

LONDON



TUNNELS



The London Tunnels

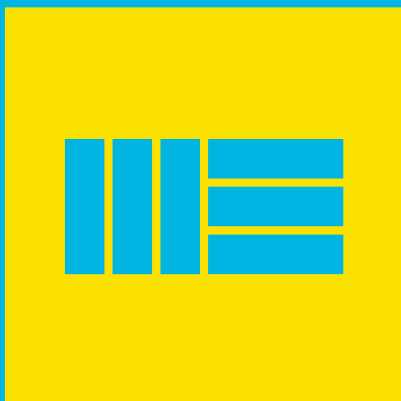
10. Planning Statement

30 November 2023



THE LONDON TUNNELS PLANNING STATEMENT

30 NOVEMBER 2023



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1.0 EXECUTIVE SUMMARY

- 1.1 This Planning Statement (“the Statement”) has been prepared as part of a full planning application (“Application”) for a change of use of the existing buildings and tunnel complex (“the Proposals” / “Proposed Development” / “Scheme”) at 38-39, 40-41 Furnival Street, London, EC4A 1JQ and part ground and lower floor 31-33 High Holborn, London, WC1V 6AX (“the Site” / “the Tunnels” / “the London Tunnels”), on behalf of The London Tunnels PLC (“the Applicant”) (**Section 2**).
- 1.2 The description of development for this Application for full planning permission, is as follows:
- “Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction (F1), including bar (Sui Generis); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works”*
- 1.3 The Site is located across the jurisdiction of two local planning authorities, the City of London (“CoL”) and the London Borough of Camden (“LBC”), making it a ‘cross-boundary’ application. Identical planning applications have been submitted to both LPAs.
- 1.4 The Site comprises three above ground buildings including where specified lower ground floor elements and a network of subterranean tunnels. The Site straddles the border of both the City of London (“CoL”) and the London Borough of Camden (“LBC”) (**Section 3**).
- 1.5 This Application seeks full planning permission for the change of use of the Kingsway Exchange Tunnel Complex and works to associated above ground structures, to provide a visitor and cultural attraction (**Section 4**).
- 1.6 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context (**Section 5**).
- 1.7 **Section 6** provides an assessment of the Application against the policies and guidance contained within these documents.
- 1.8 Having regard to the detailed assessment undertaken within this Statement, we consider that the planning benefits arising from this Scheme is summarised in **Section 7** and includes categorised as: economic, social, environmental, and heritage and townscape.
- 1.9 Based on the above, and even in the event of any identified harm arising from the Proposed Development, the planning benefits brought about through the Scheme clearly represent significant material considerations in the determination of the Application, which outweigh any such harm (**Section 8**).
- 1.10 On this basis, and following supportive engagement with both LPAs, we hope the Application receives permission, to enable one of London’s best kept historical secrets to come forward, as a world-leading cultural and tourist attraction. One which, the Applicant hopes, will make this part of London, a destination in its own right and bring to both boroughs a variety of valuable social, environmental and economic benefits.

2.0 INTRODUCTION

2.1 This Planning Statement (“the Statement”) has been prepared as part of a full planning application (“Application”) for a change of use of the existing buildings and tunnel complex (“the Proposals” / “Proposed Development” / “Scheme”) at 38-39, 40-41 Furnival Street, London, EC4A 1JQ and part ground and lower floor 31-33 High Holborn, London, WC1V 6AX (“the Site” / “the Tunnels” / “the London Tunnels”), on behalf of The London Tunnels PLC (“the Applicant”).

2.2 The description of development for this Application for full planning permission, is as follows:

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

2.3 The Site is located across the jurisdiction of two local planning authorities, the City of London (“CoL”) and the London Borough of Camden (“LBC”), making it a ‘cross-boundary’ application. Identical planning applications have been submitted to both LPAs.

2.4 Above ground, the Site comprises 38-39, 40-41 Furnival Street and part ground floor of 31-33 High Holborn. Below ground, and 7,829 sqm (GIA) of underground tunnels.

2.5 Full details of the Proposed Development are set out within the Design and Access Statement that accompanies this Application, prepared by architects WilkinsonEyre.

Purpose and Format of the Planning Statement

2.6 The purpose of this Statement is to provide information to allow for an informed assessment of the Proposed Development against relevant national, regional and local planning policy and other material considerations.

2.7 This Statement sets out how the relevant planning policies and other key material considerations to the determination of the Application have been taken into account. This Statement brings together the findings of the technical reports identified below and, having regard to these, provides a balanced planning assessment of the Proposals.

2.8 The scope of Application material has been established regarding the national and local list requirements, alongside feedback during pre-application engagement with CoL and LBC officers.

2.9 This Application comprises:

1. Covering Letter, prepared by Montagu Evans;
2. Planning Application Form and Ownership Certificates, prepared by Montagu Evans;
3. Community Infrastructure Levy Form, prepared by Montagu Evans;
4. Application Drawing Schedule (Schedule TLT2), prepared by Montagu Evans;
5. Site Location Plan, prepared by WilkinsonEyre;
6. Site Plan, prepared by WilkinsonEyre;
7. Application Drawings, prepared by WilkinsonEyre;

8. Design and Access Statement, prepared by WilkinsonEyre;
9. Accessibility Assessment, prepared by WilkinsonEyre;
10. Planning Statement, prepared by WilkinsonEyre;
11. Heritage Statement, prepared by WilkinsonEyre;
12. Archaeological Desk Based Assessment, prepared by Mills Whipp;
13. Cultural Plan, prepared by Future City;
14. Statement of Community Involvement, prepared by London Communications Agency (LCA);
15. Socio-Economic Assessment, prepared by Volterra;
16. Sunlight and Daylight Assessment, prepared by GIA;
17. Air Quality Assessment, prepared by WSP;
18. BREEAM Pre-Assessment Report, prepared by WSP;
19. Circular Economy Statement, prepared by WSP;
20. Construction Management Plan, prepared by WSP;
21. Delivery and Servicing Plan, prepared by WSP;
22. Energy Statement & Overheating Assessment, prepared by WSP;
23. Fire Statement, prepared by WSP;
24. Flood Risk Assessment and Outline Drainage Strategy (inc. SuDs Statement and Proforma), prepared by WSP;
25. Framework Travel Plan, prepared by WSP;
26. Geotech Basement Impact Assessment, prepared by WSP;
27. Geotechnical and Land Contamination Assessment, prepared by WSP;
28. Noise and Vibration Impact Assessment, prepared by WSP;
29. Pre-Demolition Audit, prepared by WSP;
30. Security Report, prepared by WSP;
31. Structural Report, prepared by WSP;
32. Sustainability Assessment, prepared by WSP;
33. Transport Assessment, prepared by WSP;
34. Waste Management Plan, prepared by WSP;
35. Whole Life-Cycle Carbon Assessment, prepared by WSP; and
36. Applicant Document Schedule (Schedule TLT1), prepared by Montagu Evans.

2.10 The above list of Application Documents has been discussed and agreed with officers at the CoL and LBC as being required for the Application to be validated by both LPAs.

2.11 This Planning Statement demonstrates that the overall Scheme would:

- Deliver the sustainable development of an underutilised brownfield site within Central London, in line with the overarching approach to development outlined in the NPPF;
- Reuse and optimise the Kingsway Exchange Tunnels complex as a unique and exceptional underground cultural hotspot;
- Act as a catalyst to boost London's world-leading tourism offering;
- Combine culture and history with technology to provide a distinctive venue for exhibitions and museum space, as well as the deepest bar in the UK;
- Deliver a design of high-quality architecture that would be well-related to the surrounding context;
- Deliver a high-quality design which promotes sustainability measures throughout its design, construction and lifetime of the building. This includes the design achieving a BREEAM rating of "Very Good" and carbon savings of in the order of 41%; and
- Contribute to the sustainable travel objectives of national, regional and local planning policy, by providing a car free development which would promote other means of travel such as cycling (through provision of new cycle spaces) and walking.

2.12 **Section 3** of this Statement provides background information on the Site, including its planning history. **Section 4** sets out details of the Scheme. **Section 5** summarises the planning policy relevant to the Site. The Proposals are assessed against these policies in **Section 6**. A summary and conclusions are contained within **Section 7**.

Pre-Application Engagement

2.13 Extensive pre-application consultation has been undertaken with both CoL and LBC and this has informed the design of the Scheme. A series of pre-application meetings have been held with officers between April and November 2023. These meetings have allowed matters and opportunities for the Site to be discussed.

2.14 A summary of the pre-application meetings held is provided below:

1. Introduction and Key Principles (18 April 2023) – CoL and LBC;
2. Land Use and Design Update (3 July 2023) – CoL and LBC;
3. Sustainability (22 August 2023) – CoL only;
4. Design (13 September 2023) – CoL and LBC;
5. Cultural Workshop (15 September 2023) – CoL only;
6. Fire Strategy and Ventilation (2 October 2023) – CoL and LBC;
7. Design and Heritage (17 October 2023) – CoL and LBC;
8. Highways Workshop (24 October 2023) – CoL and LBC;
9. Sustainability Workshop (31 October 2023) – CoL only;
10. Accessibility Workshop (7 November 2023) – CoL only;
11. Culture Workshop (13 November 2023) – CoL only; and
12. Final Design ‘Wrap-up Meeting (23 November 2023) – CoL and LBC.

Public Consultation

2.15 Throughout the development of the Proposals, there has been a notable level of public engagement. A total of six consultation events were held, including:

- A ward councillor preview;
- A resident’s preview; and
- Four public exhibition events.

2.16 The events were advertised through a combination of newsletters, media coverage, social media and letters sent to neighbours.

2.17 Over the course of the six events, a total of more than 100 people attended, comprising of a range of interested parties, which included local businesses, residents and individuals who had previously worked in the tunnel system.

2.18 Digital engagement was offered through a bespoke consultation website that provided comprehensive details of the Proposals. Alongside this, a ‘geo-targeted’ social media campaign was undertaken, to reach out to those in the Site’s vicinity and encourage their participation at the in-person events.

2.19 The Statement of Community Involvement (“SCI”) prepared by LCA (and submitted as part of this Application), outlines the public engagement undertaken in greater detail.

Environmental Impact Assessment Screening

2.20 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (“the EIA Regulations”) is the key legislation relating to the requirement for considering the likely environmental effects of development projects within the planning system in the UK. The EIA Regulations provide screening criteria and thresholds

at which certain types of development projects should be screened to determine whether a project is 'EIA Development'.

- 2.21 Regulation 2 of the EIA Regulations defines EIA Development as that which falls under either Schedule 1, where EIA is mandatory, or under Schedule 2, where only development likely to have significant effects on the environment, by virtue of factors such as its nature, size or location, should be considered EIA Development.
- 2.22 The Proposed Development does not constitute "Schedule 1" development. However, it is considered that the Proposed Development falls within Part 10 (b) of Schedule 2 "Urban Development Projects". As such, consideration as to whether the Proposed Development meets or exceeds the applicable criteria and thresholds, thus if the project is likely to result in significant effects, is required.
- 2.23 The Regulations state that EIA screening is required for Development type 10 (b) projects if the development exceeds 1 hectares of urban development which is not dwellinghouse development; or the development includes more than 150 dwellings, or the overall area of the development exceeds 5 hectares, it is necessary to consider whether an EIA is required.
- 2.24 The Proposed Development has a site area of 1.7 ha and proposes a visitor and cultural attraction. As the "Urban Development Projects" threshold criteria for the site area is exceeded, further consideration against Schedule 3 is necessary, to determine whether the Proposed Development is likely to give rise to significant environmental effects.
- 2.25 In accordance with the EIA Regulations, a Request for Screening Opinion was issued to both the CoL and LBC on 8 November 2023. This Request confirmed that the Proposed Development would not give rise to significant environmental effects, and therefore, an EIA would not be required. No response has been received from CoL or LBC on this matter, as of 30 November 2023.

3.0 SITE BACKGROUND

THE SITE

- 3.1 The Site comprises three above ground buildings including where specified lower ground floor elements and a network of subterranean tunnels. The Site straddles the border of both the City of London (“CoL”) and the London Borough of Camden (“LBC”).
- 3.2 The tunnel complex has two existing access shafts with operational lifts. The two shafts are located at 31-33 High Holborn and 38-39 Furnival Street.
- 3.3 In addition to the existing tunnels and lift shafts, there is also above ground infrastructure (and therefore floorspace) associated with the Proposals including:
- 38-39 and 40-41 Furnival Street (CoL) – 1,622 sqm
 - 31-33 High Holborn (LBC) – 329 sqm
- 3.4 The ground floor of the existing buildings at 31-33 High Holborn and 38-39 Furnival Street are used in connection with the existing connection to the tunnel network. 40-41 Furnival Street’s current lawful use is office (Class E).

Furnival Street

- 3.5 Furnival Street falls within the Chancery Lane Conservation Area. The Site does not contain listed buildings, however, there are several listed buildings in the vicinity of the Site. The nearest statutory listed buildings to Furnival Street are the Grade II listed 32 and 33 Furnival Street and Grade II* 10 Furnival Street and 25 Southampton Buildings. 38-39 Furnival Street is recognised as a non-designated heritage asset by the CoL.

31-33 High Holborn

- 3.6 31-33 High Holborn has an alternate façade along Fulwood Place. It is therefore known, variously, through this Application as 31-33 High Holborn or Fulwood Place, due to these 2 frontages (see Figure 3.1 for map of site). Fulwood Place falls within the Bloomsbury Conservation Area. The Site does not contain any listed buildings. However, there are several listed buildings in the vicinity of the Site. The nearest statutory listed buildings to Fulwood Place are the Grade II listed buildings at:
- 7 and 8 Warwick Street;
 - Field Court; and
 - 22 and 23 High Holborn (Cittie of York Public House).
- 3.7 31-33 High Holborn has been recognised by LBC as a “positive contributor” to the Bloomsbury Conservation Area and is, therefore, considered to be a non-designated heritage asset.
- 3.8 The Site has excellent connectivity with a Public Transport Accessibility Level (“PTAL”) of 6b, which is the highest possible PTAL score which is defined as “excellent”. Key transport facilities in the vicinity of the Site include Chancery Lane Underground Station, Farringdon Station (Overground and Underground) and City Thameslink (Overground).

3.9 An extract from the Site Location Plans is shown at Figure 3.1 below.

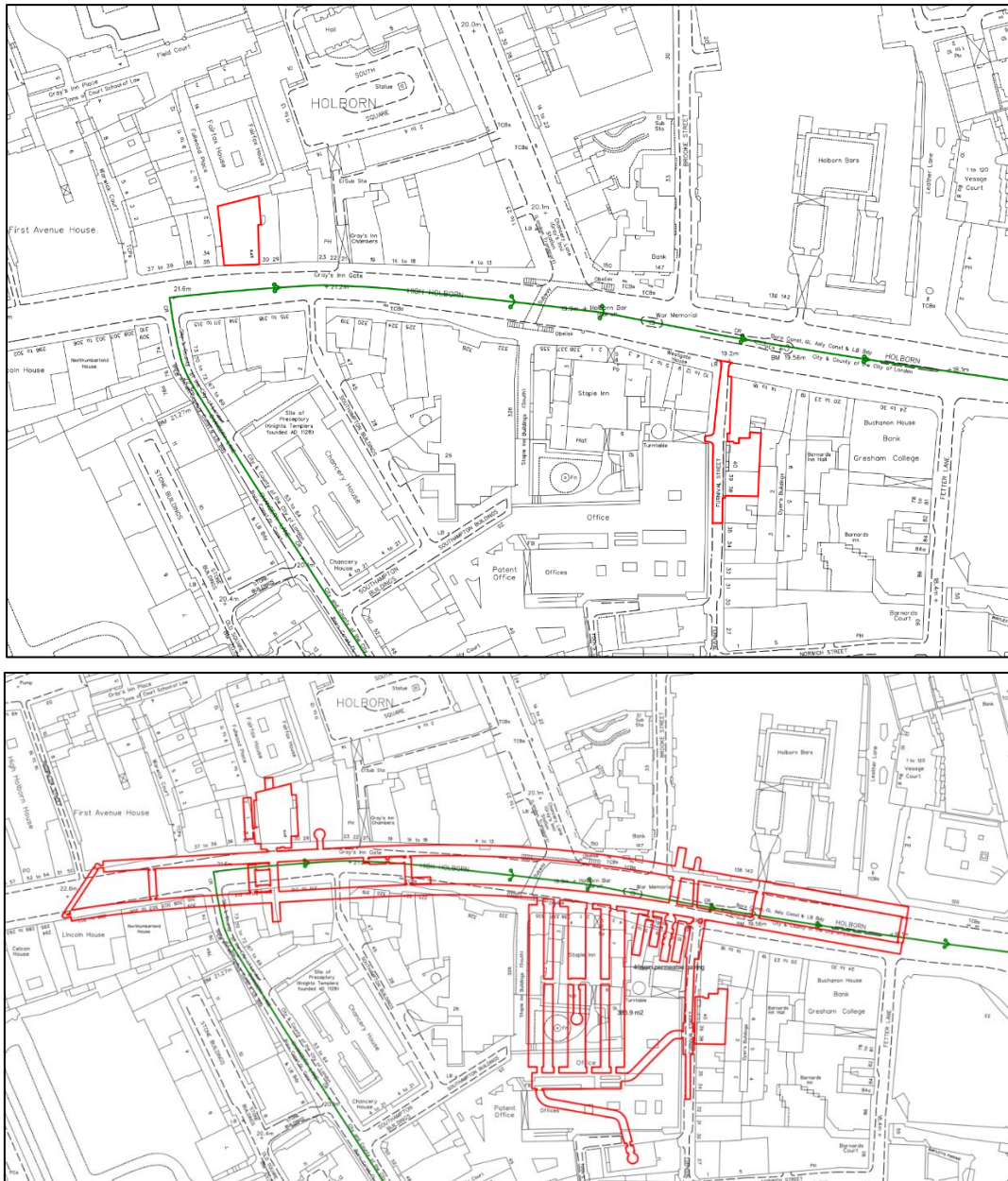


Figure 3.1: Extract from Site Location Plans (Site Location Plan 1 - Above Ground, Site Location Plan 2 - Below Ground)

THE SURROUNDING AREA

- 3.10 The immediate and wider surrounding area provides a mix of scale and massing as well as a variety of uses, including offices, residential, retail, and education. Indeed, immediately above the 31-33 High Holborn (in the same building), are office and residential uses.
- 3.11 The Site is within walking distance to other tourist attractions, including the British Museum (2km), Sir John Soane's Museum (0.6km), Covent Garden (3km) and St Paul's Cathedral (1.1km).
- 3.12 Within the vicinity of the Site is Chancery Lane Underground Station, which is situated on the Central Line.

- 3.13 The Site straddles High Holborn (A40), below ground. High Holborn is a single carriageway road which comprises two lanes of traffic and is subject to parking and loading restrictions which have been duly considered. Additionally, High Holborn contains high quality pedestrian infrastructure which serves significant footfall, between residents, workers, shoppers, and tourists.
- 3.14 To the south east of the Site, there are taller buildings, including 100 Fetter Lane (under construction), 12-14 New Fetter Lane, and 6 New Street Square.

HISTORY OF THE TUNNEL COMPLEX

- 3.15 The Kingsway Exchange Tunnels were built as a deep-level shelter underneath Chancery Lane tube station in the early 1940s. The Site was originally designed to shelter 10,000 people and has a total floor area of 7,829 sqm (GIA).
- 3.16 The “Kingsway Exchange Tunnels” reference was an intentionally misleading name to hide its true location under Chancery Lane station. Although intended for use as an air raid shelter, like many of the deep level shelters, it was never used for its intended purpose and was instead used as a government communications centre.
- 3.17 The Tunnels were kept secret for nearly 60 years under the Official Secrets Act. They were once home to the Special Operations Executive (SOE), an offshoot of MI6.
- 3.18 The Tunnels were dramatically enlarged in the late 1940s and early 1950s to serve as a secure and secret long-distance telephone exchange. The Tunnels operated the first transatlantic telephone cable, TAT1, which notably acted later as the ‘hotline’ between Moscow and Washington during the Cuban Missile Crisis.
- 3.19 When in operation, the Tunnels accommodated up to 200 staff, supported by self-contained water and air conditioning systems. There was a staff restaurant, tea bar, games room and licensed bar.
- 3.20 By the late 1980s, telecommunication technology had advanced and the Tunnels’ telephone centre became obsolete and was fully decommissioned.
- 3.21 In October 2008, British Telecom (“BT”) announced that the Kingsway Exchange Tunnels were for sale. In 2023, BT agreed to sell the Tunnels to the Applicant.

PLANNING HISTORY

On-Site Planning History

- 3.22 The table below outlines the relevant planning history to the Site. There is no planning history available on CoL’s online portal for 38-39 Furnival Street.

Reference	Proposal	Date approved
<i>40-41 Furnival Street, London, EC4A 1JQ (City of London)</i>		
15/01240/FULL	Alterations to facade including removal of projecting tubular frame, alterations to ground floor elevation, zinc cladding at fourth and fifth floor levels and fenestration, installation of plant within a new enclosure at roof level.	19/01/2016
1205H	Retention of an external fire escape stair.	11/01/1991

Reference	Proposal	Date approved
1205D	Demolition of existing building and erection of new building for office use (B1).	02/12/1988
1205A	Erection of an addition to the first floor of 40/41 at the rear of the premises	03/03/1955
<i>31-33 High Holborn, London, WC1V 6AX (London Borough of Camden)</i>		
2011/0846/P	Change of use from retail (Class A1) to financial and professional services (Class A2) at part ground and mezzanine floor level.	13/04/2011
2010/0445/P	Revisions to planning permission 2008/2588/P, dated 25/03/2009, for change of use of upper floors from retail/office uses (Class A1 and B1) to residential use (Class C3) to provide 9 units, including extension and refurbishment of the upper floors, retention of ground and mezzanine floors as retail (Class A1), alterations to ground floor entrance, refuse storage and existing spiral stair/escape provision. Revisions comprise an enlarged mansard roof extension at fifth floor level (on east side of High Holborn front elevation) and associated alterations for approved Flat 8 (compared with that granted by planning permission 2009/4519/P, dated 10/12/2009).	18/03/2010
2010/0460/P	Revisions to planning permission 2008/2588/P, dated 25/03/2009, for change of use of upper floors from retail/office uses (Class A1 and B1) to residential use (Class C3) to provide 9 units, including extension and refurbishment of the upper floors, retention of ground and mezzanine floors as retail (Class A1), alterations to ground floor entrance, refuse storage and existing spiral stair/escape provision. Revisions comprise erection of mansard roof extension at fifth floor level (on west side of High Holborn front elevation) to provide additional residential accommodation for approved Flat 8.	18/03/2010
2009/4519/P	Revisions to planning permission 2008/2588/P, dated 25/03/2009, for change of use of upper floors from retail/office uses (Class A1 and B1) to residential use (Class C3) to provide 9 units, including extension and refurbishment of the upper floors, retention of ground and mezzanine floors as retail (Class A1), alterations to ground floor entrance, refuse storage and existing spiral stair/escape provision. Revisions comprise extension at fourth floor level and mansard roof extension above at fifth floor level and alterations at ground floor level, including a new staircase, lift and an enlarged cycle store.	10/12/2009
2008/2588/P	Change of use of upper floors from retail/office uses (Class A1 and B1) to residential use (Class C3) to provide 9 units, including extension and refurbishment of the upper floors, retention of ground and mezzanine floors as retail (Class A1), alterations to ground floor entrance, refuse storage and existing spiral stair/escape provision.	25/03/2009

4.0 DEVELOPMENT PROPOSALS

4.1 As set out in **Section 2** of this Statement, this Application seeks full planning permission for the change of use of the Kingsway Exchange Tunnel Complex and works to associated above ground structures, to provide a visitor and cultural attraction.

4.2 The Scheme involves the following:

- Use of disused deep level tunnels for visitor and cultural attraction, including bar;
- Demolition of existing building and structures at 38-39 Furnival Street and construction of building of up to 4 storeys;
- Redevelopment of 40-41 Furnival Street to provide a building of up to 5 storeys;
- Use of 38-39 and 40-41 Furnival Street as a mixed-use building;
- Creation of a new entrance at High Holborn / Fulwood Place, to provide a secondary visitor attraction entrance / exit (including bar entrance / exit);
- Provision of ancillary cycle parking, substation, servicing and plant; and
- Landscaping and public realm works.

4.3 The Scheme would transform the disused Tunnels into one of the world's most unique underground experiences. The Proposed Development would offer two main areas of exhibition space including:

- A Heritage Exhibition – relevant existing equipment would be displayed to celebrate the history of the Tunnels and their role during WW2 and the Cold War. This is anticipated to be a permanent exhibition; and
- A Cultural Exhibition – technology would be provided for contemporary artists and creatives to exhibit digital artwork. This is anticipated to be on a temporary basis, offering a regular refresh of themes and attractions.

4.4 It is envisaged that the Tunnels would have an operational capacity for two million visitors per year.

4.5 The existing and proposed floorspace (GIA) figures for each building are set out in the tables below:

Schedule of Areas			
Building	sqm (GIA)		
	Existing	Proposed	Difference
38-39 Furnival Street	194	942	+ 748
40-41 Furnival Street	1,229	1,525	+ 296
31-33 High Holborn	329	329	0
Tunnels Complex	7,829	7,829	0
Total	9,581	10,625	+ 1,044

Land Use

4.6 The Proposals is to provide a cultural and visitor attraction (F1) and bar (Sui Generis). The Proposed Development would provide ancillary retail and office floorspace within the above ground buildings.

- 4.7 The main visitor attraction pedestrian entrance would be located at Furnival Street. For this, 38-39 and 40-41 Furnival Street are proposed to be demolished and combined to provide the required spaces for users to safely and orderly access and egress from the Tunnels.
- 4.8 Fulwood Place is designed to be a secondary entrance (and exit), dedicated to school groups and visitors to the bar. Both entrances would provide evacuation routes and fire fighter access.

Design Approach

- 4.9 The publicly accessible use proposed for the Scheme dictates the requirements for access and evacuation. The Scheme has been shaped by the need to provide an extremely robust fire and evacuation strategy. This is central to the entire Scheme. Without a solution to this issue, there is no prospect of these Tunnels being reused in the way which is envisaged in this Application.
- 4.10 The Tunnels were designed in a different era and for a different purpose, where the volumes of access now proposed could not have been conceived. Furthermore, since their construction, in recent years, shafts have effectively been built over.
- 4.11 The existing entrances to the Tunnels and connections to the surface do not currently provide the level of access and egress to make the scheme practicable. Therefore, the Proposed Development includes works to enlarge the existing shafts to provide the required access and evacuation.
- 4.12 The volume of plant required to ventilate the Tunnels to an acceptable standard could not be solely accommodated within 38-39 Furnival Street. As such, 40-41 Furnival Street is included within the Proposals.
- 4.13 The Proposed Development includes the demolition and redevelopment of the existing buildings at 38-39 and 40-41 Furnival Street. A whole life carbon optioneering has been undertaken to identify the most appropriate level of retention of the existing buildings.
- 4.14 The design of the Furnival Street buildings has been heavily defined by the requirement of enlarging the existing shaft under 38-39 Furnival Street, which requires an open-air excavation to undertake the works in a safe manner.
- 4.15 It is proposed to demolish and rebuild the existing building at 38-39 Furnival Street, maintaining the existing proportions, re-using the key materials and components that define the current building.
- 4.16 40-41 Furnival Street, as existing, is a more recent construction, and with no historic significance. The building is proposed to be demolished and redeveloped to provide a new plant building sensitive to the area. This building would house most of the equipment servicing the Tunnels. The proposed massing provides a balanced articulation of volumes facing Furnival Street. In contrast with 38-39 Furnival Street, the proposed façade is veil, light and translucent providing an insight into the activities happening behind.
- 4.17 38-39 and 40-41 Furnival Street would be combined, to provide the main visitor entrance. The buildings would incorporate several ancillary uses, to support the main visitor attraction, including retail, office space and dedicated amenities, including cycle parking.
- 4.18 31-33 High Holborn forms an integral component of the Scheme, functioning as a secondary entrance (and exit). The Proposals include the enhancement of the High Holborn front façade, taking inspiration from the original historic elevation.
- 4.19 All plant is to be located above ground, to enable maintenance, upgrade and replacement.
- 4.20 Further information is included within the Design and Access Statement.

Transport, Access, and Servicing Considerations

- 4.21 A Transport Assessment and Travel Plan have been prepared by WSP and form part of this Application.
- 4.22 Both Furnival Street and Fulwood Place are located in areas of high public transport accessibility (PTAL 6b), with the closest underground station being Chancery Lane, with Holborn, Farringdon and Barbican stations all located less than 1 kilometre away.
- 4.23 To gain access to the Tunnels, lift shafts are to be provided at both Furnival Street and Fulwood Place. As set out above, it is proposed that Furnival Street would be the primary access for visitors and Fulwood Place would serve as an access for staff, VIP guests, school children and public visitors to the bar.
- 4.24 The Proposed Development would be car free except for the retention of the single blue-badge car parking space on Furnival Street. Secure and covered cycle parking for staff would be provided within the buildings of 38-39 Furnival Street, with short-stay cycle visitor parking provided in the nearby public open realm.
- 4.25 Due to above ground land constraints, all servicing would occur on the carriageway, with Furnival Street proposed as the key servicing location away from the A40 (Holborn). No dedicated bay has been provided, as servicing vehicles could wait on the single yellow lines present on Furnival Street. Delivery and servicing vehicle movements would be managed, in accordance with the Delivery and Servicing Plan, submitted as part of this Application.

Energy, Sustainability, and Carbon Considerations

- 4.26 An Energy Assessment has been prepared by WSP and forms part of this Application. The Assessment demonstrates how the design of the Proposed Development meets the requirements of the London Plan, which aims to limit the carbon emissions of new buildings, through passive and clean energy methods.
- 4.27 A Circular Economy Statement and Whole Life Carbon Assessment have been prepared by WSP and also forms part of this Application. These reports summarise the waste and circular economy strategy for the Proposed Development and demonstrate the buildings' carbon impact.

5.0 PLANNING POLICY FRAMEWORK

5.1 This Application has been informed by adopted and emerging development plan policies and other relevant guidance. This section of the Statement provides a summary of the relevant planning context, and **Section 6** provides an assessment of the Application against the policies and guidance contained within these documents.

TOWN AND COUNTRY PLANNING ACT (1990)

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that *“if regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*.

5.3 Section 70 of the Town and Country Planning Act 1990 (as amended) states that when determining applications for planning permission, the Local Planning Authority should *“have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations”*.

THE DEVELOPMENT PLAN

5.4 The Statutory Development Plan for the Site comprises the adopted plans of the following authorities:

- The Greater London Authority (“GLA”);
- The City of London (“CoL”); and
- The London Borough of Camden (“LBC”).

Regional Planning Policy – The Greater London Authority

5.5 The London Plan (2021) sets out the Mayor and Greater London Authority’s (“GLA”) overall strategic plan for London. It forms part of the development plan for all London Boroughs.

5.6 Relevant policies of the London Plan for the Site include:

- Policy GG1 – Building strong and inclusive communities;
- Policy GG2 – Making the best use of land;
- Policy GG3 – Creating a healthy city;
- Policy GG5 – Growing a good economy;
- Policy GG6 – Increasing efficiency and resilience;
- Policy SD4 – The Central Activities Zone (CAZ)
- Policy D1 – London’s form, character and capacity for growth;
- Policy D3 – Optimising site capacity through the design-led approach;
- Policy D4 – Delivering good design;
- Policy D5 – Inclusive design;
- Policy D8 – Public realm;
- Policy D10 - Basement Development;
- Policy D11 – Safety, security and resilience to emergency;
- Policy D12 - Fire Safety;
- Policy D13 - Agent of change;
- Policy D14 – Noise;
- Policy S1 – Developing London’s social infrastructure;
- Policy E10 – Visitor infrastructure;
- Policy E11 – Skills and opportunities for all;

- Policy HC1 – Heritage conservation and growth;
- Policy HC5 – Supporting London’s culture and creative industries;
- Policy HC6 – Supporting the night-time economy;
- Policy G5 – Urban greening;
- Policy SI 1 – Improving air quality;
- Policy SI 2 – Minimising greenhouse gas emissions;
- Policy SI 3 – Energy infrastructure;
- Policy SI 4 – Managing heat risk
- Policy SI 7 – Reducing waste and supporting the circular economy;
- Policy SI 12 – Flood risk management;
- Policy SI 13 – Sustainable drainage;
- Policy T1 – Strategic approach to transport;
- Policy T2 – Healthy Streets;
- Policy T3 – Transport capacity, connectivity and safeguarding;
- Policy T4 – Assessing and mitigating transport impacts;
- Policy T5 – Cycling;
- Policy T6 – Car parking; and
- Policy T7 – Deliveries, servicing and construction.

5.7 The following supplementary planning documents have been produced by the GLA and are considered of relevance to the Application:

- Accessible London SPG (October 2014);
- Characterisation and Growth Strategy LPG (June 2023);
- Optimising Site Capacity: A Design-led Approach LPG (June 2023);
- Fire Safety, LPG (February 2023);
- Social Infrastructure SPG (May 2015);
- Urban Greening Factor LPG (February 2023);
- Air Quality Positive LPG (February 2023);
- Air Quality Neutral LPG (February 2023);
- Be Seen energy monitoring LPG (September 2021);
- Energy Assessment Guidance (June 2022)
- Whole Life Carbon LPG (March 2022)
- Circular Economy Statements LPG (March 2022); and
- Sustainable Transport, Walking and Cycling LPG (November 2022).

Local Planning Policy – City of London

5.8 The following documents comprise the Statutory Development Plan for the City of London:

- The London Plan (2021) (“London Plan”); and
- City of London Local Plan (2015) (“City Plan”).

5.9 Relevant policies of the City of London Local Plan for the Site include:

- Policy CS3 – Security and Safety;
- Policy DM3.2 – Security measures in new development and around existing buildings;
- Policy DM3.4 – Traffic Management;
- Policy CS10 – Design;
- Policy DM10.1 – New development;

- Policy DM10.3 – Roof gardens and terraces;
- Policy DM10.4 – Environmental enhancement;
- Policy DM10.5 – Shopfronts;
- Policy DM10.7 – Daylight and sunlight;
- Policy DM10.8 – Access and inclusive design;
- Policy CS11 – Visitors, Arts and Culture;
- Policy CS12 – Historic Environment;
- Policy DM12.1 – Managing change affecting all heritage assets and spaces;
- Policy DM12.2 – Development in conservation areas;
- Policy DM12.4 – Ancient monuments and archaeology;
- Policy CS15 – Sustainable Development and Climate Change;
- Policy DM15.1 – Sustainability requirements;
- Policy DM15.2 – Energy and CO2 emissions assessments;
- Policy DM15.3 – Low and zero carbon technologies;
- Policy DM15.4 – Offsetting of carbon emissions;
- Policy DM15.5 – Climate change resilience and adaptation;
- Policy DM15.6 – Air Quality;
- Policy DM15.7 – Noise and light pollution;
- Policy DM15.8 – Contaminated land and water quality;
- Policy CS16 – Public Transport, Streets and Walkways;
- Policy DM16.1 – Transport impacts of development;
- Policy DM16.2 – Pedestrian movement;
- Policy DM16.3 – Cycle parking;
- Policy DM16.4 – Facilities to encourage active travel;
- Policy DM16.5 – Parking and servicing standards;
- Policy CS17 – Waste;
- Policy DM17.1 – Provision for waste in development schemes;
- Policy DM17.3 – Designing out construction waste;
- Policy CS18 – Flood Risk;
- Policy DM18.2 – Sustainable drainage systems (SuDS);
- Policy DM19.2 – Biodiversity and urban greening; and
- Policy CS22 – Social Infrastructure and Opportunities.

5.10 The following supplementary planning documents (“SPDs”), of relevance to the Application, have been produced by the City of London:

- Lighting SPD (October 2023);
- Archaeology and Development Guidance SPD (July 2017);
- City of London Air Quality SPD (July 2017);
- Chancery Lane Character Summary and Management Strategy SPD (January 2012);
- City of London Public Realm SPD (July 2016); and
- Carbon Options Guidance (March 2023).

Local Planning Policy – The London Borough of Camden

5.11 The following documents comprise the statutory development plan for the London Borough of Camden:

- The London Plan (2021);
- Camden Local Plan (2017) (“Camden Local Plan”); and
- Camden Site Allocations (2013).

5.12 Relevant policies of the Camden Local Plan for the Site include:

- Policy G1 - Delivery and location of Growth;
- Policy C3 – Cultural and leisure facilities;
- Policy C5 – Safety and security;
- Policy C6 – Access for all;
- Policy E3 – Tourism;
- Policy A1 - Managing the impact of development;
- Policy A4 - Noise and vibration;
- Policy A5 – Basements;
- Policy D1 - Design;
- Policy D2 – Heritage;
- Policy D3 – Shopfronts;
- Policy CC1 - Climate change mitigation;
- Policy CC2 – Adapting to climate change;
- Policy CC3 – Water and flooding;
- Policy CC4 – Air quality;
- Policy CC5 – Waste;
- Policy T1 - Prioritising walking, cycling and public transport;
- Policy T2 - Parking and car free development;
- Policy T3 - Transport infrastructure;
- Policy T4 – Sustainable movement of goods and materials; and
- Policy DM1 - Delivery and monitoring.

5.13 Throughout 2018 and 2019, LBC updated its suite of Camden Planning Guidance (“CPG”) documents to support the Local Plan. The following are considered of relevance to the Application:

- Air Quality (January 2021);
- Amenity (January 2021);
- Basements (January 2021);
- Design (January 2021);
- Energy efficiency and adaptation (January 2021);
- Transport (January 2021);
- Water and flooding (March 2019); and
- Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011).

EMERGING DEVELOPMENT PLAN

City Plan 2040

- 5.14 The City of London is in the process of preparing a new Local Plan, called “City Plan 2040”. Once adopted, the new Plan will replace the current City of London City Plan (2015).
- 5.15 Formal consultation on the draft “City Plan 2036” first commenced in 2019. A further consultation was held between March and May in 2021 on the Proposed Submission Draft of the Local Plan.
- 5.16 Due to the issues raised by the Mayor of London in relation to tall buildings and a range of other factors, including the impact of the Covid-19 pandemic, evidence gathering is underway to ensure that the City Plan 2036 will provide a robust framework for a post Covid City. The draft City Plan 2036’s end date has been changed to

2040 to align with the commitment in the CoL's Climate Action Strategy to support the achievement of net zero for the Square Mile by 2040.

- 5.17 It is anticipated that a further consultation on the revised Proposed Submission Draft City Plan 2040 will be consulted on in February and March 2024, then submitted to the Secretary of State for examination later in 2024. The City anticipates that the new City Plan will be adopted in 2025.
- 5.18 Due to the early stage in the drafting of the City Plan 2040, it currently holds no / limited material weight in the determination of a planning application by the City of London. From now on, in this Statement, reference will be made to the "Draft City Plan 2040" or the "Draft City Plan", which refer to the same document.

Camden Local Plan

- 5.19 The current Camden Local Plan was adopted on 3 July 2017 and forms the basis of the strategic and development management policies shaping planning decisions in the Borough. LBC has started the process of reviewing the Camden Local Plan 2017. To inform the development of the new and updated Local Plan for Camden, a call for views engagement was carried out between November 2022 and January 2023. Following this, consultation on the Draft Local Plan is expected in early 2024, with adoption not expected until 2025.
- 5.20 Due to the early stage of the review of the Camden Local Plan, any review currently holds no / limited material weight in the determination of a planning application by LBC.

OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework

- 5.21 The National Planning Policy Framework ("NPPF") sets out the Government's approach to planning matters and is a material consideration in the determination of planning applications. The NPPF was updated on 5 September 2023. This revised Framework replaces the previous NPPF published in March 2012, revised in July 2018, updated in February 2019 and revised in July 2021.
- 5.22 Paragraph 7 of the NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 goes on to explain that this to be achieved by meeting the following three overarching objectives:
- a) *"an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c) *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*
- 5.23 At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). This means approving development proposals that accord with an up-to-date development plan without delay.

- 5.24 As stated in Chapter 9, the potential impacts of development on transport and opportunities to promote active travel (walking, and cycling) should be addressed at the earliest stages of plan-making. Consideration should be made to ensure sustainable transport options are evaluated and implemented as part of a proposed development.
- 5.25 Chapter 11 states that planning decisions should promote an effective use of land in meeting the need for land uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Such decisions should encourage the multiple benefits of developing urban land, including by taking opportunities to achieve net environmental gains, and give substantial weight to the value of using suitable brownfield land within settlements to meet identified needs.
- 5.26 In accordance with Chapter 12 of the NPPF, planning decisions should prioritise the creation of well-designed spaces that foster safety, inclusivity, and a sense of place. Planning applications should endeavour to generate distinctive places to work and visit that can bolster the local economy.

Practice Guidance (NPPG)

- 5.27 In March 2014, the Government published the National Planning Practice Guidance (“NPPG”) which is a material consideration in relation to planning applications. The NPPG replaces several previous circulars and guidance to provide a simplified single source of guidance at the national level. The NPPG is a material consideration in the determination of planning applications.

SITE SPECIFIC DESIGNATIONS

- 5.28 The Site falls within the following planning designations within the City of London:

- Central Activities Zone (CAZ);
- Chancery Lane Conservation Area;
- Archaeological Priority Area;
- Blackheath Point Protected Vista; and
- Greenwich Park Protected Vista.

- 5.29 The Site falls within the following designations within the London Borough of Camden:

- Central Activities Zone (CAZ);
- Central London Area;
- Holborn Local Plan Growth Area;
- High Holborn Central London Frontage;
- Bloomsbury Conservation Area;
- London Suburbs Archaeological Priority Area; and
- Greenwich Park Protected Vista.

Other Relevant Designations

- 5.30 There are no statutorily listed buildings at the Site. However, the following are acknowledged as non-designated heritage assets:
- 38-39 Fumival Street
 - 31-33 High Holborn
 - The Tunnels themselves

- 5.31 The Application therefore includes a Heritage Statement.

5.32 The Site is located in Flood Zone 1; an area having a less than 1 in 1,000 annual probability of river or sea flooding.

6.0 PLANNING POLICY ASSESSMENT

6.1 This section of the Statement assesses the component parts of the Proposed Development against the Statutory Development Plan and other material considerations as outlined in **Section 5** for each borough.

PRINCIPLE OF DEVELOPMENT

6.2 At the heart of the NPPF is the presumption in favour of sustainable development, achieving this through meeting the three “overarching aims” set out in Paragraph 8: building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities, and protecting and enhancing the natural, built and historic environment.

6.3 Paragraph 124 of the NPPF states that planning policies and decisions should support development that makes efficient use of land, considering identified needs, market conditions, the availability of infrastructure, the desirability of preserving an area’s character or promoting regeneration and change, and the importance of securing well designed, attractive and healthy places.

6.4 Policy GG2 (Making the best use of land) of the London Plan seeks to create sustainable mixed-use places that make the best use of land. Policy GG5 (Growing a good economy) supports proposals which supplement the growth of a diverse and strong London worker and visitor economy.

6.5 London Plan Policy D3 (Optimising site capacity through the design-led approach) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The policy states that higher density development should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

6.6 At a local level, the City Plan sets out a vision for the City of London to maintain and enhance the City’s contribution to London’s world-class cultural status and to enable the City’s communities to access a range of arts, heritage and cultural experiences.

6.7 The Camden Local Plan aims to ensure particular attention is given to the value provided by cultural facilities and the contribution they make to the attractiveness of Camden as a place to live, work or study.

6.8 The Proposed Development comprises the reuse of the Kingsway Exchange Tunnels, in a highly sustainable and accessible location in Central London. The Proposed Development would open an asset to the public that has been secret throughout most of its existence, to provide a new cultural and visitor attraction that could accommodate up to 2 million visitors a year.

6.9 The Proposed Development seeks to make the most efficient use of the Site relative to its location, benefitting from the highest level of accessibility by public transport, as well as in consideration of the surrounding built context and environmental considerations.

6.10 The Proposed Development would be highly beneficial for the City of London, London Borough of Camden, and surrounding neighbourhoods, and is in accordance with national, regional, and local planning policies.

6.11 The principle of the Proposed Development is consistent with high-level objectives of both current and emerging planning policy and is in accordance with the Government’s overarching objectives for sustainable development.

PRINCIPLE OF DEMOLITION IN CONSERVATION AREA

6.12 This Application seeks the demolition and rebuilding of 38-39 and 40-41 Furnival Street.

- 6.13 Supporting paragraph 39.16 of the City Plan states that *“demolition or substantial demolition of unlisted buildings that make a positive contribution to the conservation area would be resisted unless it can be demonstrated that the public benefits of the proposal, including the quality of the replacement building, outweigh the case for retention of the building.”*
- 6.14 Policy DM12.2 of the City Local Plan is consistent with the NPPF in stating that proposals for the demolition of buildings in a conservation area (whether listed or not) *“will only be permitted if it preserves and enhances the character or appearance of the conservation area”*. It goes on to state that *“the loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted”*.
- 6.15 Supporting Paragraph 7.49 of the Camden Local Plan states that *“the Council will resist the total or substantial demolition of buildings which make a positive contribution to a conservation area unless circumstances are shown that outweigh the case for retention”*.
- 6.16 A Heritage Statement prepared by Montagu Evans, forms part of this Application.
- 6.17 38-39 Furnival Street is not listed but has been identified as a non-designated heritage asset on account of its historic associations and is considered by CoL to make positive contribution to the Chancery Lane Conservation Area, due to its *“strikingly industrial aesthetic”*. The building is currently in a dilapidated state and sits directly above one of the shafts of the Kingsway Tunnels. The shaft needs to be enlarged in diameter, to provide the requisite access to refurbish and use the Tunnels as a cultural attraction. To facilitate the works to the shaft, and thus enable the wider benefits of the Proposals as a whole, it is necessary for the existing building at 38-39 Furnival Street to be demolished and rebuilt.
- 6.18 In accordance with paragraphs 203 and 207 of the NPPF and Policy DM12 of the City Plan, the demolition of 38-39 Furnival Street would result in a degree of harm to the Chancery Lane Conservation Area. This harm is considered to be *“less than substantial”* and at the low end of the scale, owing to the modest intrinsic significance of the building and its limited contribution to the significance of the Conservation Area as a whole. However, it is considered that this harm is justified and capable of being outweighed, as per paragraph 202 of the NPPF, by the considerable planning and heritage benefits associated with the Proposals.
- 6.19 40 Furnival Street is an unlisted modern building and is not mentioned in the adopted CA appraisal. The building is typical of late-20th century commercial office development and is of no intrinsic historic or architectural interest. It is considered to make a neutral impact to the character and appearance of the CA. Therefore, its demolition would result in ‘no harm’ in principle, and the special interest of the CA would be preserved subject to the design of the replacement building.

LOSS OF OFFICE

- 6.20 Policy E1 (Offices) of the London Plan states that dynamic clusters of world city businesses and other specialist functions of the central London office market, including the Central Activities Zone (“CAZ”), should be developed and promoted. The policy does go onto state that there is scope for the redevelopment, intensification and change of use of surplus office space to other uses.
- 6.21 Policy E2 (Providing Suitable Office Space) of the London Plan further states development proposals which, involve the loss of existing B Use Class (now Class E) business space (including creative and artists’ workspace) in areas identified in a local Development Plan Document, where there is a shortage of lower-cost space or workspace of particular types, uses or sizes, should: demonstrate there is no reasonable prospect of the site being used for business purpose or ensure that an equivalent amount of B Use Class (now Class E) business space is re-provided.

6.22 City Plan Policy DM1.1 (Protection of office accommodation) notes that the loss of office accommodation to other uses where the building is suitable for a long-term viable office use, and there are strong economic reasons why the loss would be inappropriate. The policy notes that losses would be inappropriate for any of the following reasons:

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

6.23 Draft City Plan Policy OF2 (Protection of Existing Office Floorspace) states that the loss of existing office floorspace will be resisted unless it can be demonstrated:

- There is no demand in the office market, supported by marketing evidence covering a period of no less than 12 months;
- Refurbishment or re-provision of some or all of the office floorspace on the site would be unviable in the longer term, demonstrated by a viability assessment; or
- The loss of office floorspace is limited to ground or below ground levels and proposed new uses would be complementary to continued office use on upper floors; or
- The loss of office floorspace is within or near identified residential areas and would result in the provision of additional housing, particularly Build to Rent or Co-living accommodation.

6.24 The Proposed Development would involve the redevelopment of 40-41 Furnival Street, an existing office building. Whilst it is recognised that this would result in the loss of office accommodation within the CoL, the proposed loss is not considered to be inappropriate, in accordance with the reasons set out in policy i.e. it would be acceptable. The existing office building is of a small scale and is not considered to contribute to the primary business function of the City. Given its scale and location, the existing building would not have the potential to deliver a large office development site in the future.

PRINCIPLE OF CULTURAL USE

6.25 London Plan Policy S1 (Developing London’s social infrastructure) seeks to ensure that the social infrastructure needs of London’s diverse communities are met. London Plan Policy HC5 (Supporting London’s Culture and creative industries) aims to support the continued success of London’s cultural assets, whilst Policy SD4 (The Central Activities Zone) identified that the unique concentration of and diversity of cultural arts, entertainment, night-time economy and tourism functions should be promoted and enhanced in the CAZ.

6.26 City Plan Policy CS11 (Visitors, Arts and Culture) seeks to maintain and enhance the City’s contribution to London’s world-class cultural status and to enable the City’s communities to access a range of arts, heritage and cultural experiences.

6.27 Draft City Plan Policy S6 (Culture, Visitors and the Night-Time Economy) states that CoL will maintain and enhance the City of London’s contribution to London’s world-class cultural offer and the City’s communities will be able to access a range of arts, heritage, and cultural experience by encouraging access to and further developing a wide range of creative and cultural spaces and facilities across the City. This policy requires applicants to submit Cultural Plans for major developments outlining how it will contribute to the enrichment and enhancement of the City’s cultural offer.

6.28 Draft City Plan Policy S24 (Culture Mile Implementation) states that the CoL will promote and protect Culture Mile as the City’s main cultural centre and world class cultural destination, by:

- encouraging and supporting a diverse leisure, retail, food and beverage offer; and

- encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists.
- 6.29 Camden Local Plan Policy E3 (Tourism) recognises the importance of the visitor economy in LBC and support tourism development.
- 6.30 Camden Local Plan Policy C3 (Cultural and Leisure facilities) encourages the creation of theatres, galleries and museums due to their contribution to LBC's attractiveness as a place to live, work or study.
- 6.31 At the forefront of the Proposed Development is meeting CoL's 'Destination City' objectives by ensuring that the CoL remains as the world's most innovative, inclusive, and sustainable business ecosystem, and an attractive place to invest, work, live, learn and visit. The CoL is a world class centre for culture and the Proposals intend to bring forward a cultural anchor that would install a permanent dedication to social heritage that compliments the architectural heritage assets.
- 6.32 The Proposals are consistent with the aspirations of CoL whose vision is that of a 24hour destination with a vibrant mix of uses. The Proposed Development would help to drive and support more visitors to the CoL, seven days a week. The London Tunnels' strategic position and proximity to other nearby cultural sites makes it the 'missing link' between existing central attractions and CoL's 'Culture Mile'.
- 6.33 The location of the Site at the intersection of London's West End and the historic Square Mile makes the Proposed Development ripe to be a new destination for London's visitors. As well as supporting Destination City, the Proposed Development would play a crucial role in supporting LBC's aspirations for the tourism sector.
- 6.34 The Site is located within LBC's Central London Area where LBC supports growth for a range of economic and social purposes. The Proposed Development complies with Policy C3 which seeks opportunities for new cultural facilities in major, mixed use developments in areas where as many people as possible can enjoy their benefits and make use of public transport to get there.
- 6.35 In accordance with local planning policy, a comprehensive Cultural Plan has been developed by Futurecity during the design development process. This Plan has informed the proposed cultural offer on Site.
- 6.36 The Plan demonstrates how the new cultural offer would help CoL achieve its goal of a vibrant seven-days-a-week destination and help to increase footfall (for both boroughs) back to pre-pandemic levels. The London Tunnels would act as a catalyst for building an ecosystem of culture-led businesses and public organisations across both boroughs, expanding beyond cultural anchor organisations to bring together historic locations and smaller galleries, theatres, and experiences, all within a walkable area. The Proposed Development would provide both a heritage experience and a cultural experience.
- 6.37 The heritage experience would use a range of media to share stories of the war, from the perspective of those who experienced it. Visitors would be able to see and use restored equipment, as well as experiencing stories and information made accessible through projection, digital screens, and audio, to create a narrative, assisted by actors and guides.
- 6.38 The history of the London Tunnels at the intersection of London's West End and the Square Mile, would draw people who would not normally see a trip to CoL as an attractive proposition, making this one of Central London's more unusual destinations, playing a key part in helping to bolster London's cultural and heritage offer and attracting up to two million people each year.
- 6.39 Beyond the heritage offer, the Proposed Development would offer a programme of exciting cultural activations, exhibitions and events. The London Tunnels would partner with London Festivals and Cultural Institutions to provide a varied programme of art, fashion, architecture, film, heritage, music and performance.

6.40 The Cultural Plan that would be delivered by the Proposed Development would make a significant contribution to several policy objectives within the London Plan, City Plan and Camden Local Plan, as well as emerging policies. The public benefits associated with the Proposals are significant and would further complement the contribution that the Proposed Development can make to City of London's 'Destination City' initiative.

6.41 As such, the proposed cultural use is considered acceptable and strongly encouraged in planning terms, specifically in relation to:

- London Plan policies S1, HC5 and SD4
- City Plan Policies CS11 and CS22
- Draft City Plan Policy S6;
- Camden Local Plan Policies C3 and E3.

DESIGN CONSIDERATIONS

6.42 High quality and inclusive design are encouraged at all policy levels. The NPPF notes that "good design" is a key aspect of sustainable development and should contribute positively to making places better for people. Paragraph 127 of the NPPF outlines the requirement for good design and sets out that developments:

- *"will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

6.43 Paragraph 131 outlines that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

6.44 Chapter 3 of the London Plan reinforces the Mayor's commitments to ensuring the delivery of good quality designed developments, which reflect and respond to London's character.

6.45 London Plan Policy D1 (London's form, Character and Capacity for growth) requires development to respond to local context by delivering buildings and spaces that are positioned and are of a scale, appearance and shape that responds successfully to the identity and character of the locality.

6.46 Policy D3 (Optimising site capacity through the design-led approach) states that development proposals should follow a design-led approach which requires consideration of design options, to determine the most appropriate form of development that responds to a site's context to create a safe and inclusive environment.

- 6.47 Policy D4 (Delivering good design) requires a design and access statement to be submitted to demonstrate that proposals meet the design requirement of both the London and Local Plans.
- 6.48 Furthermore, Policy D5 (Inclusive Design) requires developments to deliver inclusive environments that meet the needs of all Londoners.
- 6.49 At a local level, Policy CS 10 (Design) of the City Plan requires proposals to promote a high standard of design and sustainable buildings, streets and spaces, alongside having regard to their surroundings and the historic and local character of the City. The policy further requires the proposed bulk, height, scale, massing, quality of materials and the detailed design of buildings to be appropriate to the character of the City and the setting and amenities of surroundings building and spaces.
- 6.50 Policy DM10.1 (New Development) of the City Plan further requires all developments, including alterations and extensions to existing buildings, to be of a high standard of design and should not result in harm to the townscape and public realm.
- 6.51 Within the latest version of the Draft City Plan 2040, Policy S8 (Design) states that CoL will promote innovative, sustainable, inclusive high-quality buildings, streets and spaces. Developments should optimise pedestrian movement by maximising permeability, providing both external and internal routes. Proposed developments should deliver high quality sustainable architecture of a height, bulk, massing, scale, urban grain, material, quality and depth of modelling and detail which conserves and enhances the local and wider character and appearance of the City and is appropriate to its neighbours.
- 6.52 Draft City Plan Policy DE2 (New Development) states that developments should be of a world-class standard of design and architectural detail and should enhance the townscape and public realm. Development that would adversely affect the character, appearance or amenities of the buildings or area will be resisted. The design of all new development must ensure that the bulk, scale and massing of the scheme is appropriate.
- 6.53 Camden Local Plan Policy D1 (Design) seeks to secure high quality design in development is supported by Camden's Planning Guidance on Design.
- 6.54 Camden Local Plan Policy C5 (Safety and Security) aims to make Camden a safer place and requires developments to demonstrate that they incorporated design principles which contribute to community safety and security and for appropriate measures to be incorporated.
- 6.55 Camden Local Plan Policy C6 (Access for all) seeks to promote fair access and remove barriers that prevent everyone from accessing facilities and opportunities. The policy expects buildings and places to meet the highest practicable standards of accessible and inclusive design with fully accessible routes through buildings and facilities in the most accessible parts of buildings.
- 6.56 A Design and Access Statement, produced by WilkinsonEyre, forms part of this Application. This provides further details on the design evolution of the Scheme and how it has responded in light of pre-application engagement with CoL, LBC and other key stakeholders. This includes how the Scheme has responded to comments regarding massing, scale, the detailed design of the elevations and the proposed materiality of the Proposals.
- 6.57 The accompanying Design and Access Statement demonstrates that the Proposed Development accords with national, regional and local policy through the provision of a scheme which is of the highest architectural quality and which responds to its setting through carefully considered design and the sensitive use of materials. The following section will consider the Proposals, in light of the surrounding heritage designations, further demonstrating that it is in line with adopted and emerging London-wide and local planning policies and that the Proposed Development is of a scale, appearance and massing that responds successfully to the identity and character of the locality.

HERITAGE CONSIDERATIONS

6.58 The Site lies within both the Chancery Lane Conservation Area and Bloomsbury Conservation Area. The Site itself does not contain any statutorily listed buildings. However, the following are acknowledged as non-designated heritage assets:

- 38-39 Furnival Street
- 31-33 High Holborn
- The Tunnels themselves

6.59 In relation to heritage assets, a strategic policy of the NPPF is to conserve and enhance the historic environment. Paragraph 184 describes heritage assets as an:

“irreplaceable resource and should be considered in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”

6.60 Paragraph 189 further states that in determining applications, local planning authorities should require an application to describe the significance of any heritage assets affected, including any contributions made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

6.61 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (Paragraph 193).

6.62 Policy HC1 (Heritage conservation and growth) of the London Plan states that development proposals should have regard for surrounding heritage assets and archaeological assets. In both instances, their significance should be conserved. Proposals should avoid harm and identify enhancement opportunities.

6.63 At a local level, Policy CS12 (Historic Environment) of the City Local Plan seeks to conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors. Policy DM12.1 (Managing change affecting all heritage assets and spaces) further outlines CoL's intention that:

- *“The settings and significance of heritage assets should be sustained and enhanced;*
- *Development proposals that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development;*
- *The loss of routes and spaces that contribute to the character and historic interest of the City would be resisted;*
- *Development would be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings; and*
- *Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.”*

6.64 City Plan Policy DM12.2 (Demolition in Conservation Areas) notes that the development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area and that the loss of heritage assets that contribute to the character or appearance of the conservation area will be resisted.

- 6.65 Camden Local Plan Policy D2 (Heritage) outlines that LBC will preserve and, where appropriate, enhance the rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- 6.66 The demolition of 38-39 Furnival Street would result in a degree of harm to the Chancery Lane Conservation Area. This harm is considered to be “less than substantial” and at the low end of the scale, owing to the modest intrinsic significance of the building and its limited contribution to the significance of the Conservation Area as a whole.
- 6.67 Paragraph 202 of the NPPF states that “*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public and heritage benefits of the proposal including, where appropriate, securing its optimum viable use.*” In this case, there are considerable public benefits that are considered to outweigh the less than substantial harm identified, these benefits and consideration of the overall planning balance are set out in section 7 of this Planning Statement.
- 6.68 Overall, the Heritage Assessment concludes that the Proposed Development would not give rise to any unacceptable impacts to the identified heritage assets, in line with national, regional and local policy requirements.

TRANSPORT

- 6.69 Chapter 9 of the NPPF promotes sustainable transport and requires applications for development under Paragraph 110 to:
- a) Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) Safe and suitable access to the site can be achieved for all users;
 - c) The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - d) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 6.70 Policy T1 (Strategic approach to transport) and Policy T2 (Healthy Streets) of the London Plan support sustainable transport options including public transport, walking and cycling to promote healthy streets. For the promotion of sustainable transport, development proposals will have to reduce car dominance.
- 6.71 At the local level, Policy CS16 (Public transport streets and walkways) of the City Plan seeks to build on the City’s strategic Central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the Square Mile.
- 6.72 Policy SM 16.1 (Transport impacts of development) states that development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
- Road dangers;
 - Pedestrian environment and movement;
 - Cycling infrastructure provision;
 - Public transport; and
 - The street network.

- 6.73 Transport Assessments and Travel Plans should be used to demonstrate adherence to the CoL's transportation standards.
- 6.74 Policy DM16.2 (Pedestrian movement) sets out that pedestrian movement must be facilitated by the provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
- 6.75 Draft City Plan Policy S10 (Active Travel and Healthy Streets) states that CoL will work with partners to improve the quality and permeability of the City's streets and spaces, to prioritise walking and cycling. Draft City Plan Policy AT1 (Pedestrian Movements) states that developments should facilitate pedestrian movement and reduce severance, by provision of suitable routes through and around new developments.
- 6.76 Camden Local Plan Policy T1 (Prioritising walking, cycling and public transport) is the primary transport policy which promotes sustainable transport in the borough. The policy seeks to ensure that development is properly integrated with the transport network and supported by adequate walking, cycling and public transport links.
- 6.77 The Site is located within Central London and therefore has access to several key services, which are within walking distance of the Site. The Site has an excellent public transport accessibility (PTAL 6b), which indicates excellent links to the Underground, National Rail and bus services.
- 6.78 Therefore, a 'car free' development is entirely appropriate for the Proposed Development. 'Blue badge' accessible car parking is already available on-street, if required.
- 6.79 A Transport Assessment has been prepared by WSP, which forms part of this Application. This assesses the Proposed Development's impact upon highways, sustainable transport modes and addresses any issues of access.
- 6.80 The Proposed Development would be accessed from the primary access point at 38-39 and 40-41 Furnival Street which would be repurposed to accommodate visitors within the curtilage of the Site, without any pedestrian queuing on to the public highway. The secondary access point at Fulwood Place would act as an access for school parties, or access to the bar, and as an emergency exit.
- 6.81 A trip generation, mode share and distribution exercise has been completed to predict how many visitors the Site would generate during the peak period, what mode of transport visitors would use and where they would come from / go to. The trip generation shows that the Proposed Development may create up to 1,500 two-way total person trips on the busiest single day scenario i.e. when operating at peak capacity (also known as "design day"). On this basis, a Pedestrian Comfort Level (PCL) analysis and Chancery Lane Underground Station "Legion Model" have been produced to model likely pedestrian flows.
- 6.82 The Transport Assessment demonstrates that in the peak capacity scenario, which is only likely to occur on the 20 busiest days of the years (certain weekends and bank holidays) the Proposed Development would not generate an unacceptable impact on the local transport network i.e. it will be acceptable.
- 6.83 Overall, the Proposed Development satisfies the relevant policies set out in national, regional and local policy and guidance through encouraging sustainable transport use, providing good access to local services, and minimising additional pressure on local highways. As such, the Proposals should be found acceptable in terms of transport and highways.

Parking

- 6.84 The NPPF requires local authorities to consider parking provision within new developments, based upon their accessibility and the opportunities for public transport, and facilitate the provision of ultra-low emission vehicles.
- 6.85 Policy T6 (Car Parking) of the London Plan states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Furthermore, car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. The policy states that all sites with a PTAL of 5-6 should be 'car-free'. Policy T6.5 (Non-residential Disabled Person Parking) of the London Plan outlines disabled parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.
- 6.86 City Plan Policy SM16.5 (Parking and servicing standards) requires developments within the City to be car-free, except for designated Blue Badge spaces. Where other car parking is exceptionally provided, it must not exceed London Plan's standards.
- 6.87 Draft City Plan Policy VT3 (Vehicle Parking) states that developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is provided it must not exceed London Plan standards.
- 6.88 Camden Local Plan Policy T2 (Parking and car-free development) limits the availability of parking and requires all new development in the borough to be 'car-free'.
- 6.89 The Proposed Development would be car-free, as a result of its sustainable location and excellent accessibility to public transport and active travel modes. The single blue badge car parking space on Furnival Street would be retained.
- 6.90 The Proposed Development is expected to generate 75 taxi trips per hour, which equates for approximately 38 movements (based on 2 people per taxi). Taxis would be expected to pick up and drop off on Furnival Street and coaches would pick up and drop off on Holborn.
- 6.91 The Proposed Development is expected to generate approximately 2 coaches per hour during operational hours. Prior to the development opening (pre 10am), a total of 1 school coach will be expected during term time. No coach parking would be permitted. School coach drivers would be expected to drop and pick up in the existing bus lane on the north side of Holborn. Any other non-school coach trips would utilise the existing bus lane on the south side of Holborn to pick up and drop off.

Cycle Parking

- 6.92 Both the NPPF and the London Plan promote cycling in locations which can be made sustainable. Paragraph 104 of the NPPF requires developments to provide for high quality walking and cycling networks and supporting facilities such as cycle parking.
- 6.93 Policy T5 (Cycling) of the London Plan supports proposals that include provision of cycle parking, in accordance with the Mayor's minimum cycle parking standards. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.
- 6.94 Policy DM16.3 (Cycle Parking) of the Local Plan states that on-site cycle parking must be provided in accordance with local standards set out in Table 16.2. Draft City Plan Policy AT3 (Cycle Parking) requires developments to provide on-site cycle parking for occupiers and visitors which comply with the London Plan standards. All long stay on-site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.

6.95 Cycle parking is proposed to be provided in accordance with the London Plan standards. As there are no specific cycle parking standards for tourist attractions, the London Plan 'D1 Other' parking standards have been applied to the above ground floor area only.

6.96 The London Plan D1 cycle standards are set out below:

Type	London Plan Policy Requirement
Staff	One space per 8 staff members
Visitor	One visitor space per 100sqm of floor area

6.97 The number of cycle parking spaces required for visitors and staff, based on the above ground infrastructure only is shown below:

Parking Type	No. of Spaces	Type to be provided
Long Stay	Furnival Street - 11	6 x two tier racks
Short Stay	High Holborn – 17 Fulwood Place - 4	Sheffield standards provided within the public realm

6.98 Secure and covered cycle parking for staff would be provided within 40-41 Furnival Street. This would be located to the rear of the building in the form of 6 two-tier racks which would be access controlled and covered.

6.99 Short stay visitor parking would be provided at both Furnival Street and Fulwood Place in the nearby public open realm.

6.100 The proposed quantum of cycle parking spaces to be provided accords with the requirements of the London Plan, as set out above, and is therefore considered acceptable.

SERVICING AND REFUSE

6.101 London Plan Policy T7 (Deliveries, servicing and construction) states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans are required and should be developed in accordance with Transport for London guidance, and in a way which reflects the scale and complexities of developments.

6.102 City Plan Policy DM17.1 (Provision for Waste in Development Schemes) requires waste facilities to be designed into buildings, where feasible and allow for separate storage and collection of recyclable materials.

6.103 City Plan Policy DM17.2 (Design our Construction Waste) requires new developments to be designed to minimise the impact of deconstruction and construction and waste on the environment. This requirement is brought forward within the Draft City Plan Policy S16 (Circular Economy and Waste), which states that the CoL will support business and residents in moving towards 'Zero Waste City,' by applying Circular Economy principles, the waste hierarchy and the proximity principle at all stages of the development cycle.

6.104 Camden Local Plan Policy CC5 (Waste) seeks to make LBC a low waste borough, aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled / composted by 2020 and aspiring to achieve 60% by 2031. The

policy also seeks to make sure that developments include facilities for the storage and collection of waste and recycling.

- 6.105 Due to the ground floor access constraints, all servicing would occur on carriageway, with Furnival Street proposed as the key servicing location, away from the A40 (Holborn). No dedicated bay would be provided, as servicing vehicles could wait on the single yellow lines, present on Furnival Street. Delivery and servicing vehicle movements would be managed by the Delivery and Servicing Plan.
- 6.106 A Waste Management Strategy has been prepared by WSP and forms part of this Application. The Strategy confirms that the Furnival Street entrance would be used to manage the waste generated within the Tunnels, and the administration areas, including the reception, shop and offices. The Fulwood Place entrance would be used to manage the waste generated by the bar.
- 6.107 The Waste Management Strategy considers the need to lessen the overall impact of waste generation through recycling of materials, from the operational phase of the Proposed Development. The proposed strategy accords with the requirements of relevant waste policy and guidance.

ENERGY AND SUSTAINABILITY

- 6.108 Section 14 of the NPPF relates to 'Meeting the challenges of climate change, flooding and coastal change' and states that the planning system should help to share places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the reuse of existing resources including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 6.109 Paragraph 150 of the NPPF states that new development should be planned in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Paragraph 153 requires new development to take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.110 Policy SI2 (Minimising greenhouse gas emissions) sets out a minimum on-site reduction of at least 35 per cent beyond Building Regulations 152 is required for major development.
- 6.111 London Plan Policy SI4 (Managing heat risk) outlines that major development proposals should demonstrate, through an energy strategy, how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
- 6.112 London Plan Policy SI5 (Water infrastructure) requires development proposals to achieve at least the BREEAM excellent standard for the 'Wat 01 water category' or equivalent for commercial developments.
- 6.113 London Plan Policy SI7 (Reducing waste and supporting the circular economy) sets out that resource conservation, waste reduction, increase in material re-use and recycling, and reductions in waste going for disposal will be achieved by promoting a circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible.
- 6.114 City Plan Policy CS15 (Sustainable Development Climate Change) of the Local Plan requires all development proposals to demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and "end of life" phases of development. Proposals for major development should aim to achieve a BREEAM rating of "excellent" or "outstanding".
- 6.115 Furthermore, Policy DM15.1 (Sustainability requirements) of the City Plan states that for major development (including new development and refurbishment) a Sustainability Statement should be submitted and include, as a minimum:

- BREEAM pre-assessment;
- An energy statement in line with London Plan requirements; and
- Demonstration of climate change resilience measures.

6.116 BREEAM pre-assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities. Innovative sustainability solutions would be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design.

6.117 Policy DM15.2 (Energy and CO2 emissions assessments) of the City Plan states that development design must take account of location, building orientation, internal layouts and landscape to reduce energy consumption. For all major development energy assessments must be submitted with a planning application demonstrating:

- *“Energy efficiency – showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;*
- *Carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;*
- *Where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through ‘allowable solutions’ for the lifetime of the building to achieve national targets of zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged; and*
- *Anticipated residual power loads and routes for supply.”*

6.118 Policy DM15.3 (Low and zero carbon technologies) of the City Plan states that for development with a peak heat demand of 100 kilowatts or more, developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

6.119 Where connection to off-site, decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

6.120 Policy DM15.3 goes on to state that other low and zero carbon technologies must be evaluated. Non combustion-based technologies should be prioritised to avoid adverse impacts on air quality.

6.121 Policy DM15.4 (Offsetting of carbon emissions) states that all feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated onsite will need to be offset using ‘allowable solutions.’

6.122 Where carbon targets cannot be met on-site, the CoL will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation, to be made to an approved carbon offsetting scheme. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

6.123 Policy DM15.5 (Climate change resilience and adaptation) states building designs should minimise any contribution to the ‘urban heat island’ effect caused by heat retention and waste heat expulsion in the built environment. The policy further seeks to avoid demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and

conserving water resources. The policy further requires major developments to achieve BREEAM rating of 'excellent' or 'outstanding' against the current relevant BREEAM criteria at the time of the application.

- 6.124 Draft City Plan Policy DE1 (Sustainability Standards) requires all developments to demonstrate the highest feasible and viable sustainability standards in design, construction, operation and "end of life phase". Proposals for major development will be required to achieve a minimum BREEAM rating of 'excellent' and aim for 'outstanding.' The policy further requires that the London Plan carbon emissions and air quality requirements be met on site, retaining embodied carbon within building structures where feasible. In exceptional circumstances where standards cannot be met on site offsetting will be required to account for the shortfall.
- 6.125 Camden Local Plan Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and operation.
- 6.126 LBC promotes zero carbon development in accordance with the London Plan, requiring all development to reduce carbon dioxide emissions through following the steps of the energy hierarchy.
- 6.127 Camden Local Plan Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and adopt appropriate adaptation measures. The policy further seeks to ensure that development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation.
- 6.128 LBC's CPG on Energy Efficiency and Adaptation (January 2021) requires all development to reduce carbon dioxide emissions by following the energy hierarchy. For non-residential development, a 15% reduction (beyond 'Part L' Building regulations) is required. In addition, all non-residential development of 500 sqm or more floorspace is to be BREEAM Excellent.

Energy

- 6.129 An Energy Statement has been prepared by WSP and forms part of this Application. The Statement sets out how the Proposed Development has been designed to achieve an energy efficient and sustainable development. To achieve optimum energy performance, the Proposed Development would incorporate the following design features:
- The building fabric would be designed to exceed the minimum fabric requirements of Part L of the Building Regulations;
 - Passive design measures would be incorporated into the design to reduce energy demand and the risk of overheating;
 - A high performance building service solution is proposed for the Proposed Development;
 - Subject to future legal and technical agreements, the plant space would be designed for future connection into the district heating network through the provision of capped connections;
 - Terminal units are designed to achieve a specific fan power (SFP) in operation, significantly lower than the Part L 2021 limiting SFP;
 - All spaces would include 100% low energy lighting; and
 - Air-source and water-source heat pumps are proposed, to provide all-electric low-carbon heating, cooling and hot water with displacement ventilation.
- 6.130 The carbon emission reduction of the Proposed Development has been maximised, to achieve the largest improvement possible on Site. Whilst the Proposed Development falls short of the 35% reduction, all buildings (including the tunnel complex) achieve Building Regulations Part L compliance.

Whole Life Carbon

6.131 A Whole Life Carbon (“WLC”) Assessment, as required under the London Plan, has been prepared by WSP and forms part of this Application. This Assessment has been completed following the GLA’s Whole Life-Cycle Carbon Assessment Methodology.

6.132 The WLC report quantitatively assesses the Proposed Development in terms of carbon emissions. The Assessment demonstrates how the Proposed Development will incorporate whole life carbon principles of reduction through design and construction activities, into the lifecycle of the assets and its componentry.

Sustainability

6.133 In relation to sustainability, the Proposals have been developed to incorporate the principles of good sustainable design. The identified sustainability measures are detailed within the Sustainability Statement prepared by WSP.

6.134 The design process has been developed exploring several innovative solutions to minimise the use of resources. The Proposed Development incorporates the following sustainability measures:

- An Energy Strategy that follows the GLA energy hierarchy and achieves an overall 41% carbon reduction over Part L 2021 minimum regulated carbon emissions through innovative building services design and low zero carbon technology;
- Targets the BREEAM rating level of “Very Good” for the development; and
- A high level of heat recovery is present in the development to ensure a highly efficiency all electric servicing strategy.

Circular Economy

6.135 London Plan Policy SI7 (Reducing waste and supporting the circular economy) states that schemes which are referable, should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted which demonstrates:

1. *“How all materials arising from demolition and remediation works will be re-used and / or recycled;*
2. *How the proposals design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their usual life;*
3. *Opportunities for managing as much waste as possible on site;*
4. *Adequate and easily accessible storage space and collection systems to support recycling and re-use;*
5. *How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy; and*
6. *How performance will be monitored and reported.”*

6.136 Draft City Plan Policy S16 (Circular Economy and Waste) states that the CoL will support businesses and residents in moving towards a Zero Waste City, by applying circular economy principles. Draft City Policy CE1 (Zero Waste City) further states that developments should be designed to promote circular economy principles throughout the lifecycle of the building.

6.137 This Application includes a Circular Economy Statement, prepared by WSP which demonstrates how the design and construction of the Proposed Development addresses the challenges of the climate emergency by prompting resource efficiency and adopting a circular economy approach that contributes to sustainable development.

- 6.138 The Proposed Development has been designed to ensure that material and resources are effectively used, managed, and reduced as far as possible, in accordance with the GLA's first principle of Circular Economy ("CE"). The Proposed Development would eliminate waste generation as far as possible, in accordance with the GLA's second principle of the Circular Economy. The Proposed Development has been designed to be flexible and adaptable, therefore increasing the buildings' durability and longevity and consequently likely reducing the need for future construction, demolition, and excavation waste. Further, the Proposed Development has been designed to manage waste sustainability in accordance with GLA's circular economy principles. A Waste Management Plan forms part of this Application.
- 6.139 The Circular Economy Statement demonstrates how the Scheme accords with the requirements set out above and therefore complies with the relevant policy detailed above.

CONSTRUCTION MANAGEMENT

- 6.140 London Plan Policy T7 (Deliveries, servicing and construction) notes that Construction Logistics Plan should be developed in line with TfL guidance and should adopt the latest standards around safety and environmental performance of vehicles to ensure freight is safe, clean and efficient.
- 6.141 City Plan Policy CS 16 (Public Transport, Streets and Walkways) requires developers to demonstrate, through transport assessment, construction logistics plans, travel plans and delivery / servicing plans, how the environmental impacts and road danger of travel and servicing will be minimised, including using river transport.
- 6.142 The supporting text to the Camden Plan Policy A1 (paragraph 6.12) outlines that measures required to reduce the impact of demolition, excavation and construction works must be set out within a Construction Management Plan (CMP).
- 6.143 In accordance with adopted policy, a Construction Transport Management Plan (CTMP) has been prepared by WSP and forms part of this Application.
- 6.144 The CTMP demonstrates how construction impacts will be minimised, in accordance with policy, in relation to site activity, during the works and the transport arrangements for vehicles servicing the Site.

NOISE

- 6.145 Policy D14 (Noise) of the London Plan states that noise should be managed and mitigated, to improve health and wellbeing. The management of noise is about encouraging the right acoustic environment, both internal and external, in the right place, at the right time.
- 6.146 City Plan Policy DM15.7 (Noise and light pollution) requires developers to consider the impact of their development on the noise environment and, where appropriate, provide a noise assessment. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours would be implemented through appropriate planning conditions. Noise and vibration from demolition and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development. Developers would be required to demonstrate that there would be no increase in background noise levels associated with new plant and equipment.
- 6.147 Draft City Plan Policy HL3 (Noise and Light Pollution) states that developers must consider the noise and lighting impacts of their development. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as houses, hospitals and areas of importance for nature conservation.

- 6.148 Camden Local Plan Policy A4 (Noise and vibration) requires all noise to be controlled and managed and should have regard to LBC's noise and vibration thresholds.
- 6.149 An Acoustic Report has been prepared by WSP based on the requirements of CoL and the LBC.
- 6.150 The Report confirms that a baseline environmental noise survey has been undertaken at both above ground sites, to establish the existing noise levels affecting the Site and surrounding area. Using these measured noise levels and the required noise criteria taken from planning policy, noise emission criteria have been set for all nearby noise sensitive receptors, for any fixed building services plant associated with the Proposed Development.
- 6.151 Due to the long distances between the underground tunnels and the above-ground buildings, as well as the fact that there are London Underground Central Line tunnels running directly above the Tunnels, generating levels of noise and vibration higher than the Proposed Development would, operational noise from the proposed use of the Tunnels would be negligible, at the nearest neighbouring above ground properties.
- 6.152 In summary, the Proposed Development would not raise any residual significant or other adverse impacts on the health and / or quality of life for existing neighbouring above ground properties in the vicinity of the Site, or future occupiers of the development. It is therefore concluded that the Proposed Development complies fully with noise related national, regional, and local planning policy.

AIR QUALITY

- 6.153 NPPF Paragraph 181 sets out that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, considering the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified.
- 6.154 Policy SI1 (Improving air quality) of the London Plan outlines that development proposals should not:
- (a) *“lead to further deterioration of existing poor air quality*
 - (b) *create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
 - (c) *create unacceptable risk of high levels of exposure to poor air quality”*
- 6.155 City Plan Policy CS15 (Sustainable Development and Climate Change) requires developments to positively address local air quality, particularly nitrogen dioxide and particulates PM10. Furthermore, Policy DM15.6 (Air Quality) requires developers to consider the impact of their proposal on air quality and, where appropriate, provide an Air Quality Impact Assessment. Major developments are required to maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of oxides of nitrogen.
- 6.156 Draft City Plan Policy HLC2 (Air Quality) requires developers to effectively manage the impact of their proposals on air quality. Major developments are required to provide an Air Quality Impact Assessment. Developments that would result in worsening of the City's nitrogen dioxide or PM10 and PM2.5 pollutions will be strongly resisted. All developments must be at least Air Quality Neutral. Major developments must maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of oxides of nitrogen (NOx). The Policy further requires developers to install non-combustion energy technology where available.
- 6.157 Camden Local Plan Policy CC4 (Air Quality) requires the impact of development on air quality to be mitigated and ensure that exposure to poor air quality is reduced in the borough. LBC will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in LBC's Air Quality Action Plan.

- 6.158 An Air Quality Assessment has been undertaken by WSP to assess the potential impact of the Proposed Development on air quality at nearby sensitive receptors during the construction and operational phases. Consideration has also been given to the exposure of future users of the proposed terrace at Furnival Street.
- 6.159 The Proposed Development is located within both the CoL and LBC Air Quality Management Areas (“AQMAs”). It also falls within the Holborn High Street and Southampton Row junction Air Quality Focus Area (“AQFA”).
- 6.160 The Proposed Development will be car-free and is well served by public transport, the heating and cooling demands will be covered by electric chillers with heat recovery, as such operational impacts were scoped out of the assessment. As there are no anticipated operational emissions associated with the Proposed Development, it is considered to be Air Quality Neutral.
- 6.161 An external roof terrace is proposed at fourth-floor level at Furnival Street, where relevant receptors in terms of the short-term air quality objectives may be present. However, local monitoring data suggests that both short term NO₂ and PM₁₀ objectives are not likely to be exceeded in this area. Therefore, an exposure assessment of future receptors was scoped out of this assessment.
- 6.162 A qualitative assessment of the potential impacts on local air quality from construction activities has been carried out using the IAQM methodology as per GLA Guidance. This identified there is a Medium Risk of dust soiling impacts during the demolition and earthworks phases, a High Risk during the construction phase and a Low Risk during the exiting of construction vehicles. There is a Low Risk of increases in PM₁₀ concentrations during all phases of the construction activities. However, through good site practice and the implementation of suitable mitigation measures, the assessment confirms the effect of dust and PM₁₀ releases would be significantly reduced. The residual effects of dust and PM₁₀ generated by construction activities on air quality are therefore considered to be ‘negligible’. The residual effects of emissions to air from construction vehicles and plant on local air quality are considered to be short term, temporary and slight adverse.
- 6.163 The Assessment concludes that the Proposed Development complies national, regional and local planning policy for air quality.

DAYLIGHT AND SUNLIGHT

- 6.164 The NPPF states (Paragraph 127) that development should create places with a high standard of amenity for existing and future users.
- 6.165 Regarding Daylight and Sunlight specifically the NPPF states at paragraph 123:
- “c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”*
- 6.166 City Plan Policy DM10.7 (Daylight and Sunlight) outlines that the CoL will “resist development which would reduce noticeably the daylight and sunlight availability to nearby dwellings and open spaces, to unacceptable levels”. The policy further states that the design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight consistent with a city centre context.
- 6.167 Camden Local Plan Policy A1 (Managing the impact of development) seeks to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

- 6.168 Camden Local Plan Policy A1 is supported by the Camden CPG on Amenity (January 2021) which provides further guidance on the expectations that LBC has when considering the impact of schemes on daylight and sunlight levels. It notes that levels of reported daylight and sunlight will be considered flexibly, taking into account site-specific circumstances and context.
- 6.169 GIA have undertaken a technical daylight and sunlight assessment of the Proposed Development to understand the potential effect of the development on the amenity of the relevant neighbouring receptors.
- 6.170 Sensitive neighbouring receptors around the Site are limited. The report confirms that due to window locations and views across the Site, only 1-3 Dyers Building was considered relevant for assessment for daylight and sunlight. As such, the potential daylight and sunlight amenity alterations, arising as a result of the Scheme, are limited to this neighbour only.
- 6.171 The Sunlight and Daylight Assessment concludes that whilst the windows serving the block of flats experience some “Vertical Sky Component” (VSC) losses, beyond BRE guidance, this can be experienced due to the low existing values. The report notes that most of the absolute VSC losses are unlikely to be noticeable and therefore the impact of the Proposed Development on VSC does not amount to unacceptable harm.
- 6.172 Regarding “No Sky Limited” (NSL), the report concludes that the level of compliance is very high and any impacts beyond guidance are isolated to just two Living / Kitchen / Dining (LKDs), which do not amount to unacceptable harm.
- 6.173 Therefore, it is considered that the Proposed Development complies national, regional, and local planning policy for air quality.

URBAN GREENING

- 6.174 London Plan Policy G5 (Urban Greening) explains that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. A target Urban Greening Factor (UGF) of 0.3 is recommended for developments that are “predominantly commercial”.
- 6.175 City Plan Policy DM19.2 (Biodiversity and Urban Greening) requires developments to promote biodiversity and contribute to urban greening. Draft City Plan Policy OS2 (City Greening) requires the provision of urban greening to be integral to design and layout of the buildings and the public realm. All major developments should achieve an Urban Greening score of 0.3.
- 6.176 The UGF provides a tool to evaluate the quality and quantity of urban greening. Whilst the London Plan provides a target score that should be considered, this not a mandatory benchmark. An assessment of this Scheme’s UGF has been undertaken and forms part of the Design and Access Statement. The Assessment demonstrates that the Scheme achieves an Urban Greening Factor of 0.13 which is below with the requirements set out above. However, one reason for this is that the proposed buildings on Furnival Street are, effectively, a large plant enclosure for the 7,829 sqm of tunnel complex below ground. As a result, it was never going to be possible to ‘green wash’ a plant enclosure and thereby ever achieve a UGF of 0.3. This failure against policy will have to be seen in light of the above explanation and the context of the scheme for the Tunnels, as a whole.

ARCHAEOLOGY

- 6.177 Chapter 16 of the NPPF relates to conserving and enhancing the historic environment and identifies heritage assets as an irreplaceable resource and that should be considered in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

- 6.178 London Plan Policy HC1 (Heritage Conservation and Growth), as set out above, requires development proposals, affecting heritage assets, and their settings, to conserve their significance.
- 6.179 City Plan Policy CS12 (Historic Environment) requires developments to protect and promote the evaluation and assessment of the City's ancient monuments and archaeological remains and their settings. City Plan Policy DM12.4 (Ancient Monuments and Archaeology) further requires development proposals, which involve excavation or ground works affecting sites of archaeological potential, to be accompanied by assessment and evaluation of the Site, addressing the impact of a proposed development, mitigation of harm and identification of enhancement opportunities.
- 6.180 This position is retained within the Draft City Plan 2040. Indeed Draft City Plan Policy HE2 (Ancient Monuments and Archaeology) requires development proposals, which involve excavation or ground works affecting sites of archaeological potential, to be accompanied by an archaeological assessment and evaluation of the Site.
- 6.181 Camden Local Plan Policy D2 (Heritage) seeks to protect remains of archaeological importance by ensuring acceptable measures are taken, proportionate to the significance of the heritage asset, to preserve them and their setting, including physical preservation, where appropriate.
- 6.182 An archaeological, desk-based assessment has been prepared by Mills Whipps and forms part of this Application.
- 6.183 The Furnival Street Site lies within the CoL "Archaeological Priority Area". The City Plan notes that exception to the archaeological priority area occurs where there is evidence that archaeological remains have been lost due to deep basement construction or other ground works.
- 6.184 The Assessment confirms that the existing building at 40 Furnival Street has a 4m deep basement and the site was archaeologically excavated prior to its construction in 1988. The building next door at 38-39 Furnival Street sits over an earlier basement, housing a vent and lift shaft for the Chancery Lane underground station. These basements will have removed any pre-1930s archaeological deposits on this part of the Site and as such, impact from the Proposed Development would be very low. Under these circumstances, Historic England has initially suggested that 'pre-determination evaluation' of the Site would not be necessary.
- 6.185 The Site at Fulwood Place lies within an Archaeological Priority Area as defined by LBC The Assessment confirms the existing building has a basement which houses vent shafts and an access shaft for the early 20th century underground station. This will therefore have removed pre-1930s deposits across this part of the Site. The proposed new entrance at Fulwood Place will be confined within the footprint of the existing basement and as such, will have no impact on potential archaeology. Under these circumstances Historic England has initially suggested that predetermination evaluation of the Site will not be necessary.
- 6.186 The Assessment concludes that the Proposed Development is acceptable, within the terms and requirements of national, regional, and local planning policy.

CONTAMINATION

- 6.187 NPPF Paragraph 178 states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risk arising from land instability and contamination.
- 6.188 City Plan Policy CS 15 (Sustainable Development and Climate Change) requires developments to positively address land contamination and ensure they do not result in contaminated land. City Plan Policy DM15.8 (Contaminated Land and Water Quality) further states that where developments involve ground works or the creation of open spaces, developers are expected to conduct a detailed site investigation, to establish whether the Site is contaminated, and to determine the potential for pollution of the water environment or harm to human

health. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

6.189 Draft City Plan Policy S1 (Healthy and Inclusive City) states that the CoL will expect developments to address land contamination, ensuring that they do not result in contaminated land or pollution of the water environment.

6.190 Camden Local Plan paragraph 6.25 sets out that proposals for the redevelopment of sites that are known to be contaminated, have the potential to be contaminated, or are near such sites to be accompanied by the relevant assessments and take remedial action to LBC's satisfaction, if required.

6.191 A Preliminary Risk Assessment, prepared by WSP forms part of this Application. The Assessment recommends the following additional works are completed in due course:

- An intrusive investigation be undertaken;
- A piling risk assessment be undertaken, which assesses the risk of the aquifers underlying the Site from piling activities should a piled foundation solution to be utilised, as part of the Proposed Development;
- Consideration be given to detailed UXO risk assessment and / or mitigation prior to intrusive works at the Site; and
- Given that the Proposed Development includes the provision of occupied, below ground spaces, within basements, shafts and tunnels, consideration should be given to further, random monitoring and assessment in line with UKHSA guidance.

6.192 It is expected that a planning condition would be required to cover the above recommendations.

FLOOD RISK AND DRAINAGE

Flood Risk

6.193 NPPF paragraph 155 states that inappropriate development in areas at risk of flooding should be avoided, by directing development away from areas at the highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime, without increasing flood risk elsewhere. Paragraph 162 states that where planning applications come forward on sites allocated in the Development Plan, through the sequential tests, applicants need not apply the sequential test again.

6.194 Paragraph 163 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The policy further requires a site-specific Flood Risk Assessment be submitted with planning applications for all sites greater than 1 ha in Flood Zone 1, for sites of any size within Flood Zones 2 and 3.

6.195 London Plan Policy SI5 (Water Infrastructure) states that development proposals should minimise the use of mains water, in line with the operational Requirement of Building Regulations, achieving mains water consumption of 105 litres or less per head per day.

6.196 London Plan Policy SI12 (Flood Risk Management) requires that current and expected flood risk from all sources across London should be managed in a sustainable and cost-effective way, in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers. This policy outlines that all development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Further, proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan.

6.197 City Plan Policy CS 18 (Flood Risk) seeks to minimise river flooding risk, by requiring development within the City Flood Risk Area to seek opportunities to deliver a reduction in flood risk compared with the existing situation. This would be achieved through applying the 'sequential test' and 'exception test', as set out in the NPPF and

through protecting and enhancing existing flood defences. City Plan Policy DM18.1 (Development in the City Flood Risk Area) requires site-specific flood risk assessments to address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment.

6.198 Draft City Plan Policy CR2 (Flood Risk) requires that all development proposals within the City Flood Risk Area, and major developments elsewhere, be accompanied by a site-specific flood risk assessment, demonstrating the Site is suitable for the intended use, will be safe for occupants, safe access and egress can be achieved and flood resilient and resilience has been designed into the proposal.

6.199 Camden Local Plan Policy CC2 (Adapting to climate change) requires development to be resilient to climate change and to adopt appropriate climate change adaptation measures.

6.200 Camden Local Plan Policy CC3 (Water and flooding) seeks to ensure development does not increase flood risk and reduces the risk of flooding where possible.

6.201 A Flood Risk Assessment (“FRA”) and Outline Drainage Strategy prepared by WSP, forms part of this Application, and confirms that the Proposed Development is located within Flood Zone 1 and is at low risk from all sources of flooding.

6.202 Surface water has been deemed as having a low risk of flooding at the two shaft sites. The Outline Drainage Strategy further reduces this risk by implementing appropriate Sustainable Urban Drainage Systems (SuDS) measures, where deemed feasible.

6.203 Based on the information available, groundwater flooding at the Site has been assessed as having a low risk at the two shaft sites. However, given the nature of the Proposed Development within an existing tunnel network, appropriate waterproofing measures would be deployed throughout, to manage the risk of groundwater seepage.

6.204 Whilst the overall likelihood of flooding of the Proposed Development is low, the consequence of flooding in the Tunnels is high. As such, the FRA recommends the following mitigation measures:

- Any routes for surface water ingress to the Tunnels (i.e. via the shafts) are protected by finished floor levels that rise to a minimum of 150 mm above adjacent street levels;
- Where practicable, all electrical and life safety infrastructure is provided a minimum of 300mm above finished floor levels, or where this is not practicable, such equipment is designed to be flood resilient; and
- A Flood and Evacuation Plan is prepared for the Proposed Development and agreed with the LPAs prior to occupation.

6.205 The Flood Risk Assessment concludes that the Proposed Development is acceptable within the terms and requirements of the NPPF, subject to the implementation of mitigation measures outlined within the FRA.

Drainage

6.206 NPPF Paragraph 165 requires major developments to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

6.207 London Plan Policy SI13 (Sustainable drainage) outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

6.208 Policy SI13 goes on to state that drainage should be designed and implemented in ways that promote multiple benefits, including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

- 6.209 City Plan Policy DM18.2 (Sustainable urban drainage systems (SuDS)) states that the design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS 'management train' and London Plan 'drainage hierarchy'. Draft City Plan Policy CR3 (Sustainable drainage systems (SuDS)) requires all development proposals to incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City.
- 6.210 The proposed drainage strategy arrangement would comprise of blue roof systems and harvesting, both of which are SuDS solutions that would provide significant benefit, in terms of reducing direct runoff to the existing sewer network, as well as aiding a sustainable water supply.
- 6.211 Surface water runoff from the Proposed Development would be managed through two drainage storage systems, which have been sized to accommodate a 1 in 100-year storm rainfall event, with a 40% allowance for climate change. The proposed strategy would restrict site discharge, to a maximum rate of 1.50 l/s, offering betterment and guarantees that post-development flows will not exceed pre-development levels.
- 6.212 Foul water flows from the ground floor and above at both Furnival Street and Fulwood Place would discharge by gravity, to the existing nearby combined sewer network. Foul flows from below ground would be pumped up to ground floor, and gravity discharge to the combined sewer network. Non-return valves would be installed in the proposed outfall chambers, to prevent any internal flooding, as a result of overloaded public sewers.
- 6.213 Both surface and foul water drainage for the Proposed Development will connect to the existing Thames Water combined sewer networks via existing laterals within the Site Application boundary.
- 6.214 In summary, the Proposed Development is considered sustainable, in terms of drainage strategy and compliant with the requirements of national, regional and local planning policy.

SOCIO ECONOMIC IMPACTS

- 6.215 The London Plan acknowledges the importance of the tourism industry and supports the enhancement and extension of London's attractions.
- 6.216 City Plan Policy CS11 (Visitors, Arts and Culture) seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences.
- 6.217 Policy E3 (Tourism) of the Camden Local Plan recognises the importance of the visitor economy in Camden and supports tourism development. The policy further states that new, large-scale tourism development should be located in Central London where it easily reached by public transport.
- 6.218 Policy C3 (Cultural and leisure facilities) of the Camden Local Plan seeks opportunities for new cultural and leisure facilities in major, mixed-use developments and supports the temporary use of vacant buildings for cultural and leisure activities.
- 6.219 A Socio-economic Impact Assessment, prepared by Volterra, forms part of this Application. The Assessment details the economic, social, and cultural benefits arising from the Proposed Development. These include, but are not limited to:
- Provision of a world-class cultural experience and tourist attraction;
 - Construction and operational employment;
 - Construction worker, worker and visitor expenditure in the local area;
 - Fiscal contributions, tax revenues and business rates;
 - Access to heritage assets; and

- Free access for all primary school children in LBC and CoL.

6.220 Further details can be found within the Assessment, prepared by Volterra. This confirms that the Proposed Development would be acceptable and exceed the planning policy objectives on this issue.

FIRE SAFETY

6.221 London Plan Policy D12 (Fire Safety) requires developments to achieve the highest standards of fire safety. All major development proposals are required to include a Fire Statement, which is an independent fire strategy produced by a third party suitably qualified accessor. The statement should detail how the development proposal would function in terms of the building's construction methods, products and materials, means of escape for all building users, features which reduce the risk to life, access for fire service personnel, provision within the curtilage of the site, to enable fire appliances to gain access to the building and ensure that any potential future modifications to the Building will consider fire risk.

6.222 In line with the requirements set out above, the Application includes a Fire Statement prepared by WSP. Given the project's unique nature, traditional guidance documents such as Approved Document B (ADB) or BS 9999 are insufficient to meet the objectives of Part B of the Building Regulations. Therefore, an engineered and risk-based design approach is proposed, incorporating a 'Basis of Design' document to ensure compliance with fire safety regulations.

6.223 The Tunnels would be a secure area and visitors would be security screened prior to entry. The fuel load within the Tunnels would be carefully controlled and the LED screens that are to be installed within the Tunnels would be made of fire-retardant polymers, to ensure they have a high ignition temperature.

6.224 In case of a fire in the Tunnels, the installed water-based suppression system would be the first line of defence, to extinguish or control the fire. At the same time, a separate smoke detection and alarm system would activate the fire shutters, thus creating separate fire compartments. The compartmentation would provide multiple fire separation layers between occupants and the source of fire as occupants move towards the protection lobbies of the evacuation shafts.

6.225 The refuge lobbies, along with the vertical shafts, are to be pressurised, to be kept clear of smoke during evacuation and firefighting, in the case of sprinklers failure. The two vertical evacuation shafts are separated from each other via distance and fire separations and provide 100% redundancy for egress. All spaces occupied by the public are to have at least two exits with a route to the refuge lobbies.

COMMUNITY INFRASTRUCTURE LEVY ("CIL")

6.226 Within this Application, the following CIL rates would apply (per sqm):

- Greater London Authority (GLA) (Zone 1) (MCIL2 rate): £80
- City of London: £75
- London Borough of Camden: £32

6.227 The GLA rate would apply across the entire Scheme. The rates applicable for CoL & LBC would be divided up, based on the proportion of the Scheme that is in each borough.

6.228 A CIL Form has been submitted with this Application which outlines the relevant information for the Scheme.

7.0 PLANNING BALANCE

7.1 This section provides a planning balance assessment as required under adopted and emerging planning policies and Section 70 of the Town and Country Planning Act 1990 (as amended).

7.2 Having regard to the detailed assessment undertaken within this Statement, we consider that the planning benefits arising from this Scheme can be summarised as follows:

Economic Benefits:

- Redeveloping a brownfield site, in a highly accessible location within the Central Activities Zone (CAZ);
- Providing a high quality, sustainable development in both CoL and LBC;
- Providing a new, world-leading and unique cultural and tourist attraction, supporting London's status as a cultural capital;
- Up to 2 million visitors each year, spending between £60m-£85m in the local area;
- Supporting approximately 105 jobs, equivalent to 85 FTEs;
- £6.1m in economic activity (Gross Value Added) per annum, equivalent to 1% of CoL's and LBC's arts, entertainment and recreation industry, as of 2021;
- Increase in tax revenues each year, through economic activity supported on-site;
- Increase in business rates each year, through economic activity supported on-site;
- Generating a range of financial contributions, including Community Infrastructure Levy, and other site-specific planning obligations and benefits secured under Section 106;
- Supporting construction jobs over the construction period with construction work spend in the local area; and
- Creating apprenticeships during the construction phase of development.

Social Benefits

- Providing a world-class cultural experience, unlocking CoL's Destination City aspirations and diversifying Camden's tourist offering;
- Providing a sense of place to the community;
- Commitment to offering free access for all primary school children in CoL and LBC;
- Access for all – the tunnel complex and all experiences are fully accessible; and
- Improvements to the existing footway at Furnival Street.

Environmental Benefits

- Securing tangible environmental and sustainability improvements, that meet renewable energy targets and local environmental requirements, including the provision of effective and efficient building fabric and services;
- BREEAM sustainability rating of 'Very Good';
- Proposing car free development that encourages sustainable modes of transport;
- Providing secure cycle parking and changing facilities for visitors and employees; and
- Promoting interaction through high quality, inclusive and safe public realm, delivered through a collaborative site layout which allows for connectivity, cohesion and active frontages.

Heritage and Townscape Benefits

- £140m in restoring and preserving the Tunnels, as a unique and valuable piece the of the Country's historical heritage;
- Providing a quantum of development, in terms of bulk, scale and massing that optimises the Site yet respects the surrounding context and is proportional to its setting, considering local context, emerging townscape, the surrounding conservation and listed buildings in close proximity; and
- Providing a new development that will be of high architectural value and use high quality and durable materials.

7.3 Based on the above, and even in the event of any identified harm arising from the Proposed Development, the planning benefits brought about through the Scheme clearly represent significant material considerations in the determination of the Application, which outweigh any such harm.

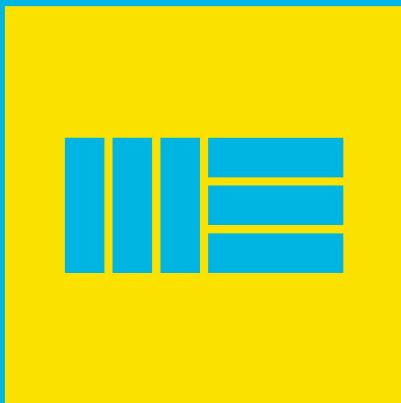
7.4 On this basis, and following supportive engagement with both LPAs, we hope the Application receives permission, to enable one of London's best kept historical secrets to come forward, as a world-leading cultural and tourist attraction. One which, the Applicant hopes, will make this part of London, a destination in its own right and bring to both boroughs a variety of valuable social, environmental and economic benefits.

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL

