



1-8 Long Lane, London, EC1A 9HF

Planning Statement

December 2023

DP9 Ltd

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1. Introduction

1.1 This Planning Statement has been prepared by DP9 Ltd (DP9) on behalf of Mactaggart Third Fund and Ian Mactaggart Trust (“the Applicant”) in support of a full planning application seeking planning permission for the redevelopment of the site at 1-8 Long Lane, London, EC1A 9HF (“the Site”).

1.2 The proposed description of development (“the Proposed Development”) is as follows:

“Demolition of existing buildings to basement level and construction of a nine-storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground floor together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.”

1.3 This Planning Statement provides the planning policy justification in support of the Proposed Development. It assesses the relevant planning considerations associated with the proposals and considers the Proposed Development in the context of the national, regional and local planning policy guidance.

1.4 This Planning Statement should be read in conjunction with the other documents, planning drawings and technical reports which accompany the application, as set out in paragraph 1.6 below.

1.5 The Proposed Development has also been the subject of significant community consultation and stakeholder engagement prior to the submission of the planning application. Full details of the public consultation is set out in the Statement of Community Involvement accompanying the planning application.

1.6 The documents accompanying the planning application are as follows:

Planning Application Forms, prepared by DP9 Ltd;

Planning Statement, prepared by DP9, including:

- Cultural Strategy;
- Draft S106 Heads of Terms

Planning Application Drawings, prepared by EPR Architects;

Design and Access Statement, prepared by EPR Architects;

Landscape Design and Access Statement, prepared by Farrar Huxley;

Heritage, Townscape and Visual Impact Assessment, prepared by Montagu Evans;

Daylight, Sunlight and Overshadowing Report, prepared by Point 2 Surveyors;

Acoustic Statement, prepared by Arup;

Whole Life-Cycle Carbon Assessment, prepared by Arup;

Circular Economy Statement, prepared by Arup;



Sustainability Statement, prepared by Arup;
Energy Strategy, prepared by Hoare Lea;
Archaeology Desk Based Assessment, prepared by MOLA;
Transport Statement, prepared by Caneparo Associates;
Travel Plan, prepared by Caneparo Associates;
Delivery, Servicing and Waste Management Plan, prepared by Caneparo Associates;
Phase 1 Geo-environmental Preliminary Risk Assessment, prepared by RPS Consulting;
Air Quality Assessment, prepared by Hoare Lea;
Air Quality Positive Statement, prepared by Hoare Lea;
Preliminary Ecological Appraisal, Biodiversity Net Gain Assessment and BREEAM, prepared by The Ecology Partnership;
Fire Statement, prepared by prepared by Arup;
Flood Risk Assessment, prepared by Elliott Wood;
Sustainable Drainage Strategy, prepared by Elliott Wood;
Wind Microclimate Planning Assessment, prepared by Arup;
Financial Viability Assessment, prepared by JLL;
Hotel Needs Assessment, prepared by JLL;
Outline Construction Logistics Plan, prepared by Caneparo Associates;
Statement of Community Involvement, prepared by Concilio;
Operational Management Plan, prepared by The Resident.

- 1.7 The Proposed Development is to be operated by The Resident who provide boutique hotels at three other locations in London and another to be delivered in Edinburgh. The Resident currently has three hotels in the top 20 of London hotels on Tripadvisor, with the Covent Garden hotel at no. 1 (September 2021) and is established in the London market as one of the very best hotel brands from the guest perspective, consistent with its reputation with team members as an employer brand.
- 1.8 The locations of The Resident Hotels are chosen purposely to encourage the discovery or regular use of nearby facilities and naturally engage in local culture.



2. Site Context

- 2.1 The Site is located on the north side of Long Lane and covers an area of 0.0825 ha and comprises two adjoining buildings (1-5 Long Lane and 6-8 Long Lane) of which the ground and upper floors have most recently been used as offices. A Pret A Manger retail unit also occupies part of the ground floor of 1-5 Long Lane with an area of hardstanding used as a seating area.
- 2.2 The existing buildings are low grade 1960s/1970s buildings with limited architectural merit and extend to ground and four upper floors. The existing buildings no longer provide modern office floorspace and so that element of the Site currently lie vacant. In addition, the buildings fail to meet modern EPC requirements and sustainability targets.
- 2.3 The two buildings are shown in the photographs below:



1-5 Long Lane



6-8 Long Lane

- 2.4 The Site lies adjacent to TfL safeguarded land comprising railway lines associated with Barbican Station to the north, to the east by the Barbican Station underground entrance and the west by the adjoining 9-12 Long Lane office building.
- 2.5 Key landmarks surrounding the Site include the Barbican estate which provides a mixture of retail and residential use as well as the Barbican Centre. In addition to Barbican Station, the Site is also in acceptable walking distance of Farringdon Station, including the eastern entrance to the Farringdon Crossrail Station (Elizabeth Line), St. Paul's Station, Old Street Station and Moorgate Station.
- 2.6 The existing floorspace of the Site is shown in the table below.

Use Class	GIA (sqm)
Office (Class E)	2,905
Retail (Class E)	320
Total	3,225

- 2.7 The Site is located within the Central Activities Zone (CAZ) and has a PTAL of 6b which is an 'Excellent' rating in terms of access to public transport.



Built Heritage

- 2.8 The Site is not located within a Conservation Area and lies to the north of the Smithfield Conservation Area, to the south of Charterhouse Square Conservation Area and to the east of the Barbican and Golden Lane Conservation area.
- 2.9 The Site is visible in views into and out of the surrounding conservation areas and is within the wider settings of several listed buildings, including the following:
- Grade II listed Barbican Estate located to the east on Aldersgate Street;
 - the Grade II* listed Smithfield Central Market buildings to the west on Long Lane and West Smithfield;
 - Grade II listed buildings at Nos. 74 and 75 Long Lane.
- 2.10 The existing townscape in the vicinity of the Site is generally now of large-scale, large footprint commercial buildings. The Heritage Townscape and Visual Impact Assessment, prepared by Montagu Evans, provides a more detailed overview of the heritage assets and townscape views in the vicinity and their significance.

Transport and Highways

- 2.11 The Site has a Public Transport Accessibility Level (PTAL) of 6b which is considered to have 'Excellent' access to public transport facilities.
- 2.12 The Site is accessible by all major public transport modes; numerous bus, London underground, rail, and Crossrail services are located within walking distance of the Site. In addition, the Site is within cycling distance of both central and outer London Boroughs.
- 2.13 The Site's vicinity also benefits from good active travel environments. The pedestrian environment is of a high standard with wide footways, which are evenly paved and easy to cross. Surrounding roads such as Long Lane offer cycle infrastructure including advanced cycle stop lines, cycleways and cycle parking
- 2.14 Long Lane is a two-way carriageway which operates predominantly in an east-west orientation between West Smithfield to the south-east and Aldersgate Street to the north-west. The carriageway offers access to one lane of traffic in each direction and is subject to a 20mph speed limit.
- 2.15 Along the southern side of Long Lane opposite the Site an on-street disabled parking space and 8 parking bays are provided.
- 2.16 The Site is located within the City of London Controlled Parking Zone (CPZ) which controls on-street parking Monday – Friday between 07:00 – 19:00 and on Saturday between 7am - 11am.



Servicing and Deliveries

- 2.17 Along the Site frontage the road is subject to single yellow line restrictions, enabling on-street servicing and drop-off activity, with the eastern element of the 1-5 Long Lane frontage between Cloth Street and Aldersgate Street providing double yellow line kerbside restrictions, preventing servicing/stopping on-street.
- 2.18 Along the Site frontage where single and double yellow line kerbside restrictions are in place, a marked cycle lane on the highway is provided.



3. Planning History

3.1 The most recent key planning permission affecting the Site was granted on 21st July 2021 (ref. 18/01020/FULMAJ) for the following development, which includes the Site and the adjacent building at 9-12 Long Lane:

“Demolition of existing buildings and structures to basement level and construction of a eight storey office (Class B1) building with basement and lower basement with retail (Class A1/A2/A3) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.” (“the consented scheme”)

3.2 The consented scheme has not been implemented. However, the consented scheme represents a realistic baseline that has informed the scope of the Proposed Development.

3.3 In respect of the existing Pret A Manger at 1 Long Lane, there have otherwise been a series of minor planning applications, which include the following:

Application Ref. Number	Description of Development	Status
07/00788/FULL	Alterations to entrance and infilling of rear doorway with glazed panel.	Approved 15.10.2007
07/00787/ADVT	Installation and display of (i) one externally illuminated projecting sign measuring 0.600m in diameter situated at a height above ground of 2.75m and (ii) one internally illuminated fascia sign measuring 0.75m high by 4.0m wide, situated at a height above ground of 2.5m.	Approved 15.10.2007
06/00330/ADVT	Installation and display of one externally illuminated fascia sign measuring 0.9m high by 2.3m long situated at a height above ground of 2.4m	Approved 28.06.2006



4. Pre-Application Discussions and Consultation

- 4.1 The Applicant and project team has engaged with statutory consultees and other key stakeholder groups throughout the design process prior to the submission of the planning application.
- 4.2 A comprehensive programme of engagement commenced in June 2022 with initial meetings held with a range of stakeholders, residents and neighbours. As the scheme evolved through the pre-application discussions with the officers at the City, a public exhibition was held at the end of September / early October 2023.
- 4.3 Please refer to the submitted Statement of Community Involvement for further details of this wider consultation and engagement, including the nature of the feedback received and the how the Proposed Development has responded accordingly.
- 4.4 A series of pre-application discussions has been held with the relevant City of London officers prior to submission of the planning application. The key topics that have been discussed have included the following:
- the principle for the proposed redevelopment of the Site;
 - the need for a hotel;
 - the loss of the existing office use;
 - the design and appearance of the new building;
 - the sustainability aspirations of the Proposed Development, including a Whole Life Carbon third party assessment.
- 4.5 In line with adopted Local Plan policy regarding the loss of offices and recently adopted Planning advice Note on 'Carbon Options Guidance' a key part of the pre-application discussions centred on the principle for the demolition of the existing building and the alternative use for hotel. Following 'third party' reviews of information provided by the Applicant in respect of the financial viability of continued office use at the Site and a carbon optioneering exercise, the principle of a change of use from offices to hotel was generally supported by the officers at the City, subject to a further assessment at the planning application stage.
- 4.6 Matters of detail design were also the focus of discussion with officers in respect of the architectural treatment of the façade of the building in terms of the use of materials, the shape and form of the building, the opportunity and extent of greening to increase biodiversity.
- 4.7 The design and use of the ground floor frontage and how this appeared in the street was also a key part of the design discussions, particularly with the likely size and type of retail fronting Long Lane. In addition, the public realm and landscaping scheme was also of interest to



officers and interested parties and seen as a major public benefit of the Proposed Development.

- 4.8 In terms of the proposed height and scale of the Proposed Development, the Applicant team has been cognisant of the height, bulk and mass of the consented scheme and has sought to work within the parameters of the consented scheme to minimise impact. This was also a key point of discussion with the officers during the pre-application discussions.



5. Application Proposals

Description of Development

- 5.1 This section of the Planning Statement provides a description of the Proposed Development. The Design and Access Statement, prepared by EPR Architects, submitted alongside this application also fully illustrates and describes the Proposed Development.
- 5.2 The Proposed Development provides the opportunity to replace a vacant office building, which is considered to be beyond its economic life and create a new boutique luxury hotel through the redevelopment of the Site with ancillary retail use fronting Long Lane. As such, the planning application seeks planning permission for the following:

“Demolition of existing buildings to basement level and construction of a nine-storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground floor together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.”

Principle of Development

- 5.3 The planning application seeks planning permission for a new development on the Site for hotel use to replace the existing two office buildings. The Proposed Development presents the opportunity to deliver a high quality, luxury hotel that is unparalleled to the existing, unused office building at the Site.
- 5.4 The Proposed Development also includes activation of part of the ground floor fronting Long Lane through the provision of flexible retail use. The hotel does not include a dedicated hotel restaurant or bar and so the provision of retail uses along the frontage of the Site will provide facilities for use by both visitors to the hotel and also members of the public.
- 5.5 The upper floors of the existing building will provide 128 hotel rooms, (which will include accessible hotel rooms) and external terraces for use by guests.

Design and Appearance

- 5.6 The design of the Proposed Development has been broken up into four main architectural components that break up the elevational treatment of the building. The Design and Access Statement describes these elements as ‘The Crown’, ‘The Attic’, ‘The Body’ and ‘The Base’.
- 5.7 The Crown element comprises a lightweight metal top that references the metal facades of the existing buildings and characterises the top stepped back levels as having a different facade quality to differentiate with the floors below.



- 5.8 The Attic storey provides a visual top to the Proposed Development when viewed obliquely along Long Lane, as the crown of the building is not visible.
- 5.9 The Body is the main banding within the mid-section of the building through the use of red brick reference that are found along Long Lane.
- 5.10 The Base provides a strong datum at ground and first floor level with large window openings at ground floor level to reflect the proportions of the context opposite on the southern side of Long Lane.

Height and Massing

- 5.11 In terms of the massing, the existing Site comprises two office buildings of ground plus four storeys.
- 5.12 The Proposed Development would demolish the existing buildings and redevelop the Site for a single building. The Applicant has been acutely aware of the parameters established by the consented scheme and the height and massing of the building approved under that planning permission.
- 5.13 As such, through the pre-application discussions with the officers at the City, an appropriate height of the building is proposed that takes into consideration the height of the consented scheme. As such, the Proposed Development, excluding plant is approximately 350mm lower in height than the consented scheme.
- 5.14 The Design and Access Statement accompanying the planning application provides a full comparison between the massing of the existing building, the consented scheme and the Proposed Development.

Land Uses and Layout

- 5.15 The Proposed Development will provide the following quantum of accommodation:

	Sqm GIA	Sqm GEA
Hotel Use	5,110	
Class E (a) / (b) Use	167	
Total	5,277	5,913

- 5.16 The proposed hotel will comprise a total of 128 rooms on the upper floors served by a centralised main lift/stair core. The ground floor accommodates the main lobby, reception and guest lounge for the hotel with the retail unit, giving an opportunity for a mix of active frontage along Long Lane.
- 5.17 The typical upper floor contains guestrooms, linen stores, and other back of house facilities associated with the hotel use. The guestroom layouts have been carefully designed to offer



guests a direct view out through the window upon entry, giving a sense of openness and luxury on arrival into the room.

- 5.18 In plan, the upper floors step back, in response to the similarly stepped massing of the previously consented scheme, in order to mitigate further impacts on daylight and sunlight enjoyed by surrounding properties. Guestrooms on the south elevation at these levels are larger.
- 5.19 The basement will contain back of house functions for the hotel staff facilities, cycle storage, a basement part of the retail unit above, and plant.
- 5.20 The eastern corner of the Proposed Development at ground floor level will address the new 'Pocket Garden', with doors opening onto that space, inviting patrons into the retail unit.
- 5.21 At roof level an enclosed plant room and lift overrun is provided, as well as a biodiverse brown roof and 237 sqm of photovoltaic panels.

Landscaping

- 5.22 A key feature of the Proposed Development is the provision of a 'Pocket Garden' to replace the existing area of hardstanding adjacent to the Pret A Manger. This area is currently unwelcoming and provides a somewhat hostile environment for pedestrians along Long Lane. The space will be transformed into a landscaped publicly accessible space at this important part of the Site at the eastern end of Long Lane.
- 5.23 The proposed landscaping scheme maximises upon the value of landscape for guests to the hotel, and for members of the public passing by and through the 'Pocket Garden'. A tree canopy is introduced to mark the beginning of Long Lane, with an understory of planting, with species selected to maximise upon a changing seasonal narrative to the street scene. The introduction of a layered planting scheme will reduce the impacts of the Urban Heat Island effect and will connect the Proposed Development with the wider green infrastructure in the locale of the site's setting, in particular Charterhouse Square and The Barbican Gardens.
- 5.24 The Landscape Design and Access Statement accompanying the planning application also sets out that within the 'Pocket Garden' and the landscaping scheme, there is the potential to provide a contribution towards a 'Cultural Strategy' on Site through a range of public art installations that could reflect the nature and history of the Site and the surrounding area.
- 5.25 The provision of green roofs across the scheme seeks to maximise upon their value as a foraging resource for visiting birds and pollinators. Green roofs offer the opportunity for birds to rest on migratory routes, and are spaces of haven for pollinator species. Plug planting of native flowering species are proposed alongside other features to maximise the ecological benefits: rope coils, sandy piles; insect hotels and log piles.



Transport, Access and Servicing

Car Parking

- 5.26 The Proposed Development will be car-free, with zero off-street parking spaces provided, reflecting the Site's Central London location and excellent access to public transport.
- 5.27 On-site servicing yard and the provision of an active ground floor floorplate can be provided within the Proposed Development, which otherwise be taken up with car parking. As set out earlier, the Site also benefits from being within short walking distance of bus services operating on Aldersgate Street, Farringdon East Crossrail Station and Barbican Station. As such, there is the opportunity for guests to travel by modes other than private car to access the Site.

Cycle Parking

- 5.28 In terms of the provision of long stay cycle parking, the Proposed Development will provide 10 long stay cycle spaces for the hotel element for both staff and visitors at basement level of the building.
- 5.29 In addition, short-stay cycle parking will be made available for the proposed retail use, by way of 6 short stay cycle parking spaces proposed to be located on-street adjacent to the proposed external green space at the eastern section of the Site.

Deliveries and Servicing

- 5.30 The existing Site is typically serviced by vehicles on-street. However, to improve on the existing situation, the proposed service yard to the rear of the Site will negate the need for frequent on-street servicing for both the hotel use and the retail use.
- 5.31 The service yard will be able to accommodate a variety of suitably sized vehicles that are able to access and egress the service yard in forward gear.
- 5.32 It is estimated that the Proposed Development will generate a reduction in daily servicing vehicle movements in comparison to the use of the building as offices.



6. Planning Policy Framework and Overview

- 6.1 This section identifies key national, regional and local planning policy and guidance relevant to the determination of the planning application, and against which the Proposed Development has been considered during design development.

Development Plan

- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Acts, it should be in accordance with the Development Plan unless material considerations indicate otherwise. The adopted Development Plan for the City comprises the following:

London Plan (March 2021);
City of London Local Plan (2015).

National Policy and Guidance

National Planning Policy Framework (NPPF)

- 6.3 National planning policy is set out in the National Planning Policy Framework (NPPF), which was updated on 19th December 2023. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11) with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of policies within the Framework.
- 6.4 The NPPF supports building “a strong, responsive and competitive economy” and encourages creating conditions ... “in which businesses can invest, expand and adapt”, making “as much use as possible of previously-developed or brownfield land” (Paragraph 8).

National Planning Practice Guidance (NPPG)

- 6.5 Alongside the NPPF, in March 2014 the Department for Communities and Local Government (DCLG) published the National Planning Practice Guidance (NPPG). The NPPG is a web-based resource which brings together planning guidance in an accessible, comprehensible and useable way. The NPPG was most recently updated in November 2023.
- 6.6 Both the NPPF and NPPG are material considerations in the determination of a planning application, but do not form part of the City of London’s Local Plan.



Regional Planning Policy and Guidance

The London Plan

- 6.7 The London Plan (adopted March 2021) is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth.
- 6.8 The GLA has also produced a number of adopted guidance documents which support London Plan policy. Those of key relevance to the Site and/or Proposed Development include:

Whole Life Carbon LPG (March 2022);
Draft Fire safety LPG (February 2022);
Urban Greening Factor LPG (February 2023);
Air Quality Neutral LPG (February 2023);
Circular Economy Statement Guidance (March 2022);
Whole Life-Cycle Carbon Assessments (March 2022);
'Be Seen' Energy Monitoring Guidance (September 2021);
Energy Assessment Guidance (June 2022);
Culture Strategy (2018);
Accessible London: Achieving an Inclusive Environment (October 2014);
The control of dust and emissions in construction SPG (July 2014);
Optimising Site Capacity: A Design-led Approach LPG (June 2023);
Fire safety LPG (draft) (June 2022);
Urban greening factor LPG (February 2023);
Air quality positive LPG (February 2023);
Circular economy statements LPG (March 2022);
Sustainable Transport, Walking and Cycling (December 2022).

Local Planning Policy and Guidance

City of London Local Plan

- 6.9 Local planning policy and guidance is set out in the City of London Local Plan which was adopted in January 2015. The Local Plan sets out the vision, strategy and policies for planning within the City of London.
- 6.10 The City has also prepared a number of supplementary documents to provide guidance on adopted planning policies. These documents form material considerations but do not form part of the Development Plan. Those relevant to the Proposed Development include:

Carbon Options Guidance (2023)
Protected Views SPD (January 2012)
Office Use SPD (adopted January 2015)



Statement of Community Involvement (adopted July 2016)
Air Quality SPD (July 2017)
Cultural Strategy (2018-2022)
City of London Transport Strategy (May 2019)
Wind and Microclimate Guidelines (August 2019)
Whole Life Carbon Optioneering Planning Advice Note (March 2023)
Draft Planning Obligations SPD (May 2021)

Emerging Development Plan Documents

The City Plan 2040

- 6.11 The City of London is in the process of preparing a new Local Plan, 'The City Plan 2040', which will replace the current Local Plan when adopted.
- 6.12 The Draft Local Plan sets out the City's vision, strategy and objectives for planning up to 2040, together with policies that will guide future decisions on planning applications. The City of London currently expects to undertake Regulation 19 Consultation in early 2024 and submit the City Plan for examination end of 2024. Full adoption of the City Plan is anticipated in summer 2025.
- 6.13 As the emerging draft Local Plan is in the early stages of preparation, its draft policies currently hold limited weight in decision making. Notwithstanding this, the Applicant and design team have had regard to the draft policies within the emerging plan and have sought to respond to these, where possible, so that the Proposed Development will support the emerging vision for the City of London as set out in the draft plan.

Other Considerations – 'Destination City'

- 6.14 The 'Visualising Destination City' report was published by the City in October 2023 and the launch of 'Destination City' coincided with the opening of the Elizabeth line. Farringdon Station is a very short walk from the Site and the Elizabeth Line now brings an extra 1.5 million people to within a 45-minute commute of the Square Mile.
- 6.15 The report sets out that the City has already implemented a 25km network of Pedestrian Priority Streets plus the Bank Junction improvements, and further work should now be set out on the next 25km as per the City's Transport Strategy which include the east-west 'Culture Mile' route of Beech Street, Long Lane and West Smithfield between the new Museum of London and the Barbican.
- 6.16 Therefore, given the location of the Site, the Proposed Development will play a role in the City's 'Destination City' initiative - which sets out a renewed vision for the Square Mile to become the world's most attractive destination for workers, residents and visitors. This ambitious vision will help to ensure that the City is the world's most innovative, inclusive and



sustainable business ecosystem as well as an attractive place to invest, work, live, learn and visit.

The Culture Mile

- 6.17 The 'Culture Mile', launched in 2017 is an initiative that will create a vibrant cultural area in the north-west corner of the City over the next 10-15 years from Farringdon to Moorgate. As noted above, the Elizabeth Line at Farringdon will have direct access to three major London airports with a 30 minute journey time from Heathrow and is the only station with the underground, Thameslink, Crossrail all interlink. Development such as the Culture Mile will only increase the demand for hotel accommodation beyond that of the London Plan requirement.
- 6.18 The Site is located at the heart of the Culture Mile and, as stated later in this statement, provides an opportunity to link into the wider strategy for this area.



7. Planning Policy Assessment

- 7.1 This section of the Planning Statement assesses the Proposed Development against the planning policy at national, regional and local level and sets out any other material considerations which are relevant to the determination of the application.
- 7.2 This section will address the following key planning matters related to the Proposed Development:

- Principle of Development
- Loss of Existing Office Use
- Appropriateness of Hotel Use
- Cultural Strategy
- Height, Massing and Design
- Heritage, Townscape and Visual Impact
- Urban Greening
- Landscaping
- Transport
- Energy and Sustainability
- Circular Economy
- Whole Life Carbon
- Daylight and Sunlight
- Fire

Principle of Development

- 7.3 At the heart of the NPPF is the presumption in favour of sustainable development, achieved through meeting the three ‘overarching aims’: building a strong, responsive and competitive economy; supporting strong, vibrant and healthy communities; and contributing to, protecting and enhancing the natural, built and historic environment.
- 7.4 The NPPF requires strategic planning policies to make “...as much use as possible of previously-developed or ‘brownfield’ land” (paragraph 123). Paragraph 131 also states that “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
- 7.5 Furthermore, London Plan Policy GG2 states that those involved in planning and development must enable the development of brownfield land and prioritise sites which are well-connected by existing or planned public transport. Development on brownfield land should be optimised and optimisation should be a design led approach.
- 7.6 National, regional, and local policy seeks to optimise the potential of brownfield sites such as the Site to deliver high-quality, high density mixed-use development. The Proposed



Development would support the principles of the optimal use of a brownfield site in a highly accessible, central location and provide a number of new jobs and hotel rooms.

- 7.7 The principle of the Proposed Development therefore accords with the central theme of policy which seeks to deliver sustainable growth and is compliant with the Government's overarching objectives for sustainable growth, specifically paragraphs 8 and 11 of the NPPF and London Plan Policy GG2.
- 7.8 Considering the above, the Proposed Development is supported by current and emerging planning policy and guidance.

Loss of Existing Office Use

- 7.9 The existing lawful use of the site is employment use (Use Class E). Local Plan Policy CS1 seeks to protect office accommodation where there are strong economic reasons why the loss would be inappropriate and prejudice the primary business function of the City.
- 7.10 Local Plan Policy DM. 1.1 goes further stating loss of existing offices will be refused where the building is considered suitable for long-term viable office-use. Losses are considered inappropriate for 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.”

Assessment

Office Market Commentary

- 7.11 As previously described, the existing Site comprises two low grade office buildings built in the 1960/1970s with limited architectural merit. Importantly, the existing office space is unsuitable to meet modern office requirements and does not meet modern sustainability targets.
- 7.12 In line with Local Plan policy, a Financial Viability Assessment (“FVA”) has been carried out by JLL to determine whether the existing building or Site would be viable for future office use. In addition, a ‘City Market Overview’ has also been carried out by JLL to review the demand and supply of office floorspace in the City and is included as an Appendix to the FVA.
- 7.13 The existing Site comprises a total 25,760 sq ft of office accommodation. This represents 0.02% of the total office stock in the City. Therefore, the loss of the existing office space from the Site is negligible and would not prejudice the primary function of the City today, as the building



represents only a tiny proportion of the overall office stock and there is plentiful current supply elsewhere in the City.

- 7.14 The 'City Market Overview' prepared by JLL demonstrates that there is a healthy office development pipeline in the City. The level of speculative development under construction in Q3 2022 stood at 4.4 million, close to the 10 year average of 4.6 million. Based on this, there is sufficient current capacity and in the development pipeline to meet demand which continues to be strongest for best-in-class accommodation with strong ESG credentials and tenant amenities, as demonstrated by continued strong pre-leasing activity. In Q3 2023 new build supply decreased over the quarter as occupiers focused on such space, falling to 1.2 million sq ft, from 1.447 million sq ft at the end of Q2.
- 7.15 The 'City Office Overview' also shows that demand for dated or Grade B accommodation continues to decline and will continue to do so as occupiers become more focused on acquiring space with good ESG credentials. The minimum EPC standard is expected to rise to C by April 2027 and B by April 2030 based on government announcements to date, which means that some landlords will need to upgrade their properties. This is of particular relevance to the existing Site, as the existing building lacks ESG credentials that appeal to occupiers and investors. 1-5 Long Lane has an EPC rating of D and 6-8 Long Lane has an EPC rating of C, and there is no BREEAM rating or any other ESG credentials.
- 7.16 As such, the existing buildings for use as offices will therefore become less desirable over time as demand increases from both occupiers and investors for buildings that perform highly in terms of ESG. The Site will become increasingly less able to compete with new and comprehensively refurbished buildings in the submarket and is highly unlikely that there would be occupational demand for the existing Site for office use.
- 7.17 The existing buildings do not provide any of the criteria that modern office occupiers are looking for and demand for the existing Site as continued office use in its current state is therefore severely limited.

Financial Viability

- 7.18 In viability terms, the submitted Financial Viability Assessment ("FVA") provides an assessment of three potential different scenarios for the reuse of the building as office use – a light refurbishment scheme; a comprehensive refurbishment and a redevelopment scheme for a new office building.
- 7.19 Each of the scenarios were robustly tested and discussed with officers as part of the pre-application discussions with the viability of the redevelopment scenario being independently reviewed by consultants on behalf of the City. It was concluded that none of the scenarios were considered to be realistic viable scenarios to warrant future office use on the Site, either within the existing building or redevelopment of the Site for a new office building.



- 7.20 The FVA submitted with the planning application re-assesses the three scenarios previously tested and fully conclude that the resultant profit return is significantly below an acceptable profit margin and presents a financial loss for all three scenarios. All three scenarios would have a financial deficit, as set out below:

	Light Refurbishment	Full Refurbishment	New Build
Surplus/Deficit	£9,366,001	£5,380,035	£17,572,387
Conclusion	Unviable	Unviable	Unviable

- 7.21 In light of the above, it has been robustly demonstrated via the submitted FVA and supporting evidence that continued use of the Site as offices would be financially unviable in any re-use scenario. Therefore, the loss of office use from the Site accords with the requirements of Local Plan Policy DM 1.1 and would not remove existing office stock for which there is demand or long term viable need.

Appropriateness of Hotel Use

- 7.22 London Plan Policy E10 confirms that London’s visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure in areas well supported by public transport.
- 7.23 The London Plan and its supporting documentation provided an in-depth analysis of the current and, more importantly, future, supply and demand requirements for serviced accommodation, highlighting the need for an additional 58,000 bedrooms by 2041 (an average of 2,230 bedrooms per annum) to meet the demands of tourists visiting the capital. In particular, the City is projected to be within the top five London boroughs/council areas for demand growth over the period to 2041.
- 7.24 The GLA identifies a requirement for an additional 5,426 new rooms to be delivered (i.e. developed or converted) within the City by 2041. While equating to a smoothed average of 208 new rooms per year, in reality, naturally there will be periods of both increased and decreased activity based on factors such as the timing/availability of suitable sites, development conditions and economic lifecycles. Overall, if achieved, the additional rooms should see serviced accommodation supply increase to 11,490 rooms within the City by 2041, up from 6,064 in 2015.
- 7.25 Part E of London Plan Policy SD4 states that the unique concentration and diversity of cultural, arts, entertainment, nighttime economy and tourism functions should be promoted and enhanced within the CAZ.
- 7.26 Core Strategic Policy (CS11) of the City of London Local Plan seeks to maintain and enhance the City’s contribution to London’s world-class cultural status and to enable the City’s communities to access a range of arts, heritage and cultural experiences, in accordance with the City



Corporation's Visitor Strategy by allowing hotel development where it supports the primary business or cultural role of the City and refusing new hotels where they would compromise the City's business function or the potential for future business growth. Policy CS11 also notes that hotels should not be located where they would create amenity problems for existing residential areas.

- 7.27 Policy DM11.3 of the City of London Local Plan states that proposals for new hotel accommodation will only be permitted where they do not prejudice the primary business function of the City; are not contrary to policy DM1.1 (as demonstrated earlier), contribute to the balance and mix of uses in the immediate locality; do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts; provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel; are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards.

Assessment

- 7.28 The Site is exceptionally well suited for the proposed hotel use given its excellent accessibility profile and access to popular visitor and commercial hotspots. It is therefore in accordance with the London Plan policies E10A and E10G which state that developments in support and extension of the tourist economy should be focused on areas well-connected by public transport, particularly into central London and the CAZ.
- 7.29 The Hotel Needs Assessment prepared by JLL submitted with this application demonstrates that there is currently a low level of hotel room supply in the immediate location (generally between 30-55%), while at the same time there is a sufficient level of demand drivers on offer which present the opportunity for new hotel development in the area.
- 7.30 The assessment sets out that hotels in the City of London have consistently achieved a strong level of occupancy well into the 80% range, with the Upper Upscale market achieving an occupancy rate of 85.8% and 86.9% in 2018 and 2019, respectively. This level of occupancy is considered to be very high and illustrates that before the Covid-19 pandemic there was strong demand for hotel accommodation in the area.
- 7.31 Not surprisingly, both occupancy and average daily rates declined throughout 2020 and 2021 due to the pandemic, however the level of performance achieved illustrates the City of London's resilience as a market compared to other markets in London and across the United Kingdom that performed significantly worse.
- 7.32 Year to date October 2023 data is evidence that a recovery in demand in the market is well underway, showing strong growth from the same period in the previous year during which travel restrictions were eased. CoStar is forecasting full occupancy recovery to 2019 levels by 2026.



- 7.33 As part of the evidence base for the emerging draft Local Plan, Avison Young, on behalf of the City published the 'City of London Visitor Accommodation Secure Commercial Needs Study' (January 2023).
- 7.34 The report concludes that over the last decade, there has been significant growth in the City of London's visitor accommodation sector which has been driven by hotels, accounting for nineteen new openings (3,221 bedrooms) and only one closure since 2013. This has resulted in a 41% increase in hotels and (a 51% increase in bedrooms). The report sets out that whilst these growths are strong, neighbouring boroughs have seen larger increases which can be attributed to the growth in the 'City Fringe' where there are more available sites (and where land values are lower than the City).
- 7.35 Furthermore, the Avison Young report advises that "despite the significant recent growth, the current pipeline of hotel projects within the City is relatively low" (and lower than neighbouring boroughs) with 10 schemes identified (including one serviced apartment) representing a potential increase of 1,483 bedrooms. This is likely due to a combination of available sites and the ongoing impact of both Covid-19 and the current economic downturn on funding markets. Nonetheless, future visitor accommodation demand prospects for the City remain buoyant.
- 7.36 Confidence in its continued status as a global financial centre can be witnessed by a number of large office developments that are due to open in the next five years and a continuing pipeline of planning applications for major development. Despite the impact of Covid-19, the City is showing healthy levels of office workers returning to office, albeit they still remain below 2019 levels. Furthermore, despite growing concerns that greater environmental considerations may limit corporate and leisure travel in the future, there remains no evidence to suggest that this will have a significant impact on the future need for visitor accommodation in Central London.
- 7.37 Avison Young model projections (based on historic annual average demand growth) forecasts that there is demand capacity for an additional 350 rooms per annum in City of London to 2037, maintaining market occupancy at around 85%. This represents supply growth of 4,012 rooms over 15 years, equating to a 38.6% increase, including those schemes in the planning pipeline.
- 7.38 In addition, together with the locational distribution of supply, shows a market need and opportunity for further hotel accommodation in this location within the Culture Mile to serve both commercial and leisure visitors to the City in line with the GLA's identified need/requirement for additional accommodation and also the aspirations of the Culture Mile.
- 7.39 Specifically to the Site, the proximity to the Barbican will generate a level of demand that cannot be quantified and evidenced. This "latent" level of demand is driven from the need driven from local residents for the use of hotel and guest accommodation. This was a particular theme to emerge from the public consultation exercise prior to the submission of the planning application.
- 7.40 In terms of further requirements of Policy DM 11.3, as set out above, the proposals do not jeopardise the primary business function of the City and are in accordance with Policy DM 1.1.



The proposed hotel use also meets the required provision of accessible room requirements, with a 10% provision of accessible rooms.

- 7.41 Importantly, this is not a planning application for a speculative hotel development. As previously set out, the proposed operator of the hotel (“The Resident”) have a track record of operating and delivering hotels in appropriate locations. The Resident has been fully involved in the design of the Proposed Development so that both the size, layout and facilities of the hotel meet their operational requirements.
- 7.42 The Operational Management Plan submitted with the planning application demonstrates that the hotel would not cause a detrimental impact on residential amenity in terms of noise or disturbance, traffic or pollution. This is due to the nature of the proposed operator and the scale and type of hotel. As set out, the hotel does not have a restaurant or bar facilities or conference rooms and is a relatively low key operation.
- 7.43 Overall, there is a clear and demonstrable need for a new hotel in this location to meet the ever growing demand for this level of hotel accommodation. Furthermore, the location of the Site within close proximity to the Barbican, Farringdon Station and at the heart of the Culture Mile is a wholly appropriate location for a hotel. Therefore, the Proposed Development for hotel use meets the regional and local planning land use policy tests.

Cultural Strategy

- 7.44 Local 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.
- 7.45 Draft City Plan Policy S6 (‘Culture, Visitors and the Night-Time Economy’) seeks to maintain and enhance the City’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 experiences.
- 7.46 Though neither an adopted planning policy document, nor guidance document, the proposed development is mindful of the City’s ‘Destination City’ initiative, which sets out a renewed vision for the Square Mile to become the world’s most attractive destination for workers, residents and visitors.

Assessment

- 7.47 The Resident adopts a proactive outreach approach to collaboration with Cultural and Charitable organisations and events or occasions, as set out in the accompanying Operation Management Plan prepared by The Resident.
- 7.48 Given the location of the Site within the ‘Culture Mile’ and close to some of London’s most important and internationally acclaimed cultural destinations, including the Museum of London and the Barbican, there is an opportunity to provide a cultural offering as part of the Proposed



Development. Throughout the pre-application process the Design team and the Applicant has considered how the Proposed Development could enhance the City's cultural aspirations and meet the City's 'Destination City' objectives.

- 7.49 The Resident will fully embrace the BID and the BIDs principal partners. As the new Museum of London comes to fruition, the hotel will provide a venue for visitors and guests within a very short walk.
- 7.50 Similarly, the hotel will be able to cater for cultural visitors and guests to the Barbican with a hotel that materially improves the accessibility to these venues. As set out earlier, this is part of the "latent" demand for the hotel on this Site.
- 7.51 The Resident will be a setting to forge positive connections both with local residents and the cultural cornucopia of international renown. This could be achieved through a combination of initiatives carried out by the hotel operator and also through the potential of physical aspects incorporated within the landscaping of the 'Pocket Garden'. The Applicant recognises that the cultural offering should be meaningful and as such considerable thought has been given to how the Proposed Development could meet these objectives.
- 7.52 The Resident hotel brand and Resident Hotels operating company continue to develop support the Arts, Culture and charity aligning with suitable partners, including theatres, museums, galleries, or visitor attractions. These cultural relationships enrich experiences and provide access to the locality for visiting guests in a very personal way, navigating the unique creative ecosystem that characterises the Culture Mile.
- 7.53 The Resident will also work with neighbours and Residents' groups and venues to ensure that the hotel is both embedded and invested in the thriving success of the area, whilst respecting the peaceful amenity that both guests and local residential neighbours will see as a benefit. The Operational Management Plan sets out the cultural and charitable initiatives The Resident has participated in other hotels. Such initiatives would be carried forward and adopted as part of the cultural offering for the proposed hotel.
- 7.54 Overall, The Resident has a strong track record of delivering cultural initiatives and forging links to the wider area as part of the hotel operation. In this case, given the location of the Site, the proposed hotel will provide the opportunity for a strong cultural link and will support the 'Destination City' initiative by helping to ensure the objective "that the city is the world's most innovative, inclusive, and sustainable business ecosystem as well as an attractive place to invest, work, live, learn, and visit".
- 7.55 In addition to the above initiatives offered by the hotel, as illustrated in the submitted Landscape Design and Access Statement, there is the potential for the public realm within the Proposed Development to offer a meaningful contribution towards a Cultural Strategy. The cultural offer could be realised through the following:



engagement with or commission of local artists to make use of the space for temporary exhibitions and sculpture;
pop up wayfinding obelisks and maps;
permanent wayfinding features;
performance within the landscape setting.

- 7.56 The 'Pocket Garden' could incorporate features to allow for the installation of public art and pop up galleries; the location of trees would allow any lighting installations within their canopies to be seen down Long Lane; the existing boundary wall can be used for display of artwork and opportunities for wayfinding to be installed as part of details within the furniture and paving.
- 7.57 All of the above initiatives that the hotel could offer, plus the opportunity for a number of features within the 'Pocket Garden' will provide a meaningful contribution towards the objectives of the Culture Mile.

Height, Massing and Design

- 7.58 Paragraph 131 of the NPPF states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development; creates better places in which to live and work and helps make development acceptable to communities.
- 7.59 Paragraph 129 of the NPPF states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.60 Paragraph 127 of the NPPF outlines local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.
- 7.61 The London Plan supports this objective through Policy D3, which states that development must make the best use of land by following a design-led approach.
- 7.62 London Plan Policy D1 ('London's form, character and capacity for growth') requires the design of new development to respond to local context in relation to position, scale, appearance and shape, and be of high quality.
- 7.63 London Plan Policy D3 ('Optimising site capacity through the design-led approach') expects development to follow a design-led approach that optimises the capacity of sites. With reference to scale, height and massing, the emerging draft policy states that development should deliver buildings that positively respond to local development through their scale and shape, with due regard to the existing and emerging street hierarchy, building types, forms and proportions.



- 7.64 Adopted Local Plan Policy CS10 ('Design') states that the bulk, height, scale and massing of buildings should be appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces and be of a high standard of design and architectural detail. Policy DM10.1 ('New development') elaborates on this in stating that Proposed Development should have due regard to the general scale, height, building lines of the locality and relate well to the character of streets, squares, lanes, alleys and passageways.
- 7.65 Emerging City Plan 2040 Policy S8 ('Design') states that development 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.

Assessment

- 7.66 The Design and Access Statement accompanying the planning application provides an analysis of the constraints and opportunities presented by the Site and how the Proposed Development has evolved in response.
- 7.67 As set out earlier, with input from the officers at the City as part of the pre-application discussions, the design team has worked hard to design a building that sits within its local context. This involved determining an appropriate height that takes into consideration the neighbours and the parameters of the consented scheme for the Site.
- 7.68 The Proposed Development therefore comprises a building of ground, plus eight storeys and roof level plant. In comparison, the 2021 consented scheme is ground, plus nine storeys and roof level plant. The Proposed Building, excluding plant equipment, is approximately 350mm lower than the consented scheme.
- 7.69 As set out in the Design and Access Statement, the external appearance of the Proposed Development has been influenced by the characteristics of existing buildings in the local area. A key part of the appearance of the Proposed Development at its eastern end is the creation of a feature to the building at its junction with the 'Pocket Garden'. This was discussed as part of the pre-application design discussions with officers who considered that a "bookend/bullnose or similar entrance feature" should be incorporated into the design at this part of the Proposed Development. In response, the design places significance on the end bat at the eastern end of the building which provides the "bookend" to Long Lane.
- 7.70 As described in the Design and Access Statement and earlier in this statement, the architectural appearance of the building is broken down into four main elements that relate to the typical urban grain of Long Lane.
- 7.71 The choice of proposed materials reflect the context and history of the surrounding area. Each of the four elements of the façades include a different material concept. The base of the Proposed Development comprises a rich colour glazed brick to give solidity, with a red brick chosen for the 'body' of the building with a lighter version for the 'attic' storey which creates a



top to the building. A lightweight metal ‘crown’ element references the metal facades of the existing buildings and characterises the top stepped back levels as having a different facade quality to differentiate with the floors below.

- 7.72 The design and architectural features and detailing have been developed through an extensive process of pre-application discussions with the officers at the City, including design based workshops. These discussions have significantly enhanced the emerging design of the Proposed Development from first inception to a high quality and sustainable building that fits into the context of the surrounding area.
- 7.73 Further details of the design comments received during the pre-application process and how these have been responded to are set out in the accompanying Design an Access Statement.
- 7.74 The Proposed Development complies with planning policies in the NPPF, the London Plan and the Local Plan, which seek to ensure that the bulk, height, scale, massing, quality of materials and detailed design of buildings which are appropriate for the City’s character, context and local amenity.

Heritage, Townscape and Visual Impact

- 7.75 A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been prepared by the Montagu Evans, which accompanies the planning application.
- 7.76 Whilst there are no heritage assets within the Site, the Proposed Development has the potential to have an effect upon the setting of a number of heritage assets in the wider area, including the Charterhouse Square Conservation Area, the Charterhouse, and the Barbican and Golden Lane Conservation Area.
- 7.77 Policy CS12 of the City of London Local Plan encourages the safeguarding of the City’s listed buildings and their settings, and preservation and enhancement of the City’s conservation areas. Whilst Policy CS13 seeks to protect and enhance significant local and strategic views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City’s landmarks.
- 7.78 Policy DM10.0 New Development. This policy reiterates the requirement for high quality design which “avoids harm to the townscape and public realm”
- 7.79 The HTVIA assesses the Proposed Development from the following viewpoints which have been informed by verified views:

- Alexandra Palace (LVMF 1A.2)
- Charterhouse Street, outside no.55
- Hayne Street
- West Smithfield Street, outside No.8
- Long Lane, outside No.53



Long Lane, outside No.76
Cloth Street, corner with Middle Street
Long Lane, southern corner with Aldersgate Street
Barbican, Ben Johnson Place
Charterhouse Square, at the Gatehouse
Charterhouse precincts, The Green

Assessment

- 7.80 In heritage terms, the Proposed Development would have no harmful effect on any heritage asset and would preserve the appreciation of their significance. As such, the Proposed Development will comply with the City of London's Policies CS12, DM12.1 and DM12.3 and London Plan Policy HC1.
- 7.81 In townscape terms, the HTVIA concludes that the scale and massing of the Proposed Development is appropriate for its location. The Long Lane elevation continues the established datum in the street, and the development as a whole remains subservient to the Farringdon Crossrail Station. The upper floors are set back, so not noticeable in the near street views.
- 7.82 As such, the Proposed Development therefore complies with the Local Plan policies on design, CS10, DM10.0 and DM10.4, and London Plan policies HC3 and HC1.

Urban Greening

- 7.83 London Plan Policy G5 ('Urban Greening') introduces the Urban Greening Factor (UGF) as a measure for calculating the amount and quality of urban greening provided as part of development proposals. The policy sets out a minimum target score of 0.3 for commercial developments.
- 7.84 Adopted Local Plan 2015 Policy DM10.1 ('New development') states that new development should provide appropriate hard and soft landscaping, including appropriate boundary treatments. Adopted Local Plan Policy DM10.4 ('Environmental Enhancement') expects new development to deliver enhancements including trees and soft landscaping, high quality materials that are harmonious with existing local materials and high-quality street furniture.
- 7.85 Adopted Local Plan Policy DM10.2 ('Design of green roofs and walls') encourages the installation of green roofs on all appropriate developments, expecting the maximum practicable coverage of green roof to be achieved on all developments and setting a preference for extensive green roofs. The policy further encourages the installation of green walls in appropriate locations where satisfactorily maintained.
- 7.86 Adopted Local Plan Policy DM10.3 encourages the provision of high quality roof gardens and terraces where they do not: immediately overlook residential premises; adversely affect rooflines or roof profiles; result in the loss of historic or locally distinctive roof forms, features or



coverings; impact on identified views. Public access will be sought where feasible in new development.

- 7.87 Emerging draft City Plan 2040 Policy S8 ('Design') and Emerging Policy DE2 ('New Development') echo the expectation for good landscaping including high quality materials and planting.

Assessment

- 7.88 The existing Site offers very little in terms of urban greening, given the whole Site is taken up by the existing building footprint and hardstanding. As a result of the habitat creation, the Proposed Development will result in a +13,586.55% biodiversity net gain.
- 7.89 The Proposed Development will achieve an Urban Greening Factor score of 0.34, which is in excess of Policy DM19.2 in the Local Plan and London Plan Policy G5. The Proposed Development achieves this score by incorporating the following measures:

- Intensive green roof/vegetation over structure
- Standard trees in Connected Pits
- Flower rich perennial planting
- Green Wall (Climbers rooted in Soil)

Landscaping

- 7.90 The Proposed Development will include a range of soft landscape strategies, including the 'Pocket Garden', roof terraces and balconies and a green roof.
- 7.91 The 'Pocket Garden' is a key feature of the Proposed Development and would replace the current hard standing area outside of Pret A Manger to become a new area of high quality publicly accessible public realm. The Proposed Development will transform this area into a 'Pocket Garden' that will provide a significant enhancement to the existing pedestrian experience along Long Lane.
- 7.92 The proposed landscaping and planting strategy is described and illustrated in the accompanying Landscape Design and Access Statement. The 'Pocket Garden' will create a welcoming high quality public space with seating and resting areas and create a marker for the Site.
- 7.93 In addition to environmental benefits, including supporting pollinators, cooling the urban heat effect, improving air quality, this space can act as a platform for a revolving round of new and exciting artist commissions to be changed throughout the year.
- 7.94 On upper floors of the Proposed Development, guest rooms include a private 'garden' for guests to use. Contemporary design to terraces and balconies provides immersion within nature when looking out from these rooms, bringing benefits for small scale ecology and guest mental



wellbeing. Low to ground planting will creep between paving stones softening and adding colour to surrounding architecture enhancing the views out to the City.

- 7.95 In addition, a ‘green roof’ will aid the continuity of green corridors through the urban environment, linking the wider green space and local flora. Seen as wild-flower meadows in the sky these roofs are proposed with a minimum of growing medium to support a rich tapestry of up to 38 species of wild flowers.

Transport

- 7.96 Paragraph 109 of the NPPF states that significant development should be focussed on locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 7.97 The London Plan aims to ensure that London’s transport is easy, safe and convenient for everyone and actively encourages walking and cycling.
- 7.98 The Mayor’s Transport Strategy (2018) and London Plan Policy T1 set a strategic target for 80% of all trips in London to be undertaken by walking, cycling or public transport by 2041.
- 7.99 The Healthy Streets Approach set out in the Mayor’s Transport Strategy (2018) and DCP Policy T2 requires development to reduce the dominance of vehicles on London’s streets and be permeable by foot, cycle and connect to local walking and cycling networks as well as public transport.
- 7.100 London Plan Policy T3 (‘Transport capacity, connectivity and safeguarding’) states that development proposals should provide adequate protection for transport schemes, not remove transport functions or limit their necessary expansion without alternative provisions. Proposals should also support capacity, connectivity and other improvements to the bus network, ensuring it can operate efficiently.
- 7.101 London Plan Policy T4 (‘Assessing and mitigating transport impacts’) sets out requirements for Transport Assessments and the transport impacts of the development and identifies that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 7.102 London Plan Policy T5 (‘Cycling’) requires the secure provision of appropriate levels of cycle parking, fit for purpose, secure and well located. The policy sets out the standards in relation to a minimum provision of cycle parking spaces to be provided. The policy also directs developers towards the guidance contained within the London Cycling Design Standards. Policy T5 includes revised minimum cycle parking standards for Hotel Use (Use Class C1) in London, and requires 1 long-stay cycle parking space to be provided per 20 bedrooms and 1 short-stay cycle parking space per 50 bedrooms. The policy also requires 1 long-stay cycle parking space per 175sqm



(GEA) and 1 short-stay cycle parking space per 20sqm (GEA) with regard to Food Retail use (Use Classes A2-A5).

- 7.103 London Plan Policy T6 ('Car Parking') states that car-free development should be the starting point for all development proposals in places that are (or planned to be) well-connected for public transport.
- 7.104 London Plan Policy T7 ('Deliveries, servicing and construction') states that development proposals should facilitate safe, clean, and efficient deliveries and servicing, with a preference for off-street servicing. The policy further states that deliveries and servicing should take place outside of peak hours.
- 7.105 Local Plan Policies CS16, DM16.1, DM16.2, DM16.3, DM16.4 and DM16.4 set out the City's transport objectives for improving transport and travel, minimising transport impacts of development, facilitating pedestrian movement, encouraging active travel, cycle parking and 'car-free' development.
- 7.106 Emerging draft Local Plan transport policy VT1 sets out that development proposals must have a positive impact on highway safety. Draft Policy VT3 continues the adopted approach of seeking 'car free' development. Draft Policies S9 and VT1 seek to minimise road danger and congestion and reduce vehicle emissions, as well as requiring development proposals to have a positive impact on highway safety for all users. Draft Policy VT2 details the aspirations in relation to freight and servicing in the City, with a view to minimising the need for freight trips through freight consolidation in major developments.

Assessment

- 7.107 The Transport Statement accompanying the planning application demonstrates that the Proposed Development would generate a reduction in peak hour travel to and from the Site. Within this, there will be a reduction in AM and PM peak hour public transport use of 43 and 35 fewer two-way trips in each respective peak. The proposals will result in a minor uplift in taxi trips, with 2 and 4 additional taxi trips in each respective peak hour. There will also be an increase in walking trips as a result of the proposed hotel use.
- 7.108 The Proposed Development is therefore considered to present a net benefit to public transport capacities during peak hours, and is supported by a suitably pedestrian environment locally.
- 7.109 Vehicular access will be retained for delivery and servicing vehicles as per the existing situation with vehicles up to and including a 3.5t box van, 4.6t panel van and small refuse vehicle able to service on-site and access and egress in forward gear.
- 7.110 The existing Site provides two vehicle crossovers. However, the Proposed Development only requires a single access point, and so the central vehicle crossover to the Site will be removed and the footway will be reinstated along the Site frontage.



7.111 The retained vehicle access point crossover will be improved to deliver suitable pedestrian crossing features including dropped kerbs, all of which it is envisaged will be secured by way of a Section 278 agreement.

Cycle Parking

7.112 The London Plan sets out the requirements for the provision of a minimum level of cycle parking spaces, as follows:

London Plan Minimum Cycle Parking Standards			
Use Class	Minimum Parking Provision	Required	Proposed
Hotels	1 space per 20 bedrooms for long stay; plus 1 space per 50 bedrooms for short stay	10	10
Financial / professional services; cafes & restaurants; drinking establishments; take-aways above 100 sqm	1 space per 175 sqm (GEA) for long stay; plus 1 space per 20 sqm (GEA) for short stay	8	6

7.113 As set out above, the Proposed Development includes the provision of 10 long stay cycle parking spaces, which accords with London Plan standards. The spaces are proposed to be provided as 4 two-tier bike stands (8 spaces), as well as a Sheffield stand offering space for one larger cycle and a standard cycle. The two tier stands, and the accessible bike space will be provided at basement level and will be accessible via the lift, which exceeds the minimum required size of 2.3m x 1.2m as per the London Cycle Design Standards (LCDS) and stair access from the ground floor level.

7.114 The cycle spaces are provided for both staff and visitors to the hotel. However, to increase the security of the basement and to avoid accessibility issues, the cycle store will only be directly accessible by staff. Visitors will be able to use the cycle store by presenting their bicycles to the hotel reception. Staff will then wheel the cycles to the basement accessing the cycle store. Guests will then be able to ask staff to retrieve their cycle from the store when they depart the hotel or when they wish to use their bicycle during their stay.

Retail Use Cycle Parking

7.115 In addition, short-stay cycle parking will be made available for the ground floor retail use, with a total of 6 short stay cycle parking spaces provided on-street adjacent to the proposed external green space at the eastern section of the Site, to be provided via 3 Sheffield stands.

7.116 The proposed retail space occupies a similar position on-site as the existing Pret A Manger, which relies on existing on-street cycle parking.



Car Parking

- 7.117 The Proposed Development will be car-free which is policy compliant as per London Plan 2021, with no car parking provided.
- 7.118 Along the southern side of Long Lane opposite the Site an on-street disabled parking space and 8 parking bays are located. The parking operates as pay-by-phone bays which allow parking from Monday to Friday within the hours of 8am to 7pm and parking Saturday within the hours of 8am – 11am. The parking bays offer up to 4 hours of parking with no return within 1 hour.
- 7.119 Therefore, whilst there is no on-site blue badge parking proposed, there are ample parking bays within close proximity of the Site, including:
- Disabled space opposite the Site on Long Lane;
 - Disabled space circa 50m south of the Site on Cloth Street;
 - Disabled space circa 90m southwest of the Site on Cloth Fair; and,
 - Pay and Display parking bays opposite the Site on Long Lane.
- 7.120 In addition, red badge holders in the City of London are permitted to park without charge or time limit at pay and display bays and disabled bays and can also park for 30 minutes on a single yellow line. The Operational Management Plan sets out how hotel staff will assist in managing the arrival of any guests by car.
- 7.121 In addition to on-street parking facilities, additional parking is available approximately 200 meters east of the Site at Smithfield Market. This car park is operational 24 hours a day and has 581 parking spaces, spaces are available for non-market customers offering a good opportunity for those who require car travel to the Site.

Deliveries and Servicing

- 7.122 The existing Site is serviced via on-street within the existing parking bays. The Proposed Development will include an on-site servicing yard capable of accommodating vehicles up to and including a 3.5t box van 4.6t panel van and a small refuse. The vehicles are able to access and egress in forward gear.
- 7.123 On the infrequent occurrence when larger vehicles are needed to service the Site, they may make use of the opposite servicing bays on Long Lane, or the single yellow line kerbside adjacent to the Site. This strategy was also accepted as part of the servicing strategy for the consented office scheme for the Site.



- 7.124 As part of the Delivery and Servicing Plan (DSP) for the Site, measures will be implemented to seek the use of smaller delivery vehicles to reduce the need for any on-street servicing for the Site.
- 7.125 The Transport Statement demonstrates that the proposed hotel is likely to result in a reduction in the number of deliveries compared to the existing Site. The Proposed Development will generate a daily servicing demand of 3-5 deliveries per day which is a reduction of 3-6 deliveries per day when compared to the existing office use.
- 7.126 In terms of parking and servicing, the Proposed Development therefore fully complies with adopted Local Plan Policy DM16.1, DM16.2, DM16.3, DM16.4 and DM16.5 and Draft Local Plan Policy DM16.5, Policy VT1, Policy VT2, Policy VT3, Policy AT3.

Energy and Sustainability

- 7.127 This section sets out key sustainability-related policies and draws on the findings of the Energy Strategy, prepared by Hoare Lea; the Whole Life Carbon Assessment and Circular Economy Statement, prepared by Arup and the Design and Access Statement.
- 7.128 London Plan Policy SI2 ('Minimising greenhouse gas emissions') expects major development Proposed Development to be net zero-carbon. In practice, this means following the 'be lean, be clean, be green, be seen' energy hierarchy to deliver a minimum on-site energy consumption reduction of 35% when compared to Building Regulations Part L, with the remaining reduction up to 100% (zero carbon) achieved through maximising on-site opportunities and, where necessary, carbon offset fund payments.

Assessment

- 7.129 The accompanying Energy Statement, sets out the proposed Energy Strategy for the Proposed Development the 'Be Lean', 'Be Clean', 'Be Green' and 'Be Seen', approach. In line with the GLA Energy Assessment Guidance (June 2022), the emissions are compared against the Part L 2021.
- 7.130 Under the 'Be lean' section of the Energy hierarchy, to isolate the savings achieved via passive and energy efficient measures, the Be Lean case aligns the heating and hot water plant performance with the Part L 2021 notional. To isolate the savings achieved via passive and energy efficient measures, the Be Lean case aligns the heating and hot water plant performance with the Part L 2021 notional.
- 7.131 Passive design and energy efficiency measures form the basis for the reduction in overall energy demand and carbon emissions for the Site. This energy strategy aims reduce the energy demand initially by optimising the envelope and building services within the Site.
- 7.132 With consideration of the Operational Energy assessment, it is estimated that energy demand relating to hot water will be lower than that assumed within the Part L model. This is due to



limitations associated with the Part L methodology and should therefore be considered when reporting on emission reductions at this stage.

- 7.133 The 'Be clean' stage of the energy hierarchy includes consideration of connection to available district heat networks, or the use of on-site heat networks and decentralised energy production such as Combined Heat and Power (CHP) in order to provide energy and reducing consumption from the national grid and gas networks, through the generation of electricity, heating and cooling on-site.
- 7.134 The development is located within reasonable proximity to the existing Citigen District Heat Network (DHN) and ongoing discussions are being held with the network operator to determine feasibility of connection. The network operator has provided figures for carbon intensity and primary energy demand to be used within the assessment, which are higher than those set within the Part L Notional for a heat network connected development.
- 7.135 If connected, the development shows an increase in emissions at this stage compared to the Part L 2021 baseline. However, it is understood that a decarbonisation plan is being developed for the network which would improve on the carbon intensity. Space provision has been allowed for within the design to enable future connection to the network should the decarbonisation plan be developed further during the building lifetime but it is not currently proposed that connection will be made for day-1 of the Site operation.
- 7.136 Under 'Be green', the Proposed Development includes the provision of space heating and hot water demand will be met via local VRF units. Additionally, an area of roof has been allocated for rooftop Photovoltaic (PV) panels to provide on site renewable energy generation. This would be provided for both heating scenarios.
- 7.137 At this stage the Proposed Development is able to demonstrate an additional ~50% saving at this stage of the hierarchy with a cumulative reduction of ~13% compared to the Part L 2021 baseline.
- 7.138 Under 'Be Seen', the Applicant is committed to monitoring and reporting sustainability performance and data every year in a transparent way. The Proposed Development will fall under the applicant's energy and carbon monitoring and reporting regime, which includes both landlord and tenant usage and encourages engagement with tenants to optimise operational performance. The reported data will be published in the yearly Corporate Responsibility Summary.
- 7.139 The energy strategy demonstrates that in relation to the GLA Energy Assessment Guidance (June 2022) carbon reduction targets within the energy hierarchy, although the Proposed Development does not demonstrate that these targets have been met, this is largely due to limitations associated with the Part L methodology and assumed hot water demand associated with hotels.



- 7.140 It is estimated that a carbon offset payment of ~£186,369 will be required under a s106 agreement to meet Policy SI 2 (London Plan) and D1 (City of London Local Plan).
- 7.141 As set out in the accompanying Sustainability Statement, the Proposed Development targets a BREEAM 'Excellent' rating for the building.

Circular Economy

- 7.142 London Plan Policy SI2 requires proposals to calculate whole lifecycle carbon emissions and demonstrate actions taken to reduce life-cycle carbon. In a similar vein, Policy SI7 sets out a series of circular economy principles that major development proposals are expected to follow, with compliance demonstrated through a 'Circular Economy Statement'. This includes specific targets for waste streams during construction and demolition waste and excavation. The Mayor has published guidance on preparing Circular Economy Statements and Whole Lifecycle Carbon Assessments to address the requirements of Policies SI2 and 7.
- 7.143 The City have also published their own guidance, referred to as 'Whole Life-Cycle Carbon Optioneering Guidance.' This optioneering guidance has been fully followed and tested as part of the pre-application discussions with officers. As requested by officers and set out in the accompanying Circular Economy Statement, the Proposed Development has been rigorously tested through an optioneering exercise to demonstrate that in carbon terms, the Proposed Development is fully justified.

Assessment

- 7.144 The planning application is accompanied by a Circular Economy Statement ("CES"), Whole Life Carbon Assessment ("WLCA") prepared by Arup.
- 7.145 The Circular Economy Statement sets out how the Proposed Development will address all the requirements specified in the London Plan Policy SI 7 Reducing waste, the adopted Local Plan and the London Plan. The CES has been prepared in line with the relevant guidance from the GLA – "London Plan Guidance – Circular Economy Statements", March 2022.
- 7.146 The key waste-related circular economy strategies to be implemented are as follows:

A Resource Management Plan will be prepared upon contractor's appointment in the next stages to guide the process;

Opportunities identified to reduce embodied carbon will be investigated and implemented where feasible as the design develops.

A long life loose fit approach will be taken throughout the design process. For instance, the structure is designed with a minimum codified design life of 50 years. The design life can be extended through an enhanced inspection and maintenance regime. Further, the



façade is also designed for extended life. The major components of the façade are designed to have a service life not less than 60 years. Where components have a design life less than that, the elements are to be designed to be easily replaced.

7.147 The CES sets out that the Proposed Development will commit to the following:

- 95% diversion from landfill at demolition stage;
- 95% beneficial use from excavation;
- 95% diversion from landfill at construction stage;
- 65% municipal waste recycling by 2030;
- 20% of the building material elements to be comprised of recycled or reused content.

7.148 The statement demonstrates how the Proposed Development will promote circular economy outcomes and describes how resource conservation, waste reduction, increases in material reuse/ recycling, and reductions in waste going to landfill will be achieved. Actual performance against the targets laid out in this statement will be submitted and recorded within 3 months of practical completion in line with GLA requirements.

Whole Life-Cycle Carbon

7.149 The planning application is accompanied by a Whole Life-Cycle Carbon Assessment (“WLCA”) undertaken in accordance with the GLA Whole Life-Cycle Carbon Assessment guidance, which should be read together with the Circular Economy Statement.

7.150 The WLCA has been prepared following the optioneering testing exercise carried out as part of the pre-application discussions with the City. As part of that exercise, three different scenarios were tested in terms of their embodied and operational carbon – refurbishment of the existing building; retention of one building and the retention of the superstructure.

7.151 Demolition of the existing building to basement level with the retention of the substructure was chosen as the preferred scheme for the following reasons:

The two existing buildings at 1-5 Long Lane and 6-8 Long Lane have differing floor levels which would affect service routes and accessibility. It would need to be corrected by adding significant structure which would hinder the hotel functionality for this project;

The existing slabs do not currently have soft spots, or zones, where introducing new penetrations or slab modifications;

The capacity of the existing lifts and size of the stair cores are too small for the new building usage and would require modification;



Based on the layout of the existing floor plates and cores, the daylight and views out from the hotel rooms, and hence the solar and thermal performance of the building would be compromised.

- 7.152 Therefore, after careful analysis, demolition of the existing 1-8 Long Lane buildings was agreed the most suitable approach.

Daylight and Sunlight

- 7.153 London Plan Policy D6 requires development proposals to ensure they provide sufficient daylight and sunlight to both occupants of the Proposed Development itself; whilst also safeguarding the daylight and sunlight quality received by neighbouring uses.
- 7.154 Policy DM10.7 of the Local Plan seek to resist development that would noticeably reduce the daylight and sunlight available to nearby residential dwellings and open spaces to unacceptable levels.
- 7.155 DCP Policy DE8 ('Daylight and Sunlight') of the emerging Draft City Plan requires development proposals to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards.

Assessment

- 7.156 The planning application is accompanied by a 'Daylight, Sunlight and Overshadowing accompanying assessment, prepared by Point 2 Surveyors that provides a technical assessment of the Proposed Development on nearby residential properties. In addition, the assessment also compares the impact of the Proposed Development on the consented scheme.
- 7.157 The assessment considers the impact to those residential properties on Long Lane, East Passage, Middle Street, Cloth Street, Charterhouse Square and Aldersgate Street as well as the school at 38-39 and 40 Charterhouse Square.
- 7.158 The assessment concludes that of the 21 buildings assessed, 17 of the surrounding properties are likely to experience reductions which are well within the BRE guidelines and considered to be unnoticeable and of negligible significance. In accordance the BRE guidelines, the remaining 4 properties are more likely to notice a reduction in daylight and/or sunlight because of the Proposed Development.
- 7.159 In terms of a comparison with the consented scheme, the assessments assumes that the Proposed Development is built alongside the western part of the consented scheme on the site at 9-12 Long Lane. The results, when compared to those that have been consented, show very similar results with negligible differences. As such, the Proposed Development will have no material additional daylight or sunlight impacts beyond those of the consented scheme.



Fire

- 7.160 London Plan Policy D12 requires all development proposals to achieve the highest standards of fire safety, and that major developments should submit a Fire Statement. In addition, London Plan Policy D5 requires that developments are designed to incorporate safe and dignified emergency evacuation for all building users.
- 7.161 A Fire Statement accompanies the planning application, which sets out how the Proposed Development would meet the comply with functional requirements of Building Regulations. The fire strategy sets out how the Proposed Development would meet the requirements of London Plan Policy D12 (Fire Safety) and Policy D5 (Inclusive Design).



8. Planning Obligations and Section 106

8.1 Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) states that a planning obligation may only constitute a reason for granting planning permission for a development if the obligation is:

- a. Necessary to make the development acceptable in planning terms;
- b. Directly related to the development; and
- c. Fairly and reasonably related in scale and kind to the development.

8.2 Paragraph 55 of the NPPF states, 'Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations'. Paragraph 57 reinforces the requirement that planning obligations meet the tests set out in Regulation 122 of the CIL Regulations.

Planning Obligations SPD

8.3 The City's Planning Obligations SPD (implemented from 1 October 2021) applies standard formulae and charges calculated based on the net uplift of floorspace for contributions towards local skills, training and employment, and local procurement; and affordable housing. Alongside this sits a Code for Local Employment and Procurement, also adopted from 1 October 2021.

Draft Section 106 and Heads of Terms

8.4 In accordance with the City's Planning Obligations SPD we anticipate the Section 106 Agreement associated with the Development to include the draft Heads of Terms listed below, subject to further discussion with officers during the determination of the planning application.

- Affordable housing contribution
- Annual construction monitoring contribution
- Local Procurement
- Local Training, Skills and Employment Initiatives (including contribution)
- Carbon Off-setting Contribution
- Relevant highway works (secured via S278 Agreement)
- Evaluation and design fee payment
- Delivery and servicing management plan
- Travel plan
- Local procurement strategy
- Monitoring Costs



Community Infrastructure Levy (CIL)

8.5 The Proposed Development will be liable for City of London CIL and Mayoral CIL (MCIL2). CIL is chargeable on the net additional increase in floor-space measured in Gross Internal Area (GIA).

8.6 The rates have been set out below in accordance with the proposed hotel use (Use Class C1) and retail use (Class E (a) and (b)). These rates will be subject to indexation.

City of London - £75 per sqm - (all other uses rate)

Mayoral CIL 2 - £140 per sqm / £165 per sqm - (hotel use / retail use within Central London rate)

8.7 A CIL Additional Information form has been completed and submitted with the planning application to allow the subsequent liability to be calculated.



9. Conclusions

- 9.1 As assessed within this Planning Statement, the Proposed Development represents an opportunity to enhance and revitalise a predominantly vacant and prominent Site within the City of London and within the 'Culture Mile'.
- 9.2 The Proposed Development will provide a new hotel of 128 rooms (including accessible rooms) with active retail frontage along this part of Long Lane that the Site is currently lacking.
- 9.3 The proposed hotel is not speculative and the operator has a track record of managing hotels such that they do not cause a disturbance to the amenity of nearby residents. The hotel would not have a restaurant or bar or conference facilities and represents a relatively low key operation that fits into the nature of the surrounding area and encourages visitors to explore the wider area.
- 9.4 Whilst the Site and the adjoining site at 9-12 Long Lane has an extant planning permission for a new office building, the Site will not be re-used or redeveloped for office use now that the existing buildings have come to the end of their economic life. This has been demonstrated that such a proposition would not be financially viable nor is there demand for continued use of the Site as offices.
- 9.5 The Proposed Development will enable the Site to be brought back into beneficial use as a hotel, for which there is a demonstrable need, with a new active frontage along Long Lane.
- 9.6 A new hotel is ideal in this location as not only is the Site well served by public transport, a hotel on this Site will serve an identified need for additional hotel rooms in the City of London and for this particular market level. In addition to the location of the Site being close to the Barbican, there is also "latent" demand from nearby residents.
- 9.7 In terms of design, the high quality architectural appearance of the Proposed Development has been closely informed by the surrounding context using brick as the primary material. The height of the Proposed Development comprises a building of ground, plus eight storeys and roof level plant, which in comparison to the consented scheme, is approximately 350mm lower.
- 9.8 An important element of the Proposed Development is the provision of an area of new public realm in the form of a 'Pocket Garden' that will replace the somewhat inhospitable area of hard standing currently at the eastern end of the Site. This new piece of public realm will be fully accessible to all and will provide a high quality space for pedestrians and users of the Proposed Development.
- 9.9 In addition, the 'Pocket Garden' will provide a meaningful contribution towards meeting the cultural strategy of the 'Culture Mile'. The operator of the hotel will also play a significant role in supporting the initiatives of the 'Culture Mile' within the surrounding area.



- 9.10 Sustainability has been at the forefront of the Proposed Development with extensive carbon optioneering tested prior to the submission of the planning application. The carbon optioneering exercise has been carried out following the City of London's latest planning guidance on this issue. The optioneering exercise concluded that the most appropriate form of development in this regard is for the redevelopment of the Site. As such, Whole Life Carbon and Circular Economy principles have been fully considered and tested as part of the design and evolution of the Proposed Development.
- 9.11 In transport terms, the Proposed Development has been assessed taking into consideration current planning policy, existing Site conditions and can be summarised as follows:
- The Site is highly-accessible by non-car modes, with good provision for pedestrians, cyclists, and public transport users in the surrounding area;
 - The Proposed Development will be car-free, with staff travelling by active and sustainable means and any guests arriving by car being able to utilise local on-street and private parking opportunities;
 - Access to the Site will be at grade and remove redundant vehicle crossovers, improve the retained vehicle crossover to the servicing yard and reinstate high quality level footways along the Site frontage;
 - Hotel trips will be undertaken via a range of sustainable modes, which will not result in any material impact to the local transport network during the peak hours;
 - The Proposed Development will introduce on-site cycle parking for both visitors and staff, in accordance with the London Plan;
 - The Site will be provided with an on-site servicing yard, from where the waste storage and collection strategy will enable direct collections from within the servicing yard,
 - Mitigation measures will be implemented to reduce impacts from the development proposals, including a Delivery and Servicing Plan, a Travel Plan, a Cycling Promotion Plan and a Construction Logistics Plan.
- 9.12 The planning application is supported by technical reports which demonstrate that the Proposed Development is acceptable in terms of energy and sustainability, townscape and heritage, daylight and sunlight and fire. The Proposed Development has been the subject of extensive pre-application discussion with both Planning and Design officers at the City as well as consultation with local residents and interested parties.
- 9.13 This Planning Statement has assessed the Proposed Development against the Development Plan and other relevant planning policy and guidance at national, regional and local level, as well as other material considerations and has concluded that the Proposed Development is compliant on all relevant planning matters. On this basis, planning permission should be granted for the Proposed Development.