hard landscaping. Further west is another tall building known as the Heron (the site is next to a cluster of tall buildings).
- 5.6 The site has a Public Transport Accessibility Level (PTAL) rating of 6(b) (on a scale of 1 to 6 where 1 representing the lowest levels of accessibility to public transport and 6 the highest). The site is within the Central Activities Zone and is designated as an Employment Priority Area (Office).

6. PROPOSAL (IN DETAIL)

- 6.1 The proposal seeks to demolish all buildings on the site and replace them with a 27-storey building (part 10, part 15, part 20, part 25, part 27-storeys) with 3 basement levels. These will contain 63,507 square metres (GIA) of office floorspace (Use Class B1(a)) and 1,222 square metres (GIA) of flexible retail/professional services/restaurant/café floorspace (Use Class A1/A2/A3).
- 6.2 Within the office there would be 955 square metres of workspace specifically for small and micro businesses within a ground floor mezzanine level fronting Fisbury Pavement with its own independent access. Cycle storage, changing and shower facilities would be provided at basement level along with storage space for the retail units. The main entrance to the office lobby would be off Ropemaker Street. Ground floor retail units would front on to Finsbury Pavement and Ropemaker Street.



- 6.3 The building would be stepped in form, with landscaped roof terraces for office occupiers. There are five terraces in total, three on the east and two on the west of the new building. There would also be 14 large balcony spaces which could be used for meetings or amenity space for office workers.



6.4 The ground floor of the building has been set back to provide increased public realm on Ropemaker Street and the building is designed to create new public space at the junction of Ropemaker Street and Finsbury Pavement. Improvements to the hard landscaping along Finsbury Street, Ropemaker Street and Finsbury Pavement are also proposed. The building would be serviced via an internal service bay at ground floor, accessed via Finsbury Street.





7. RELEVANT HISTORY:

7.1 The following previous planning applications relating to the application site are considered particularly relevant to the current proposal:

7.2 Planning Applications:

Nos. 101-117 Finsbury Pavement

7.3 Ref: 6757/03.1/1/08: The erection of new office buildings on the site, together with a bank, shops, two caretaker flats, office storage, basement car parking and plant. This application was granted consent on 8 May 1978.

7.4 Ref: TP/53566: Change of use from retail shop (580 sq. m) on part of ground and basement floors (known as Unit 2) to building society or bank branch office. This application was granted consent on 22 October 1985.

7.5 Ref: TP/53566: Change of use of ground and basement floor shop units (662 sq. m) to banking hall and offices. This application was granted consent on 17 November 1986.

Nos. 10-12 Finsbury Street

7.6 Ref: PT/TD/DO/03/29777: Erection of a new building comprising offices, storage and ancillary plant, not exceeding 9,985 sq. feet on the site. This application was granted consent on 28 January 1975.

7.7 Ref: 6757/03.1/1/08: The erection of new office buildings on the site, together with a bank, shops, two caretaker flats, office storage, basement car parking and plant. This application was granted consent on 8 May 1978.

Nos. (19)20-24 Ropemaker Street

7.8 Ref: TP/1680: redevelopment to provide six and seven storey plus basement office building with 4,869 sq. m gross office floorspace and ground floor parking for 4 cars. This application was granted consent on 18 October 1985.

7.9 A number of other planning applications have been submitted for minor development on the above sites.

7.10 **Enforcement:**

7.11 There are no enforcement cases that are relevant to the application site.

8. CONSULTATION

Public Consultation

8.1 Letters were sent to the occupants of over 3800 adjoining and nearby properties surrounding the application site in both the City of London and Islington Council boundary areas. Site notices and a press advert were displayed on 01/09/2017. The first period of public consultation closed on 22/09/2017.

8.2 As a result of the first consultation period, the applicant submitted further Daylight and Sunlight information in response to the representations received. Objections were raised that the daylight information submitted with the application did not reflect the residential layouts of the units within the Heron building. The applicant revised the daylight distribution for these units on the basis of the plans and construction drawings by the contractor who erected the Heron building. These revised daylight figures were subject to a re-consultation period.

8.3 It is the Council's practice to continue to consider representations made up until the date of a decision and a number of objections submitted after the end of the consultation period have been taken into consideration.

8.4 In response to both consultation periods, a total of 29 objections were submitted against the proposal. The issues raised can be summarised as follows (with the paragraph that provides responses to each issue indicated within brackets):

- Proposal will have an impact on the daylight and sunlight surrounding properties receive;

[The modelling for sunlight/daylight assessment provided by the submitted study considers all residential properties around the site, namely at the Heron building. The assessment has considered all 4 tests under the BRE Guidance. With regard to three of the tests, the Vertical Sky Component, Annual Probable Sunlight Hours and Winter Probable Sunlight Hours, the proposal would not result in any transgressions in accordance with the BRE Guidance. With regard to Daylight Distribution (No Sky Line) test,

only 5 rooms out of a total of 143 rooms tested would have transgressions above 20% of their former value. These transgressions are between 20% ~30% and considered minor in the context of an inner urban area which is designated for the potential of tall buildings. Additionally, the proposal has been designed in a manner to minimise any neighbouring impact whilst efficiently developing this brownfield site so as to optimise the amount of office floorspace proposed as per the site's development plan designations. In recognition of the densely developed urban context and the attempts to minimise transgressions from the BRE guidance as much as possible, the development would not result in a degree of harm that would warrant refusing planning permission and in view of the planning policy presumption that sites should be developed in such a way as to maximise their potential is considered to be acceptable in this regard].

- The proposal will result in wind tunnelling at pedestrian level and create a canyon effect;

[The application is accompanied by a Pedestrian Level Wind Microclimate Assessment (PLWMA), which provides an assessment of the effect of the proposed development effect on wind conditions at the site and in the surrounding area. It concludes that the proposal is acceptable in terms of wind microclimate subject to the recommended mitigation measures to be secured by condition and further testing with the final scheme of landscaping in place. It is recommended that landscaping to mitigate wind impacts on the roof terraces following further testing is secured as part of the recommended landscaping condition.]

- Will increase vehicle and pedestrian traffic to breaking point;

[The proposal is car-free in line with development plan policies and it is not considered that vehicle generation would be unacceptable. Further, the application has been referred to Transport for London, who have not raised objections with regard to whether the site can accommodate the proposed uses, and have recommended conditions and legal obligations in order to ensure that there is no impact on the highways. Additionally, the proposed widening of the footway along both Ropemaker Street and Finsbury Pavement would improve on the existing conditions for pedestrians around the site].

- Size of the development is out of keeping with the existing buildings. Will dominate the north and south skylines. The proposal has too much bulk to the west of the site;

[The proposal has been subject to an extensive pre-application period and discussions and amended at pre-application stage to respond to Conservation and Design officer advice. Additionally, it has also been presented on more than one occasion to the Design Review Panel, and amendments have been made as a result of comments made. The proposed building is located in an area designated for tall buildings and is not out of place with the prevailing scale of development within the locality. It is not considered that the scale and massing of the proposal is

inappropriate. The building has been designed in a manner to complement the existing area and also to minimise any impact on the setting of adjoining heritage assets. These matters are covered extensively in the design assessment section of this report].

- Proposal will impact on the open space at City Point;

[The existing buildings have a poor relationship with City Point adjacent to City Point. The proposal seeks to activate the ground floor with a double storey ground floor level lobby for the new office building, as well as widening the existing pavement along Ropemaker Street. The proposal as a result would link much better with the adjacent open space. Additionally, the proposed building along Finsbury Pavement has been set in from the existing building line so as to allow better views of the adjacent space as one moves south along Finsbury Pavement].

- Request for a construction method statement for the construction phase;

[Two conditions have been recommended by officers to address any potential negative impact on neighbouring amenity during the course of construction. This includes a Construction Environmental Management Plan and also a Construction and Logistics Plan].

External Consultees

8.5 **Greater London Authority (GLA) including TfL – Stage 1 Response (summary):** that the proposal does not fully comply with the London Plan but that the possible remedies set out in the response could address those deficiencies. The Mayor requests a copy of the draft decision notice when a resolution to determine the application has been reached, and the Mayor has the opportunity to direct refusal, request amendments, to any draft decision notice or seek to act as the LPA for the purpose of determining the application. The key areas of concern/non-compliance identified by the GLA include:

- **Principle of Development:** The principle of development is supported in accordance with London Plan policy and will deliver a qualitative and quantitative improvements to office provision within the City Fringe, as well as space for small and micro businesses.
- **Urban Design:** The application is supported in line with London Plan policy on urban design.
- **Heritage and views:** The proposals would not negatively impact the settings of nearby heritage assets or strategic views. The application complies with London Plan policy on heritage and the LVMF.
- **Climate Change:** The scheme is broadly supported in strategic terms. Further commitment and information is required with regard to the on-site communal heating network and the scheme's potential to connect to future district heat networks.
- **Transport:** Planning obligations to address the impact on the Underground network, local cycling routes as well as a Deliveries and

Servicing Plan and Travel Plan should be secured by s106 agreement. Conditions relating to a two-stage Construction Logistics Plan should also be secured.

- 8.6 **Historic England** raised no objection and stated that the scheme should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.
- 8.7 **Historic England (Greater London Archaeology Advisory Service)** raised no objection to the proposal subject to a condition and informative being attached to the permission.
- 8.8 **Crossrail Safeguarding (2008 Safeguarding Direction)** responded requesting that should the LPA be minded to grant planning permission that a condition be imposed on any permission that secures detailed design and construction method statements for all basements, ground floors and foundations and other structures to be approved in consultation with Crossrail, including an assessment on the effects of noise and vibration from the Crossrail tunnels on the development. A second condition was also recommended for concurrent working with the construction of Crossrail structures.
- 8.9 **Crossrail Safeguarding (Crossrail 2)** did not make any comments other than to state that the application relates to land outside the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction.
- 8.10 **London Underground** have stated that the construction of the basement is in close proximity to the Northern Line and recommended a condition for a detailed design and method statement.
- 8.11 **Thames Water** requested a condition in relation to an impact method piling statement and informatives relating to surface water drainage and the existing water supply infrastructure.
- 8.12 **Lead Local Flood Authority** raised no objection subject to the proposed recycling system to be secured by condition. It was recommended that a further condition be imposed to secure a maintenance plan for the management of the sustainable drainage system for the lifetime of the development in accordance with the new national requirements.
- 8.13 **The City of London** were consulted and did not want to make any comments on the application.
- 8.14 **London Fire and Emergency Planning Authority (LFEPA)** were consulted but have no provided any comments to date.

Internal Consultees

- 8.15 **Policy Officer** advised that the proposal would comply with land use policies in terms of optimizing offices in a designated employment area specifically for

offices. Further, the site is located in an area where tall buildings may be appropriate subject to the criteria in the development plan. The provision of floorspace for micro and small enterprises by virtue of their size and design not required by policy but its provision a benefit to the scheme.

- 8.16 **Access Officer** requested clarification on a number of matters relating to inclusive design and whether the proposal would meet the requirements set out in the Council's Inclusive Design SPD. These matters are incorporated in the assessment section of the report. Whilst further information was provided that clarifies these matters, conditions are recommended requesting details to be provided to demonstrate how the requirements of the Council's Inclusive Design SPD are met.
- 8.17 **Design and Conservation Officer** stated that the proposals have been extensively discussed and amended at pre-application stage to respond to officer advice. The specific comments from Design and Conservation officers have been incorporated into the assessment section of the report. In summary, they are in support of the proposal subject to conditions relating to materials and design details of the clock and roof terraces. They acknowledge that there will be some harm to adjoining heritage assets but this is 'less than substantial' and that this is outweighed by the high quality design that responds well to its context of existing tall buildings and breaks up the bulk and massing, as well as the substantial level of public benefit provided by the proposal, whilst also acknowledging that the site is designated an area appropriate for tall buildings.
- 8.18 **Energy Conservation Officer** has recommended the preferred energy strategy should be connection to Citigen and any other strategy should only be pursued should this be demonstrated not to be feasible. Should this not be feasible, then the alternative energy strategy is acceptable with additional measures being investigated. They have recommended conditions and s106 obligations to ensure that the above is secured and a Green Performance Plan is provided.
- 8.19 **Public Protection Division (Air Quality/Noise Team)** have recommended previously conditions relating to fixed plant equipment for noise mitigation, along with a Construction Environmental Management Plan.
- 8.20 **Sustainability Officer** has stated that further details are required with regard to sustainable urban drainage systems, green/brown roofs, rainwater harvesting, materials and bird and bat boxes. They state that proposals should meet 'Excellent' BREEAM rating and recommend a condition for this to be secured. A Site Waste Management Plan to be conditioned.
- 8.21 **Building Control Officer** stated that based on the submitted information there were no indications that the proposal would not meet any of the requirements of the Building Regulations, including matters relating to fire and safety.

Other Consultees

8.22 Members' Pre-Application Forum – 16 January 2017 and 13 November 2017

Design Review Panel

8.23 Islington's Design Review Panel considered the proposed development at pre-application stage on the 16 September 2016 and 11 May 2017.

8.24 The panel's written comments in relation to the most recent DRP review (issued on 01 June 2017) are summarised below and their response in full is attached under Appendix 3:

The Panel welcomed the opportunity to review the scheme for a second time and noted that the design had been substantially developed since the last review. Panel members recognised the many positives of the scheme including: a substantial uplift in flexible workspace, a good affordable workspace offer, increased and improved public realm, a 'place-making' tree, substantial cycle parking and high-level terraces providing workers with outdoor space. There is also a clear attempt to design the proposed building to respond positively to its context.

Officer's Comments: Many of the amendments incorporated within the final submission had been in direct response to comments raised by the Design Review Panel at pre-application stage.

Overall panel members thought that the original concept could be strengthened through refining the detailing. The Panel felt that it was important that the narrow 'negative' darker sections need to have as recessive an appearance as possible to ensure that the wider 'positive' sections are expressed elegantly and commented that the 'negative' sections could be more ephemeral in both form and materiality. Panel members observed that in keeping the highest 'positive' section at the proposed height to avoid impact on views of St Paul's it is closer in height to the adjoining 'negative' sections which creates a bulkier appearance and diminishes potential for an elegant silhouette to the building against the skyline.

Officer's Comments: The proposal was further refined to take on board the above comments. Council's Design and Conservation officer has stated that the further revisions have resulted in a building that is defined by a strong horizontal emphasis of the solid spandrel panels which is successfully balanced out by the verticality of the blocks and recessed form between them. The blocks appear as 'vertical ladders' which honestly express the structure of the building. The main blocks will be clad with a pale technical stone and the recessed sections a darker ceramic, with dark metal detailing to the fenestration.

The Panel acknowledged improvements to the north elevation and increased vertical emphasis and added interest. However, some panel members thought that greater elegance and harmony could have been achieved in the differing heights and that it would also be regrettable if the Building Maintenance Unit were to be visible. The Panel felt that greater clarity between the horizontal

'positive' elements and the vertical 'negative' elements could be achieved to the south elevation.

Officer's Comments: Following the above advice and design officer pre-application advice, the rear has been substantially re-designed to ensure 'vertical fluting' to express the circulation cores utilising as much glazing as possible and the Council's Design and Conservation officer has advised that the rear is now considered to be an acceptable composition. Additionally, alterations were made to the bulk of the western end of the development, which have resulted in further improvement to the resultant skyline composition in views from the HAC grounds, forming an appropriate book end to Ropemaker Place.

As a way of improving the local context of the building, the Panel encouraged the applicant to engage actively in the discussion about the public realm of Ropemaker Street, Moorfields and the plaza that serves City Point as these currently represent very poor and ill-considered public spaces.

Officer's Comments: The proposed scheme also activates the ground floor with retail uses along Finsbury Pavement and the entrance lobby areas along Ropemaker Street. This in conjunction with the public realm works of widening the public pavement areas along both frontages allows for the building to integrate with the public square at City Point immediately to the south. Finally, the design techniques applied to the building with a fold in the middle has also resulted in improved sightlines towards Moorgate and City Point.

There were mixed views on the proposed clock however if the clock is to be included the concept needs to be developed further, potentially with other alternatives considered and a solution found which better integrates the design with the building.

Officer's Comments: The top of the proposed building includes a clock on both the front and rear elevations of the building. Whilst the Council's Design and Conservation officers raised no objection to this element of the scheme, there were mixed views on this aspect from the Design Review Panel. It was recommended that if the clock were to be included, the concept needs to be developed further, potentially with other alternatives considered and a solution found which better integrates the design with the building. It is considered that this aspect of the scheme be conditioned to allow for further consideration and design work.

In summary, The Panel noted that the design had been substantially developed since the last review and recognised the many positives of the scheme. Panel members thought that the original concept could be strengthened through greater refinement of the detailing and materials which should be sufficiently robust. The Panel stressed that it was important that the narrow 'negative' darker sections are as recessive in appearance as possible to ensure that the wider 'positive' sections are expressed in order to create an elegant composition and silhouette against the skyline. Panel members thought that greater elegance and harmony could be achieved to the north elevation and greater clarity between the horizontal 'positive'

elements and the vertical 'negative' elements made to the south elevation. There were mixed views on the proposed clock and this proposal should be considered further as well as alternatives.

Officer's Comments: Further refinement of the proposal took place in response to the above before the submission of the planning application. The above matters were discussed with the Council's Conservation and Design officer, who has stated that the refinements have improved the overall design of the building and resulted in a high quality design that takes account of its context.

9. RELEVANT POLICIES

Details of all relevant policies and guidance notes are attached in Appendix 2. This report considers the proposal against the following development plan documents.

National Guidance

- 9.1 The National Planning Policy Framework 2012 seeks to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF is a material consideration and has been taken into account as part of the assessment of these proposals.
- 9.2 Since March 2014 Planning Practice Guidance for England has been published online.
- 9.3 Under the Ministerial Statement of 18 December 2014, the government seeks to increase the weight given to SuDS being delivered in favour of traditional drainage solutions. Further guidance from the DCLG has confirmed that LPA's will be required (as a statutory requirement) to consult the Lead Local Flood Authority (LLFA) on applicable planning applications (major schemes).

Development Plan

- 9.4 The Development Plan is comprised of the London Plan 2016 (Consolidated with Alterations since 2011), Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013. The policies of the Development Plan that are considered relevant to this application are listed at Appendix 2 to this report.

Designations

- 9.5 The site has the following designations under the London Plan 2015, Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013:
- Bunhill and Clerkenwell Core Strategy Key Area
 - Finsbury Local Plan (FLP) Area

- Employment Priority Area (Offices)
- Central Activities Zone
- City Fringe Opportunity Area
- Moorfields Archaeological Priority Area
- Within 50 metres of the Bunhill Fields and Finsbury Square Conservation Area
- Crossrail Safeguarding Direction

Supplementary Planning Guidance (SPG) / Document (SPD)

9.6 The SPGs and/or SPDs which are considered relevant are listed in Appendix 2.

10. ENVIRONMENTAL IMPACT ASSESSMENT (EIA) 2017

- 10.1 In March 2017 an EIA screening request was made to the Council for the redevelopment of site to provide a 27 storey (plus basement levels) office building (Use Class B1) with flexible retail uses (Use Class A1/A2/A3) at part basement and ground floor levels, along with associated landscaping and other works.
- 10.2 In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the London Borough of Islington determined the following:
- 10.3 *“In exercise of the powers conferred by regulation 5(5) of the 2017 Regulations, the Council hereby considers that the proposed development described in the request for a screening opinion and the documents submitted with it, is not 'EIA development' within the meaning of the 2017 Regulations.”*

11. ASSESSMENT

- 11.1 The main issues arising from this proposal relate to:
- Land Use
 - Design, Conservation and Heritage Considerations (including Archaeology)
 - Basement Development
 - Accessibility
 - Neighbouring Amenity
 - Sustainability
 - Energy Efficiency and Renewable Energy
 - Highways and Transportation
 - Contaminated Land
 - Wind and Microclimate
 - Planning Obligations, Community Infrastructure Levy and local finance considerations

Land-use

Development Plan Policies and Designations

- 11.2 The existing building on the site provides for 18,054 square metres (GIA) of office floorspace along with 1,298 square metres (GIA) of retail floorspace and 2 residential units (284 square metres) that were originally granted consent as ancillary caretaker units to the office space and became lawful residential units through the course of time.
- 11.3 The planning application seeks permission for the redevelopment of the site to provide for 63,507m² (GIA) of Use Class B1(a) office floorspace, which represents an uplift of 44,511 square metres of office floorspace, and 1,222 m² (GIA) of Use Class A1-A3 flexible retail, café and restaurant uses at ground floor level.

- 11.4 The site is located within the Central Activities Zone (CAZ) and the City Fringe Opportunity Area (CFOA). Further, the CFOA identifies the site within the Opportunity Area as a 'Core Growth Area'. At a local level, the site is designated within the Bunhill and Clerkenwell Core Strategy Key area as well as the Finsbury Local Plan (Area Action Plan for Bunhill and Clerkenwell). The site is designated within the Priority Employment Area for Offices.
- 11.5 London Plan (LP) Policy 2.10 recognises the 'mixed' nature of much of the CAZ and seeks to enhance and promote the unique international, national and London wide role of the CAZ through the promotion of a range of mixed uses including: ensuring that development of office provision is made for a range of occupiers, and; supporting and improving the retail offer of the CAZ to meet the needs of its residents, workers and visitors.
- 11.6 LP Policy 2.11 indicates that boroughs should ensure that development proposals to increase office space within the CAZ incorporate a mix of uses including housing, subject to compliance with other policies of the London Plan. This is reiterated in LP Policy 4.3.
- 11.7 Policy guidance at strategic level such as the Mayor of London's Central Activities Zone Supplementary Planning Guidance (March 2016) (the CAZ SPG) and the City Fringe Opportunity Area Planning Framework (December 2015) (CFOAPF) are also relevant to the site. The new guidance places a greater emphasis on the provision of business floor space in the CAZ.
- 11.8 Islington Core Strategy Policy CS13 encourages new employment floorspace, in particular business floorspace, to locate in the CAZ and town centres where access to public transport is greatest. Furthermore, it seeks to safeguard existing business spaces throughout the borough by protecting the change of use to non-business uses, particularly in the CAZ. Additionally, development which improves the quality and quantity of existing provision will be encouraged.
- 11.9 Paragraph 3.4.3 of the Core Strategy notes that employment in Islington is expected to increase by around 35,000 to 45,000 jobs between 2012 and 2027. Furthermore, it notes that the Islington Employment Study 2008 projected that just over 50% of these jobs will be provided within B-use floorspace. Paragraph 3.4.4 states that:
- 'The CAZ is expected to continue to be the most attractive location for increases in B-use floorspace, accounting for around 75% of total growth. In terms of the Key Areas identified in the Spatial Strategy, Bunhill and Clerkenwell is expected to account for around 70% of the borough's new B-use floorspace.'*
- 11.10 Islington Council's Annual Monitoring Report (AMR) for 2013 states that there was a net decrease of 23,466m² B use floorspace during the 2011/12 reporting period and a further decrease of 13,655m² during the 2012/13. Paragraph 6.6 of the AMR notes that *'Although the five-year trend indicates an overall net increase in B1 floorspace, the net loss of B1 floorspace in two consecutive years is a concern, particularly in light of the changes to*

permitted development rights which now allow change of use from office to residential use.'

- 11.11 The site is also located in the Bunhill and Clerkenwell Core Strategy Key area and the provisions of the Finsbury Local Plan are applicable. Policy BC8 Part A of the Finsbury Local Plan states that within designated Employment Priority Areas (General and Offices), proposals should incorporate the maximum amount of business floorspace (B-class uses) reasonably possible on the site.
- 11.12 Further, Policy BC8 Part C of the Finsbury Local Plan states that within designated Employment Priority Areas (Offices) the proportion of office (B1(a)) floorspace provided within a development should be optimised, and retail or leisure uses may be provided at ground level where an active frontage would enhance the street environment, or where these uses would complement or extend the offer of neighbouring clusters of retail or leisure uses.
- 11.13 The predominant character of the area is commercial and the redevelopment of this site to provide 63,507m² (GIA) of Use Class B1(a) office floorspace would be consistent with the broad aims of Policies 2.10 and 2.11 of the London Plan, which seek to enhance and promote the Central Activities Zone (CAZ) as an appropriate location for office developments. Policy 4.2 of the London Plan and Policies CS7 and CS13 of the Islington Core Strategy also seek to encourage the provision of quality office accommodation in accessible locations. By virtue of the site's location within the CAZ and within a designated Employment Priority Area specifically for Offices within the Finsbury Local Plan, it is recommended that the use of the building for offices (Use Class B1 (a)), as opposed to wider light industrial use (B1 (b & c)) be secured by condition (*condition 3*).
- 11.14 With regard to the proposed flexible retail space, there is a reduction from 1,298 to 1,222 square metres of retail floorspace when compared to the existing floorspaces on the site. The existing retail space is within Use Class A2 and has a poor relationship with the existing building providing limited active frontages. The redevelopment of the site would locate the retail floorspace along Finsbury Pavement including the corner junction with Ropemaker Street to provide an improved relationship with the street at ground floor level.
- 11.15 The incorporation of 1,222 square metres (GIA) ground floor level retail floor space in this location would be consistent with policies 4.7 and 4.8 of the London Plan which seek to support a vibrant, diverse retail sector. The site is designated as a Priority Employment Area (Offices) in the Finsbury Local Plan and the proposals would be consistent with Policy BC8 of that document which seeks to provide a range of employment uses, particularly office uses with retail and leisure uses at street level to create vibrancy and interest. The proposed ground floor retail uses have been designed as a minimum two separate units that can also be expanded to five units. Subject to a condition prohibiting obscuring the shopfront glass they would provide natural

surveillance and an active frontage to the Finsbury Pavement elevation of the building.

- 11.16 Finsbury Local Plan Policy BC8 Part I states that *“new business floorspace must be designed to allow for future flexibility for a range of uses, including future subdivision and/or amalgamation for a range of business accommodation;”*
- 11.17 The proposed office floorspace would be of flexible open-plan design; proposed floor to ceiling heights would be of a suitable 3.0m+ clearance. The changing shape of the building as we move up the floors creates different type of office floorplates with 15 different floor types proposed, whilst the reception and lobby area at ground floor level can be split in two areas should one tenant take up multiple floors. Access to outdoor sitting space would be provided on terraces located at ninth, fourteenth, nineteenth, twentieth, and twenty-second floor levels on the eastern and western elevations. There would also be some further smaller open space balconies on the Ropemaker Street elevation.

Mixed Use - Housing

- 11.18 London Plan Policy 4.3 B (b) states that local planning authorities should “develop local approaches to mixed use development and office provision taking into account the contribution that ‘land use swaps’, ‘housing credits’ and off-site contributions can make, especially to sustain strategically important clusters of commercial activities such as those in the City of London...”.
- 11.19 Development Management Policy DM 5.1 (New Business Floorspace) Part E states that *“within the Central Activities Zone (CAZ) major development proposals that would result in a net increase in office floorspace should also incorporate housing, consistent with London Plan Policy 4.3. Where housing comprises less than 20% of the total net increase in office floorspace, an equivalent contribution will be sought for the provision of housing off-site.”*
- 11.20 Furthermore, Finsbury Local Plan Policy BC8 Part D states that “throughout the area, major development proposals that would result in a net increase in office floorspace should also incorporate housing, consistent with London Plan Policy 4.3. Where housing comprises less than 20% of the total net increase in office floorspace, an equivalent contribution will be sought for the provision of housing off-site.”
- 11.21 The site is located in the Central Activities Zone with no housing provided as part of the proposal. For proposals with an increase in office floorspace in the Central Activities Zone, the provision of a mix of uses including housing or a contribution towards provision of off-site affordable housing where it is accepted that housing cannot be provided on site.
- 11.22 The proposal is subject to a financial contribution towards securing greater offsite housing provision than could be provided on the site itself. This is to be

secured via an obligation in the section 106 Agreement and amounts to £4,639,680.

- 11.23 The existing buildings contain two residential units that are accessed off Finsbury Street. These two units were originally granted as ancillary caretaker units and are not to be replaced within the proposed development. Development Management Policy DM 3.2 states that the loss of existing self-contained housing, including affordable housing, will be resisted unless the housing is replaced with at least equivalent floorspace. The existing units were originally granted as caretaker units and do not have an appropriate level of amenity for its occupants. They do not have their own legible and independent entrances and access is gained through the office building. Additionally, they do not have access to amenity space and have limited daylight and sunlight levels due to their outlook and location between tall office buildings. It is not considered that the loss of these two residential units, which have been designed as caretaker units, would have a detrimental impact on the Council's existing housing stock.
- 11.24 Further, provision for replacement residential units within the scheme has not been provided given the constraints of providing a new building that optimises office floorspace accommodation in accordance with the development plan designations set out above. The applicant has explored the provision of providing residential accommodation within the new building, however this would lead to a reduction in the amount of office floorspace within the proposal and put forward compromised residential units in terms of the quality of accommodation (given the need for separate entrances and different floorplate layouts). Given the land use designations set out above the loss of two residential units is considered acceptable. Furthermore, the proposal would be subject to legal financial contribution towards provision of off-site affordable housing of £4,639,680.

SME Workspace

- 11.25 Given the site is located within the Priority Employment Area (Offices), there is no requirement under the Finsbury Local Plan Policy BC8 to provide accommodation for micro and small enterprises by virtue of their design, size or management and/or affordable workspace as a percentage of the total amount of proposed business floorspace.
- 11.26 Finsbury Local Plan Policy BC8 designates two types of Priority Employment Areas: 'General', where B1 office is the priority use but can be supported by a range of other employment uses as well as affordable workspace; and 'Office' where full office use is strongly promoted, particularly large floorplate, corporate offices. The 'Office' priority areas form a very small part of the Finsbury Local Plan (less than 10%), but are located immediately adjacent to the City of London, hence they are seen as an extension of The City office market.
- 11.27 The policy underwent several rounds of consultation and was subject to independent examination. The policy was developed at a time when viability of office development was at a low ebb following the economic downturn, and

the policy can be viewed as a deliberate attempt to incentivise large-scale office development in certain areas, in order to deliver wider economic benefits.

- 11.28 Notwithstanding the above, the proposal includes 955 square metres (GIA) of office floorspace at first floor level that would be suitable for occupation by micro and small enterprises by virtue of its size and design. This specific floorspace allocated for micro and small enterprises would have a separate entrance accessed off Finsbury Pavement and independent of the remaining office floorspace. It would have a dedicated lift along with access to the cycle and shower facilities, as well as the refuse and storage areas. A condition is recommended requiring that the units at this level cannot be amalgamated so that the units remain no larger than 90 square metres (GIA) in size. Additionally, the submission of details of unit sizes, design, management and marketing information including rent and service charges are to be secured by a s106 legal obligation. Given the designation of the site within a Priority Employment Area (Offices) and as the Development Plan Policies do not require the provision of such accommodation for micro and small enterprises, this element of the proposal represents a benefit to the proposal in addition to optimising office floorspace on the site.
- 11.29 The policy framework provides strong support for commercial development and employment growth in this location. The proposal would result in the delivery of 63,507m² (GIA) of Use Class B1(a) office floorspace, which represents an uplift of 44,511 square metres of office floorspace. The above proposed figure also includes 955 (GIA) square metres of small and micro enterprise floorspace to contribute towards meeting an identified need with corresponding economic and employment benefits. The application estimates that the new floorspace would accommodate 3,419 jobs.
- 11.30 It is considered that the development is acceptable in land use terms with regard to the development plan and the cascade of policies from the London Plan, Islington Core Strategy, Development Management Policies, Finsbury Local Plan Action Area, and as such would make an efficient use of this brownfield site. Its delivery would be consistent with the broad aims of the NPPF and its presumption in favour of sustainable development that supports economic growth.

Design, Conservation and Heritage Considerations (including Archaeology)

- 11.31 The existing buildings on the application site consist of No. 20 Ropemaker Street (7-storeys), No. 101 Finsbury Pavement (9-storeys) and Nos. 10-12 Finsbury Street (6-storeys). These buildings are 30-40 years old and make a negative contribution to the townscape in terms of their poor quality design, materials and condition.
- 11.32 The site itself is not located within any heritage designations, however it is in close proximity to the Bunhill Fields and Finsbury Square Conservation Area to the north, as well as the Finsbury Circus Conservation Area to the south and close to the Brewery Conservation Area, both of which are within the City

of London. To the north are the grounds of the Honourable Artillery Company (GII* Listed).

- 11.33 Sections 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 require decision-makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings, and to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 11.34 Development Plan policies seek to secure sustainable development that is of high quality and contributes towards local character, legibility, permeability and accessibility of the neighbourhood. Developments should contribute to people's sense of place, safety and security. Development should have regard to the pattern and grain of spaces and streets in orientation, scale, proportion and mass and be human in scale with street level activity.
- 11.35 The delivery of high quality design including the conservation and enhancement of the historic environment is a key objective of the planning system which is to contribute to achieving sustainable development as supported by the NPPF. Sustainable development is further described as including positive improvements in the quality of the built and historic environments including but not limited to replacing poor design with better design (para 9). A core planning principle of the NPPF is to always seek to secure high quality design (para17).
- 11.36 NPPF Chapter 7 'Requiring good design' reinforces that this is a key aspect of sustainable development and indivisible from good planning and should contribute positively to making places better for people. Chapter 7 also confirms that high quality design includes consideration of individual buildings, public and private spaces. Policies and decisions should ensure that development amongst other things, responds to local character and history and reflects the identity of local surroundings and materials, whilst not preventing or discouraging appropriate innovation. Also, that they are visually attractive as a result of good architecture and appropriate landscaping.
- 11.37 NPPF Chapter 12 'Conserving and enhancing the historic environment' sets out the criteria for the conservation and enjoyment of the historic environment in the strategy of local plans as well as relevant criteria for assessing and determining planning applications. Consideration includes harm posed to both designated and non-designated heritage assets and their setting.
- 11.38 At the regional level, high quality design is central to all the objectives of the London Plan and is specifically promoted in chapter 7 policies. These include: policy 7.1 which sets out some overarching design principles; policy 7.6 which considers building architecture; policy 7.7 which addresses specific design issues associated with tall buildings; policy 7.8 which seeks to protect heritage assets; policy 7.11 which considers strategic landmarks and wider character; and policy 7.4 which considers local character.
- 11.39 At a local level, Core Strategy Policy CS8 states that the scale of development will reflect the character of the area, while Policy CS9 requires

new buildings to be of sympathetic scale and appearance and to be complementary to local identity; the historic significance of heritage assets and historic environment will be conserved whether they are designated or not; new buildings and developments to be based on a human scale and efficiently use a site which could mean some high density development; and tall buildings are generally inappropriate. This is further supported by Development Management policies DM2.1 (Design) and DM2.3 (Heritage).

11.40 Core Strategy Policy CS9E states:

“New buildings and developments need to be based on a human scale and efficiently use the site area, which could mean some high density developments. High densities can be achieved through high quality design without the need for tall buildings. Tall buildings (above 30m high) are generally inappropriate to Islington’s predominantly medium to low level character, therefore proposals for new tall buildings will not be supported. Parts of the Bunhill and Clerkenwell key area may contain some sites that could be suitable for tall buildings, this will be explored in more detail as part of the Bunhill and Clerkenwell Area Action Plan.”

11.41 This is further reinforced in Development Management Policy 2.1 Part C, which states that *“the only locations in Islington where tall buildings may be suitable are set out in the Finsbury Local Plan (Area Action Plan for Bunhill and Clerkenwell). Any proposal for tall buildings must meet other design policies and have regard for the criteria set out in English Heritage/CABE’s Guidance on tall buildings (2007).”*

11.42 Policy BC9 Part B of the Finsbury Local Plan states that “buildings of 30 metres in height or more may be appropriate only within the areas indicated on Figure 17. These areas include sites identified in Policy BC2 (City Road Basin) and Policy BC3 (Old Street), as well as an area adjacent to the City of London boundary at Moorgate”, whilst Part C of the same Policy states that “elsewhere, building heights must respond to the local context, particularly those contextual factors indicated on Figure 17.”

11.43 The application site is located within one of the areas within Figure 17, specifically the area adjacent to the City of London boundary at Moorgate, and as such is considered appropriate for tall buildings above 30m subject to the criteria that must be satisfied in Part D of Finsbury Local Plan Policy BC9.

11.44 The principle building form is defined by four ‘positive’ vertical elements separated by four ‘negative recessed elements that step up in height from the street block on Finsbury Pavement up to a height comparable to City Point before lowering again towards a height comparable to Ropemaker Place. The highest point is 128.6m.

11.45 The proposals have been extensively discussed and amended at pre-application stage to respond to advice provided by the Council’s Design and Conservation officers and the Design Review Panel.

- 11.46 The massing has been developed to ensure the maximum volume of development without impacting on LVMF River Prospect 16B: Southbank – Gabriel’s Wharf, while being no higher than City Point, a nearby tower. Consequently, the massing is angled away from St Paul’s Cathedral to ensure an acceptable impact. This allowed an opportunity for a stepped form, the lowest level of which carefully links with the streetscape of Finsbury Pavement at 55m in height. The massing is otherwise successfully broken up in to four interconnected blocks of equal width but differing heights. The building also steps down from the west to ensure a balanced skyline when the building is viewed as part of a group of taller buildings from the HAC grounds. The gaps between the four blocks are infilled with set-back form which softens and articulates the built form.
- 11.47 An extremely important detail of the proposed tower is how its footprint is angled at its midpoint to successfully transition the change in geometry of the street layout between Finsbury Pavement and Ropemaker Street, these not being perpendicular to each other. The fold in the building is successfully detailed with vertical glazing. This results in two significant positive effects in townscape terms. Firstly, a large area of pavement/public realm is created at the corner of Finsbury Pavement and Ropemaker Street which suffers most from overcrowding. The proposed tree in this location is also a very welcomed addition to the greening of the area. These were two important requirements expressed at pre-application stage by Design and Conservation officers and incorporated within the scheme. Secondly, the proposed scheme skilfully reduces the visual impact of the tower when viewed from Finsbury Square. The additional pavement widening is welcomed as is the substantially recessed entrance under a colonnade. There is likely to be a substantial reduction in overcrowding to the pavements as a result of the building footprint at ground floor level. The proposal would result in a development that respects long established building lines and street frontages, utilises design techniques that break up the bulk of new buildings, and relates positively to the width of the street.



11.48 The proposed tower's sustainable design principles are also of note making a significant contribution to the resultant building. Notably, the tower has been designed with much less glazing than previous approaches to commercial towers. This has determined the character of the tower which is defined by a strong horizontal emphasis of the solid spandrel panels which is successfully balanced out by the verticality of the blocks and recessed form between them. The blocks appear as 'vertical ladders' which honestly express the structure of the building. The main blocks will be clad with a pale technical stone and the recessed sections a darker ceramic, with dark metal detailing to the fenestration. The materials are welcomed for their quality, robustness and tone.



- 11.49 Subject to a condition requiring details and samples of all of the proposed materials, they are considered to suitably reference and complement the palette of materials in the surrounding area and are acceptable. Additionally, further design details of the detailing/articulation of the technical stone spandrel panels is to be requested to ensure they are of the highest architectural quality. Consequently, a full size sample panel will be conditioned.
- 11.50 The rear of the tower is as important as the front because it is actually the only part of the building that will be entirely visible from a single viewpoint, this being from the Honourable Artillery Company (HAC) Grounds. Following pre-application advice from Design and Conservation officers, the rear has been substantially re-designed to ensure 'vertical fluting' to express the circulation cores utilising as much glazing as possible. The rear is now considered to be an acceptable composition. The double height ground floor and active frontages are welcomed but the detailing of these aspects are to be conditioned, including the proposed canopies. The roof terraces are also welcomed in providing open space areas within the building, however their detailing are also to be secured by condition.



1. Illustrative view from the HAC grounds, with consented schemes indicated



2. Illustrative view from Finsbury Square, with consented schemes indicated

- 11.51 The top of the proposed building includes a clock on both the front and rear elevations of the building. Whilst the Council's Design and Conservation officers raised no objection to this element of the scheme, there were mixed views on this aspect from the Design Review Panel. It was recommended that if the clock were to be included, the concept needs to be developed further, potentially with other alternatives considered and a solution found which better integrates the design with the building. It is recommended that this aspect of the scheme be conditioned to allow for further consideration and design work.
- 11.52 In summary, it is considered that although the proposed development is taller than the existing buildings on the site, the architectural approach is supported with use of materials that are respectful to the context of the area. Additionally, the stepped massing approach successfully integrates with the scale of existing buildings in the area, namely the heights of Ropemaker Place/City Point and the lower rise context to the east and north. The amendments throughout the pre-application stage to the western most element have resulted in further improvement to the resultant skyline composition in views from the HAC grounds, forming an appropriate book end to Ropemaker Place. The proposed scheme also activates the ground floor with retail uses along Finsbury Pavement and the entrance lobby areas along Ropemaker Street. This in conjunction with the public realm works of widening the public pavement areas along both frontages allows for the building to integrate with the public square at City Point immediately to the south. Finally, the design techniques applied to the building with a fold in the middle has resulted in improved sightlines towards Moorgate and City Point.



- 11.53 Overall, in terms of detailed architectural design, the proposals have been carefully considered. Subject to the conditions outlined above, the proposal would represent a high quality and appropriate design response which would enhance the character of the building and the surrounding area.

Tall Buildings Assessment

- 11.54 As noted above, the application site is located within an area considered appropriate for tall buildings above 30m. However, such proposals are subject to the criteria that must be satisfied in Part D of Finsbury Local Plan Policy BC9.

- 11.55 It is considered that overall the proposal satisfies the tall building design requirements set out in Finsbury Local Plan Policy BC9 Part D. These are addressed in italics as follows:
- 11.56 'D. Proposals for tall buildings must satisfy all of the criteria set out in Part 4 of English Heritage and CABE's Guidance on Tall Buildings (2007), alongside other Development Plan policies. Specifically, proposals must:
- i. Reinforce the legibility and identity of the wider area and enhance the quality of street-level and long distance views, including across borough boundaries – *the proposals improve pedestrian permeability with two new routes through the site whilst public realm improvements and active frontages are proposed at ground level. The proposed building would provide a high quality landmark in longer distance views;*
 - ii. Conserve and enhance designated and non-designated heritage assets and their setting – *the proposal would result in less than substantial harm to heritage assets however this is significantly outweighed by the public benefits of the scheme. This is covered in detail in the following heritage assessment and the concluding section of this report;*
 - iii. Not create unacceptable impacts on infrastructure, including transport capacity; and adequately mitigate any transport impacts – *this requirement would be met subject the CIL infrastructure contribution, the requirements of the Section 106 agreement and relevant conditions and is covered in detail in the Highways and Transportation Section of this report;*
 - iv. Exhibit an exceptional standard of architecture – *the proposal is considered to represent an exceptional standard of architecture subject to detailed conditions;*
 - v. Create an active and interesting street frontage appropriate to the local context – *the proposal involves the introduction of active frontages at ground floor level along both elevations;*
 - vi. Exhibit the highest standards of sustainable design and carbon minimisation, by incorporating green roofs and/or walls, involving services engineers from an early design stage to ensure that energy use associated with mechanical cooling and lighting is minimised, utilising sustainable materials, and controlling solar gain, -. *this requirement is considered to be met and is covered in detail within the Sustainability, Energy Efficiency and Renewable Energy section of this report;*
 - vii. Provide public space, including, where appropriate, mid-block pedestrian routes and the extension of (and integration with) neighbouring areas of public space – *the proposal involves significant public realm improvements by widening the footpaths along both frontages and introduction of a place making tree;*

- viii. Provide private amenity and play space where residential uses are proposed as part of the development, and – *no residential uses are proposed however suitable open space amenity areas have been provided for the occupants of the office accommodation throughout the building;*
- ix. Not have adverse environmental effects at ground level, nor overshadow neighbouring habitable rooms or formal public spaces – *the Wind Microclimate Report demonstrates that the wind impact will be acceptable or can be adequately mitigated whilst overshadowing is covered in detail later in this report – the closest neighbouring residential properties are located to the west of the application site in the existing Heron building and the proposal would not have a detrimental impact on these habitable rooms.*

11.57 In addition to the above, London Plan Policy 7.7 states that “*applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria below*”:

C. Tall and large buildings should:

- a) generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport – *the site is located within the CAZ and benefits from the highest level of Public Transport Accessibility;*
- b) only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building – *the application site is an area designated for tall buildings and the impact of the proposal on the locality is considered in detail in the following section of this report;*
- c) relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level; - *the proposed development is the result of a very comprehensive design development process informed by a detailed analysis and response to the surrounding character areas clearly demonstrated through the design of the building;*
- d) individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London – *the new building will result in a high quality addition to an already varied townscape and will deliver an improvement to the London skyline through its high quality design and appearance;*
- e) incorporate the highest standards of architecture and materials, including sustainable design and construction practices – *the proposal is considered to exhibit a high standard of architecture with materials selected to complement the surrounding area, whilst sustainability is addressed in detail within the Sustainability, Energy Efficiency and Renewable Energy section of this report;*

- f) have ground floor activities that provide a positive relationship to the surrounding streets – *the proposal introduces flexible retail uses with active frontages to the ground floor;*
- g) contribute to improving the permeability of the site and wider area, where possible – *the proposal provides widening of the existing pavement areas;*
- h) incorporate publicly accessible areas on the upper floors, where appropriate – *it is not considered that there are compelling reasons to require public access in this instance; and*
- i) make a significant contribution to local regeneration – *the proposal would deliver substantial economic and employment benefits.*

D. Tall buildings:

- a) should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference – *the applicant has submitted reports to satisfactorily address the relevant potential impacts and these are detailed later within this report;*
- b) should not impact on local or strategic views adversely – *the applicant has demonstrated within the TVIA that the proposal will not impact on strategic views.*

E. The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designated by boroughs as being sensitive or inappropriate for tall buildings – *the building is viewed as causing 'less than substantial' harm to designated heritage assets requiring balancing against the public benefits and detailed analysis is provided in the Heritage Assessment section further below. It is noted that the GLA support the scheme in design terms and consider in their view that the building would enhance the setting of nearby heritage assets.*

Heritage Views and Assessment

11.58 The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development. Paragraph 7 of the NPPF states that the environmental role of a development includes protection and enhancement of the historic environment, while section 12 sets out how the historic environment should be conserved and enhanced.

- 11.59 Specifically, the NPPF states that 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. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting'.
- 11.60 Where a proposed development will lead to 'substantial harm' to or loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a proposal will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 11.61 London Plan Policy 7.8 is concerned with heritage assets and states, inter alia, that 'development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.'
- 11.62 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should (s66) "*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*" and in relation to conservation areas, (s72) special attention must be paid to the "*to the desirability of preserving or enhancing the character or appearance of that area*".
- 11.63 Policy CS9 of the Core Strategy is concerned with 'Protecting and Enhancing Islington's Built and Historic Environment' and states, inter alia, that:
- 'High quality architecture and urban design are key to enhancing and protecting Islington's built environment, making it safer and more inclusive.*
- B. The historic significance of Islington's unique heritage assets and historic environment will be conserved and enhanced whether designated or not. These assets in Islington include individual buildings and monuments, parks and gardens, conservation areas, views, public spaces and archaeology.'*
- 11.64 Policy DM2.3 of the Council's Development Management Policies document is concerned with Heritage and states, inter alia, that:
- A. Conserving and enhancing the historic environment*
- Islington's historic environment is an irreplaceable resource and the council will ensure that the borough's heritage assets are conserved and enhanced in a manner appropriate to their significance. Development that makes a positive contribution to Islington's local character and distinctiveness will be encouraged.*

B. Conservation Areas

i)...new developments within Islington's conservation areas and their settings are required to be of high quality contextual design so that they conserve or enhance a conservation area's significance. Harm to the significance of a conservation area will not be permitted unless there is a clear and convincing justification. Substantial harm to the significance of a conservation area will be strongly resisted.

C. Listed buildings

iii) New developments within the setting of a listed building are required to be of good quality contextual design. New development within the setting of a listed building which harms its significance will not be permitted unless there is a clear and convincing justification, and substantial harm will be strongly resisted.

D. Registered historic parks and gardens, London squares and other heritage landscapes

iii) Developments must not detract from the enjoyment, layout, design, character, appearance or setting of historic parks, gardens or squares and key views out from the landscape, or prejudice future restoration.

- 11.65 The site is not located within a Conservation Area, however it is nearly adjacent to the Bunhill Fields and Finsbury Square Conservation Area to the north. It is also nearly adjacent to the Finsbury Circus Conservation Area to the south and close to the Brewery Conservation Area, both within the City of London. To the north are the grounds of the Honourable Artillery Company (GII* listed). These are the main heritage considerations, especially the potential for development to impact on views from the Honourable Artillery Company grounds and Finsbury Square itself.
- 11.66 The existing building is 30-40 years old and makes a negative contribution to the townscape in terms of its poor quality design, materials and condition, its replacement is welcomed subject to the conditions outlined above.
- 11.67 The site is bordered by inadequately narrow pavements, especially to Finsbury Pavement and the corner of Finsbury Pavement and Ropemaker Street. To the south of the site are a cluster of tall buildings in the City and Moorgate Station. The public realm around the station is to be pedestrianised and upgraded, in association with the arrival of Crossrail, with an important visual link, as well as desire line with heavy footfall, with the site directly to the north.
- 11.68 Finsbury Square is characterised by Portland Stone clad buildings with a strong commercial character. The better examples of buildings (1 and 30 Finsbury Square) display a fine 'filigree' character which is an important contextual consideration.

- 11.69 The application is accompanied by a Heritage, Townscape and Visual Impact Assessment (HTVIA) in order to demonstrate the potential impact of the proposals on the settings of local heritage assets and views. The TVIA demonstrates that the proposals have the potential to be seen in the near and middle distance views of some of the Conservation Areas and listed buildings nearby. The scheme would form part of the foreground or background views which take in existing large scale and tall buildings of differing architecture, quality and age.
- 11.70 The main heritage considerations are the potential for development to impact on views from the Honourable Artillery Company grounds and Finsbury Square itself.

From the HAC Grounds

- 11.71 While the proposed tower is highly visible and has a significant impact on this view the massing and detailing of the building, described above, ensures an articulated form and balanced skyline when the building is viewed as part of a group of taller buildings from the HAC grounds.





From (the far side of) Finsbury Square

- 11.72 While the proposed tower is highly visible and has a significant impact on this view the massing and detailing of the building, described above, ensures an acceptable impact on the skyline viewed from the far side of Finsbury Square. Furthermore, the detailing ensures a contextual design that integrates well with the buildings of Finsbury Square.





View from Finsbury Square (at street level)

- 11.73 As described above, the lowest level of the stepped form carefully links with the streetscape of Finsbury Pavement at 55m in height which results in a successful integration with the street grain viewed from Finsbury Square. The detailing ensures a contextual design that integrates well with the buildings of Finsbury Square.





- 11.74 Overall, the Council's Design and Conservation officers have advised that within the Borough of Islington the proposed tower will be highly visible from the Bunhill Fields and Finsbury Square Conservation Areas to the north and the setting/grounds of the Honourable Artillery Company (GII* listed). The proposed tower will have a significant impact on views out of the Conservation Areas and Honourable Artillery Company grounds by virtue of its scale. However, this impact is in part mitigated by the high quality design that responds well to its context of existing tall buildings and breaks up its bulk and massing.
- 11.75 Nevertheless, there will be some harm to the Bunhill Fields and Finsbury Square conservation areas and the setting of the Honourable Artillery Company (GII* listed), however this is considered to fall within the 'less than substantial harm' category of the NPPF. The site is also designated within an area considered appropriate for tall buildings above 30m due to the potential for the public benefit to outweigh potential harm. Council's Design and Conservation officers are of the view that the level of public benefit provided by the proposals far outweigh the 'less than substantial harm' to the heritage assets.
- 11.76 It should also be noted that the City of London have raised no objections with regard to the proposed development on the designated heritage assets south of the site within the City of London. Further, the GLA have also assessed the proposal in terms of the impact on the adjoining designated heritage assets and are of the view that the proposed scheme would be a high quality addition to an already varied townscape, a substantial aesthetic improvement over the existing buildings and, where visible, would enhance the setting of nearby heritage assets. Finally, Historic England have not objected to proposals and

stated that the scheme should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.

- 11.77 In cases where the degree of harm is considered to be 'less than substantial', Paragraph 134 of the NPPF is of relevance and this indicates that the harm should be weighed against the public benefits of the proposal. The public benefits include a significant uplift in employment on the site, 955 m² of SME workspace, and public realm improvements including the widening of Finsbury Pavement and Ropemaker Street. The effect of the duties imposed by section 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 is that where harm is identified, that harm should be given considerable importance and weight in the planning balance. An overall assessment is carried out later in this report.

Strategic Views and Assessment

- 11.78 London Plan Policies 7.11 and 7.12, along with the London View Management Framework SPG, provide guidance on London's key views and how they should be protected and managed. The submitted TVIA assesses the scheme against the existing and approved conditions, and includes Accurate Visual Representations (AVRs) of the potential impact on the relevant strategic views.
- 11.79 Whilst the site is located in a designated area appropriate for tall buildings, the development has the potential to impact on strategic views of St. Paul's Cathedral. The site lies within close proximity to LVMF Protected Vista 8A.1 which assesses the impact on St. Paul's Cathedral from Westminster Pier. It is also in close proximity to LVMF Protected Vista 9A.1, which assesses the impact from King Henry's Mound. It should be noted that the proposal falls outside of the background assessment areas of the above views. Nonetheless, the proposal has been designed with a stepped approach and overall heights to respond to any potential impact on St. Paul's Cathedral, and the TVIA successfully demonstrates that this approach ensures that the proposals would not impact upon the setting of St. Paul's Cathedral.
- 11.80 The site is also within LVMF River Prospect 16B.1: Southbank – Gabriel's Wharf. The massing has been developed to ensure the maximum volume of development without negatively impacting on LVMF River Prospect 16B: Southbank – Gabriel's Wharf. Consequently, the massing is angled away from St Paul's and this successfully ensures an acceptable impact. The GLA have also commented on this view and stated that the scheme would appear off to the left of the towers of St. Paul's Cathedral, adjacent to City Point, but appearing in lower views. There would be a minor visual impact and the proposed use of light coloured stone cladding would further minimise any potential impact.
- 11.81 TVIA also assesses four other views within the panorama of river prospects and demonstrates that there would be no negative impact on strategic views. The proposed architectural approach and use of high quality materials and detailing is consistent with the scale and character of the site's context.

Finally, the proposed scheme does not fall within any of Islington Council's local views.

Archaeology

11.82 The site is located within an Archaeological Priority Area (Moorfields) and as such was referred to Historic England (Greater London Archaeology Advisory Service), who provide advice to boroughs in accordance with the NPPF and GLAAS Charter.

11.83 The planning application lies in an area where heritage assets of archaeological interest are expected. The NPPF (Section 12) and the London Plan (2016) Policy 7.8 emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should submit desk-based assessments, and where appropriate undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision. If planning consent is granted paragraph 141 of the NPPF says that applicants should be required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence publicly available.

11.84 GLAAS have advised that a watching brief should be maintained during reduction of the basement level. Appraisal of this application using the Greater London Historic Environment Record and information submitted with the application indicates that the development would not cause sufficient harm to justify refusal of planning permission provided that a condition is applied to require an investigation to be undertaken to advance understanding.

11.85 **Basement Development**

11.86 The development includes a three-level basement below the new buildings to accommodate, servicing, deliveries, cycle parking and showers, along with other associated works. The basement is an imperative part of the scheme in order to comply with a range of development plan policies. Should the services located and provided within the basement not form part of the application, then the proposal is unlikely to receive support in view of the fact that it would not comply with a range of development plan policies.

11.87 Any proposal involving a basement would be considered against the Council's Basement SPD. Paragraph 7.2.2 states that *"In taking a balanced and precautionary approach, basements should generally not exceed 1 storey in depth, and not exceed 3m floor to ceiling height. For clarity, a basement extension below an existing basement/lower ground floor (that is not an original feature of the building) would result in a two storey basement and will be resisted."*

11.88 Further, paragraph 7.2.3 states that *"In limited circumstances, for example a major commercial redevelopment site or a detached residential house with generous distances to adjoining properties, it may be acceptable to have a*

basement greater than one storey in depth if robustly demonstrated via detailed evidence that there would be no significant impact upon the hydrogeology or the structural stability of buildings, trees and other structures, and the design complies with all other relevant guidance in this SPD. As part of that evidence, it is likely that physical site investigations will need to be undertaken such as boreholes to establish robust site specific data.”

- 11.89 Paragraph 6.8 states that *“The SMS should contain the findings of early site investigations, and clearly articulate how these findings have influenced the design that is proposed. At each stage of the design and construction process a suitably qualified person with relevant experience in the construction of basements relevant to the type of basement (i.e. residential or large scale commercial) proposed should be appointed and retained by the applicant as both a designer and construction monitor.*
- 11.90 The proposals includes an approach being taken to basement design and in formulating the Structural Method Statement (SMS) without on-site investigations. This is due to the physical constraints and issues for occupiers that would prevent site investigations from being undertaken at an early stage. Further, the applicant considers that they have sufficient information to proceed with the SMS given the absence of site investigations (i.e. the existing borehole information from neighbouring sites and other existing information in the vicinity of the area, etc.).
- 11.91 Such an approach may be considered acceptable provided the SMS provides a robust justification and is independently assessed by a suitably qualified person. The independent assessment shall include comment upon the outputs from the Ground Movement Analysis (GMA) provided in any SMS report and the GMA will include assumptions, method of analysis adopted and the outputs of the analysis – each of which would be reviewed. This review must also include any recommendation to the Council on the acceptability of the proposals. Further, the submission must also include an assessment of the impact (including cumulative impacts) on subsurface flows resulting from the introduction of the proposed basement.
- 11.92 A draft SMS was to the Council for consideration during the pre-application stage and was reviewed by Alan Baxter Associates for an independent assessment. A preliminary response from Alan Baxter informed of further information required in the final SMS that was submitted with the planning application. This in turn has been independently reviewed by Alan Baxter Associates, who have made the following comments:

“... we noted that Waterman’s proposal not to carry out site investigations prior to planning appears reasonable. However, we do not consider that this should be used to justify deferring the assessment of the adjacent buildings as Waterman have demonstrated that they already have good quality information on the ground conditions, sufficient to carry out initial assessments of the effects of the basement construction on the tunnels and sewers close to the site. Therefore on this basis, it appears that LBI are entitled to require the developer to meet the requirements set out in their guidance with respect to design and amend the SMS and GMA to include the

assessment of the impact of the works on the adjacent buildings and demonstrate that the damage will be limited to a maximum of category 2.”

- 11.93 In response to the above, the applicant provided further information to address the comments made by Alan Baxter Associates. This in turn was reviewed and the following comments made:

“Further to my email of 11 October we have now received a Preliminary Ground Movement Analysis and Building Damage Assessment report from Watermans for the three buildings directly to the north of the proposed redevelopment. This assessment is in line with the documentation that we said was needed in our email and meets the requirements given in LBI’s guidance on Structural Method Statements (SMS). The predicted ground movements are of the order we would anticipate and the Building Damage Assessment concludes that the predicted damage to the buildings closest to the redevelopment could range from negligible to slight (Category 2) (based on an initial greenfield assessment, using moderately conservative parameters and assumptions).

This meets LBI’s requirement that damage to neighbouring properties should be limited to a maximum of Category 2. The report also notes that the predicted ground movements represent a conservative evaluation of the potential impact and that more detailed modelling, which is to be undertaken at design development stage, should yield lower movements of the buildings and associated impacts. Based on our experience on previous projects this is likely to be the case.

With the receipt of this preliminary ground movement analysis and Building Damage Assessment and the various previous amendments to the SMS, Waterman have now addressed all of our comments of 17 August, 26 September and 11 October 2017. We therefore have no further comments on the proposals at this stage.”

- 11.94 In light of the independent review of the SMS, the above approach is considered acceptable. Nonetheless, a condition is recommended requiring an update to the SMS once demolition has taken place and that on-site investigations be carried out. The review of any updated SMS is to be submitted once on-site investigations take place after demolition and is also to be independently assessed once submitted. Should the on-site investigations conclude that the three-level basement is not possible, and as such be unable to provide the proposed elements within the scheme to make the development acceptable in planning terms, then the development should not take place and a fresh planning application should be submitted. This is to be secured via a Grampian condition preventing superstructure works taking place prior to the construction of the proposed basement.

- 11.95 **Accessibility**

- 11.96 London Plan Policy 7.2 states development should achieve the highest standards of accessible and inclusive design, ensuring that developments can be used safely, easily and with dignity by all regardless of disability, age

gender ethnicity or economic circumstances. Such requirements are also required by Islington Core Strategy CS12. Further, Development Management Policy DM 2.2 seeks all new developments to demonstrate inclusive design. The principles of inclusive and accessible design have been adopted in the design of this development in accordance with the above policies.

- 11.97 The provision of level access throughout the building is considered to be fundamental to the fulfilment of this policy. The provision of wheelchair accessible lifts and accessible toilets on all floors would ensure the building offers highly accessible accommodation. Council's Access officers requested clarification on a number of matters relating to inclusive design and whether the proposal would meet the requirements set out in the Council's Inclusive Design SPD.
- 11.98 The ground floor plans show two revolving doors to the main entrance of office section of the new building along Ropemaker Street, with an adjacent pass door for wheelchair users. This is considered unacceptable as it would separate people and could be not considered inclusive. A condition requiring amendments and compliance with the relevant SPD is recommended.
- 11.99 Concern was also raised by the Council's Access officer at the width of the pavement along Finsbury Pavement at its narrowest point to the north of the building with regard to vulnerable road users. Given the proposed widening of the footpath along this section of Finsbury Pavement is an improvement on existing conditions, the works along this section of the road would improve legibility for all road users. As noted above, the area for chairs and tables outside the flexible Use Class A1-A3 uses is to be conditioned as per the demarcated area shown on the submitted drawings. As such, the widening of the footpath would remain for public use at all times. The use of the wider pavement for public use is also to be secured as a legal obligation under the s106 agreement.
- 11.100 The proposal as originally submitted contained a single safe refuge on each floor. Concern were raised at the inclusivity of such a proposal as it would limit the amount of disabled users to each floor. As such, the number of safe refuge areas has been increased to two at basement levels, three at levels 1-9, and two refuges at levels 11-23. The above provision exceeds that of British Standards and Building regulations and considered appropriate. Additionally, the scheme contains two dedicated fire-fighting lifts which would be used for evacuation purposes for those requiring level access until the point the fire brigade arrives on site. The development will also provide personal emergency evacuation plans for all persons requiring assistance to leave the building including visitors. It is considered that a condition be imposed requesting an Evacuation Strategy for the whole building for all users including mobility impaired users to ensure that the evacuation strategy is inclusive.
- 11.101 The proposal as submitted contained visitor cycle racks up against the building and this raised concerns as they necessitate cyclists pushing or riding their bikes across pedestrian flow. An alternate visitor cycle strategy has been submitted locating the visitor cycle spaces along the kerb line. Although this

has resulted in a loss of 6 visitor spaces, it is considered that this option represents a better outcome, when considering all matters relating to pedestrian flows and inclusivity along with the impact of the proposed bays on the public realm. The revised strategy would avoid visiting cyclists from having to cross the footway to secure their cycles. This revised proposal is to be secured via condition.

- 11.102 As it is not possible to provide all the required disabled parking spaces on site as required by policy, a financial contribution towards the provision of a number of a disabled drop-off bays and on-street accessible parking bays (proportionate to the scale and nature of the use) in the vicinity of the site is considered to be acceptable. Where it might not be possible to implement the accessible parking bays on the street (e.g. as a result of opposition to amending the traffic management order), the contribution would be used towards accessible transport initiatives to increase the accessibility of the area for people with mobility and sensory impairments.

Neighbouring Amenity

- 11.103 London Plan policy 7.6 is concerned with ensuring that new buildings do not cause unacceptable harm to the amenities of surrounding sensitive land uses, particularly residential buildings. At the local level, Policy CS7 of the Core Strategy prohibits new developments from overshadowing existing residential buildings and Development Management Policy DM 2.1 seeks to safeguard the amenity of adjoining residential occupiers.
- 11.104 The site is surrounded by commercial uses to the east, south and north. The nearest residential use is located to the east of the site at No. 5 Moor Lane, which is known as the Heron building. This building contains residential units from the 7th floor and above. All other buildings surrounding the site are used for non-residential purposes.

Daylight and Sunlight

- 11.105 The British Research Establishment (BRE) has produced guidance assessing the impact of proposals on the daylight, sunlight and overshadowing received from adjoining properties. The Council's policies and the daylight/sunlight report submitted with the application all refer to the BRE guidance as a point of reference, and this guidance will be used to assess the impacts of the proposals.
- 11.106 The introduction to the BRE guide stresses that it should not be used as an instrument of planning policy and should be interpreted flexibly because lighting is only one design factor for any scheme and designs should factor in site context. Sunlight and daylight target criteria as found in the BRE guidance have been developed with lower density suburban situations in mind. In denser inner urban contexts, sunlight and daylight levels may struggle to meet these target criteria in both existing and proposed situations. The target criteria cannot therefore be required for dwellings in denser inner urban locations as a matter of course.

- 11.107 The application site is located within an accessible central London location, where the potential of sites and density should be maximised where possible. Urban design considerations are important when applying the guidance quoted above.
- 11.108 The 'Vertical Sky Component' assessment (VSC) is a measure of the amount of daylight available at the centre point to the external pane of a window. A good level of daylight is considered to be 27%. Daylight will be adversely affected if after a development the VSC is both less than 27% and less than 80% of its former value.
- 11.109 A total of 230 individual windows serving the residential properties in the Heron building were considered. The BRE guidelines state that daylight will be adversely affected if after a development the VSC is both less than 27% and less than 80% of its former value. None of the 230 windows would have transgressions that result in a percentage less than 80% of its former value. With regard to the VSC assessment, the proposal would satisfy the recommended levels set out in the BRE Guidelines with no transgressions.
- 11.110 The 'no sky line' method (daylight distribution) assesses the impact which a development will have on the position in an affected room where the sky is no longer visible.
- 11.111 In this instance, 143 rooms of the Heron building were assessed against this method. Of all of the above 143 rooms, a total of 138 rooms (serving habitable rooms) would retain a good level of daylight distribution with no reductions greater than 20% of their former value. The 5 other rooms that would have transgressions greater than 20% of their former value range between 21% ~ 32%. Specifically, these transgressions are as follows: 21.18%, 24.30%, 26.77%, 29.35% and 31.83%.
- 11.112 The BRE guidance recognises that sunlight is less important than daylight in the amenity of a room and is heavily influenced by orientation. North facing windows may receive sunlight on only a handful of occasions in a year and windows facing eastwards or westwards will only receive sunlight for some of the day. In order for rooms to achieve good sunlight the BRE target criteria is that rooms should receive 25% of Annual Probable Sunlight Hours (APSH) in total, including 5% in winter. Where rooms receive less than the recommended APSH then the BRE guidance states that reduction of more than 20% would be noticeable.
- 11.113 In this instance, all 230 windows serving 143 rooms in the Heron building were assessed against the above criteria. All of the 143 rooms would have at least one window to receive at least 25% of annual probable sunlight hours, and where any values are below 25%, the reductions are less than the 20% threshold in the BRE guidelines of its former value.
- 11.114 Similarly, with regard to winter probable sunlight hours, all of the 143 rooms would have at least one window to receive at least 5% of winter probable sunlight hours.

- 11.115 With regard to the annual and winter sunlight assessment, the proposal would satisfy the recommended levels set out in the BRE Guidelines with no transgressions.
- 11.116 When looking at all of the above sunlight/daylight assessments with regard to the Heron building, only 5 rooms out of a total 143 rooms would have transgressions above 20% of their existing levels, and these losses are also considered to be marginal. The BRE guidance does state that in central locations the guidance should be applied flexibly to secure appropriate townscape design. The proposed development is designated within an area for tall buildings and has been suitably designed to minimise any impact on amenity. The proposal would make better use of this central site through efficiently developing this brownfield site and the minor transgressions should be considered within this context.
- 11.117 Therefore, in recognition of the poor design of the existing buildings, the densely developed urban context and the minor deviances from the BRE guidance the development would not result in a degree of harm that would warrant refusing planning permission and in view of the planning policy presumption that sites should be developed in such a way as to maximise their potential is considered to be acceptable in this regard.

Privacy and overlooking

- 11.118 Representations have been received mainly from the Heron building stating that these proposals generate an unacceptable level of overlooking due to the proximity, height, and number of windows.
- 11.119 Development Management Policy DM 2.1 states that there should be a minimum distance of 18 metres between windows of habitable rooms. The siting of the building would be located more than 18 metres from all adjoining habitable room windows in the Heron building. As such, it is considered that the proposal would be in accordance with the above policy in terms of overlooking.

Noise Mitigation

- 11.120 Conditions are recommended to ensure that building services plant equipment operates below background noise levels to protect nearby residential amenity. The development will involve substantial structural alterations and then a considerable construction period with the inevitable impact upon the nearby residential and commercial occupants. To mitigate these impacts, it is recommended that a Construction and Environmental Plan is conditioned. A code of construction response document is to be secured by legal agreement.
- 11.121 It is considered that a condition requiring submission of a Construction Logistics Plan will ensure that the impacts of the construction and future

operation of the development on neighbouring occupiers are appropriately mitigated. This condition has also been requested by TfL with regards to the impact on the highways.

Sustainability

- 11.122 London Plan Chapter 5 policies are the Mayor's response to tackling climate change, requiring all development to make the fullest contribution to climate change mitigation. This includes a range of measures to be incorporated into schemes pursuant to Policies 5.9-5.15. Sustainable design is also a requirement of Islington Core Strategy Policy CS10. Details and specific requirements are also provided within the Development Management Policies and Islington's Environmental Design SPD, which is supported by the Mayor's Sustainable Design and Construction Statement SPG.
- 11.123 The development is located in an urban area where people can access services on foot, bicycle or public transport. It is an office-led development satisfying key sustainability objectives in promoting the more efficient use of land, and reducing the need to travel.
- 11.124 The BREEAM pre-assessments submitted demonstrate that the office and retail parts of the development are likely of achieving a BREEAM 'Excellent' rating against the BREEAM New Construction. Development Management Policy DM7.4 requires all major non-residential developments to achieve an "Excellent" rating and make reasonable endeavours to achieve "Outstanding". Given the development has demonstrated that it would be capable of achieving a BREEAM 'Excellent' rating, and also provides a margin above this level, which is supported and in accordance with planning policies requiring all development to meet the highest standards of design and construction. It is recommended that the requirement to achieve a BREEAM 'Excellent' rating is required by condition.
- 11.125 The proposal includes rainwater attenuation in order to reduce water use and more efficient use of water re-use. These aspects of the proposal are supported and these details are to be sought and secured via the imposition of a condition.
- 11.126 London Plan policy 5.3 and Core Strategy Policy CS10 require developments to embody the principles of sustainable design and construction. As part of this proposal consideration has been given to the use of sustainably sourced, low impact and recycled materials. The commitment to target a high number of materials BREEAM credits is supported and policy compliant. However, a target level of non-hazardous waste to be diverted to landfill and a target level of materials to be derived from recycled and reused content should be provided. These details are to be sought via condition seeking a Site Waste Management Plan (SWMP) setting out how these targets will be achieved. The above SWMP should include a brief assessment of the feasibility of reusing or recycling demolition waste on and/or off site.
- 11.127 London Plan policies 5.10 and 5.11 seek to promote green infrastructure in major developments and policy CS10D of the Core Strategy requires existing

site ecology to be protected and for opportunities to improve upon biodiversity to be maximised. The existing site is of no biodiversity or ecology value and although the proposed buildings would occupy 100% of the site, thereby precluding any potential for mature tree planting, proposals to incorporate ecology and green infrastructure would represent an improvement over the existing situation.

- 11.128 The proposal includes a place making tree at ground floor level at the junction of Ropemaker Street and Finsbury Pavement. This represents an improvement on the existing situation and the details of the tree shall be conditioned via a landscaping condition. Further, green/brown roofs have been proposed at roof levels across the new building. The roof should also be biodiversity based green roof with a varied substrate depth of 80-150mm. A condition shall be imposed for details of the proposed green/brown roofs along with further details demonstrating that green/brown roofs have been maximised across the site. Further, the provision of bird and bat boxes across the site will be sought via condition.
- 11.129 Planning proposals are required to prioritise sustainable drainage solutions before relying on hard engineered solutions such as that which is proposed. Green/brown roofs are one SUDS option amongst others that should be fully explored as part of any justification for not being able to meet DM Policy 6.6 or London Plan Policy 5.13. It is acknowledged that the site has constraints given its 100% site coverage, however as noted above, there are ample further opportunities at the various roof levels for potential green/brown roofs to accommodate additional attenuation. It is recommended that green roofs with additional drainage volume (drainage layers) are integrated into the scheme in order to comply with DM Policies 6.5 and 6.6. Given the extent of roof areas proposed, there are areas to provide further opportunity for an appropriate SUDS strategy to be incorporated into the scheme. A revised drainage strategy will be sought via condition in order for the quantity and quality standards of DM Policy 6.6 to be met.
- 11.130 Finally, a Green Performance Plan has been submitted in draft, however full details will be secured through a section 106 obligation.

Energy Efficiency and Renewable Energy

- 11.131 The London Plan and Core Strategy require development proposals to make the fullest possible contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy; be lean, be clean, be green. Policy 5.2 of the London Plan requires the submission of a detailed energy assessment setting out efficiency savings, decentralised energy options and renewable energy production.
- 11.132 Policy CS10A of Islington's Core Strategy requires onsite total CO2 reduction targets (regulated and unregulated) against Building Regulations 2010 of 30% where connection to a decentralised energy network is not made and 40% where connection to a decentralised energy network is possible. The London Plan sets out a CO2 reduction target, for regulated emissions only, of 40%

against Building Regulations 2010 and 35% against Building regulations 2013.

- 11.133 The applicant has provided a strategy which proposes a preferred option for the development is to connect to the nearby Citigen District Energy Network. London Plan Policies 5.5 and 5.6 and Core Strategy policy CS10 prioritise connection to existing or planned decentralised energy networks where feasible over site wide CHP networks and communal heating and cooling. The proposed site lies in close proximity to the Citigen power station. As such, it is recommended that a legal obligation in the section 106 agreement obliges the owner to carry out a feasibility study into the supply of both heating and cooling to the development from a district heating network.
- 11.134 In the event that connection to Citigen is found unviable, the energy strategy proposes an alternative strategy whereby the heat to the site will be delivered via an on-site high-efficiency gas-fired boilers.
- 11.135 Under the preferred energy strategy (involving connection to Citigen), the development is expected to achieve a reduction of 39.6% on regulated emissions, versus a 2013 Baseline target. This exceeds the London Plan target of 35%. Under the alternative strategy (using an on-site solution), a reduction of 30.2% is expected. This falls short of the London Plan target.
- 11.136 With regard to the Council's Co2 reduction targets, under the preferred energy strategy, the development is predicted to achieve a reduction of 39.6% in total emissions, vs. a 2013 baseline. This just exceeds the Islington target of 39%, for developments connecting to a DE network. Under the alternative energy strategy, the development would be expected to achieve a reduction of 31.4% in total emissions. This exceeds the Islington target of 27%, for developments not connecting to a heat network.
- 11.137 In accordance with the Council's Zero Carbon Policy, the council's Environmental Design SPD states "after minimising CO2 emissions onsite, developments are required to offset all remaining CO2 emissions (Policy CS10) through a financial contribution". "All" in this regards means both regulated and unregulated emissions. The Environmental Design SPD states "The calculation of the amount of CO2 to be offset, and the resulting financial contribution, shall be specified in the submitted Energy Statement."
- 11.138 In this instance, a contribution of £848,360 is secured under the preferred strategy towards offsetting any projected residual CO2 emissions of the development, to be charged at the established price per tonne of CO2 for Islington (currently £920). An offset contribution of £963,461, which is based on the alternative strategy involving an on-site solution and final emissions of 1,047 tonnes would be applicable should the preferred option be unfeasible.
- 11.139 As such, in the event that connection to Citigen proves unfeasible under the terms of the section 106 agreement, then the alternative strategy would be pursued with the applicant considering additional energy efficiency measures in order to meet the London target. A revised energy strategy prior to

implementation in the event connection to Citigen is unfeasible will be imposed by condition.

- 11.140 The proposals address the energy hierarchy of 'be lean, be clean, be green' in the following way:

BE LEAN

Energy efficiency standards

- 11.141 The U-values proposed for the development are as follows: external wall = 0.35, curtain wall = 1.40, roof = 0.25 and floor = 0.25. Although the development currently meets its carbon targets, we would recommend seeking a further improvement here. Looking at the glazed façade areas, proposed values are centre pane = 1.06, frame = 3.3, spandrel = 1.5 and g-value = 0.35. We would recommend improvements to the frame U-values where possible.
- 11.142 An air permeability of 5m³/m²/hr is proposed. This is considered reasonable; however, we would suggest investigating further improvement to this, since the development will be mechanically ventilated.
- 11.143 The proposed lighting gives power demands in the range 4-10W/m². The lighting control strategy is based on a combination of presence detection, daylight dimming where appropriate and is considered a reasonable approach.
- 11.144 The development is to be provided with mechanical ventilation, although there will be some provision made for natural ventilation through openable windows on the upper floors. It is proposed that the building will be provided with active cooling, via centralised chiller plant.

BE CLEAN

Energy (Heating and Cooling) Supply Strategy

- 11.145 As a preferred strategy, the applicant proposes connection to the local Citigen heating network. Should this ultimately prove unviable, an alternative strategy involving heat from high-efficiency boilers is proposed. It is clear how heating will be provided to the development - but further clarification on the hot water provision strategy will be requested in an updated energy assessment should the alternative strategy be implemented. Active cooling is proposed for the development. This is to be delivered via a centralised system, served by high efficiency water cooled chillers.

District Heating and Cooling Networks

- 11.146 The applicant is currently pursuing connection to the Citigen Heat network as their preferred option. This is strongly supported, and would request the applicant to make all endeavours to secure a connection to the network. A connection to the Citigen cooling network is not considered feasible, due to available capacity of and distance to the network, and this is accepted.

- 11.147 As detailed above, it is recommended that the applicant verify, and provide proof where required, that connection to Citigen is viable both in terms of the connection cost and whole-life cost, in comparison to the alternative Energy Strategy.

Site-Wide Communal System/Network and Design for District Network Connection

- 11.148 The Energy Statement says relatively little about future-proofing for connection to a heat network. The Council's preference remains for the site to connect to Citigen. However, should this not prove possible and an on-site solution implemented, the applicant will need to demonstrate how the development will be future-proofed for connection, in line with the requirements laid down in Appendix 1 of the SPD. This is to be secured through the section 106 agreement.

Shared Energy Networks

- 11.149 The Energy Statement does not propose connection to a shared heat network, having evaluated several potential options, with advice from the Council, and which is agreed is not feasible at this stage. Given these results and that the priority is to secure a connection to Citigen, no further evaluation of shared heat network options is required at this stage.

CHP/CCHP or Alternative Low Carbon On-Site Plant

- 11.150 Should it not prove possible to connect to Citigen, the applicant proposes that heat to the site will be delivered via a on-site high-efficiency gas-fired boilers. On-site CHP has been ruled out, on grounds that the office nature of the development and its comparatively low heat load will not offer sufficient running hours for CHP to be viable.

- 11.151 Although it remains the Council's preference for the development to make connection to the Citigen network, further details of the heat demand (e.g. monthly kWh heating and hot water loads) as further evidence with regards to on-site CHP will be required under an updated energy strategy should the alternative energy strategy be implemented.

- 11.152 BE GREEN

Renewable Energy Supply

- 11.154 The renewables analysis recommends solar PV for the development, and this is supported. The energy statement has identified only a limited area at 9th floor level as suitable for PV, due the form of the development and other uses, such as green roofs and amenity spaces. The proposed array covers 36m² in total, with an annual output of 3,765kWh area.

- 11.155 In addition to the above energy hierarchy, London Plan Policy 5.9 and Islington Core Strategy Policy 10 require proposals to reduce potential for overheating to occur and reduce reliance on air conditioning. Local planning policy and guidance states:

“The need for cooling should be designed out as far as possible through use of passive design and passive ventilation”. “Use of technologies from lower levels of the hierarchy shall not be supported unless evidence is provided to demonstrate that technologies from higher levels of the hierarchy cannot deliver sufficient heat control.”

- 11.156 Dynamic thermal modelling has been carried out, and a summary of this provided. For the most part, the assumptions underlying the modelling are considered to be reasonable. However, in the first instance, modelling has been carried out with the assumption that cooling is already installed. The development shows that summer thermal comfort requirements are met, in the presence of artificial cooling. Islington's methodology regarding summer overheating would require the development to first be modelled using the same DSYs on the basis of mechanical ventilation (and natural ventilation available to the upper floors), as proposed by the applicant - but with the absence of artificial cooling. Therefore, it is recommended that the applicant re-run the thermal model under these conditions and provide the results.
- 11.157 The applicant has outlined their approach to passive measures, and the cooling hierarchy more generally, in Section 4.4 of the Energy Statement. Active cooling is proposed for the main office and commercial unit areas. As stated above, artificial cooling is not normally accepted under Islington's policies, unless it can be demonstrated that the development is likely to overheat in its absence. Therefore, updated overheating modelling will be required. As such, a condition shall be imposed for the non-installation of artificial cooling until the need has been demonstrated with further information on thermal modelling as outlined above.
- 11.158 In summary, it is considered that the preferred option of connecting to the existing district network for heating and cooling (subject to feasibility) is considered appropriate, and should this prove unfeasible then the alternative strategy with additional energy measures under a revised energy strategy is an appropriate alternative for the scheme. These are to be secured via conditions and s106 obligations.

Highways and Transportation

- 11.159 The site is located at 20 Ropemaker Street and Finsbury Court, which is 101-117 Finsbury Pavement. The site is well-served by public transport and has a PTAL score is 6B which is excellent and represents the highest possible.
- 11.160 The Site is bounded by Ropemaker Street to the south, Finsbury Street to the west and Finsbury Pavement to the east. Finsbury Pavement A501 is part of the Strategic Road Network (SRN). Approximately 200m north of the site it becomes City Road A501 and approximately 700m north, at Old Street Roundabout, City Road A501 becomes part of the Transport for London Road Network (TLRN).
- 11.161 The 100, 21, 141, 43, 153, 271, 76, and 214 bus services are all located within walking distance, as well as a variety of frequent national rail (NR) services from Moorgate and Liverpool Street, and London Underground (LU)

stations at Moorgate, Liverpool Street and Old Street, giving access to the Circle, Hammersmith & City, Metropolitan, Central and Northern lines.

- 11.162 The Elizabeth Line (Crossrail) began serving Liverpool Street in May 2017. TfL is now gradually introducing new trains on the Liverpool Street to Shenfield route currently operating as TfL Rail. The Elizabeth Line is expected to become fully operational from Reading and Heathrow to Abbey Wood and Shenfield by December 2018. The new Liverpool Street Crossrail station will eventually be served by a new exit out onto City Plaza, which is directly opposite the application Site's southern frontage, across Ropemaker Street.

Site Access (Pedestrian, Cycling and Vehicles)

- 11.163 A dedicated pedestrian entrance would be created approximately half-way along the new building frontage to Ropemaker Street. The footway width along Ropemaker Street would increase, ranging from 3.3m to 8.2m at the widest points, and 5.1m next to the south east corner of the site, where ground floor retail units with their own entrances are proposed adjacent to an existing pedestrian crossing across Finsbury Pavement.
- 11.164 Short-stay cycle parking in the footway adjacent to the site would be accessible on-street. A dedicated cycle entrance is proposed on Ropemaker Street just west of the main pedestrian entrance. Long-stay cycle parking proposed at basement level would be accessed via a shallow staircase with two wide channels to wheel bikes in and out. The access arrangements are considered acceptable along with the provision of a lift to the basement level, for overspill use during busy periods and to help mobility-impaired cyclists.
- 11.165 A single vehicular access for servicing only is proposed on Finsbury Street, which is LB Islington highway. The proposal for off-street servicing and separate access arrangements for cyclists, pedestrians and vehicles is considered acceptable.

Car Parking

- 11.166 For non-residential developments, Development Management Policy DM8.5 (Vehicle parking), Part B (Non-residential parking) states that parking will only be permitted where this is essential for operational requirements and integral to the nature of the business/service (such as a car hire or storage/distribution use). Normal staff parking will not be permitted. The development does not propose any car parking in accordance with Core Strategy Policy CS10 (Sustainable development), Part H, which requires car free development.
- 11.167 Wheelchair accessible parking should be provided in line with Development Management Policy DM8.5 (Vehicle parking), Part C (Wheelchair accessible parking). Given the site's constraints to provide for on-site wheelchair parking, a contribution of £132,000 towards parking bays or other accessible transport initiatives given 66 accessible parking bays cannot be provided on site or on street. As such, the development would be car-free and consistent with policy CS10 of the Core Strategy.

Cycle Parking

- 11.168 Core Strategy Policy CS10 (Sustainable design), Part H seeks to maximise opportunities for cycling. The level of cycle parking proposed for the office use would meet the required number in line with the Council's Development Management Policy as well as the London Plan requirements. A total of 752 cycle spaces are proposed in the basement.
- 11.169 The development also proposes 44 visitor cycle spaces along Ropemaker Street, which falls short of the London Plan minimum standard. However, allowing limited visitor cycle parking in the basement would be difficult to manage in practice during occupation of the development. Further, providing all of the short-stay cycle parking required by London Plan policy in the footways around the site would also have an unacceptable negative impact on pedestrian comfort. Finally, the constraints of the pavement in meeting accessibility considerations also impacts on the number of spaces that can be provided. A compromise approach is therefore sensible given the unique characteristics of the local context and it is considered that the above amount of visitor spaces provided is acceptable.
- 11.170 Development Management Policy DM8.4 (Walking and cycling), Part C requires the provision of secure, sheltered, integrated, conveniently located, adequately lit, step-free and accessible cycle parking. Additionally, Core Strategy Policy CS10 (Sustainable design), Part H seeks to maximise opportunities for cycling. Conditions will be imposed to ensure cycle arrangements are in line with CS10 and DM 8.4 with regard to the above.
- 11.171 Development Management Policy DM8.4 (Walking and cycling), Part E requires publically accessible uses (including A1, A2, A3, D1 and D2) to contribute financially to cycle parking in the public realm. The submitted transport statement identifies a number of issues with safety, comfort and attractiveness of key local cycling routes, as well as measures necessary to address these matters. This financial contribution is captured by Islington's CIL (Community Infrastructure Levy).

Walking

- 11.172 The overall impact of the proposed development on the local pedestrian environment would be acceptable. Pedestrian comfort on Ropemaker Street and Finsbury Pavement would improve if the development occurs compared to if the existing building is retained. This is because pedestrian comfort levels in the vicinity are currently forecast to worsen considerably in the coming years due to a large increase in Crossrail passengers leaving local stations, and the development proposal would create more footway by stepping the building line back.

Physical impacts on the on-street network

- 11.173 Any alterations to the Council managed highways of Islington Council or TfL controlled roads will be required to be secured via a section 278 agreement with all works to be carried out by LBI Highways.

Trip generation and mode split

- 11.174 Transport for London have stated that the development will generate additional strain on the transport network, likely to lead to further overcrowding at Moorgate Underground station, and potentially impact the operation of a nearby Cycle Hire dock.
- 11.175 Overall, the development will generate an additional 434 London Underground (LU) trips, 335 National Rail trips and 55 bus trips in the AM peak hour (8-9am). The Transport Assessment highlights a wide variety of public transport options in the local area would be available to accommodate new demand generated by the development. However, the assumption that new trips will split evenly across all available bus, LU and National Rail services is unrealistic.
- 11.176 Therefore, mitigation may be required for the 428 new passengers projected to pass through Moorgate in the AM peak should planning permission be granted. Moorgate currently suffers from crowding and congestion in both the AM and PM peak hours, with operational controls being enforced on a regular basis. This is to be secured via a s106 obligation.

Refuse and Recycling

- 11.177 Storage is appropriately located within the development for all uses. These details regarding the number and type of bins are to be secured by condition.

Servicing and Deliveries

- 11.178 The application includes a detailed delivery and servicing management plan alongside the submitted transport assessment. For commercial developments over 200 square metres and some larger residential developments, delivery/servicing vehicles should be accommodated on-site.
- 11.179 In line with Development Management Policy DM8.6 (Delivery and servicing for new developments), Part A, delivery/servicing vehicles should be accommodated on-site, with adequate space to enable vehicles to enter and exit the site in forward gear (demonstrated by a swept path analysis). In line with this policy and supporting paragraph 8.39, details should be submitted to establish the delivery/servicing needs, including hours, frequency, location/s and size of vehicles.
- 11.180 The application proposes a single vehicular access for servicing only on Finsbury Street, which is LB Islington highway. This aspect of the proposals is welcomed. A framework Deliveries and Servicing Plan (DSP) has been submitted with the application and its details are acceptable. TfL have recommended that the DSP should be secured through the Section 106 agreement for the site. This legal obligation will require details to be submitted as required by Development Management Policy 8.6 and the servicing and delivery plan addressing the list of required information at section 8.39 of the Development Management Policies SPD in consultation with TfL.

Construction and Logistics Plan

- 11.181 Any impacts arising from the construction of the building in highway and transport terms would be controlled by the submission of a Construction and Logistics Plan. This has also been recommended by TfL, who have also stated that such a plan should ensure their operation is not adversely affected during construction.
- 11.182 In addition to the above conditions and section 106 obligations the following has also been secured as part of the planning application
- Submission of a final Travel Plan
 - The repair and re-instatement of the footways and highways adjoining the development. Cost to be confirmed by LBI Highways, paid for by the applicant and the work carried out by LBI Highways.

Contaminated Land

- 11.183 The application is accompanied by a Preliminary Environmental Risk Assessment for contaminated land given the site would be excavated with a substantial basement and the formation of a concrete slab. As such, the Council's Environmental Pollution, Policy and Projects officer has not recommended a contaminated land condition in this instance. They have advised that any waste should be disposed of appropriately and that they should maintain a watching brief during the construction works. A Site Waste Management Plan (SWMP) has been conditioned as outlined in the sustainability section of this report, and the SWMP will require the above details to be included. The proposal is therefore considered acceptable in terms of land contamination.

Wind and Microclimate

- 11.184 The application is accompanied by a Pedestrian Level Wind Microclimate Assessment (PLWMA), which provides an assessment of the effect of the proposed development effect on wind conditions at the site and in the surrounding area. The assessment provides a detailed account of the average gust and wind conditions around the existing building and the proposed development and also assesses the cumulative impact with other proposed developments within the vicinity.
- 11.185 The proposed development and surrounding area have wind conditions ranging from acceptable for 'sitting' use, to acceptable for 'leisure walking' during the windiest season, using the Lawson scale. Wind Conditions which are classified as acceptable for 'leisure walking' use or calmer are considered acceptable for the desired use for thoroughfares, and therefore further mitigation is not required.

- 11.186 An assessment of the cumulative impact with proposed buildings in-situ demonstrates that the wind conditions increase to the east of the site and decrease in the west with strong wind exceedances in this area reduced or eliminated. Based on the Lawson Comfort Criteria, all areas in the public realm and at ground level are suitable for their intended use and therefore no further mitigation is required as a result. However, the proposed private roof terrace wind level conditions would be greater than desirable and this could be mitigated in the form of soft landscaping features to ensure a suitable environment for future officer users.
- 11.187 It is therefore considered that the proposal is acceptable in terms of wind microclimate subject to the recommended mitigation measures to be secured by condition and further testing with the final scheme of landscaping in place. It is recommended that landscaping to mitigate wind impacts on the roof terraces following further testing is secured as part of the recommended landscaping condition.

Planning Obligations, Community Infrastructure Levy and local finance considerations

Planning Obligations

- 11.188 The officer recommendation of approval is also subject to the Heads of Terms as set out in Appendix 1 – Recommendation B, to be included in a Section 106 Agreement attached to any planning permission, in order to secure compliance with planning policy and mitigate the impacts of the development on surrounding infrastructure.
- 11.189 The proposed development generates a requirement for s106 contributions towards off-site housing (£4,639,680), employment and training (£366,171), accessible transport improvements (£132,000), Code of Construction Monitoring Fee (£28,894), carbon off-setting (£848,360) and Crossrail contribution of £4,050,360 minus any Mayoral CIL credit).
- 11.190 Additional obligations include the repair and reinstatement of the footways and highways adjoining the development site, compliance with the Code of Local Procurement and Code of Employment and Training, facilitation of 28 work placements during construction, a Green travel plan, and feasibility study on connecting to the Citigen district heating network.
- 11.191 It is considered that these contributions are necessary to make the development acceptable in planning terms; the impacts are directly related to the development and fairly and reasonably related in scale and kind to the proposals and would comply with the Community Infrastructure Levy Regulations.
- 11.192 Islington's CIL Regulation 123 infrastructure list specifically excludes measures that are required in order to mitigate the direct impacts of a particular development. This means that the measures required to mitigate the negative impacts of this development in terms of carbon emissions, lack of accessible parking spaces and local accessibility cannot be funded through Islington's CIL. Separate contributions are therefore needed to pay for the

necessary carbon offset, accessible transport, highway reinstatement and local accessibility investment required to ensure that the development does not cause unacceptable impacts on the local area.

- 11.193 None of the financial contributions included in the heads of terms represent general infrastructure, so the pooling limit does not apply. Furthermore, none of the contributions represent items for which five or more previous contributions have been secured.
- 11.194 The carbon offset and accessible transport contributions are site-specific obligations, both with the purpose of mitigating the negative impacts of this specific development. The carbon offset contribution figure is directly related to the projected performance (in terms of operation emissions) of the building as designed, therefore being commensurate to the specifics of a particular development. This contribution does not therefore form a tariff-style payment. Furthermore, in the event that policy compliant on-site accessible car parking spaces had been provided by the development (or other accessibility measure) a financial contribution would not have been sought. Therefore, this is also a site-specific contribution required in order to address a weakness of the development proposal, thus also not forming a tariff-style payment.
- 11.195 The highway and footway reinstatement requirement is also very clearly site-specific. The total cost will depend on the damage caused by construction of this development, and these works cannot be funded through CIL receipts as the impacts are directly related to this specific development.
- 11.196 None of these contributions were included in Islington's proposed CIL during viability testing, and all of the contributions were considered during public examination on the CIL as separate charges that would be required in cases where relevant impacts would result from proposed developments. The CIL Examiner did not consider that these types of separate charges in addition to Islington's proposed CIL rates would result in unacceptable impacts on development in Islington due to cumulative viability implications or any other issue.

CIL

- 11.197 Additionally, the Mayor's Community Infrastructure Levy CIL (currently £50 per square metres) is applicable to the application. An appropriately worded informative is recommended to draw the agent's attention to the CIL liability. Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), the Mayor of London's Community Infrastructure Levy (CIL) will be chargeable on this application in the case of it being granted planning permission. In the event that the application is approved, CIL would be payable to the London Borough of Islington after the planning consent has been implemented and will be used by the Mayor of London to pay for Crossrail in accordance with CIL Regulations 2010 (as amended).
- 11.198 Developments in the Central Activities Zone (CAZ) must also make a separate contribution towards Crossrail in the section 106 agreement.

However, Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and this is to be reflected in the wording of the section 106 agreement.

- 11.199 The CIL contributions are calculated in accordance with the Mayor's and Islington's adopted Community Infrastructure Levy Charging Schedules. CIL would be payable to the London Borough of Islington following implementation of the planning consent.

12. SUMMARY AND CONCLUSION

Summary

- 12.1 The proposal seeks demolition of the existing buildings and erection of a 27-storey building (part 10, part 15, part 20, part 25, part 27-storeys) with 3 basement levels to provide for 63,520 square metres (GIA) of office floorspace (Use Class B1(a)) and 1,222 square metres (GIA) of flexible retail/professional services/restaurant/café floorspace (Use Class A1/A2/A3). The proposal also includes within the office floorspace the provision of 955 square metres (GIA) of office floorspace at first floor level that would be suitable for occupation by micro and small enterprises by virtue of its size and design. Public realm improvements are proposed along the two frontages of the site with the introduction of a placemaking tree at the junction of Ropemaker Street and Finsbury Pavement as well as the widening of both footway pavements.
- 12.2 Subject to a contribution towards securing offsite housing provision (the contribution accounts for an equivalent 20% of the uplift in office floorspace) and amounts to £4,639,680, the development of a mixed use Class A1/A2/A3 and Class B1 office scheme on this highly accessible site in an Employment Priority Area designated specifically for offices in the CAZ is considered to be acceptable in land use terms. The provision of high quality Class B1 office accommodation would be consistent with the aims of the development plan.
- 12.3 It is considered that although the proposed development is taller than the existing buildings on the site, the architectural approach is supported with use of materials that are respectful to the context of the area. Additionally, the stepped massing approach successfully integrates with the scale of existing buildings in the area, namely the heights of Ropemaker Place/City Point and the lower rise context to the east and north. The amendments throughout the pre-application stage to the western most element have resulted in further improvement to the resultant skyline composition in views from the HAC grounds, forming an appropriate book end to Ropemaker Place. The proposed scheme also activates the ground floor with retail uses along Finsbury Pavement and the entrance lobby areas along Ropemaker Street.
- 12.4 Sections 66(1) and 72(1) of the Planning (Listed buildings and Conservation Areas) Act 1990 require decision-makers to give considerable weight and importance to the desirability of preserving the setting of listed buildings, and to the desirability of preserving or enhancing the character or appearance of a

conservation area. Paragraph 134 of the NPPF states that 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 securing its optimum viable use.

- 12.5 Whilst there will be some harm to the Bunhill Fields and Finsbury Square conservation areas and the setting of the Honourable Artillery Company (GII* listed), this is considered to fall within the 'less than substantial harm' category of the NPPF. The site is also designated within an area considered appropriate for tall buildings above 30m due to the potential for the public benefit to outweigh potential harm. Council's Design and Conservation officers are of the view that the level of public benefit provided by the proposals far outweigh the 'less than substantial harm' to the heritage assets.
- 12.6 In particular, the scheme would deliver a significant amount of new and upgraded office floorspace in the CAZ along with floorspace for small and micro enterprises (a benefit as this provision is not required by planning policy) alongside public realm improvements.
- 12.7 No part of the development would result in unacceptable adverse impacts in terms of loss of daylight, sunlight, outlook, sense of enclosure or privacy that would justify refusing planning permission.
- 12.8 Subject to appropriate conditions, including submission of a feasibility study for connection to Citigen, the development would comply with relevant planning policies relating to sustainability and energy efficiency.
- 12.9 The proposed development would be serviced on-site and subject to appropriate conditions would have no adverse impacts on the local road network. The refuse/recycling and servicing arrangements are considered to be acceptable. The provision of secure cycle storage and showering and changing facilities for staff would encourage sustainable travel.
- 12.10 In addition to the Mayoral and Islington Community Infrastructure Levy, the application is supported by a comprehensive s106 planning agreement and contributions related to and mitigating impacts of the scheme. For these reasons and all the detailed matters considered in this report, the scheme is acceptable subject to conditions, informatives and the s106 legal agreement.

Conclusion

- 12.11 It is recommended that planning permission be granted subject to conditions and s106 legal agreement heads of terms for the reasons and details as set out in Appendix 1 - RECOMMENDATIONS.

APPENDIX 1 – RECOMMENDATIONS

RECOMMENDATION A

That the Committee resolve to GRANT planning permission subject to any direction by The Mayor to refuse the application or for it to be called in for determination by the Mayor of London. Therefore, following the Council's resolution to determine the application, the application shall then be referred to the Mayor of London in accordance with Article 5 of the Town and Country Planning (Mayor of London) Order 2008 – allowing him 14 days to decide whether to:

- a. allow the draft decision to proceed unchanged; or
- b. direct the Council under Article 6 to refuse the application; or
- c. issue a direction under Article 7 that he is to act as the Local Planning Authority for the purpose of determining the application.

RECOMMENDATION B

That planning permission be granted subject to the prior completion of a Deed of Planning Obligation made under section 106 of the Town and Country Planning Act 1990 between the Council and all persons with an interest in the land (including mortgagees) in order to secure the following planning obligations to the satisfaction of the Head of Law and Public Services and the Service Director, Planning and Development / Head of Service – Development Management or, in their absence, the Deputy Head of Service:

1. The repair and re-instatement of the footways and highways adjoining the development. The cost is to be confirmed by LBI Highways, paid for by the applicant and the work carried out by LBI Highways. Conditions surveys may be required.
2. Compliance with the Code of Employment and Training.
3. Facilitation, during the construction phase of the development, of 28 work placements: Each placement must last a minimum of 26 weeks. The London Borough of Islington's approved provider/s to recruit for and monitor placements, with the developer/contractor to pay wages. Within the construction sector there is excellent best practise of providing an incremental wage increase as the operative gains experience and improves productivity. The contractor is expected to pay the going rate for an operative, and industry research indicates that this is invariably above or well above the national minimum wage and even the London Living Wage (£9.15 as at 04/04/15). If these placements are not provided, LBI will request a fee of £140,000.
4. Compliance with the Code of Local Procurement.
5. Compliance with the Code of Construction Practice, including a monitoring fee of £28,894 and submission of site-specific response document to the Code of Construction Practice for approval of LBI Public Protection, which shall be submitted prior to any works commencing on site.

6. The provision of an additional number of accessible parking bays (66) or a contribution towards bays or other accessible transport initiatives of £132,000.
7. A contribution towards offsetting any projected residual CO2 emissions of the development, to be charged at the established price per tonne of CO2 for Islington (currently £920). Total amount: £848,360 – based on information submitted in Energy Strategy should the preferred energy strategy of connection to Citigen network take place and £963,461 should the alternative strategy involving an on-site solutions take place.
8. Connection to a local energy network, if technically and economically viable (burden of proof will be with the developer to show inability to connect). In the event that a local energy network is not available or connection to it is not economically viable, the developer should develop an on-site solution and/or connect to a neighbouring site (a Shared Heating Network) and future proof any on-site solution so that in all cases (whether or not an on-site solution has been provided), the development can be connected to a local energy network if a viable opportunity arises in the future.
9. Submission of a Green Performance Plan.
10. Submission of a draft framework Travel Plan with the planning application, of a draft full Travel Plan for Council approval prior to occupation, and of a full Travel Plan for Council approval 6 months from first occupation of the development or phase (provision of travel plan required subject to thresholds shown in Table 7.1 of the Planning Obligations SPD).
11. Payment towards employment and training for local residents of a commuted sum of £366,171.
12. For proposals with an increase in office floorspace in the Central Activities Zone, the provision of a mix of uses including housing or a contribution towards provision of off-site affordable housing where it is accepted that housing cannot be provided on site. A contribution towards provision of off-site affordable housing of £4,639,680.
13. Crossrail contribution of £4,050,360 minus any Mayoral CIL credit.
14. The approved Public Access Areas shall be maintained as an open unrestricted space at all times.
15. Securing the provision of the small/micro workspace with submission of details of unit sizes, design, management and marketing information including rent and service charges.
16. Mitigation to address impact on further overcrowding at Moorgate Underground station and the operation of a nearby Cycle Hire dock.
17. Delivery and Servicing Plan.

18. Council's legal fees in preparing the S106 and officer's fees for the preparation, monitoring and implementation of the S106.
19. All payments to the Council are to be index-linked from the date of Committee are due upon implementation of the planning permission.

That, should the Section 106 Deed of Planning Obligation not be completed within the timeframe agreed between the parties in the Planning Performance Agreement (PPA), the Service Director, Planning and Development/Head of Service – Development Management or, in their absence, the Deputy Head of Service may refuse the application on the grounds that the proposed development, in the absence of a Deed of Planning Obligation is not acceptable in planning terms.

ALTERNATIVELY, should this application be refused (including refusals on the direction of The Secretary of State or The Mayor) and appealed to the Secretary of State, the Service Director, Planning and Development/Head of Service – Development Management or, in their absence, the Deputy Head of Service be authorised to enter into a Deed of Planning Obligation under section 106 of the Town and Country Planning Act 1990 to secure to the heads of terms as set out in this report to Committee.

RECOMMENDATION C

That the grant of planning permission be subject to **conditions** to secure the following:

List of Conditions:

List of Informatives:

1	S106
	SECTION 106 AGREEMENT You are advised that this permission has been granted subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990.
2	Superstructure
	DEFINITION OF 'SUPERSTRUCTURE' AND 'PRACTICAL COMPLETION' A number of conditions attached to this permission have the time restrictions 'prior to superstructure works commencing on site' and/or 'following practical completion'. The council considers the definition of 'superstructure' as having its normal or dictionary meaning, which is: the part of a building above its foundations. The council considers the definition of 'practical completion' to be: when the work reaches a state of readiness for use or occupation even though there may be outstanding works/matters to be carried out.

3	<p>Community Infrastructure Levy (CIL) (Granting Consent)</p> <p>INFORMATIVE: Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the Mayor of London's CIL Charging Schedule 2012. One of the development parties must now assume liability to pay CIL by submitting an Assumption of Liability Notice to the Council at cil@islington.gov.uk. The Council will then issue a Liability Notice setting out the amount of CIL that is payable.</p> <p>Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed. The above forms can be found on the planning portal at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil</p> <p>Pre-Commencement Conditions:</p> <p>These conditions are identified with an 'asterix' * in front of the short description. These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of these unidentified pre-commencement conditions have been discharged.</p>
4	<p>Roller Shutters</p> <p>ROLLER SHUTTERS</p> <p>The scheme hereby approved does not suggest the installation of external rollershutters to any entrances or ground floor glazed shopfronts. The applicant is advised that the council would consider the installation of external rollershutters to be a material alteration to the scheme and therefore constitute development. Should external rollershutters be proposed a new planning application must be submitted for the council's formal consideration.</p>

APPENDIX 2: RELEVANT POLICIES

This appendix lists all relevant development plan policies and guidance notes pertinent to the determination of this planning application.

1 National Guidance

The National Planning Policy Framework 2012 seeks to secure positive growth in a way that effectively balances economic, environmental and social progress for this and future generations. The NPPF is a material consideration and has been taken into account as part of the assessment of these proposals.

Since March 2014 Planning Practice Guidance for England has been published online.

2. Development Plan

The Development Plan is comprised of the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013. The following policies of the Development Plan are considered relevant to this application:

A) The London Plan 2016 - Spatial Development Strategy for Greater London, Consolidated with Alterations since 2011

1 Context and strategy

Policy 1.1 Delivering the strategic vision and objectives for London

2 London's places

Policy 2.1 London in its global, European and United Kingdom context

Policy 2.2 London and the wider metropolitan area

Policy 2.3 Growth areas and co-ordination corridors

Policy 2.5 Sub-regions

Policy 2.9 Inner London

Policy 2.10 Central Activities Zone – strategic priorities

Policy 2.11 Central Activities Zone – strategic functions

Policy 2.12 Central Activities Zone – predominantly local activities

Policy 2.13 Opportunity areas and intensification areas

Policy 2.14 Areas for regeneration

Policy 2.15 Town centres

Policy 2.18 Green infrastructure: the network of open and green spaces

3 London's people

Policy 3.1 Ensuring equal life chances for all

Policy 3.2 Improving health and addressing health inequalities

Policy 3.3 Increasing housing supply

Policy 3.4 Optimising housing potential

Policy 3.5 Quality and design of housing developments

Policy 3.6 Children and young people's play and informal recreation facilities

Policy 3.8 Housing choice

Policy 3.9 Mixed and balanced communities

Policy 3.10 Definition of affordable housing

Policy 3.11 Affordable housing targets

Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes

Policy 3.13 Affordable housing thresholds

Policy 5.11 Green roofs and development site environs

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.14 Water quality and wastewater infrastructure

Policy 5.15 Water use and supplies

Policy 5.16 Waste self-sufficiency

Policy 5.17 Waste capacity

Policy 5.18 Construction, excavation and demolition waste

Policy 5.19 Hazardous waste

Policy 5.20 Aggregates

Policy 5.21 Contaminated land

Policy 5.22 Hazardous substances and installations

6 London's transport

Policy 6.1 Strategic approach

Policy 6.2 Providing public transport capacity and safeguarding land for transport

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.4 Enhancing London's transport connectivity

Policy 6.5 Funding Crossrail and other strategically important transport infrastructure

Policy 6.6 Aviation

Policy 6.7 Better streets and surface transport

Policy 6.8 Coaches

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.12 Road network capacity

Policy 6.13 Parking

Policy 6.14 Freight

Policy 6.15 Strategic rail freight interchanges

7 London's living places and spaces

Policy 7.1 Building London's neighbourhoods and communities

Policy 7.2 An inclusive environment

Policy 3.14 Existing housing
Policy 3.15 Coordination of housing development and investment
Policy 3.16 Protection and enhancement of social infrastructure
Policy 3.17 Health and social care facilities
Policy 3.18 Education facilities
Policy 3.19 Sports facilities

4 London's economy

Policy 4.1 Developing London's economy
Policy 4.2 Offices
Policy 4.3 Mixed use development and offices
Policy 4.4 Managing industrial land and premises
Policy 4.5 London's visitor infrastructure
Policy 4.6 Support for and enhancement of arts, culture, sport and entertainment provision
Policy 4.7 Retail and town centre development
Policy 4.8 Supporting a successful and diverse retail sector
Policy 4.9 Small shops
Policy 4.10 New and emerging economic sectors
Policy 4.11 Encouraging a connected economy
Policy 4.12 Improving opportunities for all

5 London's response to climate change

Policy 5.1 Climate change mitigation
Policy 5.2 Minimising carbon dioxide emissions
Policy 5.3 Sustainable design and construction
Policy 5.4 Retrofitting
Policy 5.5 Decentralised energy networks
Policy 5.6 Decentralised energy in development proposals
Policy 5.7 Renewable energy
Policy 5.8 Innovative energy technologies
Policy 5.9 Overheating and cooling

Policy 7.3 Designing out crime
Policy 7.4 Local character
Policy 7.5 Public realm
Policy 7.6 Architecture
Policy 7.7 Location and design of tall and large buildings
Policy 7.8 Heritage assets and archaeology
Policy 7.9 Heritage-led regeneration
Policy 7.10 World Heritage Sites
Policy 7.11 London View Management Framework
Policy 7.12 Implementing the London View Management Framework
Policy 7.13 Safety, security and resilience to emergency
Policy 7.14 Improving air quality
Policy 7.15 Reducing noise and enhancing soundscapes
Policy 7.16 Green Belt
Policy 7.17 Metropolitan Open Land
Policy 7.18 Protecting local open space and addressing local deficiency
Policy 7.19 Biodiversity and access to nature
Policy 7.20 Geological conservation
Policy 7.21 Trees and woodlands
Policy 7.22 Land for food
Policy 7.23 Burial spaces
Policy 7.24 Blue Ribbon Network
Policy 7.25 Increasing the use of the Blue Ribbon Network for passengers and tourism
Policy 7.26 Increasing the use of the Blue Ribbon Network for freight transport
Policy 7.27 Blue Ribbon Network: supporting infrastructure and recreational use
Policy 7.28 Restoration of the Blue Ribbon Network
Policy 7.29 The River Thames
Policy 7.30 London's canals and other rivers and waterspaces

8 Implementation, monitoring and review

Policy 8.1 Implementation
Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy
Policy 8.4 Monitoring and review for

Policy 5.10 Urban greening

London

B) Islington Core Strategy 2011

Spatial Strategy

Policy CS2 (Finsbury Park)

Policy CS3 (Nag's Head and Upper Holloway Road)

Policy CS4 (Highbury Corner and Holloway Road)

Policy CS5 (Angel and Upper Street)

Policy CS6 (King's Cross)

Policy CS7 (Bunhill and Clerkenwell)

Policy CS8 (Enhancing Islington's Character)

Strategic Policies

Policy CS9 (Protecting and Enhancing Islington's Built and Historic Environment)

Policy CS10 (Sustainable Design)

Policy CS11 (Waste)

Policy CS12 (Meeting the Housing Challenge)

Policy CS13 (Employment Spaces)

Policy CS14 (Retail and Services)

Policy CS15 (Open Space and Green Infrastructure)

Policy CS16 (Play Space)

Policy CS17 (Sports and Recreation Provision)

Infrastructure and Implementation

Policy CS18 (Delivery and Infrastructure)

Policy CS19 (Health Impact Assessments)

Policy CS20 (Partnership Working)

C) Development Management Policies June 2013

Design and Heritage

DM2.1 Design

DM2.2 Inclusive Design

DM2.3 Heritage

DM2.4 Protected views

DM2.5 Landmarks

DM2.6 Advertisements

DM2.7 Telecommunications and utilities

Employment

DM5.1 New business floorspace

DM5.2 Loss of existing business floorspace

DM5.3 Vale Royal / Brewery Road Locally Significant Industrial Site

DM5.4 Size and affordability of workspace

Housing

DM3.1 Mix of housing sizes

DM3.2 Existing housing

DM3.3 Residential conversions and extensions

DM3.4 Housing standards

DM3.5 Private outdoor space

DM3.6 Play space

DM3.7 Noise and vibration (residential uses)

DM3.8 Sheltered housing and care homes

DM3.9 Houses in Multiple Occupation,

Health and open space

DM6.1 Healthy development

DM6.2 New and improved public open space

DM6.3 Protecting open space

DM6.4 Sport and recreation

DM6.5 Landscaping, trees and biodiversity

DM6.6 Flood prevention

Energy and Environmental Standards

DM7.1 Sustainable design and construction statements

hostels and student accommodation

Shops, culture and services

DM4.1 Maintaining and promoting small and independent shops

DM4.2 Entertainment and the night-time economy

DM4.3 Location and concentration of uses

DM4.4 Promoting Islington's Town Centres

DM4.5 Primary and Secondary Frontages

DM4.6 Local shopping Areas

DM4.7 Dispersed shops

DM4.8 Shopfronts

DM4.9 Markets and specialist shopping areas

DM4.10 Public houses

DM4.11 Hotels and visitor accommodation

DM4.12 Social and strategic infrastructure and cultural facilities

DM7.2 Energy efficiency and carbon reduction in minor schemes

DM7.3 Decentralised energy networks

DM7.4 Sustainable design standards

DM7.5 Heating and cooling

Transport

DM8.1 Movement hierarchy

DM8.2 Managing transport impacts

DM8.3 Public transport

DM8.4 Walking and cycling

DM8.5 Vehicle parking

DM8.6 Delivery and servicing for new developments

Infrastructure

DM9.1 Infrastructure

DM9.2 Planning obligations

DM9.3 Implementation

D) Finsbury Local Plan June 2013

BC8 Achieving a balanced mix of uses

BC9 Tall Buildings and contextual considerations for building heights

BC10 Implementation

3. Designations

The site has the following designations under the London Plan 2016, Islington Core Strategy 2011, Development Management Policies 2013, Finsbury Local Plan 2013 and Site Allocations 2013:

- Bunhill and Clerkenwell Core Strategy Key Area
- Finsbury Local Plan (FLP) Area
- Employment Priority Area (Offices)
- Central Activities Zone
- City Fringe Opportunity Area
- Moorfields Archaeological Priority Area

- Within 50 metres of the Bunhill Fields and Finsbury Square Conservation Area
- Crossrail Safeguarding Direction

4. Supplementary Planning Guidance (SPG) / Document (SPD)

The following SPGs and/or SPDs are relevant:

Islington Local Plan

- Environmental Design
- Accessible Housing in Islington
- Conservation Area Design Guidelines
- Inclusive Landscape Design
- Planning Obligations and S106
- Urban Design Guide
- Development Viability SPD
- Basement SPD

London Plan

- Accessible London: Achieving and Inclusive Environment
- Sustainable Design & Construction
- Planning for Equality and Diversity in London
- City Fringe Opportunity Area Planning Framework

APPENDIX 3: DESIGN REVIEW PANEL COMMENTS