

PLANNING COMMITTEE REPORT

Development Management Service
Planning and Development Division
Environment and Regeneration
Department
PO Box 333
222 Upper Street

PLANNING COMMITTEE		
Date:	17 November 2015	NON-EXEMPT

Application number	P2015/2259/FUL
Application type	Full Planning Application
Ward	Bunhill
Listed building	N/A
Conservation area	None
Development Plan Context	Central Activities Zone, City Fringe Opportunity Area, Employment Priority Area, Bunhill & Clerkenwell Core Strategy Key Area
Licensing Implications	Culmative Impact Area
Site Address	205 Old Street, London, EC1V 9QN
Proposal	Demolition of existing single storey Post Office building and erection of a new two storey building comprising of a flexible retail (A1-A3) unit and new Post Office (A1) and associated back of house operations.

Case Officer	Colin Leadbeatter
Applicant	Helical Bar Plc
Agent	DP9 Ltd

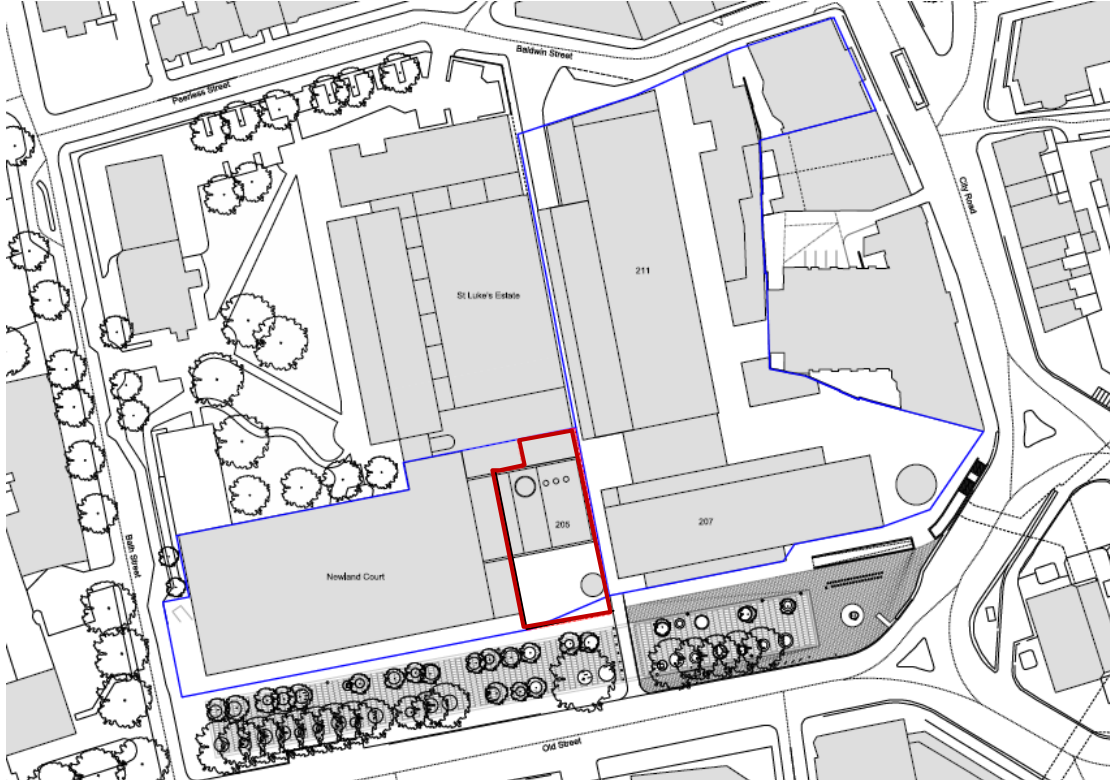
1. RECOMMENDATION

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

1. subject to the conditions set out in Appendix 1 and

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.

2. SITE PLAN (site outlined in red)



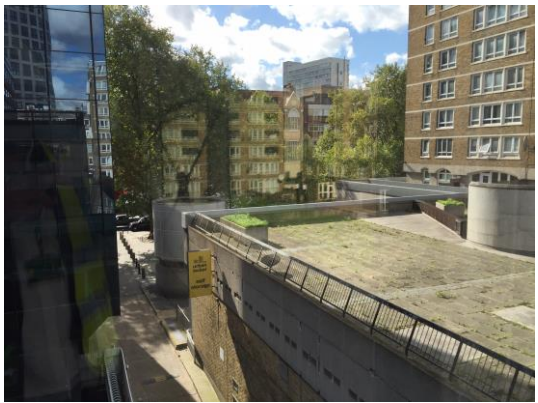
3. PHOTOS OF SITE/STREET



View from the Promenade of Light (Old Street)



View from adjacent building at 211 Old Street across existing Post Office roof



View over existing servicing entrance, and over green space adjacent to Bath Court

4. SUMMARY

- 4.1 The redevelopment of 207 & 211 Old Street (and Empire House) was originally granted planning permission under application reference P2013/1667/FUL on the 13th December 2013 (as amended by P2014/3081/S73 and P2015/0824/S73). Number 205 Old Street falls under the same land ownership, and constitutes part of the wider site as outlined in Site Allocation BC 23 of the Finsbury Local Plan. The applicants originally intended for 205 Old Street to form part of the 2013 submission, but ongoing discussions with the Post Office resulted in this part of the application site not being included.
- 4.2 During pre-application discussions the Local Planning Authority emphasised to the applicant that the loss of the Post Office on this site would be resisted due to the potential loss of an important public service. This application seeks to demolish the existing building in order to provide a larger replacement building to house a replacement Post Office, and a further retail unit over one or two floors. Policies BC 3 (Old Street) and BC 8 (Achieving a Balanced Mix of Uses) of the Finsbury Local Plan (2013) support the provision of retail uses fronting Old Street, along with the site allocation BC 23 which specifically seeks redevelopment of the site with retail units to be provided fronting Old Street, as well as the retention of the post office which this scheme achieves.
- 4.3 The proposed building would be two storeys in height, consisting of a lower ground floor, ground floor and mezzanine level, which would be one storey taller than the existing building. While only one additional storey is being proposed, due to the height of the existing building this would only equate to 1.7m of additional height. When considered against the heights of the existing buildings either side of the proposed development, this increase in height is considered to be acceptable in townscape terms.
- 4.4 The general exterior design and finish of the proposed building fronting Old Street would follow that previously approved for 207 Old Street and the new-build 'studio' buildings. In this regard, the detailed design of the building is considered to be of a high quality and appropriate to its context.
- 4.5 The proposed uses and increase in scale and bulk of the proposed development are considered to be acceptable with regard to the amenity of neighbouring residential properties due to the increase in height of the development having only a marginal impact in terms of outlook and sense of enclosure to two residential units at first floor level of the adjacent Newland Court. The proposed use is considered to be acceptable as this would front Old Street and would face away from residential units, with activity within acoustically shielded. Additionally, due to the potential for cumulative impacts of A3 uses, and the close proximity of residential properties, and hours of operation condition to restrict the hours of a possible A3 use is recommended to protect residential amenity.
- 4.6 The proximity of the application site to Old Street Underground Station, along with National Rail Links, with a number of bus routes running past the site and good cycling and pedestrian links makes the site ideal for a more intensive

development. It is considered the public transport network as existing can adequately support the increased level of visitors to and from the site, along with providing adequate access for delivery and servicing, along with an acceptable level of cycle parking (along with an off-site contribution for public cycle parking facilities). The proposed A1/A3 (and retained Post Office) land use is considered to be compliant to local, regional and national policy including London Plan Policies 2.12, 4.7 and 4.8, Islington Core Strategy Policies CS7 and CS14, Development Management Policies DM2.1, 2.2, and 4.3 along with Finsbury Local Plan Policies BC3 and site allocation BC23, with the retail functions at ground and first floor level supporting the predominantly business function of the area.

- 4.7 The proposed development is considered acceptable subject to the applicant entering into a Section 106 agreement to secure the heads of terms to mitigate the impacts of this development. Conditions are recommended to secure compliance with planning policy and ensure that the operation of the site does not adversely affect the functioning or amenity of the surroundings.
- 4.8 As well as the above, the proposals are considered to also comply with adopted national, regional and local planning policies, including the National Planning Policy Framework, Policies 2.12 (Central Activities Zone – Predominantly Local Activities), 4.1 (Developing London’s Economy) and 4.7 (Retail and Town Centre Development) of the London Plan (2015), Policy CS 8 (Enhancing Islington’s Character), CS 10 (Sustainable Design), CS 14 (Retail and Services) and CS 18 (Delivery and Infrastructure) of the Islington Core Strategy (2011), Policy DM2.1 (Design) and DM4.3 (Location and Concentration of Uses) of the Islington Development Management Policies (2013).

5. SITE AND SURROUNDING

- 5.1 The site comprises of 205 Old Street which falls adjacent to the west of 207 and 211 Old Street. The site is bounded to the north by Bath Court (part of the St Luke’s Estate), to the east by 207 and 211 Old Street with City Road 100m away, to the south by Old Street (with Old Street roundabout to the immediate south-east corner of the site) and Newland Court of the St. Lukes Estate to the west. The site does not fall within a conservation area, but is bounded by the Moorfields Conservation Area to the east and north east and the Bunhill Fields and Finsbury Square Conservation Area to the south.
- 5.2 The site also includes a single storey cylindrical flat-roofed brick and concrete ‘rotunda’ to the front forecourt which currently houses an escape stair from the basements of 205, 207 and 211 Old Street below.
- 5.3 The site is currently set back from the main frontage of a retail parade to the west (which fronts the Promenade of Light), it is set in by 13m with an underutilised space to the front of it. Newland House sits above the retail parade.

- 5.4 An existing service/access road divides the proposal site and 207 Old Street to the east.
- 5.5 The site falls adjacent to the Moorfields Conservation Area, which was formed in 1990 and is centred on the Islington side of City Road and some buildings in secondary streets behind. The architecture of the conservation area is mainly comprised of late Victorian and Edwardian commercial buildings that rise up to 7 storeys. More recent planning consents for taller buildings mean the character of the surrounding area is likely to change somewhat in the next few years, with work now well underway on the White Collar Factory (the former Transworld building). The best of the earlier Victorian and Edwardian predominantly red-brick buildings is the Grade II listed former Leysian Mission falling to the east of the application site.
- 5.6 The Bunhill Fields and Finsbury Square CA was first designated in 1987 and extended in 1998 and again in 2002. Its character is derived from a mixture of large-scale office buildings around Finsbury Square close to the City borders and low-rise former warehouse and residential properties in the streets near the Old Street Roundabout. It also contains some large green open spaces including Bunhill Fields historic burial ground, which is owned by the City of London, Finsbury Square, which was first developed in 1777, and the playing fields of the Honourable Artillery Company.

6. PROPOSAL (IN DETAIL)

- 6.1 The proposal includes the complete demolition of the existing above-ground elements of 205 Old Street which comprise of a single storey building housing the existing post office and a single storey spherical rotunda currently housing an escape stair, and the construction of a two-storey building (with green roof). The building is designed to have a fully glazed front elevation facing onto Old Street, with a single storey metal-clad side addition linking the proposed building to 207 Old Street (accommodating two ATM's and two post boxes).
- 6.2 The proposed development would comprise of two retail (Class A1) units, one housing the retained Post Office, and one to be let or sold to a private tenant as either an A1 or A3 use, with an internal bicycle store at basement level and a rear servicing yard to be shared with 207 Old Street.

7. RELEVANT HISTORY:

- 7.1 Since the Post Office was built in the 1960's the Council has processed only a handful of applications with regard to the host property, mostly with regard to signage and the installation of an ATM. It is not considered there is any specific planning history that is relevant to this application, with the exception of the adjacent site at 207 – 211 Old Street and its recent permissions as outlined below:
- 7.2 P2013/1667/FUL (approved 13/12/2013): Extensions and alterations and associated re-cladding to 207-211 Old Street,(including additions at roof level)

refurbishment and change of use of Empire House to provide A3/A5 restaurant use at basement and ground with office (B1)/Hotel (C1)/ private members club(Sui Generis) above, creation of part 2, part 3 storey buildings to provide additional B1 and A1,A2, A3, A4, floorspace, and creation of new pedestrian link from Old Street to Baldwin Street with associated landscaping and associated works.

- 7.3 P2014/3081/S73 (approved 28/11/2014): Material minor amendment of planning permission P2013/1667 dated 13 December 2013. Amendments include: Amalgamation and change of use of two office units (B1a) to restaurant (A3) at 211 Old Street; changes to green/brown roofs and soft landscaping; variations to studio building entrance; addition of terrace at ninth floor and reduction in height of parapet to 211 Old Street; variations to elevations of studio buildings and 211 Old Street; change of material from glass to brick to new office building corner; and variations to courtyard layout.
- 7.4 P2015/0824/S73 (approved 04/11/2015): Material minor amendment of planning permission P2013/1667/FUL dated 13 December 2013 (as amended by P2014/3081/S73 on the 28th November 2014. Amendments include: design changes to the principle elevations of 207 Old Street, an increase of height of the overall building by 525mm, a reduction in the projection of the extensions to 207 Old Street as approved, a larger plant screen at roof level, and associated alterations including changes to the pedestrian 'cut-through' to 207 Old Street.

ENFORCEMENT:

- 7.5 None

PRE-APPLICATION ADVICE:

- 7.6 Q2014/0687/MJR: The principle of retail on this site is supported by the site allocation. Policy BC8 of the Finsbury Local Plan encourages a range of retail, leisure or community facilities on ground floor frontages facing onto Old Street. Site allocation BC23, which the site falls within, highlights that redevelopment should retain the Post Office with retail uses at ground and basement. There was therefore no objection to the principle of retail use – the key issue was the size and type of retail to be provided, and securing the retention of the Post Office. The pre-application advice also asked the applicants to investigate the use of any upper storeys for B1(a) floorspace, however it was noted that the overall redevelopment of 207 – 211 Old Street is already delivering over 10,000m² of additional B1(a) floorspace.

8. CONSULTATION

Public Consultation

- 8.1 Letters were sent to occupants of 249 adjoining and nearby properties at Bath Court, Newland Court and Old Street on 04/09/2015. A site notice and a press advert were displayed on 04/09/2015. The public consultation of the

application therefore expired on 01/10/2015, however it is the Council's practice to continue to consider representations made up until the date of a decision.

8.2 At the time of the writing of this report a total of 7 responses had been received from the public with regard to the application all of which were objections. Additionally, a petition with 43 signatories, mainly from residents of Bath Court was received on 6 November 2015, hand delivered to the office. The issues raised can be summarised as follows (with paragraph numbers where those issues have been addressed in brackets):

- Increased sense of enclosure to Newland Court (addressed in paragraph 11.45 – 11.46 of this report);
- Proposed use as retail/restaurant (see paragraph 11.7 – 11.17);
- Height (see paragraph 11.23);
- Overlooking (see paragraph 11.46);
- Objection to the proposed character and appearance of the development (see paragraph 11.18 – 11.27);
- Potential Plant Noise/Location of fixed plant (see paragraph 11.47-11.48);
- Closing of existing servicing road (see paragraph 11.69);
- Construction Noise (addressed in paragraph 11.50 of this report); and
- Lack of consultation to some nearby residential properties:

Response: The Local Planning Authority made every effort to consult all addresses within Bath Court. The Local Planning Authority also erected a site notice (erected 04/09/2015) and advertised the proposals in the press (in the Islington Gazette on the 08/09/2015). Discussions were also held with the chair of the Resident's Association, Ray O'Halloran.

External Consultees

- 8.3 **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.
- 8.4 **Metropolitan Police** (Crime Prevention) no response to consultation.
- 8.5 **Thames Water** raise no objection subject to an informative being added with regard to water pressure.

- 8.6 **Transport for London** raise no objection subject to conditions being attached to any planning permission seeking a Construction Management Plan and Delivery and Servicing Management Plan to be submitted and approved by the Local Planning Authority prior to works commencing on the application site in consultation with TfL TLRN.
- 8.7 **Royal Mail** (Post Office) have confirmed in writing through the application process that the proposals are in line with their discussions with the landowners.

Internal Consultees

- 8.8 **Access Officer** has raised concerns on a number of issues, please see access section in the body of this report (para 11.31).
- 8.9 **Design and Conservation Officer** raised no objection.
- 8.10 **Energy Conservation Officer** raises concerns that the proposals do not adequately address a potential connection to a District Heat Network.
- 8.11 **Public Protection Division (Noise Team)** raises no objection subject to a condition being added in order to mitigate any noise/nuisance from fixed plant and/or extraction systems.
- 8.12 **Public Protection Division (Licensing)** have confirmed that the hours of operation recommended to be conditioned by the LPA for the A3 restaurant unit fall within the adopted Licensing core hours as set out in Islington's Licensing Policy 2013 – 2017, and raise no objection.
- 8.13 **Public Protection Division (Land Contamination)** raised no objection.
- 8.14 **Spatial Planning and Transport** (Transport Officer) provided no response to consultation.
- 8.15 **Sustainability Officer** raises no objections subject to reasonable conditions.
- 8.16 **Planning Policy** raise concerns with regard to the quantum of retail floorspace to be provided.

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 2015 (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:
- Central Activities Zone
 - Employment Priority Area (General)
 - City Fringe Opportunity Area
 - Site Allocation BC 23 (Copy Provided at Appendix 3)

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

- 10.1 An EIA screening was not submitted. However the general characteristics of the site and proposal are not considered to fall within Schedule 1 or 2 development of the EIA Regulations (2011). No formal decision has been issued to this effect.

11. ASSESSMENT

- 11.1 The main issues arising from this proposal relate to:

- Land Use;
- Design and Conservation;
- Accessibility;
- Neighbour amenity;
- Sustainability, Energy efficiency and renewable energy;
- Highways and transportation implications;
- Planning Obligations.

Land-use

Employment floor space:

- 11.2 The site is located within an Employment Priority Area (General) where Core Strategy policy CS13 and Finsbury Local Plan policy BC8 safeguard existing employment floor space and encourage new employment floorspace (particularly business floorspace) to locate in the CAZ where access to public transport is greatest. New business floorspace is required to be flexible to meet future business needs and shall include the provision of a range of unit types and sizes, including those suitable for Small/Medium Enterprises (SMEs).
- 11.3 Finsbury Local Plan Policy BC8 states that proposals should incorporate the maximum amount of business floorspace reasonably possible on the site. However, it then adds that the employment floorspace of a development should not be unfettered business floorspace (B1a) but where appropriate must also include retail or leisure uses at ground floor alongside a proportion of non-B1a or business-related floorspace and/or office B1a or retail floor space suitable for accommodation by SMEs and/or affordable workspace.
- 11.4 The proposed development consists of one A1 unit and one A1/A3 unit. Whilst it would not provide any additional office floorspace it is considered that as the overall redevelopment of 207 – 211 Old Street will provide over 10,000m² of additional B1(a) floorspace the provision of further office floorspace at 205 Old Street is not in this instance necessary to meet the overall aims of the spatial policies, nor the site allocation (BC 23).
- 11.5 In accordance with policy BC8 the proposal would introduce retail use at ground and first floor when considered in the context of the wider site allocation provides a range of facilities that are considered to be supportive and complimentary to the primary business role of the area. The increase in density together with the potential mix of uses (A1/A3) and high level of public access to the site would ensure that the building would be flexible to future business needs and would not compromise economic function/growth. In addition to this, the proposal would increase the level of employment density of the site compared to the existing building.

Principle of Post Office, A1 and A3 Uses

- 11.6 The existing land use of the site falls within an A1 use class and currently operates as a Post Office.

- 11.7 The proposed development would constitute provide two units, one A1 unit housing a replacement Post Office (325.12m²), and a further flexible A1/A3 unit measuring 433m², or up to a maximum 897m² if an optional mezzanine floor is added.
- 11.8 The application site falls within site allocation BC 23 of the Finsbury Local Plan 2013. While the majority of the site has the benefit of planning permission for a comprehensive redevelopment (which at the time of writing was nearing completion of Phase 1, with Phase 2 to commence in early 2016), the Post Office site has until now been excluded from proposals. The site allocation seeks a new, high quality building in this location with retail units provided at ground floor to provide an active frontage to Old Street. The site allocation also seeks the retention of the Post Office use on the site.
- 11.9 The Post Office has been consulted through the evolution of the proposals and this subsequent application for planning permission and is to be retained in accordance with BC 23. The proposed development would result in a slightly smaller Post Office unit than existing from 486m² to 325m², however it is considered (and has been confirmed by the Post Office) that the design of the proposed unit would make better use of the area available to efficiently provide a service to customers, as well as back of house operations. The scheme design has been informed by the Post Office's trading requirements. It is considered that as the Post Office is being retained, and a contemporary development is likely to provide an updated offer to customers, the reduction in floorspace is considered to be acceptable.
- 11.10 The proposed land use is also considered to comply with Policy BC 3 (Old Street) of the Finsbury Local Plan as the proposed use would specifically address part E of the policy which seeks a range of retail facilities on ground floor frontages facing Old Street.
- 11.11 While the Council's Policy Team has raised concerns with regard to the quantum of retail floorspace proposed and its potential impact on nearby Town Centres (Angel) and Local Shopping Areas (Whitecross Street) it is considered that a single retail unit (the other rehousing the Post Office) would be acceptable in this location due to the predominantly retail function of the Promenade of Light, along with the requirements set out by the Site Allocation (BC 23), including the site's location within the CAZ. It should be noted that the overall site for 207 – 211 Old Street is predominantly made up of A3/A4 units at ground floor level fronting Old Street, and therefore the presence of the A1 retail units on this part of the site would offer the commercial floorspace sought by the Finsbury Local Plan.
- 11.12 With regard to the possible A1/A3 unit, while the principle of A1 use is broadly accepted, Development Management policy DM4.2 states that night-time economy uses are appropriate within Old Street (see para 4.16 of the DMP where it states entertainment and night time uses will be generally directed towards Town Centres alongside parts of the Central Activities Zone where identified in policy BC8) and policy BC8 of the Finsbury Local Plan states that new entertainment uses will only be allowed within Employment Priority Areas, as is the case here. Policy DM4.3 establishes where these uses are

appropriate, stating that restaurants, drinking establishments and similar uses should not have a negative cumulative impact due to an unacceptable concentration of such uses in one area and should not cause unacceptable disturbance or detrimentally affect the amenity, character or function of an area. It should be noted that the site falls within a Cumulative Impact Area, as designated under Licensing Policy where there is an identified abundance of licensed premises. The Council's Licensing team were consulted as part of the application process and confirmed that the proposed restricted opening hours recommended by the Local Planning Authority for the A3 unit fall within the Licensing core hours as set out in Islington's Licensing Policy 2013 – 2017, and raise no objection.

- 11.13 While the previous use of the site did not include any dining facilities the proposal would introduce one possible café/restaurant which would constitute a night-time economy use. While this would cumulatively increase the number of night time economy uses within the locality, it is considered the proposal would be complementary to the retail function of the Promenade of Light by encouraging a possible food and beverage offer to the parade.
- 11.14 Additionally the proposal would provide activity to the street frontage and introduce additional publicly accessible commercial spaces. As such, the proposal would not result in an unacceptable concentration of such uses in this area and the proposed uses would be in keeping with the character and function of the area. Policy DM 4.2 and 4.3 also seek to ensure restaurant uses do not cause unacceptable disturbance or detrimentally affect the amenity, character and function of the area. This is addressed further in para 11.49.

Conclusion:

- 11.15 The proposed change of use at the site would ensure the continued occupation and operation of the Post Office and the redevelopment of this underused and inefficient site.
- 11.16 In accordance with Employment Priority Area (General) and CAZ policy aims, as well as the site allocation, the proposal would result in a complimentary use to the nearby employment floor space surrounding the site, introducing uses complimentary to the primary business function of the area. Additionally, the proposed retail/restaurant uses are not considered to represent an over concentration of uses subject to details hours of operation conditions to protect residential amenity.
- 11.17 As such, it is considered that the proposed change of use is acceptable in land use terms, subject to an assessment of all other relevant policy, and any other relevant material planning consideration.

Design, Conservation and Heritage Considerations (including Archaeology)

- 11.18 Proposals for any new development in this location are required to achieve excellent quality designs in order to meet the requirements of Site Allocation

BC 23 (a high quality building will be sought in this location), and policy BC 3 (buildings of a high quality architectural design) of the Finsbury Local Plan 2013 and Policy DM2.1 (all forms of development are required to be of high quality) of the Islington Development Management Policies 2013.

- 11.19 Originally constructed in the 1960's the Old Street Post Office is a single storey (though with a grand order height of just under 8m) building set back from Old Street and the Promenade of Light by a 13m deep forecourt. The existing building has not been significantly altered since its construction, and is now in need of considerable refurbishment in order to bring the post office into sustainable use. The existing building makes an inefficient use of space, and the forecourt is currently underused, creating a break in the building line along Old Street, while offering a secluded area which suffers from instances of antisocial behavior and crime in the hours of darkness.
- 11.20 This unfortunate under-use of a significant, readily-accessible central London site could be remedied by refurbishment or redevelopment. This provides an opportunity to bring a prominent and significant site into sustainable use, whilst improving the streetscene along with providing a more efficient post office and an improved retail/dining offer to the Promenade of Light. The principle of redevelopment is therefore welcomed in design terms.
- 11.21 The proposals are to demolish the existing building and replace it with a two storey (with lower ground, ground floor and an optional mezzanine level [depending on tenant requirements]) flat roofed and glass fronted building with the same building line as the adjacent row of shops fronting onto the Promenade of Light.



Site Layout

- 11.22 The existing retail frontage of 205 Old Street is considerably set back from the neighbouring retail units, which currently creates an inconsistent retail

frontage for the parade. The proposals seeks to align the frontage of the retail units, which would enhance the visual appearance of the street, while removing a low quality and poorly lit forecourt. The proposed roof of the building projects forwards to create a canopy which would be of a similar depth as the canopy covering the adjacent promenade of shops, tying the proposed development in with the existing neighbouring buildings while offering some shelter to pedestrians from adverse weather conditions.

Height and Massing

- 11.23 The height of the proposed building would be 1.7m taller than the existing building on the site reaching 9.2m in height. The neighbouring buildings either side of the proposed development are of a much more significant height, with Newland Court comprising of 9 storeys to the west, and 207 Old Street at 15 storeys (but with permission to extend to 18 storeys) to the east. The proposed two storey building would read as a standalone unit, but would be tied into the overall 207 – 211 Old Street development through the use of similar design and materials, whilst maintaining an appropriate gap between 207 Old Street with a single-storey link. The proposed development has been designed with consideration to the neighbouring residential windows to Newland Court in mind, projecting only an additional 1.7m some 6m away from the nearest residential window. It is considered that the proposed development would be appropriate within the context of the streetscene, and would be of a scale to compliment surrounding buildings.

Architectural Detailing and Materials

- 11.24 The design and appearance, materials and finishes of the proposed building would match those already approved for the 207 – 211 Old Street development. It is considered that the proposed design of the building would comply with the site allocation (BC23) by providing a new high quality building with sensitive design and massing in order to protect the St Luke's Estate. It is also considered that the high quality design would satisfy Policy BC 3 of the Finsbury Local Plan by providing a building of a high quality architectural design which relates positively to its surroundings, and improves the character, quality and identity of the Promenade of Light. It is also considered that Policy DM2.1 of the Islington Development Management Policies is met by providing a high quality design which incorporates inclusive design principles and makes a positive contribution to the local area.
- 11.25 The front elevation of the proposed development would feature full height glazing, creating an active frontage to Old Street. The proposed glass façade/building line would step back to match the building line of 207 Old Street, which would link views through the colonnade of the completed 207 Old Street, making the main entrance to the post office visible from the roundabout and the doors themselves providing natural surveillance over the proposed ATM and post box location.



- 11.26 The unglazed element of the east façade is proposed to be clad with a folded zinc cladding with vertical seams, of a colour to compliment that approved for the steel cladding to 207 - 211 Old Street. While this material is considered to be acceptable in principle, a condition would be attached to any approval seeking further details and samples of the cladding to be used (Condition 3).
- 11.27 The proposed glazing treatment facing onto Old Street would feature the same Glulam framed glazing product with timber reveals as has previously been approved and features on the Studio Buildings to the rear of 207 Old Street, creating a sense of a continuing design ethos for the area as a whole.

Archaeology

- 11.28 Historic England have confirmed that the desk based archaeological assessment provided with the application is sufficient.

Other Matters

- 11.29 There is an existing rotunda to the forecourt of the post office which is proposed to be demolished, which will result in the loss of an emergency escape stair to the existing basement. The existing stair would no longer be required as a result of the changes at basement level previously approved under the wider redevelopment of the site, with alternate escape routes provided to the rear of the development. It is considered that as the existing rotunda offers no streetscape merit, it's demolition is considered to be acceptable.

Accessibility

- 11.30 The Islington Core Strategy (2011) policy CS10B requires all development to achieve the highest feasible level of a nationally recognised sustainable building standard.

- 11.31 In terms of the internal layout of the retail units, these are considered to be purely indicative at this stage. The Post Office and separate retail unit will engage their own architect to complete the fit-out.
- 11.32 The Council's Access Officer raised concerns relating to the WC in the A1/A3 unit, the applicants have confirmed that the WC in the larger unit will be revised during the detailed design phase and Part M requirements of the Building Regulations will be fully addressed, a condition (Condition 5) is recommended to secure this.
- 11.33 While the Council's Access Officer raised concerns regarding the disabled access to the rear service yard (due to the gradient of the ramp proposed) it should be noted the ramp to the rear of the building is for servicing and delivery purposes only (for example, loading/unloading retail stock pallets etc.). The level access into the retail units is provided at the front, main entrance. Due to site constraints, the service ramp cannot be reduced in gradient any further without either blocking the existing fire exit to neighbouring commercial units in the basement (Gymbox) or taking further space away from Newland Court service yard.
- 11.34 It is considered that while the access arrangements are generally acceptable, a condition should be attached to any decision requiring detailed plans relating to level and inclusive access (Condition 5).

Landscaping and Trees

- 11.35 The proposed development would not create any new landscaped areas, and would not remove nor replace any existing trees.
- 11.36 Notwithstanding this, the applicants have as a result of a request from officers agreed to finance and carry out some improvement works to an existing terrace which is currently used by the Newland House Residents Association as a Community Centre. These improvements would include works to make good the surface of the terrace, along with some planting in order to soften the appearance of a 1.7m wall which would be erected 6m from the windows to the community centre and one residential unit. The details of these works are to be secured via a clause in the Section 106 agreement.

Neighbouring Amenity

- 11.37 The existing building on the application site measures 7.6m in height (plus two existing roof additions bringing the total height to 9.9m from ground level), and the proposed building would be a total of 9.2m high with a flat roof and no additions at roof level. The proposed development would bring the building line forward towards Old Street, increasing the mass and volume of the building. It is considered that this increase in height would be perceptible from properties within Newland Court and Bath Court in the neighbouring St Luke's Estate.

- 11.38 The applicants have carried out a Daylight and Sunlight report to assess the potential impact of the increased mass of the building with regard to the windows serving habitable rooms of neighbouring residential properties.
- 11.39 Daylight and Sunlight: The assessment is carried out with reference to the 2011 Building Research Establishment (BRE) guidelines which are accepted as the relevant guidance. The supporting text to policy DM2.1 identifies that the BRE 'provides guidance on sunlight layout planning to achieve good sun lighting and day lighting'.
- 11.40 Daylight: the BRE Guidelines stipulate that there should be no real noticeable loss of daylight provided that either:

The Vertical Sky Component (VSC) as measured at the centre point of a window is greater than 27%; or the VSC is not reduced by greater than 20% of its original value. (Skylight);

And

The daylight distribution, as measured by the No Sky Line (NSL) test where the percentage of floor area receiving light is measured, is not reduced by greater than 20% of its original value.

- 11.41 Sunlight: the BRE Guidelines confirm that windows that do not enjoy an orientation within 90 degrees of due south do not warrant assessment for sunlight losses. For those windows that do warrant assessment, it is considered that there would be no real noticeable loss of sunlight where:

In 1 year the centre point of the assessed window receives more than 1 quarter (25%) of annual probable sunlight hours (APSH), including at least 5% of Annual Winter Probable Sunlight Hours (WSPH) between 21 Sept and 21 March – being winter; and less than 0.8 of its former hours during either period.

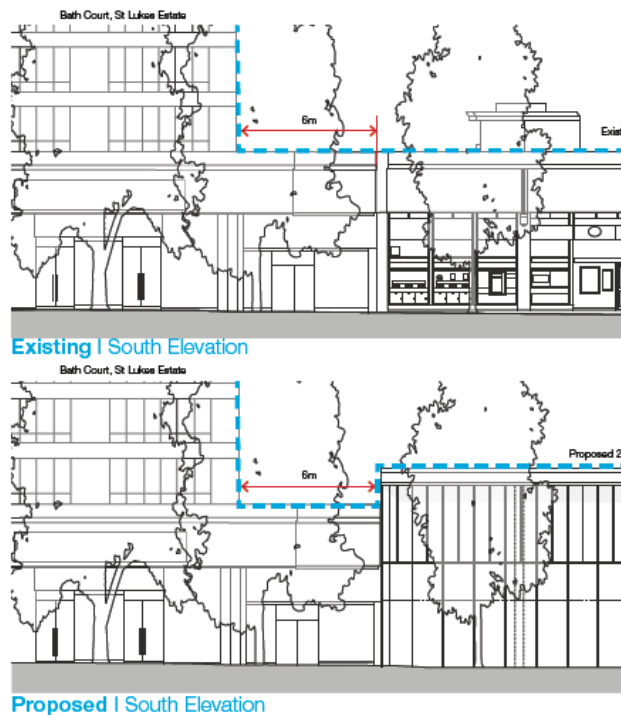
In cases where these requirements are breached there will still be no real noticeable loss of sunlight where the reduction in sunlight received over the whole year is no greater than 4% of annual probable sunlight hours.

- 11.42 Where these guidelines are exceeded then sunlighting and/or daylighting may be adversely affected. The BRE Guidelines provide numerical guidelines, the document though emphasizes that advice given is not mandatory and the guide should not be seen as an instrument of planning policy, these (numerical guidelines) are to be interpreted flexibly since natural lighting is only one of many factors in site layout design.
- 11.43 The applicants have tested the daylight and sunlight of 1 to 108 Newland Court, and at the Council's request windows serving the closest habitable rooms to the proposed development in Bath Court.
- 11.44 Every window surveyed passed the BRE's Vertical Sky Component (VSC) tests, and the rooms they serve also passed the Daylight Distribution tests. All

windows surveyed also passed Annual Probable Sunlight Hours (APSH) tests. It is considered that the proposal meets the requirements of the Building Research Establishment guidelines, and are therefore considered acceptable with regard to daylight and sunlight.

Outlook, Sense of Enclosure and Overlooking / Privacy

- 11.45 The proposed development would be 1.7m taller than the existing building (excluding the existing roof additions). There is an existing community centre and two residential units which will in effect have a 1.7m wall erected 6m away which would not have been present previously. This is demonstrated in the image below:



- 11.46 It is acknowledged that while the proposal would introduce effectively a 1.7m high wall above an existing parapet located 6m away from a number of windows serving habitable rooms these windows would still retain adequate levels of outlook with views upwards and over the proposed building, and would still allow large amounts of open sky to be visible (as illustrated by the BRE daylight results). While there will be an increased sense of enclosure experienced by these two residential units, it is considered the proposed increase in height of the development would not have a sufficient negative impact on the amenity of the affected units to warrant a refusal of planning permission. Furthermore, the S106 secures a scheme to improve the space between Newland Court and the proposed building including possible planting along the proposed 1.7m wall. It should also be noted that there are no windows proposed to the side or rear elevations of the proposed building, as such no overlooking will be experienced by nearby residential properties.

Noise

- 11.47 The proposed development is unlikely to have any significant negative impact on the amenity of neighbouring residential properties with regard to an increase in noise, due to the orientation of the building facing out onto Old Street. There are no windows proposed to the west elevation of the building, nor is there proposed to be any access to the flat roof (other than to access the community centre terrace from Newland Court), except for essential maintenance.
- 11.48 A condition is proposed (Condition 15) to seek noise details of any roof-top plant and/or mechanical extraction/ventilation, which will be required to operate within specific acoustic parameters as set out by the Council's Environmental Health team.
- 11.49 Opening hours should a restaurant use take up the flexible A1/A3 unit would also be restricted by condition (Condition 19) in order to ensure there would be no undue impact on neighbouring residential properties. These would be limited to between 8am – 9pm Sunday – Thursday and Public Holidays, and 8am – 10pm Saturdays and Sundays. Whilst other A3/A4 units within the wider 207 – 211 Old Street development have been granted longer hours, these hours of operation restrictions are considered necessary due to the very close proximity of numerous residential properties. Restrictions on the times of deliveries and servicing are also proposed (Condition 22) to between 7am – 8pm Monday – Friday, and 8am – 8pm on Saturdays, Sundays and Public Holidays. Transport for London has sought a condition to be added to any planning permission for a Delivery and Servicing Management Plan, which will be sought by Condition 22.
- 11.50 A number of objectors have raised construction noise as a reason that the proposals should be refused, however it should be noted that nuisance and noise caused during construction cannot be a reason for refusal, but mitigating measures are proposed. The applicant is encouraged to utilise contractors accredited under the Considerate Constructors Scheme, and has agreed to abide by the Code of Construction Practice (under the S106 agreement) as well as pay the Council a £1529.00 monitoring fee. Furthermore a condition (Condition 21) is recommended to secure details of how construction will be carried out in order to minimise impacts on residents.

Sustainability

- 11.51 The Core Strategy requires developments to address a number of other sustainability criteria such as climate change adaptation, sustainable transport, sustainable construction and the enhancement of biodiversity. Development Management Policy DM7.1 requires development proposals to integrate best practice sustainable design standards and states that the council will support the development of renewable energy technologies, subject to meeting wider policy requirements. Details are provided within Islington's Environmental Design SPD, which is underpinned by the Mayor's Sustainable Design and Construction Statement SPG. Major developments are also required to comply with Islington's Code of Practice for Construction

Sites and to achieve relevant water efficiency targets as set out in the BREEAM standards.

- 11.52 An Energy and Sustainability Statement was submitted with the application. It confirms that a BREEAM “Excellent” rating could be achieved for the new build, which is welcomed and complies with policy DM7.4 – Sustainable Design.
- 11.53 An appropriate condition relating to the green performance and procurement of materials is recommended (Condition 3).
- 11.54 While the applicants have proposed a green and/or brown roof across the majority of the flat roof proposed for the development, further details will be required with regard to the specific design relating to Sustainable Urban Drainage Systems (SuDS) and rainwater/greywater harvesting. A condition (Condition 13) is proposed to seek these details prior to commencement of works to the superstructure of the development.

Energy Efficiency and Renewable Energy

- 11.55 The London Plan (2015) Policy 5.1 stipulates a London-wide reduction of carbon emissions of 60 per cent by 2025. Policy 5.2 of the plan requires all development proposals to contribute towards climate change mitigation by minimising carbon dioxide emissions through energy efficient design, the use of less energy and the incorporation of renewable energy. London Plan Policy 5.5 sets strategic targets for new developments to connect to localised and decentralised energy systems while Policy 5.6 requires developments to evaluate the feasibility of Combined Heat and Power (CHP) systems.
- 11.56 All development is required to demonstrate that it has minimised onsite carbon dioxide emissions by maximising energy efficiency, supplying energy efficiently and using onsite renewable energy generation (CS10). Developments should achieve a total (regulated and unregulated) CO₂ emissions reduction of at least 27% relative to total emissions from a building which complies with Building Regulations 2013 (39% where connection to a Decentralised Heating Network is possible). Typically all remaining CO₂ emissions should be offset through a financial contribution towards measures which reduce CO₂ emissions from the existing building stock (CS10).
- 11.57 Detailed thermal modelling has been carried out with regard to the materiality of the facades of the proposed development, and the proposed design attempts to optimize the glazing to the front elevation for balancing heating and cooling loads. The applicants have also provided a Green Performance Plan to demonstrate efficient fabrics are being proposed for external and internal elements of the proposed construction.
- 11.58 The applicants have also proposed 65m² of Photovoltaics to be installed at roof level which is welcomed by the Council’s Energy Officers, however this has not been shown on the proposed roof plan. A condition is recommended seeking details of the location, design and method of installation of this apparatus (Condition 12).

- 11.59 The remaining heating and cooling of the premises is proposed to utilise a CHP along with mechanical plant. While the Council recognizes and accepts the 27% reduction in total carbon emissions for the proposed development, it is considered that further steps could be taken.
- 11.60 The current proposals for the development do not include a connection to the Bunhill Decentralised Energy Network. This is considered to be unacceptable, and a requirement under the Section 106 agreement is proposed to seek a full feasibility study to be carried out in consultation with the Council's DHN Officer and Energy Team with a view for the development to connect to the network.
- 11.61 The applicants have agreed a Carbon Offsetting contribution in line with the Council's Planning Contributions SPD of £56,120.00 to be secured within a S106 agreement.

Highways and Transportation

- 11.62 The site has a PTAL rating of 6a, which is 'Excellent'. Old Street Station is located within 300 metres of the site, while Barbican and Farringdon Tube Stations are located in close proximity, bus routes run along the surrounding roads and a significant number of TfL Cycle Hire points are available nearby.
- 11.63 Public Transport Implications: The proposal would result in an uplift in floor space of up to 739 square metres and would introduce retail and/or restaurant floor space as well as the retention of the Post Office use. While there would be multiple users of the building, which could potentially increase the actual intensity of the use of the site, due to there being no on-site car parking and the high PTAL level of the site, the proposal would not detrimentally impact upon the surrounding transport infrastructure. A Travel Plan is secured in the Legal Agreement.
- 11.64 Pedestrian Access: The site is incredibly well served by existing pedestrian links including the Promenade of Light. Bringing the building line of the development forward to meet that of the adjacent parade of shops would enhance pedestrian access to the site, and would also allow for level access to the proposed retail/A3 unit and post office, which currently has a single step to its entrance.
- 11.65 Vehicle Parking: The site does not include any off-street car parking and none is proposed, in accordance with Development Management policy DM8.5.
- 11.66 Cycle Parking: Policy DM8.4 and Appendix 6 of the Development Management Policies set out the minimum cycle parking standards for development proposals. Cycle parking should be covered and secure and 'end of trip' facilities provided such as showers and locker facilities.
- 11.67 The applicants have proposed 8 cycle spaces for staff use located within the internal service yard, and a further 28 cycle spaces secured through a Section 106 agreement for provision within the Promenade of Light which would meet the Council's policy requirements for cycle parking under Appendix 6 of the

Islington Development Management Policies. This is considered to be acceptable due to the lack of available level-access basement space for the storage of bicycles, along with staff being able to access the wider 300 space bicycle store in 211 Old Street.

- 11.68 This is considered to be acceptable, and it is noted that the site has an 'Excellent' PTAL rating and is served by an abundance of public transport options, including a TfL Cycle Hire with 125 bicycle racks located only 25m from the application site.
- 11.69 Delivery and Servicing Arrangements: This is proposed to be facilitated through a dedicated entrance on the northern side of the development, sharing arrangements with the wider 207 & 211 Old Street site. The proposal also includes the closure of an existing servicing route between Old Street and the application site across the Promenade of Light. The closure of this servicing access is considered to be acceptable as it is not an adopted Islington road, and would improve pedestrian safety on the Promenade of Light. Servicing to the site from the existing servicing bay for 207 – 211 Old Street is considered to be acceptable as vehicles would not need to move across this important pedestrian route.
- 11.70 Although the applicant has not yet secured an operator for the site, a draft Delivery and Servicing Plan has been submitted as part of the Transport Assessment. This details that deliveries and servicing would be maintained in the current location to the rear of the post office. The draft document proposes that the majority of deliveries would be between 0800 hours and 1800 hours to minimise disruption to neighbouring occupiers. This would be in accordance with existing time restrictions for 207 Old Street, and the Council's Acoustic Officer has previously noted that these hours would be acceptable.
- 11.71 A condition (Condition 22) is recommended requiring a detailed Delivery and Servicing Plan to be submitted to and approved in writing by the local planning Authority prior to the first occupation of the A1/A3 unit.
- 11.72 Construction: The legal agreement ensures that the proposal would be constructed in compliance with the Code of Construction Practice and secures a monitoring fee (further details provided in the neighbour amenity section).

Contaminated Land

- 11.73 It is not expected that the site falls on contaminated land due to the nature of the historic use of the application site, and no conditions have been requested by the Pollution Officer.

Planning Obligations, Community Infrastructure Levy and local finance considerations

- 11.74 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.

11.75 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.

11.76 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.

11.77 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.

11.78 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.

11.79 Agreed Heads of Terms

The agreed Heads of Terms are set out at Appendix 1, Recommendation A of this report.

National Planning Policy Framework

11.80 The scheme is considered to accord with the aims of the NPPF and to promote sustainable growth that balances the priorities of economic, social and environmental growth. In the final balance of planning considerations officers have also considered the proposal in the context of the presumption in favour of sustainable development set out in the NPPF.

12. SUMMARY AND CONCLUSION

Summary

12.1 A summary of the proposals is set out at paragraphs 4.1 to 4.8 of this report.

Conclusion

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

APPENDIX 1 – RECOMMENDATIONS

RECOMMENDATION A

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 the following number of 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 £5000.00.
4. Compliance with the Code of Local Procurement.
5. Compliance with the Code of Construction Practice, including a monitoring fee of £1,354.00, 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: 1, or a contribution towards bays or other accessible transport initiatives of: £2000.00
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: £56,120.00.
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. A contribution towards Crossrail of : £78,120.
12. Roof terrace adjacent to St Luke's community centre - works to the sum of £10,000. Details of the scope of works to be carried out shall be consulted on with the St Luke's Estate Community Centre and nearby residents, and the final proposal submitted to and approved by the Local Planning Authority prior to superstructure works commencing on the site. The works are to be carried out prior to first occupation of the retail units.
13. The installation of 28 secure cycle stands (cost to be agreed).
14. Council's legal fees in preparing the S106 and officer's fees for the preparation, monitoring and implementation of the S106.

That, should the **Section 106** Deed of Planning Obligation not be completed within an agreed PPA timescale, 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 the heads of terms as set out in this report to Committee.

RECOMMENDATION B

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

List of Conditions:

<p>1</p>	<p>Commencement</p> <p>CONDITION: The development hereby permitted shall begin no later than the of 3 years from the date of this permission.</p> <p>REASON: To comply with the provisions of Section 91(1)(a) of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004 (Chapter 5).</p>
<p>2</p>	<p>Approved plans list</p> <p>CONDITION: The development hereby approved shall be carried out in accordance with the following approved drawings and information:</p> <p>Design and Access Statement, Daylight and Sunlight Report (including Daylight and Sunlight Addendum Report), Archaeological Assessment dated August 2015, Transport Statement TPLO1136/TS, Site Waste Management Plan dated August 2015, Framework Travel Plan TPLO1136/FTP, Energy and Sustainability Statement 111750/KA/141201, Green Performance Plan 111750/EV/150927, Preliminary Ecological Appraisal dated August 2015, 13070_60_A_[01]_P098 Rev P01, P099 Rev P01, P100 Rev P01, P102 Rev P01, P200 Rev P01, P201 Rev P01, P300 Rev P01, 13070_60_A_[00]_P098 Rev P01, P099 Rev P01, P100 Rev P01, P101 Rev P01, P101B, P200 Rev P02, P201 Rev P01, P300 Rev P02.</p> <p>REASON: For the avoidance of doubt and in the interests of proper planning.</p>
<p>3</p>	<p>Materials and samples</p> <p>CONDITION: Details and samples of all facing materials shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure work commencing on site. The details and samples shall include:</p> <ul style="list-style-type: none"> a) Any solid brickwork (including brick panels and mortar courses) (if applicable) b) render (including colour, texture and method of application) (if applicable); c) External cladding (including material, colour, texture and method of application); d) window treatment (including sections and reveals); e) roofing materials; f) balustrading treatment (including sections); g) any other materials to be used. h) A green procurement plan. <p>The development shall be carried out strictly in accordance with the details and samples so approved, shall be maintained as such thereafter and no change therefrom shall take place without the prior written consent of the Local Planning Authority.</p> <p>REASON: In the interests of securing sustainable development and to ensure that the resulting appearance and construction of the development is of a high standard.</p>
<p>4</p>	<p>Roof-level structures</p> <p>CONDITION: Full details of any roof-top structures/enclosures shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure</p>

	<p>works commencing on site. The details shall include the location, height above roof level, specifications and cladding and shall relate to:</p> <ul style="list-style-type: none"> a) roof-top plant; b) ancillary enclosures/structure; and c) lift overrun <p>The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.</p> <p>REASON: In the interest of good design and also to ensure that the Authority may be satisfied that any roof-top plant, ancillary enclosure/structure and/or the lift overruns do not have a harmful impact on the surrounding streetscene.</p>
5	Access
	<p>CONDITION: Notwithstanding the plans hereby approved the scheme shall be constructed in accordance with the principles of Inclusive Design. Plans and details confirming that these standards have been met shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site. The details shall include:</p> <ul style="list-style-type: none"> a) Refuge Areas on all upper and lower floors; b) Cycle storage and changing facilities including: <ul style="list-style-type: none"> i) Provision of accessible cycle storage and mobility scooter storage (with 30 minutes of fire protection); ii) Stair link between ground floor cycle storage and upper floor changing facilities to be inclusive and in accordance with design guidance; and iii) Route to and arrangement of the wheelchair accessible shower facility, including a WC. <p>The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.</p> <p>REASON: In order to facilitate and promote inclusive and sustainable communities.</p>
6	District Heat Network
	<p>CONDITION: If a connection to a neighbouring District Heat Network is found to be unfeasible, details of how any communal boiler and/or associated infrastructure shall be designed to allow for the future connection to any neighbouring heating and cooling network shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.</p> <p>The communal boiler and associated infrastructure shall be carried out strictly in accordance with the details so approved, installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p>REASON: To ensure the facility is provided and so that it is designed in a manner which allows for the future connection to a district system.</p>

7	Energy Reduction
	<p>CONDITION: The energy efficiency measures/features and renewable energy technology(s) (including solar PVs), which shall provide for no less than 38.6% on-site total CO₂ reduction as compared to the 2006 Building Regulations (Part L) detailed within the 'Energy Strategy' shall be installed and operational prior to the first occupation of the development.</p> <p>Should, following further assessment, the approved renewable energy option be found to be no-longer feasible, then a revised scheme of renewable energy provision, which shall provide for no less than 38.6% CO₂ reduction, shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site. Those details shall include:</p> <ul style="list-style-type: none"> a) the resulting scheme, together with any flue/stack details, machinery/apparatus location, specification and operational details; b) a management plan and maintenance strategy/schedule for the operation of the technologies; c) (if applicable) a servicing plan including times, location, frequency, method (and any other details the Local Planning Authority deems necessary); d) (if applicable) a noise assessment and air-quality assessment regarding the operation of the technology; and e) (if applicable) confirmation that ground source heat pumps and ground source cooling system shall be a 'closed loop' system and shall not tap or utilise ground water / aquifer. <p>The final agreed scheme shall be installed and operational prior to the first occupation of the development and shall be maintained as such thereafter.</p> <p>REASON: In the interest of sustainable development and to ensure that the Local Planning Authority may be satisfied that CO₂ emission reduction targets by energy efficient measures/features and renewable energy are met.</p>
8	Vehicular Facilities Provided
	<p>CONDITION: The development shall not be occupied unless and until the servicing area for loading/unloading, turning, parking and vehicular access facilities as shown on the plans hereby approved have been constructed, made available for their intended use and appropriately line-marked and/or signs erected.</p> <p>Those vehicle facilities shall be maintained as such thereafter and retained for the purposes so approved only.</p> <p>REASON: The vehicle facilities are considered to form an essential element of the development, without which the scheme would have a harmful impact on both residential amenity and the free-flow and safety of traffic and the public highways.</p>
9	Cycle Storage
	<p>CONDITION: The internal bicycle storage area(s) hereby approved shall be covered, secure and provide for no less than 8 bicycle spaces as well as the provision of showering, changing and locker facilities.</p>

	<p>The approved bicycle storage details shall be installed and operational prior to the first occupation of the development hereby approved and maintained as such thereafter.</p> <p>REASON: To ensure adequate cycle parking is available and easily accessible on site and to promote sustainable modes of transport.</p>
10	Amalgamation of Retail Units
	<p>CONDITION: The ground floor retail (use class A1-A3) units hereby approved shall not be amalgamated or divided.</p> <p>REASON: The consideration of the acceptability of the retail units was based on the proposed size of units as shown on the approved plans; the amalgamation or further subdivision of the units is likely to have operational, transportation, security and amenity implications, which should be the subject of consultation and a relevant planning application.</p>
11	BREEAM (Compliance)
	<p>CONDITION: The development shall achieve a BREEAM (2011) rating of no less than 'Excellent'.</p> <p>A Green Guide shall be provided to future retail tenants to inform them of the measures they will need to incorporate as part of the fit out process to further enhance the environmental performance of the units.</p> <p>A copy of the Green Guide shall be provided to the Council prior to occupation of any of the retail units.</p> <p>REASON: In the interest of addressing climate change and to secure sustainable development.</p>
12	Green / brown Roofs and Photovoltaics
	<p>CONDITION: Full details of green and brown roofs along with the location and design of at least 65m² of Photovoltaics as set out in the Energy Statement hereby approved shall be submitted to and approved by the Local Planning Authority prior to commencement of superstructure works.</p> <p>The details of the biodiversity (green/brown) roof(s) shall include confirmation that they will be:</p> <ul style="list-style-type: none"> a) biodiversity based with extensive substrate base (depth 80-150mm); b) laid out in accordance with plan 1370_A_(00)_P102 and P300 hereby approved; and c) planted / seeded with a mix of species within the first planting season following the practical completion of the building works (the seed mix shall be focused on wildflower planting, and shall contain no more than a maximum of 25% sedum). <p>The biodiversity (green/brown) roof(s) shall not be used as amenity or sitting out spaces of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.</p>

	<p>The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.</p> <p>REASON: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity.</p>
13	Sustainable Urban Drainage System
	<p>CONDITION: No development shall take place unless and until a detailed implementation, maintenance and management plan of the approved sustainable drainage scheme has been submitted to and approved in writing by the Local Planning Authority. Those details shall include:</p> <ol style="list-style-type: none"> I. a timetable for its implementation, and II. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. <p>No building(s) hereby approved shall be occupied unless and until the approved sustainable drainage scheme for the site has been installed/completed strictly in accordance with the approved details.</p> <p>The scheme shall thereafter be managed and maintained in accordance with the approved details.</p> <p>REASON: To ensure that sustainable management of water and minimise the potential for surface level flooding. This is required as a pre-commencement condition in order that the detailed design of the building does not overlook the required SuDS features.</p>
14	Nesting Boxes
	<p>CONDITION: No less than 3 (total) bird and bat nesting boxes / bricks shall be installed on the development hereby approved.</p> <p>The nesting boxes / bricks shall be installed prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and shall be maintained as such thereafter.</p> <p>REASON: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity.</p>
15	Plant and Extraction
	<p>CONDITION: Details of the design and installation of new items of fixed plant and/or mechanical extraction/ventilation shall be submitted and approved by the Local Planning Authority prior to first occupation of the unit to which they relate, and be such that when operating the cumulative noise level Laeq Tr arising from the proposed plant, measured or predicted at 1m from the façade of the nearest noise sensitive premises, shall be a rating level of at least 10dB(A) below the background noise level LAF90 Tbg.</p>

	<p>The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142:1997.</p> <p>Any mechanical extraction/ventilation must be designed and located in such a way to ensure no negative impact on the amenity of nearby residential properties.</p> <p>REASON: To ensure that the development does not have an undue adverse impact on nearby residential amenity or business operations.</p>
16	Vibration
	<p>CONDITION: Internal vibration levels shall not exceed the category of “low probability of adverse comment” in Table 7 of Appendix A of BS 6472:2008.</p> <p>REASON: To ensure that the development does not have an adverse impact on amenity and / or quality of business accommodation, and neighbouring residential properties.</p>
17	Noise
	<p>CONDITION: Groundborne noise shall not exceed 40dB LAmax Slow as measured in the centre of any room.</p> <p>REASON: To ensure that the development does not have an adverse impact on amenity of nearby residential properties.</p>
18	Lifts
	<p>CONDITION: All lifts serving retail floorspace hereby approved shall be installed and operational prior to the first occupation of the retail floorspace hereby approved.</p> <p>REASON: To ensure that inclusive and accessible routes are provided throughout the retail floorspace at all floors and also accessible routes through the site are provided to ensure no one is excluded from full use and enjoyment of the site.</p>
19	Retail Opening Hours
	<p>CONDITION: The ground and first floor retail uses (A1) hereby approved shall not operate except between the hours of 08:00 and 23:30 on any day unless otherwise agreed in writing with the Local Planning Authority.</p> <p>The ground and first floor café/restaurant uses (A3) hereby approved shall not operate except between the hours of 08:00 and 21:00 hours Sunday - Thursday (and public holidays), and 08:00 and 22:00 hours Fridays and Saturdays.</p> <p>REASON: To ensure that the operation of the retail units do not unduly impact on residential amenity, and to ensure the operation of any café/restaurant units do not unduly and/or cumulatively impact on the amenity of neighbouring residential amenity, in accordance with Policy DM4.2 of the Islington Development Management Policies 2013.</p>
20	Shopfront Glass
	<p>CONDITION: The window glass of all ground floor retail units shall not be painted,</p>

	<p>tinted or otherwise obscured and no furniture or fixings which may obscure visibility above a height of 1.4m above finished floor level shall be placed within 2.0m of the inside of the window glass.</p> <p>REASON: In the interest of securing passive surveillance of the street, an appropriate street frontage appearance and preventing the creation of dead/inactive frontages.</p>
21	Construction Management Plan & Construction Logistics Plan
	<p>CONDITION: No development shall take place unless and until a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) has been submitted to and approved in writing by the Local Planning Authority following consultation with Transport for London.</p> <p>The CMP and CLP shall update the Draft Construction Management Plan as submitted as part of the application hereby approved, while also providing the following additional information:</p> <ol style="list-style-type: none"> 1. identification of construction vehicle routes; 2. how construction related traffic will turn into and exit the site 3. details of banksmen to be used during construction works 4. the parking of vehicles of site operatives and visitors; 5. loading and unloading of plant and materials; 6. storage of plant and materials used in constructing the development; 7. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate; 8. wheel washing facilities; 9. measures to control the emission of dust and dirt during construction; 10. a scheme for recycling/disposing of waste resulting from demolition and construction works. <p>The report shall assess the impacts during the construction phases of the development on the Transport for London controlled City Road and Old Street, along with nearby residential amenity and other occupiers together with means of mitigating any identified impacts.</p> <p>The development shall be carried out strictly in accordance with the approved CMP and CLP throughout the construction period.</p> <p>REASON: In order to secure highway safety and free flow of traffic on City Road and Old Street, local residential amenity and mitigate the impacts of the development. This condition is pre-commencement in order to ensure the potential impacts on the road network and the safety of pedestrians, along with the amenity of neighbouring residential properties, are properly considered prior to building works commencing.</p>
22	Delivery and Servicing Management Plan
	<p>CONDITION: A delivery and servicing management plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with TfL, prior to the first occupation of the development.</p> <p>The plan shall include details of all servicing and delivery requirements including:</p>

	<p>a) waste and recycling collection; and b) how safe access to and from the disabled parking bay shall be provided and managed.</p> <p>All service vehicle deliveries / collections / visits to and from the development hereby approved must not take place outside hours of:</p> <p>Monday - Friday 08:00 to 20:00; and Saturdays, Sundays and Public Holidays 08:00 to 20:00</p> <p>The development shall be carried out strictly in accordance with the details so approved.</p> <p>REASON: In order to secure highway safety and free flow of traffic on Old Street, City Road and Baldwin Street, protect local residential amenity and mitigate the impacts of the development.</p>
23	Recycling/refuse storage provision and management
	<p>CONDITION: Full details of refuse/recycling storage locations, dimensions, and management shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of superstructure works.</p> <p>The approved details shall be installed prior to the first occupation of the development and collection and management practices be carried out in accordance with the details so approved permanently thereafter.</p> <p>REASON: To secure the necessary physical waste enclosures to support the development and to ensure that responsible waste management practices are adhered to.</p>
24	No external piping
	<p>CONDITION: Other than any pipes shown on the plans hereby approved, no additional plumbing, down pipes, rainwater pipes or foul pipes shall be located/fixed to any elevation(s) of the buildings hereby approved.</p> <p>Should additional pipes be considered necessary the details of those shall be submitted to and approved in writing by the Local Planning Authority prior to installation of any such pipe.</p> <p>REASON: The Local Planning Authority considers that such plumbing and pipes would detract from the appearance of the building.</p>

List of Informatives:

1	S106
	<p>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.</p>

2	<p>Superstructure</p> <p>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.</p>
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: 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 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>
5	<p>Thames Water</p> <p>Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</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 2015, 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 2015 - 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 2.9 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

3 London's people

Policy 3.1 Ensuring equal life chances for all

4 London's economy

Policy 4.1 Developing London's economy

Policy 4.7 Retail and town centre development

Policy 4.8 Supporting a successful and diverse retail sector

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 5.5 Decentralised energy networks

Policy 5.6 Decentralised energy in development proposals

Policy 5.9 Overheating and cooling

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

6 London's transport

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.5 Funding Crossrail and other strategically important transport infrastructure

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.12 Road network capacity

Policy 6.13 Parking

7 London's living places and spaces

Policy 7.2 An inclusive environment

Policy 7.3 Designing out crime

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

Policy 7.8 Heritage assets and archaeology

Policy 7.9 Heritage-led regeneration

Policy 7.15 Reducing noise and enhancing soundscapes

Policy 7.19 Biodiversity and access to nature

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 London

B) Islington Core Strategy 2011

Spatial Strategy

Policy CS7 (Bunhill and Clerkenwell)

Policy CS13 (Employment Spaces)

Policy CS14 (Retail and Services)

Strategic Policies

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

Policy CS10 (Sustainable Design)

Policy CS11 (Waste)

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

Energy and Environmental Standards

DM7.1 Sustainable design and construction statements

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

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

DM4.5 Primary and Secondary Frontages

DM4.7 Dispersed shops

DM4.8 Shopfronts

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

BC10 Implementation

BC23 Site Allocation: 207 – 211 Old Street

5. Designations

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:

Central Activities Zone (CAZ)	Employment Priority Area (General)
City Fringe Opportunity Area (London Plan policy 2.13 and ref 1, table A1.1 in Annex 1)	Site Allocation BC23: 207-211 Old Street Central London Area

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

The following SPGs and/or SPDs are relevant:

Islington Local Plan

- Environmental Design
- Conservation Area Design Guidelines
- Planning Obligations and S106
- Urban Design Guide

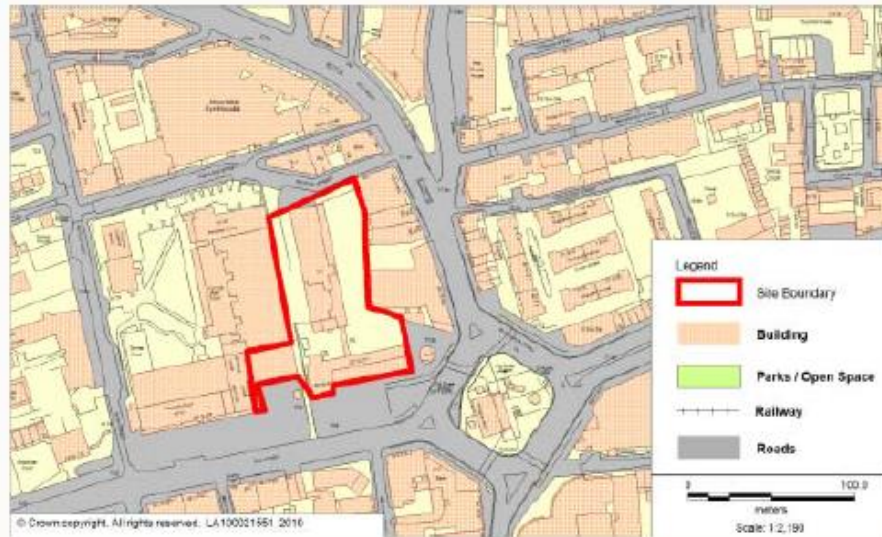
London Plan

- Accessible London: Achieving and Inclusive Environment
- Sustainable Design & Construction
- Planning for Equality and Diversity in London

APPENDIX 3: Site Allocation (Finsbury Local Plan 2013)

Site BC 23

207-211 Old Street



Address, location, postcode	207-211 Old Street (northwest corner of roundabout), EC1V 9NR
Ownership	Old Street Ltd
Approximate size of site	8,270m ²
Current/previous use	Offices
How was the site identified and relevant planning history	Redevelopment of the site has previously been the subject of pre-application interest and discussions. Site identified in the London SHLAA, and the Bunhill and Clerkenwell Urban Design Study (site 04)
Allocation and justification	<p>Redevelopment of site to provide a commercial-led mixed use development, including the retention of the Post Office, with retail uses at ground floor/basement and large floorplate office accommodation, alongside commercial and retail floorspace for smaller businesses. An element of residential uses may also be appropriate.</p> <p>Open space should be provided on site, including through-site pedestrian links to City Road and Baldwin Street, where appropriate.</p>

	<p>The site lies within the CAZ, in close proximity to Old Street station, with excellent accessibility and with frontage onto Old Street. Refurbishment or redevelopment presents an opportunity to substantially improve the quality of the local environment. Any public realm improvements should complement the Promenade of Light.</p>
Design considerations and constraints	<p>A new, high quality building will be sought in this location. Retail units should be provided at ground floor to provide an active frontage to Old Street. Basement connections to the station should be considered (see also Site BC24). Sensitive design and massing of the building is required, in order to protect the residential amenity of the adjacent St. Luke's Estate.</p> <p>Tall buildings (of 30 metres or higher) may be appropriate on some parts of the site, subject to meeting the criteria set out in Policy BC9.</p> <p>The site lies within 150 metres of the developing Bunhill Decentralised Energy network. Provision of a decentralised energy hub and/or connection to a neighbouring network should be explored.</p> <p>The site is adjacent to the Bunhill Fields/Finsbury Square and Moorfields Conservation Areas, and Grade II Listed Imperial Hall. Proposals should conserve and enhance this heritage setting.</p> <p>The site is within a Local Flood Risk Zone and is at risk of significant/extreme flooding. Proposals will therefore be required to further assess and mitigate this risk. Detailed guidance is set out in the Development Management Policies.</p>
Cross-references	Policy BC3; Public space priority projects 19 and 20
Estimated timescale	2016 to 2021