

Committee:	Date:
Planning Applications Sub Committee	17 April 2024
<p>Subject:</p> <p>London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN</p> <p>23/01304/FULEIA: Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway.</p> <p>23/01277/LBC: External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).</p> <p>23/01276/LBC: Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the</p>	Public

development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).	
Ward: Aldersgate	For Decision
Registered No: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC	Registered on: 20 November 2023
Conservation Area: Barbican and Golden Lane Estates	Listed Building: Ironmongers Hall (II) Barbican Estate (II)

Summary

The proposals relate to a 2.18-hectare site at the western end of London Wall, bounded on its northern side by the grade II listed Barbican Estate, Monkwell Square on its eastern side, 200, 172 and 160 Aldersgate Street on its western side and commercial development on London Wall to the south.

The site encompasses the former Museum of London including the Rotunda roundabout junction, Bastion House (office building), Ferroner's House (the 1970s extension to Ironmonger's Hall containing ancillary office space and part of a children's day nursery on the ground floor) and the western end of the London Wall car park. Highwalks and pedestrian routes within and connected to this area are included within the application site in addition to Barber Surgeon's Gardens. The northern boundary of the site has an interface with the Barbican Estate and therefore minor elements of the Estate are included within the site.

The redevelopment of the site is covered by three applications: one application for planning permission (ref. 23/01304/FULEIA) and two applications for listed building consent (23/01276/LBC and 23/01277/LBC). This report covers all applications.

The proposal includes:

- Demolition of all existing buildings on the site and the ramp down leading from London Wall to the London Wall car park.
- Removal of all existing highwalks and public routes through the site, including three of the highwalk bridges over London Wall.
- Reconfiguration of the Aldersgate Street/London Wall, Rotunda roundabout junction. A peninsula road layout is proposed that incorporates a new configuration of carriageway, cycle lanes, crossings, and traffic signals.

Proposals for the road layout align with the objectives and design of the City's St Paul's Gyratory project.

- Erection of three new office buildings – 'New Bastion House', 17 storeys on the site of current Bastion House; the 'Rotunda building', 14 storeys on the peninsula created by the new road layout and the 'North building', 5 storeys on the northwest corner of the site.
- Provision of 8182.9 sqm of cultural floorspace which would be located between the New Bastion House and Rotunda building and at the roof level of the Rotunda building. A public viewing gallery would be included as part of the site's cultural offer.
- Alterations and making good to Ironmongers' Hall following the removal of Ferroners' House and minor internal alterations as well as creation of a dedicated service bay at lower ground level (these works are covered by listed building consent application (23/01276/LBC).
- Provision of 88sq.m of formalised nursery floorspace.
- Provision of extensive new public realm and routes through the site at podium, ground and lower ground level to include: a new plaza off London Wall "Central Plaza"; a new plaza off Aldersgate Street "Aldersgate Plaza" ; creation of a "Northern Garden"; some relandscaping and improved access to Barber Surgeon's Gardens: formation of new green spaces at podium level "The Glade"; and a new active covered route the "Rotunda Arcade. New highwalk connections would be formed, including a connection into the currently truncated walkway on Mountjoy Close (these works are covered by listed building consent 23/01277/LBC) and reinstatement of one of the bridges over London Wall with increased clearance.
- Within part of the London Wall car park the car parking would be removed (save for accessible spaces) and a new cycle hub would be provided. The existing Roman Cripplegate Fort Gate remains which are locked away in the car park would be represented and open up to the public.
- Following the removal of the highwalk bridges across London Wall, the voids containing the staircases and lifts between ground and highwalk level in 200 Aldersgate Street and 1 London Wall would be removed and the buildings made good.

Part of the site is within the Barbican and Golden Lane Conservation Area and it overlaps with the Registered Historic Park and Garden of the Barbican, which is Grade II*. There are two Scheduled Monument listings within the site, these include the length of Roman Wall within Barber Surgeon's Garden and the west gate of Cripplegate Fort and section of wall within the London Wall car park. Part of the extent of the Pre-Expulsion Cemetery of the Jews is within the application site.

The applicant's Statement of Community Involvement sets out the consultation that was carried out prior to the submission of the scheme. The Local Planning Authority (LPA) has carried out three rounds of consultation, one of which related to the submission of information under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

In terms of comments from consultees, of particular note, Historic England does not object in principle to these proposals and welcome the changes that improve the visibility of the Grade II listed Ironmongers' Hall from Aldersgate Street, the presentation of the Fort Gate and raises no objection to the impact on the Barbican and Golden Lane Conservation Area. Historic England considers that the proposal would result in some less than substantial harm through development within the setting of the following designated heritage assets: the St Bride's Church (Grade I), St. Botolph's Church (Grade I), Barbican Estate (Grade II), the Barbican Estate Registered Historic Park and Garden (Grade II*) and the Postman's Park Conservation Area, and advised that this harm would need to be weighed against the public benefits of the proposal as part of the decision making process. Historic England identify a minor impact, at the lower end of the scale of less than substantial, to view LVMF 13A.1. Whilst not expressly stated, this is taken to infer a minor impact upon St Paul's Cathedral.

The Surveyor to the Fabric of St Paul's Cathedral echoes this objection and identifies minor, less than substantial harm to St Pauls Cathedral (Grade I) in LVMF 13A; a low level of residual harm in the loss of views of the ball and cross from the Barbican Estate; and raises concerns to ensure the cultural offerings as part of the public benefits package are secured. The Cathedral commend the developer team for their approach to consultation and to the material provided at pre-application stages. Whilst the Cathedral state they have no objection in principle to the scheme, they welcome the cultural offering proposed, and wish to explore the opportunities for the Cathedral to be a part of this moving forward.

The Twentieth Century Society strongly objects to the scheme due to the loss of the Museum of London and Bastion House, noting that they should be considered as Non-Designated Heritage Assets. They consider that the proposal would cause substantial harm to the setting of Ironmongers' Hall, the Barbican Estate (II), the Registered Historic Park and Garden (II*) and the Barbican and Golden Lane Conservation Area. The Committee for the Preservation of Jewish Cemeteries in Europe (CPJCE) requests that there must be no digging in and throughout Barber Surgeons Gardens.

The Barbican and Golden Lane Neighbourhood Forum, Ironmongers' Company, Barbican Quarter Action and Barbican Association Planning Sub

Committee raise objections to the scheme. As of midday 8th April 2024 (6th April was the end of the Local Planning Authority's third consultation period) 965 objection letters have been received (some objectors have written in multiple times). The main planning related areas of concern are demolition of the existing buildings and the carbon implications that demolition would have, the design of the proposal, loss of amenity to residents, harm to heritage assets, the lack of consultation on the proposals and concerns with the quality of the application submission, the impact of the demolition and construction phase of the development and the impact of the proposed delivery and servicing arrangements on local residents. There have been 15 letters of support as of midday 8th April 2024.

The proposal would provide 56,211 sqm (GIA) of flexible Grade A office space on the site which would contribute towards supporting the City of London's role as one of the world's leading international financial and business centres. The commercial space would be complemented by the provision of 1,112 sqm of food and beverage space, and 8,182.9 sqm (GIA) of cultural floorspace which would include a public viewing gallery at roof level within Rotunda Building. The retail space and cultural offer would enliven the area of the site around London Wall and would contribute towards the site's status as a new City destination, thus aligning with the Destination City agenda.

The new Bastion House and Rotunda building would be classed as tall buildings by virtue of their height. A thin sliver of the New Bastion tower would be within the Barbican and Golden Lane Conservation Area designation. This would result in some conflict with policy CS14(2) of the Local Plan 2015 and therefore London Plan policy D9 B (3). Officers have thoroughly assessed the impact of the new Bastion tower against the criteria set out in London Plan policy D9 C and D and have found that the scheme complies with these criteria.

The architecture amounts to a complex and high-quality piece of design. Various conditions are proposed to ensure that the promise of the proposals is fully realised at detailed design, construction, and operational stage in accordance with D4 of the London Plan. Overall, it is considered the proposal would optimise the use of land, delivering high quality office space, and a multi-layered series of flexible cultural opportunities externally and through the buildings. It would improve the site's interfaces with and contribution to its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 DE2 London Plan D3 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.

The proposed public realm would be in compliance with policies D3, D8, T1 and T2 of the London Plan 2021, as well as CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies S10, AT1, S8, DE2, DE3 of the emerging City Plan 2040, and, the City of London Public Realm SPD and the City Public Realm Toolkit. The extent of the proposed greening and creation and/or improvement of new and existing public spaces and routes exceeds policy compliance, it is considered by officers to be a significant benefit of the scheme. When compared to other planning applications in the City of London, it is unusual to see such a comprehensive re-design and improvement to so many public routes and spaces in one application.

Notwithstanding the above, following a thorough assessment of the proposal in terms of its impact on designated heritage assets and strategic and local views, it is considered that the proposal would result in some less than substantial harm to the following: St Brides Church (Grade I), Church of St Botolph (Grade I) and the Postman Park Conservation Area. As such the proposal would result in some conflict with Local Plan 2015 policies CS12 (1), DM12.1 (1) and CS13 (1 and 2) and Emerging City Plan 2040 S11 (2) S13 (1 and 2) with the objectives set out in Section 66 of the Planning (Listed Building and Conservation Area) Act 1990 and relevant NPPF policies.

In giving great weight to the conservation of the designated assets and applying the NPPF paragraph 208 balancing exercise, it is considered that the economic, social and environmental benefits of the scheme would outweigh the heritage harm that has been identified to the designated heritage assets.

Thorough consideration has been given to the impact of the scheme on the Jewish Cemetery. Initially, the proposals included elements that would have encroached into the extent of the Jewish cemetery, including supports for the proposed Mountjoy House highwalk connection and the enlargement of existing service runs. Through subsequent negotiations, revisions to the proposals have been agreed to remove these impacts. It would be feasible to revise the design of the highwalk connection and re-route the services meaning only replacement of the services within their existing runs would be required. Details of these elements and agreement of a 'no dig' zone around the cemetery area would be secured by condition. As such, the proposal would result in no harmful impacts to the medieval Jewish Cemetery which would remain undisturbed.

The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, wind microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are

acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings, including at Ironmonger's Hall. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight or sunlight to nearby dwellings to unacceptable levels such that it would warrant a refusal of permission.

In transportation terms the proposal would radically transform a brutal road junction in line with aspirations set out in the City's Transport Strategy. Policy compliant levels of cycle parking are proposed which would encourage active travel to the site. On analysis of the pedestrian environment, it is concluded that the net uplift in walking trips around the site can be satisfactorily accommodated via the proposed pedestrian network. Local residents have raised concerns about the proposed delivery and servicing arrangements and the indicative arrangements that have been proposed for demolition and construction traffic. In respect of demolition and construction traffic, deconstruction and construction logistics plans would be required by condition. Subject to stringent controls on the operation of the development which would include a cap on the number of deliveries, details of which would need to be set out in a delivery and servicing management plan, it is considered that the proposed servicing arrangement would be acceptable.

The lack of retention of buildings on site and the high embodied carbon impacts from the proposed new build scheme for a much larger development have attracted heavy criticism and formed one of the main grounds of objection to the scheme. It is considered that the proposal would deliver a low carbon and energy efficient development of the highest sustainability quality that commits to a high 5* NABERS UK rating and is on track to achieve an "outstanding" BREEAM assessment rating for the proposed office use in accordance with Local Plan and London Plan requirements. The development would contribute to the expansion of the Citigen heat network through accommodating the location of plant in the basement of the Rotunda building, this would help deliver the City of London Local Area Energy Plan.

The assessment of options for the existing buildings on the site has been carried out in accordance with the Carbon Options Guidance 2023. It confirmed that a redevelopment scenario would – due to the complexity of the existing site – result in the lowest whole life-cycle carbon emissions per square meter GIA out of the options that were considered. Despite its highest level of overall whole life-cycle carbon emissions due to its largest size, the redevelopment option has been developed to provide a long-term solution for the site through successful integration into the City through connectivity, urban design and

ultimately future proofing with high levels of urban greening, climate resilience, flexibility and diversity of uses alongside a commitment for a whole life-cycle carbon performance exceeding the GLA's aspirational benchmark. This is coupled with a strategy to achieve maximum flexibility, adaptability and material optimisation to satisfy the GLA's circular economy principles.

When taking all matters into consideration and recognising that virtually no major development proposal is in complete compliance with all policies, and in arriving at a decision, it is necessary to assess all the policies and proposals in the plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. It is the view of officers that the proposal complies with the plan when considered as a whole. The Local Planning Authority must determine the application in accordance with the Development Plan, unless material considerations indicate otherwise. It is the view of officers that other material considerations also indicate that planning permission be granted. Officers also consider that the applications for listed building consent should be granted.

It is recommended that planning permission be granted for the proposed development subject to all the relevant conditions being applied and the Unilateral Undertaking being entered into to secure the public benefits and minimise the impact of the proposal. It is also recommended that the applications for listed building consent be granted for the proposed alterations subject to the relevant conditions being applied.

Regulation 64(2) of the Environmental Impact Assessment Regulations 2017 provides that where a local authority is bringing forward a proposal it must make appropriate administrative arrangements to ensure functional separation between persons bringing forward the proposals and the persons responsible for determining it. Members will be aware that steps have been taken to ensure compliance with these regulations, including the publication of a handling note in respect of this application.

Recommendation

- (1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:
 - (a) The City as landowner giving a commitment (through a resolution or delegated decision) that it will comply with the planning obligations in connection with the development if it implements the planning permission (and that it will ensure that the obligations are binding on any future purchaser or development partner) and a Unilateral Undertaking being signed in respect of those matters set out in the report, the decision notice not to be issued until the commitment/resolution has been given and a Unilateral Undertaking has been signed.
- (2) That it is noted in principle that land affected by the building which is currently public highway and highway over which the public have a right of access, including Shaftsbury Place may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed under delegated authority with arrangements for advertising and making of a stopping-up order for the various areas, to the extent that such stopping-up order is unopposed. If there were to be any unresolved objections to the stopping-up order, a report would be taken to the Planning and Transportation Committee for decision;
- (3) That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (information to be provided to the developer post determination of the application), and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

APPLICATION COVER SHEET

TOPIC	INFORMATION			
1. HEIGHT	EXISTING AOD		PROPOSED AOD	
	<p>Building:</p> <p><u>Bastion House</u></p> <p>1. AOD to top of main building: 86.65m 2. AOD of highest projection: 90.28m (top of antenna)</p> <p><u>Museum of London</u></p> <p>> Main Building</p> <p>1. AOD to top of main building: 31.34m 2. AOD of highest projection: 37.00 m</p> <p>>Rotunda Wall</p> <p>1. AOD to top of wall: 25.50m</p> <p>>Northern Wing</p> <p>1. AOD to top of main building: 31.34m 2. AOD of highest projection: 34.45m</p>		<p>Building:</p> <p><u>New Bastion House:</u></p> <p>1. AOD to top of main building: 86.65 m 2. AOD of highest projection: 87.13m (top of BMU rail)</p> <p><u>Rotunda Building:</u></p> <p>1. AOD to top of main building: 75.27m 2. AOD of highest projection: 76.27m</p> <p><u>North Building:</u></p> <p>1. AOD to top of main building: 37.45m 2. AOD of highest projection: 39.62m</p>	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	NET CHANGE
	Office (Class E(g(i)))	16,887	56,211	39,324
	Retail / Restaurant (Class E(b))	0	1,112.4	1,112.4
	Cultural (Sui Generis)*	0	8,182.9	8,182.9
	Livery Hall (Sui Generis)	439	480	41
	Museum (Class F1(c))	15,188	0	-15,188
	Bar (Sui Generis)	287	0	-287
	Public Car Park (Sui Generis)	1,458	594.2	-863.8
	Cycle Hub (Sui Generis)	0	703	703
	Total	34,259	67,283.5	33,024.5
3. OFFICE PROVISION IN THE CAZ (GIA SQM)	56,211			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	275*		3,091**	

*Jobs located within the Museum of London as of November 2023. The figure assumes that tenants of Bastion House have relocated.

** Gross direct employment based on office commercial uses (E(g)), café/restaurant uses (E(b)) and cultural and maker spaces (Sui Generis) floorspace figures and appropriate employment densities (HCA, 2014).

5. VEHICLE/CYCLE PARKING

Car Parking – Existing

London Wall Car Park	44 spaces
140 London Wall Basement	16 spaces
Service Road	16 spaces

Car Parking -Proposed

London Wall Car Park	5 accessible spaces
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Cycle Parking – Existing

Location	Basic	Semi-Upright	Two-tier	Total
Museum enclosure	26	-	10	36
Bastion car park	32	14	-	46
Total	58	14	10	82

Cycle Parking – Proposed Long Stay (Employee) Cycle Parking at the Site

	<i>Long Stay Policy Requirements</i>	Provision			
		Sheffield Stands	Two-Tier/Wall Mounted Stands	Folding Bike Lockers	Total Provision (Provision in additional to policy requirements)
New Bastion House & London Wall Exhibition Area (combined)	463	25	394	45	464 (+1)
Rotunda Building	308	16	264	81	361 (+53)

New North Building	41	2	35	6	43 (+2)
Total	812	43	693	132	868 (+56)

Cycle Parking – Proposed Short Stay (Visitor) Cycle Parking at the Site

	Requirement		Provision			
	Short stay Policy Requirements	Existing Provision (To be reprovided)	Sheffield Stand Spaces	Single/Double-Tier Stands	Folding Bike Lockers	Total (Provision in addition to policy requirements)
Street Level	210	12	76	-	-	76
LW Car Park Cycle Hub		-	7	213	30	250
Total	210	12	83	213	30	326 (+104)

Short-Stay London Plan requirements = 210 spaces

Short-Stay Cycle parking provision = 76 spaces at Street Level, 250 spaces in Cycle Hub.

In addition to 76 spaces at Street Level, LW Car Park Cycle Hub includes 134 spaces as per London Plan requirements. Existing 12 spaces adjacent to One London Wall relocated to Cycle Hub. Overprovision of 104 short stay cycle spaces in LW Car Park Cycle Hub.

6. HIGHWAY LOSS / GAIN

Existing and Proposed Areas by Designation

Level	Designation	Existing extent within Site Boundary (m2)	Proposed extent within Site Boundary (m2)
Ground level	Public highway (carriageway + footway)	8,980.5	9,003.0
	Permissive path	685.0	2,205.3
	City walkway	15.5	442.5

	City walkway (restricted height)	0.0	0.0
	Total public realm	9,681.0	11,650.8
Highwalk level	Public highway (carriageway + footway)	0.0	0.0
	Permissive path	271.8	817.7
	City walkway	2,132.8	1,787.6
	City walkway (restricted height)	0.0	166.1
	Total public realm	2,404.6	2,771.4
Ground + Highwalk level	Public highway (carriageway + footway)	8,980.5	9,003.0
	Permissive path	956.8	3,023.0
	City walkway	2,148.3	2,230.1
	City walkway (restricted height)	0.0	166.1
	Total public realm	12,085.6	14,422.2

Summary of Changes in Designation

Level	Designation	Difference in Area (m ²)	Difference in Area (%)
Ground level	Public highway (carriageway + footway)	22.5	+0.3%
	Permissive path	1,520.3	+221.9%
	City walkway	427.0	+2753.5%
	City walkway (restricted height)	0.0	N/A
	Total public realm	1,969.8	+20.3%
Highwalk level	Public highway (carriageway + footway)	0.0	N/A
	Permissive path	545.9	+200.8%
	City walkway	-345.2	-16.2%
	City walkway (restricted height)	166.1	N/A
	Total public realm	366.8	+15.3%

	<table border="1"> <tr> <td rowspan="5">Ground + Highwalk level</td> <td>Public highway (carriageway + footway)</td> <td>22.5</td> <td>+0.3%</td> </tr> <tr> <td>Permissive path</td> <td>2,066.2</td> <td>+215.9%</td> </tr> <tr> <td>City walkway</td> <td>81.8</td> <td>+3.8%</td> </tr> <tr> <td>City walkway (restricted height)</td> <td>166.1</td> <td>N/A</td> </tr> <tr> <td>Total public realm</td> <td>2,336.6</td> <td>+19.3%</td> </tr> </table>	Ground + Highwalk level	Public highway (carriageway + footway)	22.5	+0.3%	Permissive path	2,066.2	+215.9%	City walkway	81.8	+3.8%	City walkway (restricted height)	166.1	N/A	Total public realm	2,336.6	+19.3%
Ground + Highwalk level	Public highway (carriageway + footway)		22.5	+0.3%													
	Permissive path		2,066.2	+215.9%													
	City walkway		81.8	+3.8%													
	City walkway (restricted height)		166.1	N/A													
	Total public realm	2,336.6	+19.3%														
7. PUBLIC REALM	The proposal achieves an overall uplift for total public realm area of 43.5% (note: this area does not include the public terrace area at Rotunda (12 th floor).																
8. TREES	<p style="text-align: center;">EXISTING</p> <p>39 individual trees and 3 groups of trees comprising:</p> <ol style="list-style-type: none"> 1. 5 Category A trees; 2. 12 Category B trees; 3. 22 Category C trees and 4. 3 Category C groups. 		<p style="text-align: center;">PROPOSED</p> <p>100 trees</p>														
9. SERVICING VEHICLE TRIPS (One-Way)	<p style="text-align: center;">EXISTING</p> <p><u>Bastion House</u> Unconsolidated: 34</p> <p><u>Former Museum of London</u> Unconsolidated: 49</p> <p><u>TOTAL</u> Unconsolidated: 83</p>		<p style="text-align: center;">PROPOSED</p> <p><u>Bastion House</u> Unconsolidated: 83 Consolidated: 47</p> <p><u>Rotunda:</u> Unconsolidated: 84 Consolidated: 54</p> <p><u>North Building</u> Unconsolidated: 6 Consolidated: 3</p> <p><u>TOTAL</u> Unconsolidated: 174 Consolidated: 104</p>														
10. SERVICING HOURS	A detailed DSP will be submitted and approved by the LPA and is expected to be secured through a planning condition or planning obligation. This will ensure that all delivery and servicing activities on the Site will accord with the relevant policy requirements																
11. VOLUME OF RETAINED FABRIC	Overall – 0% volume retention																

**12. REGULATED
Operational CARBON
SAVINGS**

Overall improvements against Part L 2021: 1.3 %
GLA requirement: 35 %

Be Lean stage improvements against Part L 2021: 16.1 %
 GLA requirement: 15 %

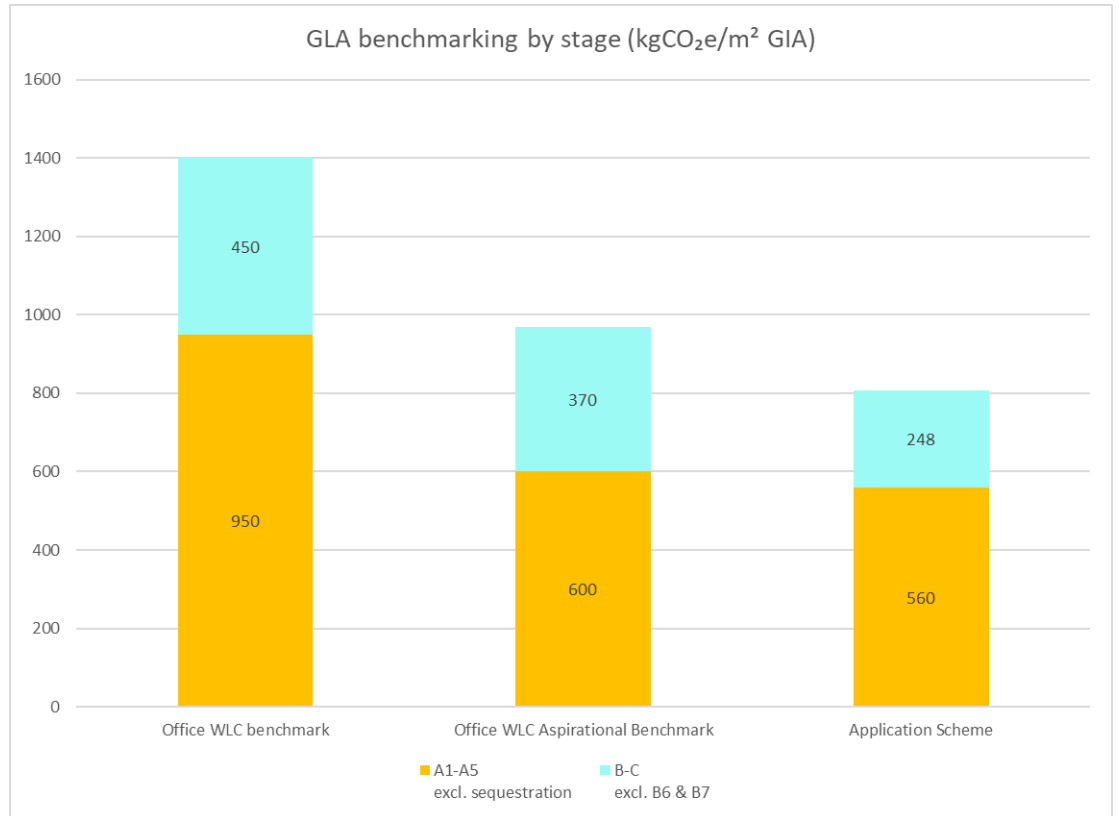
Be green stage improvements against Part L 2021: 3.3 %

Note: Be Clean stage connection to local heat network currently cancels out most savings against Part L due to unavailability of future carbon factors of the heat network

**13. OPERATIONAL
CARBON
EMISSION**

Over 60 years absolute: **45,172 tonnes CO2**
 Over 60 years per square meter: **672 kg CO2/m2**

**14. EMBODIED
CARBON
EMISSIONS**



Embodied Carbon:









- life-cycle modules A1-A5 (Product and construction process stage)
- life-cycle modules B – C (except B6 and B7 operational carbon) (in use stages)

Total embodied carbon: **54,409 tonnes CO2e (808 kgCO2e per sqm)**

**15. WHOLE LIFE -
CYCLE CARBON
EMISSIONS**

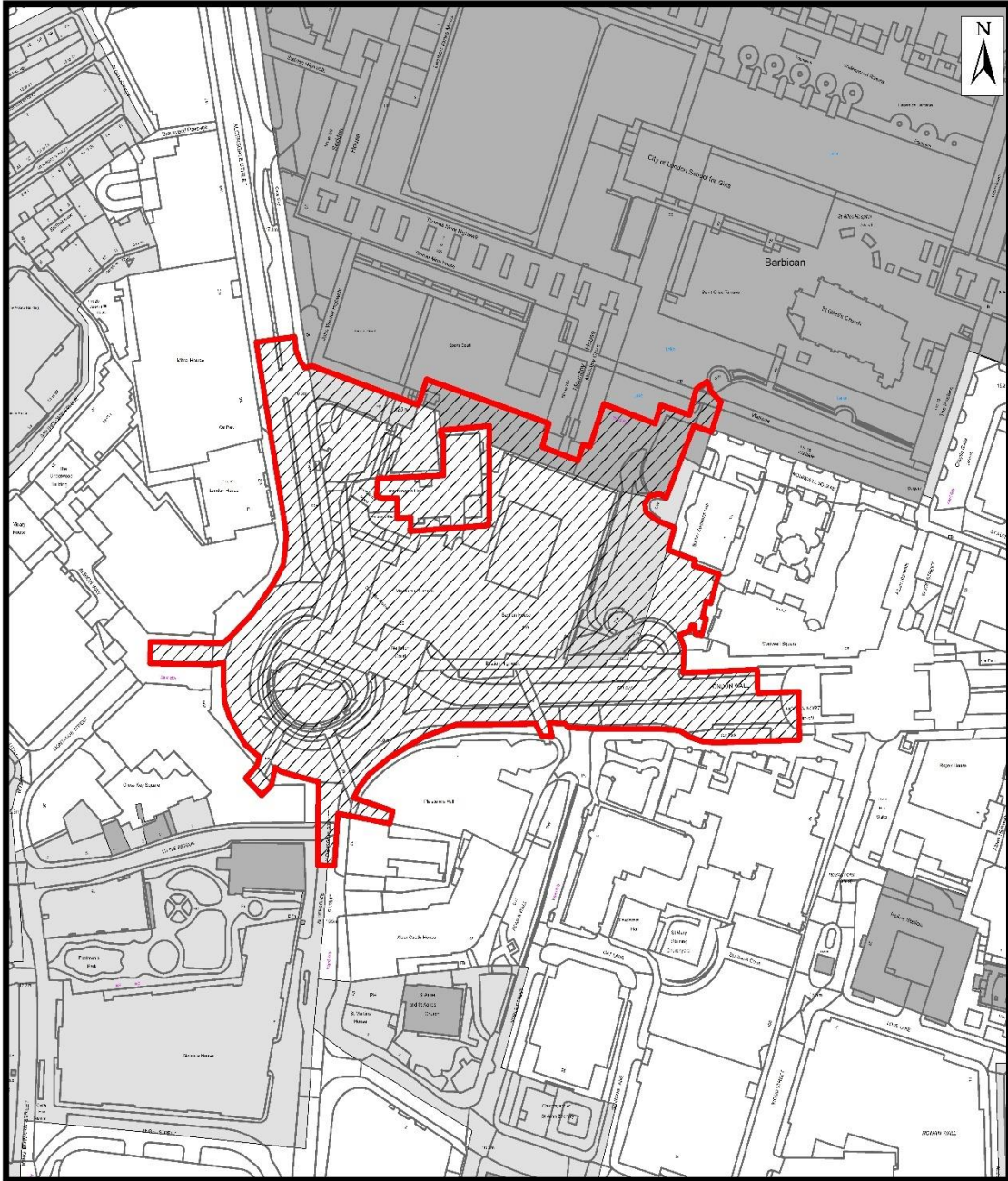
Total whole life-cycle carbon emissions: **99,581 tonnes CO2**
 Total whole life-cycle carbon emissions per square meter: **1,480 kg CO2/m2**

**16. WHOLE LIFE-
CYCLE CARBON
OPTIONS**

		 Carbon Options Assessment							
		GLA Aspirational Benchmarks		Scenario 1	Scenario 3a	Scenario 3b	Scenario 5	Scenario 6	Scenario 9
Substructure A-C exc. B6-B7		100	144	40	41	129	57	113	
Superstructure A-C exc. B6-B7		350	505	114	130	154	126	259	
Façade A-C exc. B6-B7		170	245	268	279	263	281	240	
Finishes/FF&E A-C exc. B6-B7		130	188	36	35	35	35	37	
MEP A-C exc. B6-B7		220	318	154	155	145	175	142	
Total A-C exc. B6-B7		<970	<1400	360 +275 Benchmark +Major refurb	613	641	726	674	790
A1-A5 totals		<600	<950	230 Benchmark	391	411	509	434	560
Operational energy B6 (kgCO2e/m2)				1,185	951	894	797	1,007	589
Estimated existing building demolition (kgCO2e/m2 GIA)				0	3	4	20	16	25
Total WLCA (incl. B6 & pre-demolition) (kgCO2e/m2 GIA)				1,545	1,566	1,539	1,543	1,697	1,404
Total existing building demolition (tCO2e)				0	144	169	1,043	831	1,712
upfront embodied carbon (A1-A5) (tCO2e)				7,880	19,918	21,066	26,487	22,542	37,678
In-use embodied carbon (B-C) (tCO2e)				4,454	12,124	12,588	12,201	13,401	16,686
Operational Carbon for building life time (B6) (tCO2e)				52,688	48,429	45,842	41,542	52,307	43,187
Total WLCA (incl. B6 and pre- demolition) (tCO2e)				65,021	80,614	79,635	81,272	89,082	99,264
Module B7 is not considered									
GIA (m2)				34,259	50,940	51,256	52,139	51,941	67,283

17. TARGET BREEAM RATING	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 5px; text-align: center;">Good</div> <div style="border: 1px solid black; padding: 5px; text-align: center;">Very Good</div> <div style="border: 1px solid black; padding: 5px; text-align: center;">Excellent</div> <div style="border: 2px solid green; padding: 5px; text-align: center; background-color: #e0f0e0;">Outstanding</div> </div> <p>Aspiring to Outstanding (policy target Excellent or Outstanding)</p> <ul style="list-style-type: none"> Retail - shell only - excellent Other (assembly and leisure) - shell only - excellent Office Shell and Core - outstanding
18. URBAN GREENING FACTOR	0.41
19. AIR QUALITY	Implementation of Air Quality Mitigation Measures as set out in Chapter 8 (Air Quality) of the ES
20. Biodiversity Net Gain	24.11% (Habitats) 28.39% (Hedgerow Units)

Site Location Plan




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ADDRESS:

London Wall West, 140 London Wall, 150 London Wall
Ironmongers' Hall, Shaftesbury Place, London Wall Car Park

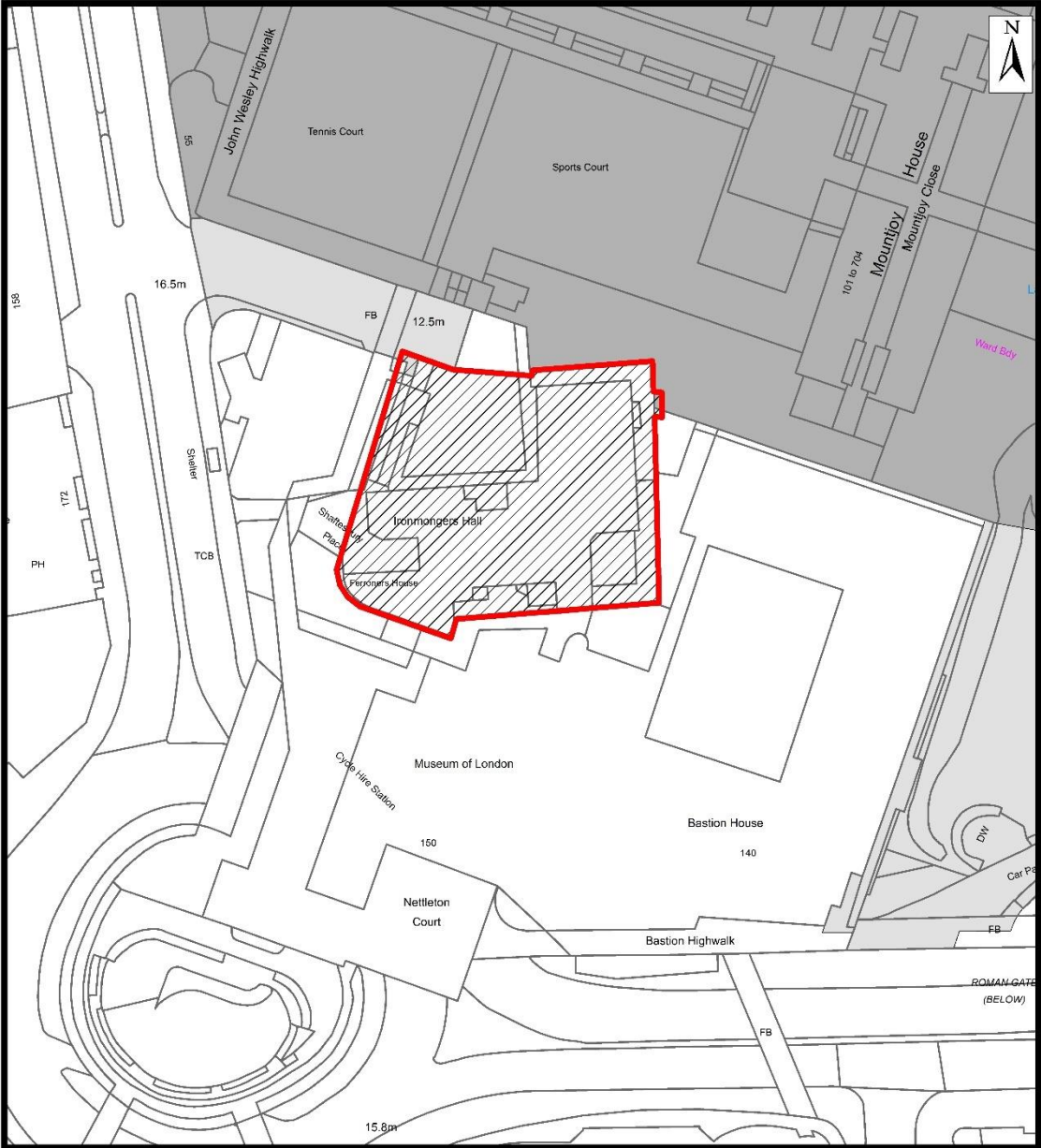
CASE No.
23/01304/FULEIA

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



ENVIRONMENT DEPARTMENT




Site Location Plan



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ADDRESS:
Ironmongers' Hall

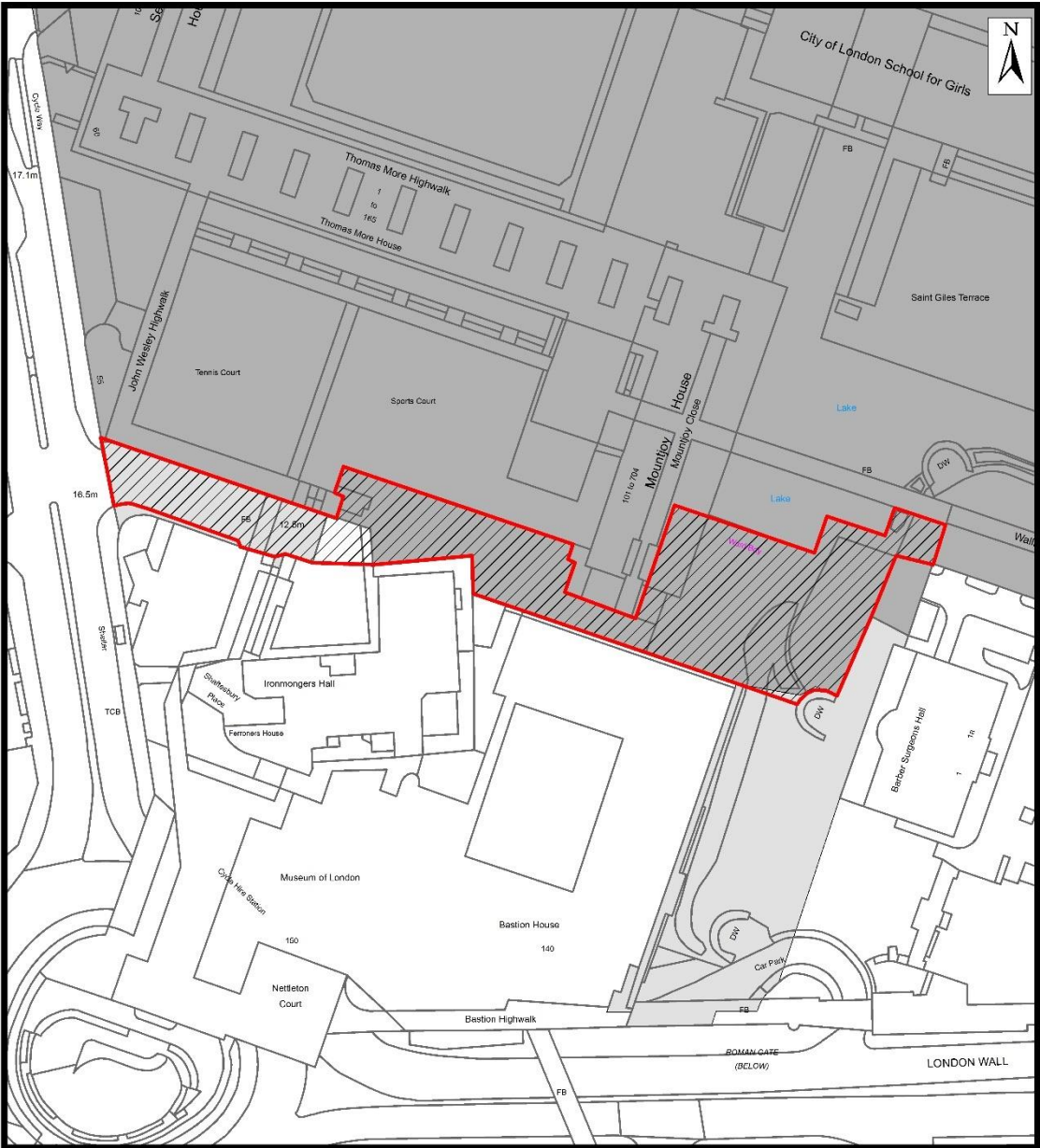
CASE No.
23/01276/LBC

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



ENVIRONMENT DEPARTMENT


Site Location Plan



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ADDRESS:
Barbican Estate Highwalks

CASE No.
23/01277/LBC

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



ENVIRONMENT DEPARTMENT

Site Photos

(Images taken from the Townscape, Visual and Built Heritage Impact Assessment)

Aldersgate Street, near the junction with Little Britain Existing



Proposed



Postman’s Park – outside Memorial to Heroic Self Sacrifice

Existing



Proposed



London Wall: South pavement, between Alban Gate and 88 Wood Street looking west.

Existing



Proposed



Aldgate: west pavement looking south

Existing



Proposed



Aldersgate, opposite entrance to Ironmongers' Hall (looking east)

Existing

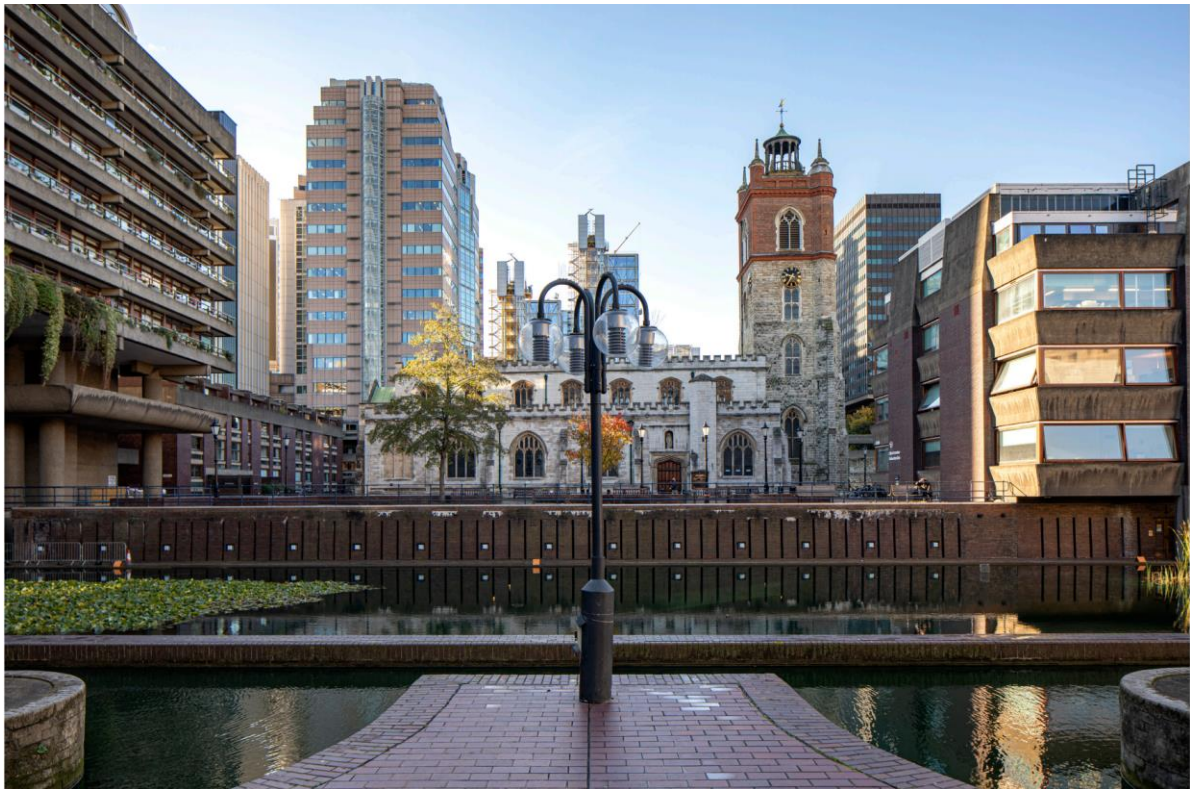


Proposed

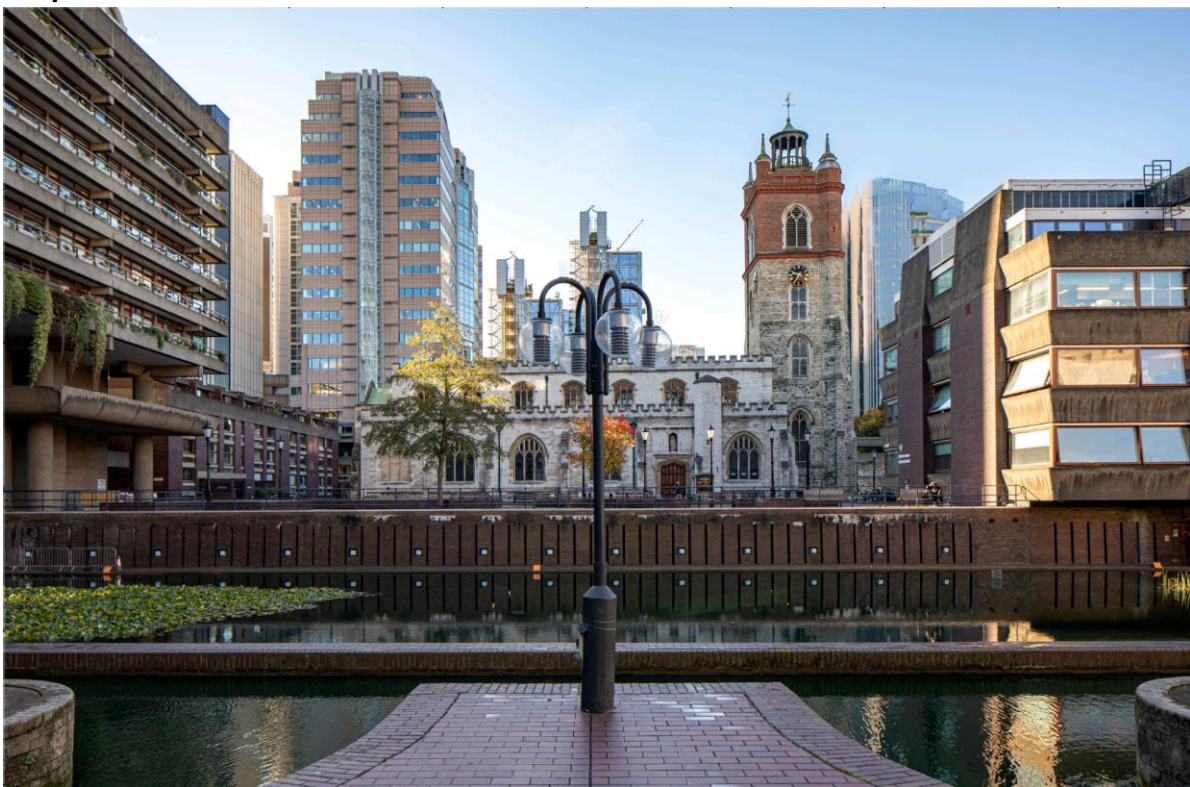


Barbican Estate: Lakeside Terrace, looking directly at St Giles Cripplegate Church

Existing



Proposed



Barbican Estate: St Giles' Terrace – outside St Giles Cripplegate

Existing



Proposed



Barbican Estate: Thomas More Highwalk terrace, west end, overlooking tennis courts

Existing



Proposed



Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - To examine the environmental information
 - To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
 - To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.
5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the

environmental information to be examined and taken into account by your Committee.

6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
7. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.
8. The Local Planning Authority also appointed Trium Environmental Consulting LLP to independently assess the adequacy of the submitted Environmental Impact Assessment. Trium's review report is available online. The applicant submitted an addendum to the Environmental Statement to address matters identified in the Trium review.

Site and Surroundings

9. The proposals relate to a 2.18-hectare site on the north side of London Wall. Directly to the north of the site is the Grade II listed Barbican Estate and the City of London School for Girls sports courts, 200 Aldersgate Street, London House (172 Aldersgate Street) and Mitre House (160 Aldersgate Street) are to the west and Monkwell Square and Barber Surgeons' Hall are to the east and commercial development on London Wall is to the south.
10. The site includes:

The former Museum of London building (150 London Wall, including the Rotunda) and Bastion House (140 London Wall)

11. The Museum and Bastion House were designed by architects Powell and Moya. Bastion House was completed in the late 1970s and the Museum of London opened in 1976. The Museum was founded by an Act of Parliament in 1965 to combine the collections of the London Museum and Guildhall Museum. It comprises a basement, lower ground, upper ground plus two additional storeys. The building encloses Ironmongers Hall on three sides and spans across London Wall to meet the Rotunda, a circular building that forms the centre of the roundabout at the London Wall and Aldersgate Street junction. Within the Rotunda is a sunken garden space. Access to the Museum is from podium level

via the highwalk network, access to the highwalk is from street level via stairs and lifts. The Museum closed to the public in late 2022 in advance of the move to the former Smithfield Market site. At present the building is used by staff for archiving.

12. Bastion House was constructed as part of the wider masterplan for the extension of London Wall at that time and is one of two remaining office buildings standing from this era the other being City Tower. Bastion House comprises a 13-storey office tower (plus one plant level), set above podium level. It is clad in a dark bronze curtain walling system. Below podium level Bastion House and the Museum are linked, the core and main structural columns of Bastion House intersect the Museum of London vertically through the lower floors and the two buildings share a servicing route and back of house areas at lower ground floor level. Bastion House has two reception areas one at lower ground floor level and one at high walk level. Vacant possession of Bastion House occurred in 2023.
13. The Museum and Bastion House have a Certificate of Immunity from Listing (COIL), which was granted in August 2019. Renewal of the COIL is pending.

Ironmongers' Hall (II) and Ferroners' House

14. Ironmongers' Hall is a grade II listed livery hall by Sydney Tatchell constructed between 1923 – 1925 and currently occupied by the Worshipful Company of Ironmongers. Ferroners' House is a later extension to the building by Fitzroy Robinson 1977 – 1979. This extension is specifically excluded from the recent statutory listing. Ferroners' House contains outdated office accommodation for use by the Ironmongers' and the ground floor is occupied by a day nursery known as 'Hatching Dragons', with the rest of the nursery located within Ironmongers' Hall.

London Wall Car Park (western end)

15. London Wall Car Park is a City-owned car park containing circa 200 car parking spaces for vehicles, cycles and motorcycles. It is located under the Western End of London Wall running from Noble Street all the way to Coleman Street. The western end of the car park, which contains 42 car parking spaces and two accessible spaces is within the application site. There is currently one main entry ramp into the car park and two exit points on the north and south side of London Wall taking vehicles east and west bound. The car park access ramp is also the entry point for the service road running beneath the Museum and Bastion House.

Remains of the Roman Fort Gate

16. The remains of the Roman Wall and West Gate of Cripplegate Fort survive within a locked room within the west end of London Wall car park, adjacent to the main entrance. The remains have Scheduled Monument status.

Barber Surgeons' Garden

17. A garden area located between London Wall and the Barbican lakes, which is publicly accessible from the vehicular ramp off London Wall. Barbican residents can access the garden via two locked gates to the north and west of the site. There is an additional locked gate between Barber Surgeons' Hall and Monkwell Square. The gardens are significant as they contain the medieval bastions along the line of the Roman Wall. These remains have Scheduled Monument status. This part of the site is within the Barbican and Golden Lane Conservation Area and the Barbican Registered Historic Park and Garden (II*).

Escalator and Lift Voids within 200 Aldersgate Street and One London Wall

18. 200 Aldersgate Street is an office building to the west of the Rotunda and One London Wall is an office building to the south of the site. These buildings have voids containing staircases and lifts that provide access between ground and highwalk level and it is the voids that are in the application site. The void in 200 Aldersgate Street provides access between ground level and the Nettleton Court bridge over London Wall. 1 London Wall has two voids, whereby one provides access between ground level and the Falcon highwalk bridge over London Wall and one provides access between ground level and the Plaisterers' highwalk bridge over London Wall.

Highwalks

19. The site contains several highwalks either in their entirety or part:
 - John Wesley Highwalk – the site includes the southern part of the John Wesley Highwalk from the point where it adjoins Nettleton Court up to the area of John Wesley Highwalk adjacent to the City of London Girls School sports pitches.
 - Plaisterers' Highwalk – the site includes all of Plaisterers' Highwalk which comprises the bridge over London Wall between 1 London Wall and the Bastion Highwalk.
 - Bastion Highwalk – the site includes a section of Bastion Highwalk, from the point where it adjoins Nettleton Court to a point above the ramp that accesses London Wall Car Park.
 - Falcon Highwalk – the site includes all of Falcon Highwalk which comprises the bridge over London Wall between 1 London Wall and the Rotunda.
 - Nettleton Court – the site includes all of Nettleton Court which comprises the bridge over London Wall between the Rotunda and 200 Aldersgate Street and routes around the Rotunda that connect with Bastion highwalk to the east and John Wesley Highwalk to the north.

- Mountjoy Close - Mountjoy House is a residential block on the grade II listed Barbican Estate directly to the north of the site. The highwalk beneath Mountjoy House is known as Mountjoy close. It terminates on the south side of the building. The point at which the walkway terminates is within the application site.

Shaftesbury Place

20. Shaftesbury Place is an area of pedestrian only public highway that connects Aldersgate Street and Ironmongers Hall, it also includes a stepped route between Ironmongers Hall and the Thomas More House car park ramp to the north.

Parts of the Barbican Estate

21. The Barbican Estate is the Grade II listed Estate designed by Chamberlain, Powell and Bon in the late 1950s and built between 1962 – 1982. It contains several residential blocks, the Barbican Centre for arts, City of London School for Girls and the Guildhall School of Music and Drama. The site has interfaces with the Barbican Estate including:

- The path between Barber Surgeons' gardens and the walkway over the lake on the Barbican Estate.
- The servicing ramp and access to the Thomas Moore car park.
- The point where the John Wesley Highwalk connects to the Barbican Estate from the Museum.
- The truncated walkway at Mountjoy Close.

Aldersgate Street, London Wall and Part of Montague Street

22. The site includes the following highways (carriageway, cycle lanes and footways):

- London Wall east and west bound from the Rotunda and junction with Aldersgate Street to approximately Alban Gate, 125 London Wall.
- Aldersgate Street north and south bound from approximately outside 10 Aldersgate Street to Mitre House 160 Aldersgate Street.
- The junction between Aldersgate Street and Montague Street.

Sculptures, Memorials, Plaques and Historical Commemorative Features

23. The site includes the following sculptures, memorials, plaques and historical commemorative features:

- Wesley Memorial (Aldersgate Flame)
- Bronze Plaque Commemorating John Wesley
- Bull and Mouth carving

- Metropolitan Drinking Fountain
- Crest and decorative projecting bracket sign of the Ironmongers' Company (at entrance to Shaftsbury Place)
- Blue Plaque – Site of Thanet House
- Metropolitan Drinking Fountain and Cattle Trough Association cattle trough
- City of London Wall Walk Plaques
- Bull and Mouth Carving

Site context and designations

24. The area around the site is characterised by the commercial buildings along London Wall to the south and east and the residential blocks of the Barbican Estate and the City of London School for Girls to the north. There is additional residential development to the east and west of the site on Monkwell Square and at 172 Aldersgate Street. The Rotunda roundabout dominates the pedestrian environment at ground floor level with limited active frontage, aside from some retail units in 200 Aldersgate Street and 172 Aldersgate Street. As is characteristic of the City, there are livery companies in close proximity to the site, with the closest being Barber Surgeons' Hall (Ironmongers Hall is partially within the site).
25. The site is well connected to transport links and has the highest Public Transport Accessibility Level (PTAL) of 6B. The Barbican and St Paul's Underground Stations are in close proximity to the site and a significant number of bus stops are within walking distance of the site.
26. A tiny area to the northwest of the site, part of the Barber Surgeon's Gardens, part of Bastion House, The John Wesley Highwalk, Mountjoy Close Highwalk, part of the Barbican Estate service area/car park are located within the Barbican and Golden Lane Conservation Area and the Barbican Estate Registered Historic Park and Garden (II*). The John Wesley Highwalk and Mountjoy Close Highwalk and the service area/car park are part of the Barbican Estate (II). Ferroner's House attached to Ironmongers Hall (II) and some below servicing areas are partially within the site.
27. Nearby but outside of the site listed building include: Ironmongers Hall (II) St Giles Cripplegate (I); Church of St Botolph without Aldersgate (I); Gate and Railings Former Churchyard and Church of St Botolph (II); Police Call Box (II), Memorial to Heroic Self Sacrifice (II*); 9 and 10 and 12 Little Britain (II); St Anne and St Agnes (I); Cripplegate Institute (II); King Edward's Buildings (Post Office (II*); St Martin's House (Grade II); National Westminster Bank (Grade II) ; Statue of Rowland Hill (II); Church of St Vedast (I) No 4 Foster Lane St Vedast Rectory (Grade II). Barber Surgeon's Hall is identified as a non-designated heritage asset. Postman's Park Conservation Area, Smithfield Conservation Area, Foster

Lane Conservation Area and Charterhouse Square Conservation Area are located nearby.

28. Two Scheduled Monument listings are within the site. These include the length of ancient Roman Wall within Barber Surgeons' Garden, and the west gate of Cripplegate Fort and section of the wall within the London Wall car park. Goldsmith Hall is within the locality and is also a Scheduled Monument.
29. There are other existing green spaces within the site boundary, including the existing Rotunda and to the northwest of Ironmongers' Hall. Outside of the site there are other pockets of green space in the vicinity including Postman's Park and the Noble Street Roman Wall ruins.
30. The Pre-Expulsion Cemetery of the Jews was established in the medieval period and located outside of the Roman City Wall. It was the only Jewish cemetery in England until 1177. Using overlay maps it is possible to approximate the extent of the old cemetery and it has been identified that part of the extent of the cemetery site is within the development site boundary.
31. The site is within the Central Activities Zone (CAZ) and the Barbican/Smithfield/Farringdon specialist cluster of activity as identified by the London Plan 2021. According to the Local Plan 2015 the site is within the North of the City Key Place Area and within the draft City Plan 2040 the site is within the Smithfield and Barbican Key Area of Change. These designations support the continued improvement of the Barbican area as a cultural quarter of London-wide, national, international significance. The City of London designations seek to meet the needs of resident's needs in the north of the City, including protection of residential amenity and they seek to improve pedestrian permeability and connectivity at ground and highwalk level through large sites. The clusters of activity must be supported and sustained.

Relevant Planning History

32. The submitted planning statement sets out the site's planning history with various applications relating to modifications to the Museum of London and Bastion House, London Wall Car Park, One London Wall and 200 Aldersgate Street, none of which are directly related to the current application scheme. The following application was the original permission for the Museum and Bastion House:
 - 4648A, approved 25 April 1968 – Development of the site bounded by Aldersgate Street London Wall, proposed open space and the Barbican residential area, together with land comprising the central reservation of the proposed roundabout at the junction of London Wall and Aldersgate Street

by erection of new buildings for use as a Museum with offices, restaurant and other uses together with connecting bridges over the highway.

33. The approval of the Museum's relocation to Smithfield is relevant planning history to this case and these works were permitted under applications 19/01343/FULEIA (approved on 13 April 2023) and listed building consent reference 19/01344/LBC (approved on 28 June 2023). Further information in respect of these approvals is set out in the following section of this report.
34. In respect of Ironmongers' Hall planning permission was granted on 15 October 2015 under planning permission 15/00406/FULL, the 20 March 2018 under planning permission 18/00085/FULL and the 30 March 2021 under planning permission 20/00986/FULL for an extension to Ferroners' House. These permissions have not been implemented and an application for planning permission is currently pending consideration for the same proposal as covered by the aforementioned applications (ref. 23/01320/FULL).

Background to the Development Proposals

35. The application site has primarily been used for the Museum of London and as offices. As of December 2022, the Museum closed to members of the public with the intention of moving to the General Market and Poultry Market – former market buildings in West Smithfield (works consented under applications 19/01343/FULEIA and 19/01344/LBC). The move was driven by the London Wall Museum site no longer being fit for purpose and was identified as having the following constraints:
 - The internal configuration of the existing building with its long narrow corridors and small rooms makes typical museum activity e.g. object movement and set up difficult.
 - The building has a disproportionate ratio of back of house areas versus publicly accessible space.
 - The size of the temporary exhibition space is of limited size and poor configuration.
 - The retail space and capacity to accommodate school parties is limited.
 - The existing building has a lack of street level presence and is only accessible from highwalk level.
36. The new Museum site provides increased floorspace and greater street level presence to enable the Museum to fulfil its aspiration to be a world class visitor

attraction. The current Museum site will be empty once the museum completes its move in 2026.

37. Bastion House is currently unoccupied following expiry of the lease in 2023. The applicant considers that the office space is outdated given its layout and floor to ceiling heights.
38. The applicant explored opportunity to deliver a Centre for Music on the site but decided not to proceed with this option. Instead, the applicant developed a brief for a “commercial led scheme that addresses the strategic context and provides strong cultural, public realm and heritage benefits” (p. 11 of the Design and Access Statement).

Application Proposal

39. The proposed development scheme is covered by three applications:
 - Planning permission reference 23/01304/FULEIA
 - Listed building consent reference 23/01276/LBC
 - Listed building consent reference 23/01277/LBC
40. This report covers all applications. An overview of each application is set out below:

23/01304/FULEIA

Demolition

41. Planning permission is sought for the demolition of:
 - Bastion House, including basement areas.
 - The former Museum of London building including the Rotunda roundabout, sunken garden and basement areas.
 - The Ferroners’ House extension to Ironmongers Hall.
 - The ramp to the London Wall car park, accessed off the eastbound carriageway of London Wall, along with the existing car park toilets, fan room and interior walls around the Roman Gate room.
 - One escalator within the recess void of 1 London Wall.
 - A brick wall to the end of Mountjoy Close.

Removal of Walkways

42. As part of the demolition of the buildings the following walkways would be removed:
 - Falcon Highwalk
 - Plaisterers’ Highwalk

- The westernmost section of Bastion Highwalk
- Nettleton Court including the highwalk bridge linking 200 Aldersgate Street with the Rotunda roundabout
- The southernmost section of the John Wesley Highwalk
- Shaftesbury Place

Highway Alterations and Linkage with the St Paul's Gyrotory Project

43. Following the demolition of the Rotunda, the highway arrangement at the southernmost end of Aldersgate Street and the westernmost end of London Wall would be reconfigured. The existing Rotunda roundabout arrangement would be replaced by a peninsula road layout which incorporates a new configuration of carriageway, cycle lanes, crossings, traffic signals and the diversion of utilities.
44. The approach to the proposed highways alterations is envisioned as part of the City's St Paul's Gyrotory project. The aim of the Gyrotory project is to transform the streets and public realm between the former Museum site and the St Paul's Underground station through partial removal of the 1970s gyrotory. It is a priority project for delivery by 2030 in the City's Transport Strategy.
45. The project is split into two phases. Phase 1 covers the project area to the south of the rotunda roundabout and the opportunities for creating additional public realm in that area. Phase 2 focuses on highway changes on the Rotunda roundabout at the Museum of London/the London Wall West site. Each phase of the project can be carried out and function independently of the other. Further details in respect of the project are set out in the highways section of this report.

Rotunda Building (site of former London Museum)

46. On the peninsula a new building is proposed, herein referred to as the Rotunda building 28,014.2 sqm GIA (floor area includes the cultural development referred to below), which comprises a ground plus 13 storey building with a lower ground floor level and two basement levels below (height 75.3 m AOD). The building would provide new office floorspace (20,610 sqm GIA) with café space (232.7 sqm GIA) at ground floor level. A cultural and associated food and beverage offer would be included at the top of the building (levels 11 and 12) referred to as the Cultural Cap, alongside a free to access public viewing terrace. A reception area for the cultural offer would be provided on the ground floor of the building and access would be provided to mezzanine level where there would be flexible space that could be used as informal workspace or space to hold gatherings, talks and classes. The Rotunda would be interlinked to other cultural floorspace provided on the site, further details are set out in the cultural development section of the report below (total cultural floorspace provided in the Rotunda Building and the cultural development (see below) would be 7,171.5 sqm GIA).

New Bastion House (site of former Bastion House)

47. Bastion House would be replaced by a new building, herein referred to as New Bastion House (33,936 sqm GIA). It would comprise a ground plus 16 storey building (height 86.7 m AOD) with a lower ground level and basement below. The building would accommodate new Grade A office floorspace (32,523 sqm GIA) with a private amenity area and roof terrace at the top of the building. A café/restaurant use (875.2 sqm GIA) would be provided at ground level on the east of the building overlooking Barber Surgeons' Gardens. Studio spaces would be provided at Highwalk level for makers/artisans (537.8 sqm GIA). Plant space would be contained at basement and roof level and would include space to accommodate new Citigen plant equipment for the purposes of providing a local energy centre within the development.
48. The architectural concept for the Rotunda Building and New Bastion House is based on a pair of buildings that have a base/podium with an active inner face and an exterior husk (series of variegated fins).

Cultural Development

49. A building for new cultural space is proposed between the Rotunda building and New Bastion House (the building would be part of the Rotunda as structures, plant, loading and egress are interrelated) and along the southern edge of Ironmongers Hall, at lower ground, ground and highwalk level. This would accommodate new flexible, cultural floorspace.

North Building

50. A new ground plus four storey building (2,848 sqm GIA) with a lower ground floor below, is proposed in the northwest corner of the site (39.6 m AOD) fronting Aldersgate Street. This would provide further office floorspace.

Ironmongers Hall and Ferroners House

51. Ferroners' House, the 1970s unlisted extension to Ironmongers' Hall, would be demolished. Alterations to the stair tower are proposed following removal to Ferroners' Hall and to facilitate a reconfigured delivery and servicing operation for the building and alterations are proposed to the perimeter wall surrounding Ironmongers. Minor alterations are also proposed to the interior of Ironmongers Hall and these are covered under the separate listed building consent 23/01276/LBC.

New Public Realm and Pedestrian Routes

52. New public realm and routes through the site are proposed as part of the application scheme. These changes can be summarised as follows:

- Formation of a new plaza at the front of the Rotunda, New Bastion House and cultural building (referred to in the application documentation as the Central Plaza). The plaza would incorporate a new route (lift and stairs) up to podium level and a new direct ground level pedestrian route from London Wall onto Aldersgate Street (the route is referred to in the application documentation as the Rotunda Arcade). Seating and greening are proposed on the plaza.
- Formation of a new plaza off Aldersgate Street enclosed by Ironmongers Hall and the proposed North Building and Rotunda Building (referred to in the application documentation as Aldersgate Plaza).
- Provision of new footway along London Wall and Aldersgate Street which would incorporate landscaped areas.
- The re-landscaping of part of Barber Surgeons' Garden plus the provision of new access routes (lift, stairs and ramp) between the garden and London Wall enabled by the removal of the servicing and car park ramp. At the northern end of the garden a new stair is proposed that would incorporate a stepped terraces with a cascading water feature (a lift would also be provided for step free access). The steps would adjoin new pedestrian routes and landscaping proposed along the northern edge of the site.
- Formation of new public realm along the northern edge of the site (referred to in the application documentation as the Northern Garden) comprising greening and new east west routes between Barber Surgeon's Gardens and Aldersgate Street. This area would be formed by a new landscape deck built over the existing open service area and part of Thomas More House car park. The deck would be supported by columns that would straddle the service area. The new public realm would be graded to act as a connector to allow circulation from street to highwalk level and to connect to Barber Surgeons' Gardens.
- Formation of a new area of public realm above the cultural offer at podium level referred to as 'the glade'. This would comprise a garden area that is surrounded by banks of planting.
- A new continuous highwalk network is proposed at podium level as follows:
 - Around the perimeter of New Bastion House with a replacement connection to the Bastion Highwalk.
 - Over London Wall from the proposed highwalk around the southern edge of New Bastion House to 1 London Wall (this essentially replaces Plaisterers' Highwalk).
 - Between the highwalk along the northern edge of the New Bastion House and the existing truncated highwalk connection off Mountjoy House.
 - Between the glade and the southern edge of Ironmongers Hall. A lift and staircase are proposed at the southwestern corner of Ironmongers Hall to provide access between the highwalk and Ironmongers Plaza.

- Along the western edge of the site, over Ironmongers Plaza and along the western edge of the north building with a replacement connection into the John Wesley highwalk.

(A separate listed building consent 23/01277/LBC has been submitted for alterations to and interfaces with the Barbican Estate, further details are set out below.)

London Wall Car Park and the Roman Gate

53. Modifications are proposed to the London Wall car park. The existing vehicular access ramp would be demolished, and the north wall of the car park would be opened up to create a visual connection between the internal Roman Gate area to the Roman Wall within the garden on the outside; the Roman Gate would become a new public visitor attraction. There would be 44 parking bays removed and 2 accessible parking spaces relocated as part of this proposal. An additional 3 accessible spaces would be provided. Full height glazing would be used on entrance to the exhibition space.
54. It is proposed that the portion of car parking area affected would be repurposed as a short stay cycle hub. It would have a dedicated entrance accessed via a lift and gullied stairwell from London Wall at street level above. The hub would accommodate 250 spaces including 213 single/double tier and 30 folding cycle lockers.
55. Following demolition of the existing car park entrance ramp, eastbound traffic would instead be able to access the car park via the current egress ramp on the southern side of London Wall (opposite the Rogers building). At present the ramp is used for vehicles exiting the car park travelling west bound. As part of the proposals this arrangement would be revised, and it would instead be used for vehicular entry into the car park. Vehicles would approach via the eastbound carriageway and wait in a new pocket created in the central reservation until there is a clear gap in the traffic before making a right-hand turn movement. Geometry of the ramp is such that a left hand turn into the ramp for west bound traffic would not be achievable.
56. Vehicles exiting the car park would continue to be able to do so via the existing exit ramp which provides eastbound (only) egress on to London Wall. No changes are proposed to this exit movement in this regard. The pertinent point here is that the alternative existing exit ramp will instead be utilised to provide access into the car park; this change will, in effect, prohibit vehicles exiting the car park from travelling westbound along London Wall directly from the car park, as they currently are able to, and will result in local diversions for some trips.

1 London Wall and 200 Aldersgate Street

57. Following the removal of the Falcon Highwalk bridge and the Nettleton Court Highwalk bridge the access voids in 1 London Wall and 200 Aldersgate Street would not be required. These areas would be enclosed and made good.

23/01276/LBC

58. This application for Listed Building Consent covers external and internal alterations to Ironmongers Hall, alterations to the stair tower and the works of making good to Ironmongers' Hall following the demolition of Ferroners' House and an opening on the north wall to provide access to a new dedicated service bay at lower ground level.

23/01277/LBC

59. This application for Listed Building Consent covers the works required to enable a new highwalk connection to the truncated Mount Joy Close Highwalk, alter the John Wesley Highwalk, and to create the Northern Garden and other interface details with the Barbican Estate.

Consultations

Statement of Community Involvement

60. The Applicants have submitted a Statement of Community Involvement prepared by LCA dated November 2023, outlining their public engagement. Over a 31-month period, the Applicant conducted a three-stage engagement programme:
- Phase 1: Feedback to help shape the design of the development proposals (May 2021 – November 2021).
 - Phase 2: Feedback on the initial development proposals (November 2021 – May 2022).
 - Phase 3: Feedback on the updated development proposals (June 2022 – November 2023).
61. Phase 1 of public engagement involved collecting background feedback from key stakeholders as the initial plans were being developed. These discussions involved understanding the type of development people would like to see on the site, with particular focus on the cultural provision. Specific groups targeted included:
- Smithfield and other local residents;
 - Barbican Resident Association;

- Golden Lane Estate Residents Association;
- Visitors/tourists;
- Local workers
- CoL Access Group
- Age UK
- Madhumita Bose (Golden Lane Memory Club 1-2-1)
- Aldgate School Briefing
- Prior Weston School
- Newpark Childcare Barbican/ London Wall West

62. Phase 2 of the engagement process involved publicly presenting the early developed proposals for the site. A project website was provided and during this phase, the Applicant held and attended 19 stakeholder meetings. A total of 248 people attended two public exhibitions which displayed information about the development proposals and invited comments on the initial proposals via paper feedback forms and through Citizen Space survey.

63. Phase 3 presented more detailed plans and proposals and the project website was updated to reflect the current development proposals. By the end of Phase 3, the public website had had 10,646 visits. In addition to another round of 15 stakeholder meetings, a further three public exhibitions were held to present the updated proposals. These were publicised by 13,763 flyers sent by Royal Mail, 125 emails to City of London corporation Members, social media adverts reaching 81,952 people and posters on the Barbican estate. The public exhibitions were held on three dates at different times of the day; two on a midweek afternoon and evening and one on a weekend morning/ early afternoon. The exhibitions were held in a venue further to the north of the site, in the London Borough of Islington. A total of 255 people attended across the three sessions. In addition, two pop-up exhibitions were also held in the One New Change shopping Centre, to the south of the site. The pop-ups were held on weekday afternoons.

64. In total, 190 survey responses were received and 509 calls, emails, letters and comment cards were received. The Statement of Community Involvement sets out the key areas of feedback and how the applicant has sought to respond to these. These included the following comments that:

- Buildings should be retained, reused or refurbished rather than demolished.
- Extra office space is not required.
- Requests for more information.
- Proposals impact on the character of the area.

- Proposals impact on heritage and history of site.
 - Proposed cultural offering and how fit into ambitions for Destination city.
 - Concerns about impact of construction.
 - Support for redevelopment and improved public realm.
65. As is set out in the subsequent sections of this report, the objections that have been received raise concerns regarding the applicant's consultation process. The Planning Advice Note Developer Engagement Guidance was adopted in May 2023 and would have been in draft form during the pre-application process. This sets out how applicants are expected to demonstrate how the engagement they have undertaken has positively influenced and contributed to the evolution of their development proposals. In this case the applicant engaged with a broad range of stakeholders both within and outside of the City, throughout the process using a range of different methods (see paragraphs above). In response to feedback, more information was provided in the form of the draft Whole Life Carbon Assessment, the commissioning of property specialists JLL to explore demand for office space, and the provision of additional views and flythrough of the scheme. The changes that were made to the scheme included:
- Reintroduction of a highwalk level crossing over London Wall and further highway route added along western edge of scheme.
 - Reduction in height and width of Rotunda Building and new Bastion House.
 - Rotation and re-alignment of the Rotunda Building.
66. However, objections in particular criticise that the second round of consultation focused on a single option for redevelopment of the London Wall West (LWW) Site and did not present any alternatives which meant there was not a public debate on the question of redevelopment versus retentions and adaption. The Developer Engagement Guidance states that engagement includes exploring any alternative development options for the site with stakeholders and showing how they have considered the re-use and refurbishment of existing buildings. The release of the Whole Life Cycle Carbon Assessment by the applicant helped to inform the discussions regarding demolition of the buildings during the consultation process.

Statutory Consultation

67. Following receipt of the applications, they have been advertised on site and in the press and have been consulted upon as an Environmental Impact Assessment application, as a departure from the development plan, as affecting the Setting of a Building of Special Architectural or Historic Interest and as within a Conservation Area in accordance with article 15 of the Development Management Procedure Order (as amended) and under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

68. There have been three sets of consultation during the consideration of the applications as is set out below:

69. Initial consultation December 2023:

- Nearby residential occupiers were notified directly of the applications by letter on 12/12/2023.
- The applications were advertised in the press on 12/12/2023.
- Site notices advertising the applications were posted in 20 locations on 07/12/2023.

70. Further 30-day consultation February 2024:

(This round of consultation related to the receipt of additional information in relation to the planning application and further information in relation to the Environmental Statement submitted under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The case was also re-advertised as being a departure from the development plan):

- All nearby occupiers as well as those who had commented on the application by 27/02/2024 were notified of the additional information submitted.
- The applications were re-advertised in the press on 28/02/2024.
- Site notices re-advertising the applications were posted in 20 locations on 27/02/2024.

71. Third 21-day consultation March 2024:

(This round of consultation related to the receipt of additional information in relation to the planning application, it related to additional sustainability details and a revised site plan which included alterations to the blue line):

- All nearby residential occupiers as well as those who had commented on the application as of 14/03/2024, were notified of additional information to the planning application by letter and email on 14/03/2024.
- The applications were readvertised in the press on 14/03/2024.
- Site notices re-advertising the applications were posted in 20 locations on 14/03/2024.

72. As of midday on 8th April 2024 (6th April was the end of the Local Planning Authority's third consultation period) 965 objection letters have been received (some objectors have written in multiple times). A summary of the representations received, and the consultation responses is set out in the table below. The purpose of the table is not to reproduce the content of the significant number of objections but to provide a summary of the objections on a topic-based approach. Not all the representations below relate to material planning considerations. Those that are, have been dealt with in this report.

73. All objections and letters of support made in relation to the application are available on the public file and have been read in full and considered in drafting this report and recommendation. Copies of all received letters and e-mails making representations are attached in full and appended to this report.
74. A number of technical reports have been submitted by local resident associations. These reports have been reviewed and are not summarised in full but are addressed in the body of the report itself and are available to review on the public file.

Consultation responses	
Department for Levelling Up, Housing and Communities	A copy of the committee report has been requested.
Historic England	<p><u>Application 23/01304/FULEIA, letter dated 25/01/2024-</u></p> <p>In summary, Historic England considers that the proposals would cause some harm. As the designated heritage assets are of significance, it advises that your authority has a duty under national, regional and local planning policy to give consideration of this harm and give this ‘great weight’ and that your authority will also be expected to secure public benefits.</p> <p>Historic England’s letter dated 25/01/2024 considers the significance of the heritage assets and the proposals and their impact. Regarding the proposals and their impact, it sets out the following:</p> <p><u>“The scheme</u> The proposals by Shepherd Robson with Diller Scofidio + Renfro are for the complete demolition of the post-war buildings on the site and construction of three new buildings of 17, 14 and 5 storeys for a mixed-use scheme that includes offices and a new cultural hub. The tallest element is equivalent in height to Bastion House.</p> <p><u>Impacts</u> The proposed height of the development means that it will have an impact on the settings of more distant designated heritage assets in key views of them.</p> <p><u>LVMF View 13.A Blackfriars Bridge and Millennium Bridge (downstream):</u> Whilst the focus of the view is St Paul’s Cathedral, the Barbican Estate towers are also prominent and recognisable due to the distinctive silhouette of the projecting concrete balconies. They impact on views of the dome of the cathedral. The proposed development will</p>

encroach in the views on one of these towers - Shakespeare - with some increased bulk and mass visible in front of it, obscuring some of the lower floors. It will be of a similar height to the main body of the cathedral church and closer to it than Bastion House currently is. However, clear sky remains clearly visible between the cathedral and the new building. The development would have some minor impact on the view and would be at the lower of the scale of less than substantial harm.

LVMF View 17B.1 Golden Jubilee/Hungerford Bridge (downstream): The footbridge provides enhanced views east towards the City of London and as a river prospect view, the Thames dominates the foreground. The spire of St Bride's Church and the dome of the Old Bailey, both of which are Grade I, are distinctive vertical elements seen against the sky. The proposals will impact on the unusual, ornate 'wedding cake' spire of St Brides removing the clear sky from behind much of the lower tier, diluting the effect of the highly characterful silhouette. The visual impact of the proposals does cause harm to the Grade I listed building through development in its setting. In my view, it would be at the mid-range of the scale of less than substantial harm.

Postman's Park and St Botolph's Church: Whilst the setting of the park and the church is dominated by post-war buildings, the scale of these buildings in the middle ground is broadly similar, allowing the church spire to be admired uninterrupted and against clear sky. Under the proposals, this would be significantly altered with the new development directly in the backdrop, reducing its visual presence, clearly causing harm to its significance through development within its setting, which would be in the middle to lower range of less than substantial. The impact on the significance of the scheduled monument within the park would be negligible.

Barbican Estate: The increased quantum of development on the site will be clearly visible from within the estate and impact on views from within it, such as from Thomas More Highwalk Terrace, Wallside highway, and St Giles Terrace. Whilst Bastion House is a tall building, it is relatively slender and other development on the site is of a much lower height and scale. This reduces its impact on views from within the designated heritage asset. There will be some harm through development in its setting, which would be in the middle to lower range of less than substantial.

The proposed hard and soft landscaping will inevitably have a relationship with the Grade II* garden and be legible as an extension to it. The proposals should be informed by the

registered landscape. The proposal is for a contemporary landscape scheme rich in biodiversity. However, the success of the relationship between the new landscaping and that of the Grade II* landscape will depend on the quality and detail of the scheme.

The proposed Northern Garden would comprise a new podium-level landscape created on a deck constructed to occupy the open airspace above the existing service yard/car park entrance, which form part of the Grade II* landscape. This landscaped deck would slope along the south side of the City of London School for Girls' sports ground to connect the highwalk with ground level in the Barber Surgeons' Garden, passing under the proposed extension of the Mountjoy Highwalk into the application site. The new landscaped deck would overshadow and hide from view functional parts of the estate. The new columns supporting the deck and the new surfaced paths, ramps and steps (including the proposed stepped water terraces/SUDs) connecting into and overlaying parts of the existing greenspace of Barber Surgeons' Garden and alongside the preserved sections of the London Wall would result in direct physical impacts to the grade II* registered park and garden.

Altogether, these impacts would be minimal and localised to areas that make only a limited contribution to the designed landscape's special interest. Nevertheless, it would represent some harm to the registered park and garden's overall significance - in the lower range of less than substantial harm. This must be weighed against any public benefits which might accrue, and the proposed development's improving access and connectivity to underutilised and less-visited parts of the Barbican Gardens could be considered beneficial.

St Giles Church: The new development will encroach on the tower of the church in a similar manner to the existing Bastion House as they are broadly similar in height. However, the increase in mass and bulk will be apparent in the view and would, in my view, cause some minor harm to its setting.

Ironmongers Hall: The removal of the Aldersgate Steet building and the creation of a new public open space will improve views of the listed building's principal elevation.

The scheduled monuments of London Wall

It is not yet possible to fully determine the physical impact of the works on the monuments referred to as Bastion 14 and the Fort Gate in the absence of a detailed demolition and construction methodology and all services plans.

Additionally, a plan for protection of the upstanding remains of these monuments will need preparation.

It is likely that physical intervention would be needed into both monuments and this must be restricted to areas of demonstrable no or low significance. Any physical impact must cause no or little harm, which must be weighed against the benefits of the new presentation included within the proposals.

It is envisaged at present that there will be no physical impact upon the monument referred to as the Noble Street stretch.

Pre-application discussion has underscored the importance of making no physical intervention into standing remains in any way (other than for works of conservation). Evaluation trenches have shown areas where the buried archaeology has already been compromised through the construction of Bastion House. These trenches have also shown where the buried archaeology is well preserved.

The setting of the monument referred to as Bastion 14 will be adversely affected, as the new scheme comes closer and will loom over the monument rather more than the Museum of London and Bastion House do now. The new scheme will also impinge upon the line of the outer defensive ditch. This ditch is not visible but its line is kept clear in the current green space of the Barbican Gardens. This is proposed for building upon with walkway and access into the garden as well as excavating and establishing a planted swale as part of the site drainage strategy.

When the Roman wall was constructed here, it was initially part of the fort and then the wider city was encircled, and this was clearly to make a statement about the significance of the city of Londinium. The wall would have been the tallest and most imposing element in the landscape and predominant on the skyline here, with a wide, deep defensive ditch to overcome. It would have formed a stark and austere statement about the new city, run by the alien Roman administration.

Therefore, the proposals to build hard up to the monument, losing the line of the ditch and overshadowing the monument slightly are considered as some harm to the significance of the monument through development within the setting.

Bastion House and the Museum of London do currently compromise the setting, however, the increased mass and the loss of some of the clear space between the monument

and the new building must be considered harmful. This must be weighed against any public benefits which might accrue, such as the provision of increased onsite interpretation and information.

The Fort Gate is the subject of a design for improved public access and interpretation. The plans are not yet finalised; however pre-application discussions have been positive, and this element of the project is welcomed. It will secure much better access than is presently available. This will assist visitors, residents and local workers to better understand the wealth of history in this location.

We will be happy to continue working with the applicant to bring forward a detailed and high-quality design for this element of the scheme. No harm is envisaged to the setting of the Fort Gate monument through the current proposals.

The monument of London Wall on Noble Street will have its setting altered in the view looking north from the corner of the Roman fort. The new building is a slightly different mass to Bastion House and will intrude slightly further into the S-N view of the monument along Noble Street. However, this view is currently compromised with Bastion House, and so any harm to the significance of this monument would be low and should be weighed against the public benefits which may accrue.

Should you be minded to grant planning permission for this application, the works would also require scheduled monument consent for the monuments referred to as Bastion 14 and the Fort Gate. We would seek reassurance about the physical protection to the monuments, archaeological supervision of all works in the vicinity and the provision of substantial high-quality interpretation and extensive public access. With such reassurance, we would be likely to recommend to the Department of Culture, Media and Sport that consent be granted, subject to detailed conditions pertaining to the protection and enjoyment of the monuments.

The scheduled monument of Goldsmiths' Hall As with the Noble Street stretch of London Wall, the view from S to N along Noble Street is one in which Goldsmiths' Hall is enjoyed. However, the building is currently already hemmed in and overshadowed by surrounding buildings, and no harm is anticipated to the significance of the Hall through development within its setting from the current proposals."

The letter considers relevant policy and then sets out its position as below-

“Historic England does not object in principle to these proposals and welcome the changes that improve the visibility of the Grade II listed Ironmonger’s Hall from Aldersgate Street, the presentation of the Fort Gate and improved interpretation of the heritage assets within the public realm.

However, Historic England considers the impacts identified above would cause some harm, which would be less than substantial, through development within the setting of designated heritage assets. In accordance with the NPPF, this harm to the significance of the Grade I listed St Bride’s Church, Grade I listed St. Botolph’s Church, Grade II listed Barbican Estate, its Grade II* Registered Landscape, the Scheduled Monuments of London Wall and the Postman’s Park Conservation Area will need to be weighed against the public benefits of the scheme by the City of London Corporation as part of your decision-making process.

The NPPF also states that, if harm is unavoidable, opportunities should be sought for mitigation and enhancement. Given the physical and developmental connection between the Barbican Estate and this application site, it is important that careful consideration be given to their relationship and the very high significance of the Grade II* registered Landscape including the Highwalk.”

Officer Response to the above comments:

A full assessment of the impact of the scheme on the strategic views and relevant designated and non-designated heritage assets is set out in the design and heritage sections of this report. A section dedicated to the NPPF paragraph 208 balancing exercise is also set out in the later sections of this report.

The letter further notes, “At the same time, I would urge you to consider additional enhancement of the landscaped areas around Thomas More Highwalk, St Giles Terrace, and the City of London School for Girls sports ground where there are opportunities for improvement.

Officer Response to above comment:

The landscaped areas around Thomas More Highwalk, St Giles Terrace, and the City of London School for Girls sports ground are outside the development site. The Barbican podium areas are managed by the City of London Children and Community Services. The Barbican podium is subject to a comprehensive resurfacing and relandscaping programme through a staged approach.

Stage 1 is complete and Stage 2 approved (2023). This area of the Barbican podium will be resurfaced and landscaped as a separate project in due course. The landscaping style and design for Barbican podium needs to relate to this site wide strategy rather than following a piecemeal approach.

It is unclear from the demolition plans and proposed drawings whether the covered element of the Highwalk by Mountjoy House will be kept as part of the scheme. In our view, this element which forms the junction, is part of the historic fabric and character the Barbican Estate and should be retained.

Officer Response to above comment:

Demolition drawings show this as retained. The existing covered highwalk by Mountjoy House and which forms part of the Barbican Estate will be kept. The existing bricks which enclose this truncated highwalk will be removed and the new highwalk connection carefully integrated with the proposed Barbican highwalk.

Recommendation

Historic England strongly recommends that, should you approve these proposals, conditions be applied to secure the quality and detail of the proposed landscaping scheme. These should include matching of the hard landscaping to the surfaces and materials of the Highwalk where it joins that of the Barbican Estate, consideration of planting species based on sun-modelling and tolerance of shade, water requirements and maintenance. The proposed light coloured, bonded gravel surface is in stark contrast to that found within the Barbican Estate and its distinctive pavers. Whilst we do not suggest that this material should be replicated, we are not convinced that the material and colour would complement the existing or be robust enough in this public context.

Officer Response to above comment:

The design strategy is to preserve as much original fabric as possible at these interfaces; to make the distinction of old and new treatments clear whilst being complementary; to ensure the join is well-detailed. This is the approach that has been taken elsewhere in additions to the highwalk. As a best practice conservation approach, supported by HE guidance, it is assumed that this is also the intent behind the HE comments. Conditions would be added to ensure the quality, materials and detailing of the proposals. The proposed surface (light bonded gravel) for the new highwalk would be conditioned for further consideration with the City and Historic England.

We would also ask that you apply a planning condition requiring that scheduled monument consents be obtained before works may begin, for all monuments which will be physically affected.

We would ask that further planning conditions are applied to secure high quality presentation and public access at the Fort Gate, and for additional physical interpretation relating to London Wall to be presented within the public realm. We would be happy to work with you on this, and monitoring compliance with the conditions and supporting documentation.

Historic England has been closely involved in the City's development of the proposals for The Podium and together with that at St Alphage House. There are opportunities to build on the lessons learnt. We strongly urge that this be given the fullest consideration and that the conditions reflect the need to ensure the highest quality landscaping outcome.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us. This response relates to designated heritage assets only."

Officer Response to above comment:

A condition is recommended advising the applicant of the requirement to submit the applications for scheduled monument consents and these should be determined before any works begin. Conditions are recommended that require details of presentation and access to Fort Gate and London Wall, and landscaping details. The lessons learned relates to plant species appropriate to context and microclimate. Historic England will be consulted on these relevant heritage interpretation and landscaping conditions.

Comments on Application No 23/01276/LBC

On the basis of the information available to date, we do not wish to offer any comments. We suggest that this application should be determined in accordance with national and local policy guidance and that you seek the views of your specialist conservation advise.

Comments on Application No 23/01277/LBC

On the basis of the information available to date, in our view you do not need to notify us of this application under the relevant statutory provisions, details of which are enclosed.

<p>GLAAS, England Archaeology</p> <p>Historic</p>	<p><u>23/01304/FULEIA and 23/01277/LBC letter dated 31 January 2024, as updated by letter dated 2 April 2024</u></p> <p>The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.</p> <p>London Wall West is located just to the north-west of the Roman and medieval city walls and Roman fort. Parts of the Scheduled walls are included within the site boundary. A Jewish cemetery of possibly 11th century date extends partially onto the north-east area of the site, within the Barber Surgeon's Garden and beneath Bastion House. This formed the only Jewish cemetery in England until 1290 when the Jews were expelled. No evidence for the cemetery is visible above ground. Jewish law strictly forbids the disturbance or excavation of Jewish graves.</p> <p>This response relates solely to non-designated archaeological issues. Impacts on designated assets, including the Scheduled Monuments and their settings, will be covered by our Development Advice Team who will respond separately.</p> <p>The submitted ES includes a chapter for archaeology and also a baseline report has been provided as an appendix (Appendix 15). The results of the pre-determination archaeological evaluation have been provided to GLAAS separately rather than submitted with the planning application, but MOLA have confirmed that the results of the evaluation have been used to assess the archaeological potential of the site and are included in the ES where relevant. The evaluation report should be submitted as part of any necessary ES revisions or updates.</p> <p><u>Officer Response to Above Comment:</u></p> <p>The evaluation report has been submitted to the Local Planning Authority and was included in the pack of documents consulted upon under Regulation 25 of the</p>
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Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The ES identifies a low potential for prehistoric remains, a moderate potential for Roman remains relating to use of the City by the Romans outside the city walls and possibly including burials. The potentials identified do not include the Scheduled Monuments themselves which will not be physically affected by the development. The ES identifies a moderate potential for remains of medieval and post-medieval date relating to the expansion of the city beyond the walls and the former burial ground of St Giles which also extends into the north-east part of the site. Extensive truncation from previous and current structures and bombing has also been identified.

In response to the scoping document, GLAAS requested that the ES contain an explanation of how the new development will avoid any impact on the potential remains of the medieval Jewish cemetery in the north-east of the site and demonstrate how and where these remains have already been removed by the current basement. Unfortunately, this has not been as clearly demonstrated by either the ES or the Appendix as we had hoped. Some discussion of medieval burials has been provided, but the ES does not make fully clear that these relate to the burial ground at St Giles, which partially extended onto the site, not the Jewish cemetery. The two cemeteries are not believed to overlap. Figure 38 of the appendix suggests that parts of the Bastion House basement have only removed archaeological remains to a depth of c. 12.1m OD (basement floor at 13.1m OD and c. 1m of concrete slab) which could suggest there is still some potential for burials to survive within the basement.

The baseline appendix does, however, usefully provide section drawings of the basement and lower ground floor of Bastion House. Although not specifically stated within the text, these drawings clearly demonstrate that below the slab in Bastion House, concrete pile caps have been excavated in a dense formation which would have removed all archaeological remains in this area well into the natural ground. Thus, the likelihood of the Jewish cemetery surviving within the basement of Bastion House is negligible.

A small area to the north of Bastion House, in the north-east part of the proposed development and including the Barber Surgeon's Garden, incorporates a small part of the projected extent of the Jewish cemetery. No construction work is proposed in this area and the archaeology baseline

states that the landscaping work here will be carried out through ground that has been raised by 1m in height.

Some impacts that could potentially cause an impact to the Jewish cemetery were identified in the first iteration of the planning application. These included supports for the Highwalk connection and new service runs would also be necessary, reusing and enlarging the existing service runs. Once these impacts were identified, consultation with the applicant was carried out. The scheme has therefore been revisited to remove these potential impacts. The structural design for the Highwalk connection and Northern Garden has been revised to remove the supports within the Jewish cemetery area. Option 2 for the Highwalk also removes the need for a slab in this area and therefore should be the option used going forward. In regard to the services, the applicant has confirmed that there are two known below ground services routes that cut across the cemetery area (within the planning application demise). The exact depth and size of these routes are not known presently. However, this will be resolved subject to further survey work (GPR) of the existing drainage route and any other associated existing services. Existing services may need replacement, but they must remain below ground in their existing positions to serve other buildings in the locality including the Barbican Estate. Proposed upgrades and extensions to existing services and new service routes should be able to be routed to avoid the boundary of the cemetery (subject to multi-disciplinary detail design review and development).

It is therefore recommended that a plan be produced which shows the area of the Jewish cemetery within the site and also indicates a 'no dig' zone around this area, outside the current basement of Bastion House. The 'no dig' area should be incorporated into the landscaping method statement, the SUDS, the method statement for new services and the Construction Management Plan. This should be secured by condition and the 'no dig' zone demarcated on site by solid fixed barriers for the duration of the construction work.

The anticipated Roman, medieval, and post-medieval archaeology which may survive elsewhere on the site is likely to be of low-moderate significance and, in places, very truncated. This archaeological potential can therefore be mitigated through the use of planning conditions. A full programme of public benefit, which includes opening up access to the Roman west fort gate, currently located in the underground car park, is proposed. The proposals also include new interpretation for the City walls, an exhibition space and digital and artistic interpretation of the heritage of

the site. It is unfortunate that the information from the cultural strategy, which was submitted with the ES, was not included within the archaeology mitigation proposals within the ES as this would have usefully demonstrated the benefits of public access to this formerly hidden monument. An assessment of the public benefit should be included in any ES.

Recommendations:

Despite extensive previous truncation, the site retains some archaeological significance and archaeological remains can be expected to be identified in areas which have experienced lower levels of truncation. Whilst a minor level of harm to significant archaeology can be expected, the public benefit of the scheme is extensive especially in regard to proper public display of the Roman fort remains. Overall, the scheme is beneficial and has minimised harm to archaeology where possible.

The development could cause harm to archaeological remains and further field evaluation is needed to determine appropriate mitigation areas and establish the full extent of truncation on the site. Some evaluation was carried out pre-determination but not all areas were accessible for trenching. The evaluation is likely to need to take place post-demolition in order to access the relevant areas. Evaluation should be followed by an appropriate scheme of mitigation.

A series of archaeological conditions are recommended.

23/01276/LBC letter dated 05 January 2024

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and made available in connection with this application, I conclude the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan City of London APA.

Although the area for demolition is located in an area of known archaeology, the basement of Ferroner's House and the loading bay have already been excavated c11.50 OD which is likely to have removed the majority of any archaeological remains in this area. No development outside the footprint of the previous building is proposed and

		<p>therefore the proposed development is unlikely to have an impact on archaeology of significance.</p> <p>No further assessment or conditions are therefore necessary.</p>
Greater Authority	London	<p><u>Response to first consultation – letter dated 05/02/2024</u></p> <p>Given the scale and nature of the proposals, it is concluded that the proposals would not result in any impact on the views, or affect the viewer’s ability to appreciate the protected landmark as the development falls outside the protected vistas.</p> <p>Consequently, under article 5(2) of the above Order the Mayor of London does not need to be consulted on this application.</p> <p><u>Response to March consultation- letter dated 15/03/2024 (as set out above, the March consultation related to additional information submitted and the re-advertising of the application as a departure from the development plan)</u></p> <p>The details of the application have been assessed and, given the scale and nature of the proposals, it is concluded that the amendments do not give rise to any new strategic planning issues. Therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted on this application. The Council may, therefore, proceed to determine the application without further reference to the GLA. A copy of any decision notice and section 106 agreement should be sent to the GLA.</p>
Transport for London		<p><u>Email dated 06/03/2024-</u></p> <p>Please see below (noting that these are non- modelling related comments, comments relating to modelling are to follow).</p> <p><u>Revised highway layout</u></p> <p>TfL principally welcome the proposed changes to the St Paul’s Gyrotory and Rotunda, which will significantly change the local street layout and provides an opportunity to extensively alter the public realm around and within the Site. This includes converting the existing roundabout to a signalised priority junction and ‘peninsularisation” of the existing Museum of London site as a result. The improvement would significantly improve walkability, accessibility and permeability to the site, encourage more pedestrian/ cycle movements at ground level, this is in line with London Plan policy T2 Healthy Street. Though, the final</p>

acceptability of the scheme shall be subject to detailed assessment to traffic impact to the surrounding area and satisfactory response to address the findings in the Road safety audit.

Officer Response to Above Comment:

As noted, the scheme will be subject to further assessment of traffic impacts and additional Road Safety Audits. The findings of the initial Road Safety Audit would be considered as part of the detailed design stage. Matters raised within the independent report are all considered deliverable by the applicant at this stage, with responses since received from the applicant following the comments from TfL.

At the time of writing, discussions are ongoing with the Transport for London modelling team with regard to the traffic modelling; previous discussions have however been held during the pre-application process regarding an agreed approach, and any future modelling would be subject to the formal Model Auditing Process (MAP) TfL process.

A planning obligation would be needed to require the applicant to commit to the MAP process and the undertaking of subsequent Road Safety Audits subsequent to further detailed design.

While there are existing Legible London signages to facilitate way-finding for pedestrians utilising the existing highwalk elevated route; a new way-finding strategy should be developed for the new access routes at grade access; this should be secured by planning obligation and Legible London style signage system remains the preferred choice of way-finding system to be adopted.

It is welcomed that the proposed reconfiguration of the Rotunda and wider St Paul's Gyratory will introduce new and extended cycle lanes and ASLs at the junctions. These changes are intended to significantly improve safety for cyclists at the Rotunda. Acceptability of the proposal should be subject to a satisfactory response to address the Road Safety Audit findings.

Officer response to above comment:

A wayfinding strategy would be secured.

As noted, the findings of the Road Safety Audit would be considered as part of the detailed design stage. Matters raised within the independent report are all considered

deliverable by the applicant at this stage, with responses since received following the comments from TfL. This arrangement is discussed further in the Highways section of the report.

A planning obligation would require commitment to the undertaking of subsequent Road Safety Audits subsequent to further design work.

The Active Travel Zone assessment within the TA has assessed a number of walking / cycle routes, the City shall secure appropriate improvements in light of the findings to compliment the proposed highway/public realm improvements in the vicinity.

Officer response to above comment

An obligation is recommended to require highway improvements which should consider potential improvements relevant to the proposals as identified within the ATZ assessment (e.g. dropped kerbs and / or planting opportunities).

Cycle Parking

It is understood that the proposal will provide long term cycle parking meeting and exceed the London Plan cycle parking standards along with shower and changing facility (End of trip facilities); which is welcomed. In addition, 76 on-street spaces in the form of Sheffield Stands and a further 250 spaces in the cycle hub located at the lower ground level consisting of Sheffield stands, single tier and two-tier racks, along with folding bike lockers. TfL considers that this is acceptable subject to a condition that ensures that the design would be in high quality, conforming to the London Cycle Design Standards (LCDS) and their on-going maintenance/ improvement and provision throughout the life of the development.

Officer response to above comment

A condition is recommended to require further details of cycle parking.

Car Parking

The proposal would remove all existing car parking associated with Bastion House and the Museum of London. The proposal also includes the removal of 44 standard spaces and two accessible spaces to make way for the new 250 space cycle hub at the lower ground floor. It is intended to re-provide the two accessible spaces plus three new accessible spaces as part of the proposal. The proposal

would result in access to/from the street being reconfigured to support the proposals, with the removal of the service road and the existing entry ramp down from London Wall. The southern exit ramp will be reconfigured to provide entry from eastbound London Wall traffic via a right turn 'pocket' and the northern exit ramp will be retained for exit eastbound. It is noted that the revised access has been subject to a road safety audit, the applicant shall provide a satisfactory response to address the findings.

Officer response to above comment

The findings of this second Road Safety Audit would be considered as part of the detailed design stage.

The findings of the Road Safety Audit raise matters to consider as the design develops regarding the proposed right turn arrangement into the car park. Matters raised within the independent report are all considered deliverable by the applicant at this stage.

(Whilst not specifically identified within the independent Road Safety Audit, City Operations officers identified a separate concern relating to safety and this is discussed further within the Highways section of the report.)

However, the London Wall public car parking, linked to the Bastion House/ Museum car park will be retained. While TfL welcomes the removal of car parking directly associated with the development, it is disappointed that the public car parking connected to the site will be retained, as the proposal should also explore this opportunity to remove excess parking within the CAZ area, as the London Wall car park is within the control of the owner of the application site.

Officer response to above comment

Only a portion of the car park is included within the application site boundary. An assessment of excess capacity was undertaken to identify where spaces could be optimally repurposed. The remaining car park retains an important function for the City of London's wider transport network and requirements.

Public Transport

The TA estimates that the proposal would result in a net increase of 164 bus (include transfer from rail), 540 train and 415 Underground two-way trips in the AM peak and similar number in the PM peak. TfL agrees that it is unlikely to cause significant impact to the local bus network given the amount

	<p>of the bus routes serving the area nearby. While TfL agrees that that the predicted Underground trips would be distributed among several tube stations within walkable distance of the site, not causing significant concern to train capacity impact further advice will be given on whether any stations' capacity may be impacted.</p> <p><u>Officer response to above comment</u> To date, further advice on station capacity has not been provided.</p> <p><u>Cycle Hire docking station</u> The proposal requires the relocation of the existing cycle hire docking station. The applicant must continue to engage with TfL to investigate, identify and agree an acceptable location, and also pay toward all the cost associated with the location, this should be secured by the unilateral undertaking.</p> <p><u>Officer response to above comment</u> This is addressed by planning obligations.</p> <p><u>Servicing</u> For the proposed servicing, an off-site consolidation centre will be used, as per standard practice for larger developments in the City. TfL welcomes that consolidated servicing would reduce number of servicing trips for the proposed site; having said that the applicant shall also encourage cargo bike servicing for small deliveries rather than by LGVs to reduce vehicular trips, which is absent in the current proposed arrangement. The site wide servicing arrangement should be set out in a Delivery & Servicing Plan (DSP) and secured by appropriate condition/ planning obligation.</p> <p><u>Officer response to above comment</u> The proposed servicing arrangements would be secured by condition.</p> <p><u>Construction</u> A construction management plan and Construction logistics plan (CLP), to be produced in line with TfL's current CLP guidance should be secured accordingly.</p> <p><u>Officer Response to comments:</u> The above is addressed through condition.</p>
<p>Conservation Area Advisory Committee</p>	<p>The Conservation Area Advisory Committee received a presentation on this scheme at its meeting on 15 February 2024. We wish to thank the representatives of Sheppard Robson and DSR Architects for the detailed and well-illustrated information provided. Members of the Committee</p>

	<p>had visited the model and display currently on show at the London Centre in Guildhall.</p> <p>The proposals were discussed by the CAAC at our meeting on 7th March 2024. We recognized that this scheme addressed the problems at this important intersection which currently presented an unwelcoming and unattractive approach to the Barbican and Golden Lane Conservation Area with poor public realm. We acknowledged that Historic England had not wished to include either the former Museum of London building or Bastion House in the statutory list of historic buildings and agreed that there would be no objection to the demolition of these buildings as part of the proposals. We also acknowledged that most of the area covered by the application lay outside any Conservation Area, although part of New Bastion House, to replace the existing Bastion house, was a tall building just within the boundary of the Barbican and Golden Lane Conservation Area.</p> <p>The Committee accepted these proposals as a significant improvement on what was already there, especially for the public realm, and decided to offer no objection to the application. We welcomed the further greening of the space by Barber-Surgeons Hall and the further opening up of a section of the historic London Wall.</p> <p>In discussion a number of points were raised which should be brought to the attention of the applicants for consideration during the evolution of the scheme through its stated ten-year construction programme. These included the need for a clear programme of maintenance for the extensive greening of the site. We had some concern over the elevations of the Rotunda and New Bastion House and that the greening of their elevations could cause staining. We also felt that improvements could be made to the setting of Ironmongers' Hall, affected especially by the design of the proposed north building. We urge the imposition of conditions over details, especially concerning materials.</p> <p>The Committee would welcome further consultation on any significant changes to the proposals as the scheme evolved.</p> <p><u>Officer Response to comments:</u> The required details would be secured by condition.</p>
The Gardens Trust	All three applications are being considered and it is apparent that care has been taken to delineate the new landscape from the Barbican whilst using an existing architectural feature to connect the walkway to Mount Joy House which is in line with

	<p>the original design ethos of the estate, connecting walkways and social spaces.</p> <p>We are supportive of the proposal to mediate between the Barbican Estate and the new environment both being respectful to each other, but not perpetuating undesirable conditions; in particular the proposals at Highwalk and garden levels, where the uses and design are more focused on quiet activities, contemplation, and the enjoyment of the landscape itself. We are also supportive of the Research - Conserve - Campaign proposal to create a continuous garden connector which both creates new garden spaces, and stitches together existing green space with enhanced accessibility between all public levels of the site. Finally, we would like to endorse the landscape proposals by Nigel Dunnet, even though the landscape planting character has clearly changed over the decades since its inception. One thing we would like to suggest, however, is the creation of a garden maintenance plan for the Estate as there is a lot of new planting. Introducing a new set of 'gardens' comes with responsibility and its ultimate success lies with careful maintenance in the future.</p> <p><u>Officer Response to comments:</u> Details of the garden maintenance would be required by condition.</p>
<p>Twentieth Century Society</p>	<p>The Society strongly objects to the scheme due to the loss of the two existing buildings, which should be identified as Non-Designated Heritage Assets (NDHAs), and on account of the substantial harm that would be caused by the development to the setting of the Grade II listed Ironmongers' Hall and to the Barbican Estate, which is Grade II listed, with a Grade II* registered landscape and is set within the Barbican and Golden Lane Conservation Area.</p> <p>In summary, their comments are as follows-</p> <p><u>Non-Designated Heritage Assets</u> The proposed development would involve the full demolition of the MoL (Museum of London) and Bastion House which should be treated as Non-Designated Heritage Assets (NDHA) and the scale of harm or loss would be at the highest level as the buildings would be completely demolished. We have yet to see compelling evidence proving that refurbishing and repurposing the buildings would not be deliverable and understand that buildings are structurally sound and capable of being upgraded and adapted for reuse. There should be strong presumption in favour of repurposing and reusing buildings, as outlined in the NPPF.</p>

Located close to the estate and built at scale, the proposed development would impact upon the setting of the listed Barbican Estate. It is our view that this impact would be seriously detrimental.

Harm would be caused through the demolition of the MoL and Bastion House. Built contemporaneously with the estate, the MoL and Bastion House form part of the Barbican's history and its architecture and highwalks relate and integrate it to the estate. It is our view that the MoL and Bastion House make an important and positive contribution to the setting of the designated estate.

The loss of this contemporary development built in the '70s in connection with the Barbican would serve to further disconnect the estate from its original post-war urban landscape - this landscape has already been eroded by recent development and would be further harmed by the proposed scheme.

The Barbican Estate

the proposed new development itself would harm the setting of the designated Barbican, particularly its southern part (which includes Mountjoy House, Thomas More House and the City of London Girls School). The Rotunda Building would have a particularly detrimental impact on views - this would replace the deliberately low-lying MoL and would stand tall at 17 storeys. The development would be seen to impact the Barbican Estate's setting. This is shown in the applicant's Townscape, Visual and Built Heritage Impact Assessment (TVBHIA) in views:

- From St Paul's Cathedral Golden Gallery (view 11 within the TVBHIA, part 14, pp.85-86). This view is from the highest viewing gallery of St Paul's, a strategic heritage asset, which is regularly enjoyed by visitors and tourists. The Barbican is currently clearly legible in this view, but the proposed development (specifically the Rotunda) would substantially obscure the Barbican, particularly the estate's Thomas More House. The Barbican is an important heritage asset which should remain fully on show in this key view.

- Looking north along St Martin's Le Grand (view 12 in the TVBHIA, part 15, pp.88-89). The Barbican Estate's Lauderdale Tower is currently appreciated as a landmark building that terminates this view down this major thoroughfare in the City of London. The proposed development (again, specifically the Rotunda) would completely block views of the tower. The applicant's

suggestion that the development, on account of its 'high design quality', would be an appropriate replacement in this view to an iconic designated heritage asset is erroneous.

- From views from Aldersgate (view 17 within the TVBHIA, part 22, pp.106-107). The proposed development would impact on the estate's setting here, which is another key thoroughfare within the City. In current views, which take in both the MoL and Bastion House, the MoL is seen to be low-lying and its white tile-clad elevations distinguish the building from the Barbican while ensuring that it is a complementary neighbour. Built to five storeys and designed with highly-modelled brick elevations, the proposed 'North Building' would compete with the Barbican's John Wesley Turret in this view.

The development would also impact on views from within the designated Barbican Estate.

- From the Lakeside Terrace (view 21 within the TVBHIA, part 26, pp.121-122) and from St Giles' Terrace, outside St Giles Cripplegate (view 24 within the TVBHIA, part 29, pp.130-131). In both of these views, the proposed Rotunda would appear beside/behind the Barbican and would remove some of the clarity of the architectural expression of the roofline and elevations of the listed Mountjoy House.

- From views from the Thomas More Highwalk terrace (view 26 within the TVBHIA, part 31 & part 32, pp.136-137 and supplementary verified view A8 in the TVBHIA, PART 43, pp.207-208). Bastion House and the MoL are clearly seen within this view. With its low-lying, horizontal form and in the treatment of its tile-clad elevations which distinguish it from the concrete of the estate, the MoL complements the Barbican's listed highwalk in this view. The proposed North Building would have a much more visually intrusive impact on this part of the estate on account of its bold modelling and tonally similar finishes.

- The new development would be highly visible in numerous other views from within the estate - for example, from the Highwalk from Wallside (which is a noted local view from the Barbican and Golden Lane CAA, view 26) (view 27 within the applicant's TVBHIA, part 33, pp.142-143); from the western end of St Giles' terrace (another noted local view within the CAA, view 16) (supplementary verified view A7 within the TVBHIA, part 42, pp.204-205); from Monkwell Square (view 28 in the TVBHIA, part 34, pp.145-146); from

Beech Gardens (supplementary non-verified view, B26, pp.264-265); and from the Defoe Highwalk (supplementary non-verified view, B27, pp.266-267). In all these views, Bastion House and the MoL provide an appropriate backdrop to the estate, on account of their simple, rectilinear profiles and restrained elevation treatments. The facade design of the proposed developments are complicated in their massing and expression and would serve to draw the eye away from the estate's designated architecture and landscape.

While we accept that there has been tall development nearby, this does not justify further harmful encroaching development.

The Ironmongers' Hall

It is our view that the enclosed character of the hall's setting and the way it is revealed through glimpses from the street contributes to its significance and the loss of this in the development would be detrimental, rather than positive or beneficial. It can hardly be claimed, as the applicant does, that the proposed highwalk would partly retain this enclosed character.

Not only would the sense of enclosure be lost, but the loss of the MoL and Bastion House buildings themselves would have a harmful impact on the hall's setting and significance. While not its original setting, the MoL development has become part of the hall's post-war history.

The proposed development would itself negatively impact on views of the Grade II listed Ironmongers' Hall, particularly from the Thomas More Highwalk. The clean rectilinear forms and simple, muted finishes of the existing buildings provide a harmonious contrast with the warmth and characterful roofline of the Ironmongers' Hall, with its gables and hipped roof with a gablet. The proposed buildings appear far more intrusive and overbearing, and their complicated massing and expression would visually compete with and distract from the hall. Their impact on views of the listed building would be detrimental.

Conclusions

It is the Society's view that the proposed development would amount to substantial harm to the setting of the Grade II listed Barbican Estate, the Grade II* registered landscape and to the Barbican and Golden Lane Conservation Area, and to the setting of the Grade II Ironmongers' Hall.

This substantial harm would not be outweighed by heritage benefits nor by the public benefits that would be delivered by

	<p>the scheme. This is ultimately an office development, with some (albeit not substantial) public cultural offerings. Economic, social and environmental benefits could be achieved through a scheme which retained and revitalised the existing buildings on the site. Their demolition and the site's redevelopment is not 'necessary' to provide these benefits.</p> <p><u>Officer Response to comments:</u> An officer assessment of the above points and consideration of the impacts identified are contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views, Designated Heritage Assets and the NPPF paragraph 208 planning balance.</p>
<p>Surveyor to the Fabric of St Paul's Cathedral</p>	<p>Summary of letter dated 25 March 2024-</p> <p>We commend the developer team for their approach to consultation and to the material provided at pre-application stages. We also seek to re-assure the team that we have no objection in principle to the scheme, we welcome the cultural offering proposed, and wish to explore the opportunities for the Cathedral to be a part of this moving forward.</p> <p>As noted above, we have concerns over the effective increase of the visual impact of Bastion House in a number of views of the Cathedral from the south and the associated heritage impacts. For example, the view from Bankside taken from the viewing plaque in front of the Tate Modern. Within this view, a proportion of the proposed development will be visible above the skyline of the Cathedral. Increase in visible built form in this view is regretted. The scheme provides an opportunity to remove the visible harm of the existing structure of part of roof of Bastion House and opportunity for heritage enhancement by removing detracting elements, that would increase the ability to appreciate the significance of the Cathedral. Unfortunately, the scheme proposes an increase in development in the view from the South bank near the Tate. Also note Millennium Bridge view where there are (continuing) impacts and (minor) harms. Concur with Historic England's formal evaluation of the issue.</p> <p>The applicant's rebuttal of these concerns appear to be unduly dismissive and we invite officers to maintain an objective clarity in reporting on these matters. In our opinion, these changes do cause a material degree of harm to the significance of this Grade I listed heritage asset.</p>

As yet, we note that there has still to be a clear and evidenced demonstration that a 'no harm' option has been drawn and evaluated.

If there is a viability case for not removing visual change above parapet, full options appraisal and associated viability calculations need to be clearly and concisely offered to evidence the case for this increase in harm.

Where details relating to roofscape and plant are not yet determined, it is urged that these be resolved at application stage and if conditioned, then seek to be notified and engaged at discharge of condition stage.

Also, concern is raised by some over the loss of the view of the Ball and Cross from within the Barbican estate. Whilst it is understood that such views may be incidental and unplanned, they are linked to the historic interest of the Grade 1 listed building as a focal point on the London skyline. There is a very low level, residual harm identified in the loss of these views and it is urged that they should be taken into the weighing process.

Given this harm, it is crucial that the public benefits of the scheme, as promoted by the project team, are tangible and deliverable. As such, we have included a series of recommendations for the effective delivery of the cultural programme and other obligations, which includes the meaningful involvement of the Cathedral where we can assist, along with mechanisms for delivery and monitoring. We therefore hope that this is a letter of comment that strengthens the shared aims of the Cathedral and the City.

Officer Response to comments: An officer assessment of the above points raised and consideration of the impacts identified are contained in the following sections of this report: Strategic Views, Designated Heritage Assets and the 208 Planning balance.

The applicants have not provided viability information regarding alternative options to remove floorspace. Officers take the view that this is not essential as the proposed height of New Bastion House would match that of the existing Bastion House and therefore preserve the view 13A.1 with no further harm arising. This is assessed further in the sections below on the LVMF and indirect impacts on St Pauls Cathedral.

The material provided to SPC at pre-application was a work in progress. The finalised and submitted scheme

	<p>accurately reflects the roofscape elements and the AVRs have been prepared accordingly. Details of the roof plant and structures including AOD m spot heights for New Bastion House and the Rotunda will be conditioned and the Cathedral will be consulted.</p> <p>The Cathedral's comments regarding securing an enduring cultural programme as public benefits are acknowledged and covered in the culture section of the report. The funding, strategic aims, cultural delivery programme, mechanisms for monitoring and ongoing stakeholder engagement would all be tied into the Unilateral Undertaking for each cultural component.</p>
Thames Water	<p><u>Waste Comments</u></p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission.</p> <p><i>“No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.”</i></p> <p><i>Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.</i></p> <p>Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses. There are public sewers crossing or close to the development. If working near the sewers, it's important that risk of damage is minimised. It will need to be checked that the development doesn't limit repair or maintenance activities, or inhibit the services Thames Water provide in any other way. The applicant is advised to read the Thames Water guide to working near or diverting pipes.</p> <p>As required by Building Regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or</p>

equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line.

Please refer to the Wholesale; Business customers; Groundwater discharges section. The developer would need to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: *"A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991."*

We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line

Please refer to the Wholesale; Business customers; Groundwater discharges section. Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

If planning on using mains water for construction purposes, it's important Thames Water know before work starts, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.

No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the

development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development”

The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission-

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.

Thames Water recommend the following informative be attached to this planning permission. *Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point*

	<p><i>where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.</i></p> <p><u>Officer Response to above comments:</u> The applicant has been advised of these comments from Thames Water and the required conditions and informatives are recommended.</p>
Environment Agency	<p>No objection. Advice offered on use of Sustainable Drainage Systems (SUDs) and Water Resources. Recommend that all new non-residential development of 1000sqm gross floor area or more should meet BREEAM “excellent” standards for water consumption.</p> <p><u>Officer Response to comments:</u> This is considered in the sustainability section, operational energy and water and water sections of this report. A condition is recommended requiring a post construction BREEAM assessment to be submitted.</p>
Active Travel England	<p>Active Travel England is not providing detailed comments on development proposals in Greater London at the time but recommends consultation with TfL and refers to standing advice note.</p>
London Underground/DLR Infrastructure Protection	<p>Responded that have no comment.</p>
Claire Giraud, Public Health Practitioner (Suicide Risk)	<p>Comments received in respect of risk from terrace areas:</p> <p>Rotunda building accessible roof terrace: 50cm planter with 1.8 glass above it, glass is good as it’s harder to climb but the planter could be used as a step so either raise the glass/remove the planter/make sure it’s a thorny plant in the planter and add soft measures e.g.: cctv that is monitored/smart cctv and motion activated light.</p> <p>New bastion roof terrace: 50cm planter 2.2m glass on top, this is good in terms of height, but would still advise to put thorny plants in the planter and have some soft measures as above.</p> <p>North building roof terrace: 50 cm planter 1.2 meters on top, this is a bit low especially with the planter beneath that can be used as a step, either raise the height of the glass or take the planter away, if the planter remains, make sure it’s a</p>

	<p>thorny plant in there and add soft measures e.g.: cctv that is monitored/smart cctv and motion activated light.</p> <p>Pedestrian bridge: end 1.1 meter, middle 1.8 material tbc, strongly advise glass to avoid a prison like feeling for the service users and to be more inclusive for wheelchair users + fencing is easier to scale/climb than glass.</p> <p>High walk is 6.8 meters high with 1.1-meter planter, make planting thorny but this is not of concern.</p> <p>Private balconies: 1.1 meters, can these be made 1.2 metres and have a rolling bar at the top of the balustrade or angle the top of the balustrade to make it harder to climb?</p> <p>The building operators' staff should be trained in suicide awareness.</p> <p><u>Officer Response to comments:</u> These comments are considered in the Suicide Risk section of the report and conditions are recommended in order to address matters raised.</p>
Natural England	No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. Natural England's generic advice on other natural environment issues is set out in their advice.
City of Westminster	Responded that they do not wish to comment.
London Borough of Islington	No comments received to date.
London Borough of Southwark	Responded that they have no comment.
London Borough of Lambeth	No comments received to date
Lead Local Flood Authority	See Climate Resilience Comments below.
District Surveyor	The District Surveyors Office has reviewed the fire statement. In respect of the London Plan policies D5 and D12, they have no comments.
Environmental Health Pollution Team	This department notes the following matters where further clarity from the applicant would be welcomed:

OPERATIONAL WASTE MANAGEMENT STRATEGY 17

NOVEMBER 2023, Revision P01, reference 050462 outlines that the waste storage area for Ironmongers Hall is intended to be relocated. It is noted that the waste storage area for Ironmongers Hall is currently located in the underground car park and therefore has no line of sight to residents. Therefore, any noise associated with deliveries and collections is to a large extent contained at present. Relocation of the waste storage area should where possible, be screened from residents so as not to introduce a new source of noise.

The application identifies party walls with the school sports field and also with Ironmongers Hall but provides no further detail on noise transmission or control.

Officer Response to above comments

Further details were requested in conjunction with noise from the Ironmongers' servicing area and party walls.

Construction and Environmental Management Plan NOVEMBER 2023. Page 26 states that; "*The demolition materials will be crushed in-situ to separate the concrete from the steel rebar.*"

This is not considered best practice to control noise and this type of processing would be best done off site so as to control noise. It is not clear if a concrete crusher is being proposed on site. The use of concrete crushers on site and at this location is discouraged by this department so as to control noise and dust.

Officer Response to above comments

The applicant has been advised of the above. Further details in respect of the construction process would be required by condition (scheme of protective works).

The applicant is encouraged to review this departments code of practice for Deconstruction and Construction Sites:

Code of Practice for Deconstruction and Construction Sites
(cityoflondon.gov.uk)

The code sets out standard hours for noisy works from page 11 which is summarised (in part) below:

'Standard' hours permitted for noisy work will normally be the following:

- 08:00 - 18:00 hours (Monday to Friday);
- 09:00 - 14:00 hours (Saturday);
- No noisy working is permitted on Sundays, Bank or Public Holidays

The applicant would be reminded to ensure that all aspects of works including piling activities that may involve King Posts are designed and programmed in a manner that can be carried out within these hours.

It is not clear if proposed piles will be wet or dry. The above document states that all piles are dry. However, it is noted that bentonite plant is proposed on page 39 of Construction and Environmental Management Plan Part 3.

Noise monitoring. The Pollution Team will request access to all monitoring data in real time.

Officer Response to above comments
Construction details and details of compliance with the code of practice would be required by condition.

A s61 agreement as outlined in the Control of Pollution Act 1974 is not required by the Pollution Team.

ES VOL III - APPENDIX 7-E - ENTERTAINMENT NOISE NOTE (PART 1). “*Table 3—1 CoL proposed criteria noise limits for daytime (07:00 to 23:00 hours) entertainment noise at 1 m from nearest NSR façade*” – The applicant is requested to provide further details as to the origin of the figures provided in this table.

Officer Response to above comment
The additional information provided in conjunction with the Environmental Statement clarified the survey and methodology used to identify target noise levels (paragraph 7.6.16 of Environmental Statement Further Information).

External use of space – some of the proposals may introduce new noise sources into the area. The City of London Local Plan 2015 requires the following: Policy DM 15.7 Noise and light pollution.

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as

noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

In accordance with Policy 15.7, any proposed use must be fit for purpose and good acoustic design could allow flexible use of the development while complying with the above requirements.

The Licensing Act 2003 is a separate regulatory regime, not to be relied on at a later stage to control noise. The following condition should be used to control noise from entertainment uses:

Prior to the commencement of use, a scheme of sound insulation shall be submitted to the local planning authority to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90,5min 1m from the facade of the nearby residential premises at all third octave bands between 31.5Hz and 8kHz. The scheme shall be installed and constructed in accordance with any such approval given and shall be permanently maintained thereafter and the development shall not be carried out otherwise than in accordance with any such approval given.

Suggested Conditions are recommended relating to the following-

- Sound insulation
- No live or recorded music to be heard outside premises
- Restriction of hours of use- Class E/Sui Generis (use/premises) hereby permitted shall not be open to customers between the hours of (23:00) on one day and (07:00) on the following day.
- Restriction of hours of servicing- No servicing between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
- Doors and windows to any bar or restaurant on the site shall be kept closed.

	<ul style="list-style-type: none"> • Self closing door mechanisms • Restriction on hours of use of roof terraces between hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency. • No amplified or other music shall be played on the roof terraces. • No promoted events on the premises. • Restriction of noise from plant • Pre-commencement condition requiring scheme for protecting residents and commercial occupiers from noise, dust and other environmental effects. • Sound insulation for office. • Pre-commencement condition for fumes extract, materials and construction to prevent noise and odour penetration from restaurant. • Anti vibration mounts to mechanical plant • Land contamination conditions- Pre-commencement condition for site investigation land contamination, investigation and risk assessment, unexpected contamination. • Provision of sewer vents. • Maintenance of ventilation and extraction equipment. <p><u>Officer Response to comments</u> The noise related comments are addressed in the noise section of the report and the required conditions are recommended.</p>
<p>Environmental Health Contaminated Land</p>	<p>The applicant has identified that the site has a long history of occupation and has identified a number of small scale potentially contaminative uses within the site redline boundary including warehouses, garages, printers, typewriter works etc. The desk study has also flagged that the site suffered heavy bomb damage during WWII with associated potential for made ground to be present and risks from possible unexploded ordnance that may be present on site. The reports confirm that intrusive investigations will be required to provide information to support design of the scheme, with investigations required to confirm both geotechnical and geoenvironmental ground conditions. For the purposes of discharging contaminated land conditions the investigation will need to include shallow and deep boreholes with chemical testing of soils and groundwater as well as screening of samples for the presence of asbestos. As part of any future investigation the work should also include groundwater and gas monitoring. At this stage it is recommended that the following phased approach to</p>

	<p>contamination assessment is conditioned as part of any approval.</p> <p>The phased contamination condition should consider the following components:</p> <ol style="list-style-type: none"> 1. Submission of detailed Site Investigation scheme for approval prior to carrying out the investigation. 2. Following completion of the agreed scope of investigation an interpretative report with risk assessment including an assessment of all pollutant linkages is to be submitted for approval, prior to development commencing. 3. Following approval of the risk assessment, if the investigation works identifies contamination requiring remediation then a remediation scheme should be submitted for approval – again prior to development commencing; and 4. Prior to occupation, a remediation verification report should be submitted confirming all identified and agreed remediation measures have been successfully implemented. <p>A separate condition should also be applied, requiring the applicant to notify the council and agree corrective measures should any unexpected contamination be encountered during works.</p> <p>The conditions already suggested in the attached memo M20D, M21D and M22D remain unchanged however these should be shared with the applicant.</p> <p>It is noted that the EA have responded but not commented specifically on land contamination matters. It is suggested that any future reports submitted to address the above should also only be signed off once they have also had the opportunity to comment on matters relating to protection of controlled waters.</p> <p><u>Officer Response to comments:</u> Conditions and informatives covering the above matters are recommended.</p>
Climate Change	<p>Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Climate Change Risk Assessment, Sustainability Statement Report, and the Biodiversity Net Gain Assessment Report.</p> <p><u>Overheating and the urban heat island effect</u></p> <p>Overheating mitigation has been considered for the development, with a façade design with reduced glass façade to minimise solar shading (61% Solid, 39% glass). They also</p>

have included measures for passive solar shading, and natural & mechanical ventilation.

Roof space is optimised for overheating mitigation through PV roofs and green roofs. 18 street level trees are planned for the public realm; however, no planting or sheet shading is considered for the carriageway areas within the development site boundary.

No consideration to the reduction in urban heat island effect is mentioned in the sustainability report.

Flooding

The proposed development is in Flood Zone 1 and is at Low risk from all other sources of flooding. A Flood Risk Assessment and Drainage Strategy has been produced by Buro Happold.

Flow rate of surface water discharge for the development will be limiting discharge of 9.9l/s proposed. – equivalent to greenfield runoff rate. SuDs, drainage network designs, and rainwater attenuation system in designed for 1 in 100 + 40% climate change allowance.

Water stress

The proposed development includes measures to adapt to water stress risks, including smart controlled irrigation measures, drought resilient planting and rainwater harvesting.

Biodiversity and pests and diseases

A Biodiversity Net Gain Assessment report was completed by Burro Happold, which details the changes to biodiversity on the development. An Urban Greening Factors score of 0.41 is targeted which is higher than the required standard. The Biodiversity Net Gain scores are 24% for habitats and 38% for hedgerow units. 14 existing trees including mature trees will be removed. 100 new trees are proposed across the site. Other biodiversity measure included were bat and bird boxes.

Species Included:

Modified grassland habitat proposals in the Barber Surgeons' Garden, Northern Garden and The Glade species proposed are primarily grasses, which do not produce nectar as these are wind pollinated. Four of the six proposed species provide opportunity for two species of butterfly that could be expected within greenspaces in central London, providing they are managed appropriately. It would be suggested that areas within these gardens are allocated to be managed as species

rich grassland. This would see an increase in native species that can provide flowers that produce nectar and pollen for pollinators as well as food and host sources for invertebrate lifecycles. These areas would retain some tall swards throughout the year with cyclical mowing patterns. The proportion of additional greenspace that this scheme is provided does allow for an adapted management protocol which could support 'species-rich' grassland, a Mayor of London target habitat, by planting and establishing a diverse sward aiming to contain at least 25 species.

Comments on native trees to be planted:

Betula pubescens (Downy Birch) has been identified by Forest Research as marginal under the current baseline, and unsuitable in the Southeast by 2050 in a high emissions rate scenario. Whilst *Betula pendula* (Silver Birch) has been identified as marginal by 2050 under a high emissions scenario. It would be recommended that the number of downy birch be reconsidered in favour of similar yet more resilient species, and silver birch.

Native species suggested as options to diversify birch planting include:

Sorbus aria/aucuparia/torminalis (whitebeam/rowan/ wild service tree) moderately dense crown and can reach between 15 – 22m in height. High value to pollinators and other wildlife.

Small to medium native species suggested for planting through-out the scheme include:

Acer campestre (field maple), good for wildlife, can be utilised as hedging.

Crataegus laevigata/monogyna (Hawthorn) high ecological value, has a denser crown, could be utilised as hedging. Can be grown as a multi-stem. Can host some diseases.

General comments on tree planting approach:

Good practice for planting for future resilience is to utilise the 10:20:30 approach; no more than 10% of all trees planted should be the same species, no more than 20% of all trees planted should be the same genus and no more than 30% of all trees planted should be of the same family.

Other considerations

Food, Trade, Infrastructure –

The proposed development makes a net positive contribution to the City of London, with the potential to mitigate some of the wider impacts of climate change. The development includes facilities that are directly beneficial i.e. retail/ cultural/ community space. Facilities are provided to enable occupiers to use active transport. Infrastructure is set up to reduce

	<p>overall energy demand and peaks. The scheme contributes to the implementation of the Local Area Energy Plan. The development uses sustainable delivery practises including off site consolidation.</p> <p>There is an Operational Waste Management Strategy and a sustainable procurement plan to ensure promote circular economy and supply chain resilience.</p> <p><u>Recommendation:</u></p> <p>The proposed development is <u>partially compliant</u> with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2. The applicant should consider and provide information on the development's impact on the Urban Heat Island, as per Policy CR1: Overheating and Urban Heat Island Effect. For example by maximising stree level shading. Information as to why more extensive street level planting on the carriageway was not considered or included should be provided.</p> <p><u>Officer Response to comments</u> Climate Change Resilience is addressed in the Sustainability section of the report and conditions. In particular, a condition is recommended that requires a Climate Change Resilience Sustainability Statement (CCRSS) which would provide details of how overheating has been addressed.</p>
<p>Barbican and Golden Lane Neighbourhood Forum</p>	<p>The Barbican Estate, of which the Museum of London, Bastion House and associated public open space and public realm is an integral part, is of outstanding importance as a particularly significant and unusually well-preserved ensemble of post-war heritage and landscape. The buildings and highwalks proposed for demolition contain a very high level of embedded carbon, making demolition the most damaging of options for the site. Furthermore, the design is unsympathetic and inappropriate for this sensitive location and the massing would result in a serious loss of amenity for neighbouring residents and businesses, as well as damaging the setting of Grade I,II* and II heritage assets, and removing significant views to and from St. Paul's Cathedral. The current proposals would entail a very high degree of harm to the significance of the Barbican, to local amenity and to climate change.</p> <p>With the move of the Museum of London to Smithfield, and the demise of the proposal to replace it with a new Centre for Music, the need for careful consideration of the options for this significant site could not be greater. The City of London</p>

has not made public its options appraisal, nor has it consulted meaningfully on the potential range of uses for such a significant publicly-owned site in such a sensitive location. The Forum takes the view, therefore, that the current planning applications are premature. Unmet needs for housing, retrofit potential, major shifts in working patterns and therefore office demand, and the absence of a robust cultural strategy for the neighbourhood are considerations that should be considered in an open, transparent and independent review of the strategic options for the site, with input from residents, community and faith groups, and businesses locally.

Basis for the Barbican and Golden Lane Neighbourhood Forum's Objection to all three planning applications

The Barbican Estate, including Powell & Moya's Museum of London and their neighbouring Bastion House building, taken together are one of the great treasures of the City of London. Attracting visitors from around the world, its importance is recognised as "a hugely important part of the City of London's post-war planning history". Indeed the government's Independent Panel on UNESCO World Heritage status has said "As a masterpiece of brutalist architecture and town planning reflecting the standards of its time and arguably, one of the best examples of municipal urbanism, the Barbican is one of the best examples of municipal urbanism in the Brutalist style in the world that has maintained its authenticity and integrity despite periods of adaptation and change"

The current applications are to turn the site into a broadly commercial office park by expanding and intensifying plans that were originally drawn up for the Centre for Music, now abandoned as a project. This would involve major change to the setting of the Grade II listed Barbican and its Grade II* listed landscape along with extensive development around these buildings and the adjoining public open space. It will also have a significant negative impact on the Grade I listed church of St. Botolph without Aldersgate and Postman's Park in which it sits.

Development on the scale envisaged would have a profoundly harmful impact on the Barbican Estate and on other neighbouring residential blocks such as London House and Monkwell Square. The Barbican is one of four City parks and gardens included on Historic England's Register of Parks and Gardens of special interest. It owes its unaltered, tranquil character to the contained design of the existing buildings and their integration with the Barbican Estate. This character would be completely lost, and parts of the landscape and

buildings would be altered to such a degree that they would become unrecognisable.

Harm of a very high order is likely to be caused to local amenity. The massing and the design are completely out of character with the Barbican Estate, of which the site forms an integral part. The scheme has no meaningful relationship with the listed Barbican, nor with the neighbouring buildings on Aldersgate Street. Instead the scheme would create impenetrable facing walls using a design vocabulary alien to their setting. Unlike the previous London Wall Place development, also on City-owned land and developed under a commercial partnership with Brookfield this proposal makes no attempt to respect the street plan. Sunlight and daylight will be restricted to an unacceptable level for neighbouring homes, and the risk of night-time light pollution from commercial uses is extremely high. Views to and from St. Paul's Cathedral will be affected with the massing proposed.

We are particularly concerned about the impact of demolishing buildings on the climate. The independent third-party review of carbon optioneering, requested from the planning department in December 2023, has not been made available to the Forum. Our opinion, therefore, is shaped solely by the applicant's own assessment which we consider to have significant shortcomings. Retrofit has been proved to be viable commercially and technically on this site and has the merit of being in line with the NPPF, the London Plan, the Local Plan, the emerging City Plan 2040, and the City's own Climate Action Strategy 2020-2027. It should be the approach here, especially as the City of London as landowner is a public body. We consider that the proposals would cause substantial harm to the environment with the extent of CO₂ to be released.

The City of London's current (2015) Local Plan includes Core Strategic Policy CS5: The North of the City. The North of the City is identified as containing "a mix of areas and uses, including the strategic cultural quarter centred on the Barbican, and residential areas at the Barbican and Golden Lane, each with its own distinctive character". This cultural quarter is also recognised in the London Plan 2021 as one of the capital's strategic cultural areas. Given this, and the City's previous plan to put a Centre for Music on the site, there is a reasonable expectation that part of the site at least would be used for a rich cultural addition to the City. From the information provided we cannot see any strategic cultural element within this scheme, which raises significant questions as to how any space proposed would be secured,

managed and coexist with the interests of future corporate tenants.

Housing Need

The Forum notes that the London Plan sees the Barbican neighbourhood as a special area within the Central Activities Zone (CAZ) which is rich in cultural activity and where there is a rich mix of strategic functions and local uses. As this strategic plan for London says, this is a place where achieving a suitable sustainable balance is important. The quality and character of the CAZ's predominantly residential neighbourhoods should be conserved and enhanced. This should ensure a variety of housing suitable to the needs of diverse communities, including affordable housing, whilst ensuring that development does not compromise strategic CAZ functions. Boroughs should also consider social infrastructure demands generated by residents, workers and visitors in the CAZ when undertaking social infrastructure need assessments" (2.4.19). The City's current Plan expected that approximately 60 - 70% of new residential development in the City would take place in the Neighbourhood Area, and the Draft Plan to replace it expects more housing development in this Area than in others in the City.

As the City of London is the landowner as well as the local authority, the Forum takes the view that parts of this site should be used to address local housing need. The current Local Plan says that housing should be near existing residential areas, and the Barbican and Golden Lane Neighbourhood Forum's Housing Needs Assessment concludes that;

- a) The 75+ population of the Neighbourhood is projected to increase by 482 individuals to reach a total of around 877 in 2040. This is a 122% increase doubling the share of the population in this age group.

b) The projected household growth is 395 households.

c) The future need in Barbican and Golden Lane produces a range of 121 to 134 specialist accommodation units that might be required during the Plan period, plus around 31 care home bedspaces.

Breaking this overall range down into its component parts, there is slightly higher need for affordable than market specialist housing, and significantly higher need for accommodation with low-level care or adaptations, compared with more intensive extra-care specialist housing (which overlaps to some degree with care home accommodation).

In London, there are 170,000 homeless Londoners which London Councils notes is the same size as the population of

the City of Oxford. According to UCL's Bartlett School of Architecture, many local authorities are directly delivering housing by their own landholdings. Of those doing so, 95% are building on their own land. Given the special nature of the Neighbourhood and its housing needs, and the example of other local authorities providing housing on their own land, the Forum takes the view that at least some of the specialist housing need should be met on this site. Policy context and draft City Plan 2040

According to the City's latest published Development Information it already has an office supply pipeline of 515,207m² floorspace under construction plus 500,381m² of office floorspace permitted but not commenced (as of 31st March 2022). Against this extremely full pipeline of over one million m² of office permissions, the draft City Plan evidence documents show that there is doubt about the level of need for offices in the City on one hand and uncertainty over the secure supply of housing land on the other.

Given this context, a more suitable mixture of uses for such an important site should be considered, in our opinion.

Conclusion

We consider that the proposals would cause substantial harm to the Neighbourhood Area. If granted these proposals would be a very poor outcome for such an important place; the qualities that make it so special would be deeply compromised or lost completely. This cannot be meaningfully remedied by improvements in design; a different approach, based on minimising demolition, is needed if this level of harm is to be avoided. Furthermore, the proposals are a very inefficient means of raising money from the site. As we understand it the City has already run up debts of £11.5m since 2020 on this planning application. Adding a developer's profit, plus £7m for demolition, will encumber the site with further debt, all of which affect the ability to secure the full extent of planning contributions needed to mitigate the significant harm that this proposal entails. In recognising the Barbican's stature as a world-class example of municipal urbanism which has so far managed to retain its integrity and character, the government's Independent Panel on UNESCO World Heritage status also noted its serious concerns "The site, located in the City of London, is clearly managed well at present, however there are serious concerns relating to the future management (assurance of freehold and local authority support) and conservation (potential developments affecting Outstanding Universal Value) of the site. We regret that, instead of conserving and enhancing this world-class

	<p>asset for the future, the Corporation of the City of London is proposing to subject it to significant and irreparable harm.</p> <p><u>Officer Response to above comments</u> The matters raised are addressed in the Land Use, Design and Heritage, Environmental Impact, Sustainability and Planning Balance sections of report and through the conditions recommended.</p>
<p>Ironmongers' Company</p>	<p>Letter dated 30/01 written on behalf of the Worshipful Company of Ironmongers' London, the Ironmongers' Charity and Ferroners' plc which are the legal owners of and related entities interested in Ironmongers' Hall and Ferroners' House in Shaftesbury Place, London EC2Y.</p> <p>A summary of their comment is as follows-</p> <ul style="list-style-type: none"> • The Hall and Ferroner's House are almost entirely enclosed and surrounded by the existing Museum of London and Bastion House. Proposed planning and listed building applications would result in substantial impacts to owners and occupiers of both the Hall and Ferroners' House, during and following a construction period of sixty-eight months. This is a very significant development proposal which would clearly cause huge disruption to the ongoing beneficial use and occupation and servicing of the Hall. <p><u>Officer Response to above comments</u> It is recognised that the Hall and Ferroners' House would be significantly disrupted by construction works. Mitigation measures are discussed further in the Noise, Air Quality and Transport sections of the report and conditions are recommended to limit the impact so far as possible.</p> <ul style="list-style-type: none"> • Ironmongers' Company has long history since 1300s and relocated to the current site in 1925. The Company places great value in its very long-standing relationship with the City of London and with the City Corporation which we hope can be maintained long into the future. • Ironmongers' recognise and support that urban fabric must evolve, change and adapt over time and would not wish to obstruct proposals which met requirements and expectations. The Company at the highest level of abstraction, subject to comments below, fully supports the redevelopment of the application site, entirely recognising that the now functionally obsolescent Museum of London is in need of wholesale replacement. We are though frankly

unpersuaded as to the position on Bastion House at the present time.

Officer Response to above comments

Further explanation with regard to the demolition of Bastion House is given in the Sustainability section of the report.

- Both the City Surveyor and we fully appreciate, of course, that any scheme proposed here could not proceed unless the Corporation acquires the freehold of Ferroners' House. There are fundamental questions over approach to consideration of alternatives to the scheme proposed. High level of contractual protection are insisted upon with respect to legally enforceable Asset Protection and Neighbourly Matters Agreements that would need to be secured before works commence.

Officer Response to above comment

Consideration of alternatives to the current scheme in terms of demolition/refurbishment are discussed in the Sustainability section of the report. With regard to land use, the acceptability of the proposed Class E office/retail and sui generis Cultural uses are discussed in the Land Use section of the report. It should be noted that the Corporation as local planning authority has a duty to determine the application before them. Contractual protection is a matter for the Corporation as landowner, not as Local Planning Authority.

- Reference is made to the history of the site, and it is noted that the intended demolition of the Museum and its replacement presents an opportunity to remedy past wrongs.
- Notes that whilst the office extension known as Ferroners' House is excluded from listing, it is an important asset for the Company generating significant revenue.
- Request to be kept informed on whether the developer is likely to change/enlarge scheme. Comment that the enormous scale, bulk, and massing of the development envelope proposed would sit very uneasily alongside Ironmongers' Hall and would clearly have very significant adverse impacts due to its height and proximity- including on the degradation of the light received by the Hall. Proposed rotunda building would cast a shadow and design does not respect listed neighbour and will be seen for generations as poor piece of townscape. Question whether the City Corporation has a degree of conflict of interest in setting on this scale of development as appropriate for the site.

Officer Response to above comment

The scale and massing of the proposed new buildings and impact upon heritage assets is considered in detail in the Design and Heritage section of the report.

- Request to see social and economic drivers that were influential in emergence of the brief. Noted that no information on viability has been provided and hope that speculation has been avoided.

Officer Response to above comment

Economic drivers and viability details are not considered to be relevant to the assessment of the planning or listed building consent applications in this instance.

- Insufficient details provided in plans in Design and Access statement and drawings in Appendix 2 of EIA. Material inconsistencies among and between drawings. Expected phasing impossible to ascertain. City as planning authority would need to be satisfied that the release of a planning permission safe to do so and that setting of threshold relevant for subsequent determination of proposals.

Officer Response to above comment

The accuracy of information provided is addressed in the Design and Heritage section of the report and conditions would be required for design detail.

- Invite explanation of conclusions found in ES Volume II Townscape, Visual and Built Heritage Impact Assessment at paragraph 14.30 that on balance the proposed development would result in overall enhancement to setting of the Hall and increased appreciation of heritage significance of listed building.

Officer Response to above comment

The impact upon the Hall is addressed in the Heritage section of this report.

- Lack of detail with regard to consideration of less harmful alternatives.

Officer Response to above comment

Further consideration of alternative options that were explored is given in the Sustainability section of this report.

- Siting of City walkway on the west side of the listed Hall would enclose and obstruct the front elevation of the hall and be harmful and poor quality design. The introduction of a high circulatory walk to the rear of the Cultural Centre in close proximity to the Hall would introduce the likelihood of

noise disturbance and add to the sense of enclosure and reduction in light received by the Hall.

Officer Response to above comment

The enclosure of the Hall by the walkway is addressed in the Design and Heritage section of the report. The likelihood of noise disturbance and impact upon light and enclosure is addressed in the Noise and Daylight/sunlight sections of this report.

- Concern about assessment of construction phase impacts on Ironmongers Hall and other sensitive receptors nearby including that setting of appropriate limits do not appear to regard the sensitive nature of the use of the Hall during building works.

Officer Response to above comment

The sensitive nature of the Hall is noted. This is discussed in the Noise section of the report and details of mitigation for the impact of the construction process would be required by condition.

- Case for demolition of Bastion House requires further scrutiny.

Officer Response to above comment

This is addressed in the Sustainability section of this report.

- The Company has strong reservations over the impact in terms of daylight, sunlight and overshadowing.

Officer Response to above comment

This addressed in the Daylight/sunlight and design and heritage sections of this report.

- Sceptical of conclusion that would result in no wind microclimate effects.

Officer Response to above comment

This addressed in the Wind Microclimate section of this report.

- Request if planning permission granted, that Ironmongers be invited to participate in the framing of relevant draft planning conditions and planning obligations.

Officer Response to above comment

Draft conditions and details of the Unilateral Undertaking are included as part of this report. Any comments with regard to these that are received before the Planning Committee, will be taken into account in making the final decision.

	<ul style="list-style-type: none"> The need for the highest level of asset protection for the Hall and acknowledging both the impact of the loss of income during the construction phase and the critical importance of the separation works that would be required, clearly a sine qua non of any project being acceptable even at the highest level of abstraction, seemingly continues to be overlooked by the City Surveyor as the landowner. This is as surprising as it is regrettable, given that the scheme will be unable to proceed if the City Surveyor is unable to agree terms with the Company over a potential acquisition of the freehold of Ferroners' House, currently attached to the listed Hall. <p><u>Officer Response to above comment</u> This is a matter for the Corporation as landowner and developer rather than as Local Planning Authority.</p> <ul style="list-style-type: none"> The construction impacts demonstrate that close co-operation with the Company would be essential. The phasing of the scheme in construction is wholly unsatisfactory. The assurance of uninterrupted servicing capability for the Hall, a material consideration of high importance is ignored, and appears to be rather precarious, which is plainly unsatisfactory. <p><u>Officer Response to above comment</u> Conditions are recommended to control construction impacts. Details of servicing and construction logistics are covered in the highways and transport section of the report. The Construction Logistics Plan would need to address servicing access arrangements for Ironmonger's Hall.</p>
The Barbers Company	Letter dated 18/1 advising that will be communicating views in due course.
The Committee for the Preservation of Jewish Cemeteries in Europe (CPJCE)	<p>Letter dated 15/01/2024 commenting, in summary:</p> <ol style="list-style-type: none"> There must be no digging in and throughout the area named the Barbers Surgeons Hall Garden. Serious concerns over the placing of pathways in The Barbers Surgeons Hall Garden. This should be discussed with CPJCE in more detail as should any building of staircases in this area. CPJCE would insist that they be allowed to carry out unannounced periodical inspections of building site. With regard to the basement level of Bastion House, no works which encroach on the sub existing structure base level are to be carried out without a CPJCE Supervisor and preferably in presence of archaeologist to ensure that no

	<p>graves or human remains/remnants of previous constructions are disturbed.</p> <p>5. That prior to the commencement of any works, official recognition of the Medieval Cemetery of the Jews of London and England is given in the form of the placing of a Monument.</p> <p>6. Request further on-site meeting with The Senior Planning Engineer.</p> <p>7. That the Developers recognise CPJCE as having the status of an “Adjoining Owner” within the Party Wall Act.</p> <p>8. That is agreed between the Parties that the Developers work with CPJCE in assuring that the Annual Pilgrimage to the site by members of the UK Jewish Community which is held on the Hebrew Calendar date of the murder of the Senior Rabbi of Medieval London Rabbi Jacob of Orleans be accommodated in a safe manner and that the Pilgrims within those 24 hours be allowed to conduct their Annual Memorial Prayer Service at the site as well as their lighting of the memorial candles at the site as has been the custom and practice for decades.</p> <p>CPJCE report dated 27/03/2023 commenting on MOLA report dated 03/03/2023. There remain clear disagreements between CPJCE and MOLA over the historical factors which have an impact on the current development proposals. The five main issues identified as;</p> <p><i>1. The age of the cemetery.</i> The MOLA report states that the cemetery dates back to at least the 12th century, CPJCE report conclude that was functioning as a cemetery since 1066.</p> <p><i>2. The continuous planning cover a period of many centuries of buildings over the cemetery.</i> CPJCE report states that this has little relevance to the continued protection of the site since high probability that most of the burials/graves remain under the open ground particularly due to the limited foundation depth and likely deep graves (at least 9ft).</p> <p><i>3. The assumption that upon archaeologist WF Grimes finding 7 graves within the cemetery that were empty that the cemetery may have been desecrated.</i> CPJCE report suggests that it due to the number of graves needed and their depth, would have maintained many pre dug graves.</p> <p><i>4. That in strict contravention of Jewish Law, the Jewish Historical Society of England “partially funded” this specific</i></p>
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	<p><i>part of the Grimes Excavation of a small portion of the cemetery in 1947/8.</i></p> <p>CPJCE report finds no financial record of JHSE funding although certain individuals may have contributed.</p> <p><i>5. The mapping of the boundaries and therefore the size of the cemetery.</i></p> <p>CPJCE has extensive experience in mapping cemeteries. It should be noted that no tombstones were ever located at any time within the general area of the cemetery site and in all probability all of the cemetery boundaries (with possible exclusion of south east boundary) extends further. No doubt from evidence that southern end of cemetery extends down to Aldersgate Street and these are most unclear on why on the mapping provided by MOLA the boundary seems to stop at the Museum of London Building Barbican. Conclude maps provided by MOLA are not to be relied upon.</p> <p><u>Officer Response to comments</u> The above matters are addressed in the Archaeology and Cultural use section of the report.</p>
<p>Barbican Quarter Action (BQA) Letter dated 31/01/2024.</p>	<p>The following is a summary of the main points in the submitted letter which includes the following annexed reports-</p> <p>Appendix A: BQA letters submitted to the CoLC at pre-application stage Appendix B: Embodied Carbon Review by Targeting Zero Appendix C: BQA review of DAS by Jan-Marc Petroschka Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Horne Appendix G: Planning Policy Review table by CarneySweeney</p> <p><u>Consultation and engagement</u> The BQA consider that whilst the City of London Corporation (CoLC) may consider that pre-application community engagement has been extensive, in fact the CoLC has:</p> <ul style="list-style-type: none"> • Failed to involve the community in developing fundamental options for the future of the LWW Site once it had decided not to progress the Centre for Music. Alternative massing proposals not shared. This is a major deficiency given the significant history and location of the site and the nature of its buildings. • Failed to adjust the proposals sufficiently to reflect the public feedback received.

- Failed to share the results of the market testing or evidence that the buildings could not be successfully or viably retained and adapted.
- Failed to keep the community updated on the evolution of the project. The last presentations to the community were June 2022 and the current LWW Proposals were not presented or consulted on in advance of submission – particularly on any matters relating to access and transport considerations. Commitment to share 3D model prior to submission of application not met.
- Lacked transparency throughout e.g. its early whole life carbon assessment, including analysis of the re-use of the existing buildings and the results of the soft market test, have never been shared.
- Reductions in width of buildings nominal (Rotunda building reduced by 3m and New Bastion House by 2m). Minimal concessions and only now that model available that scheme's true height and scale fully appreciated.
- Not acted in accordance with national policy guidance in the NPPF to take account of the views of the community and to reconcile local interests.

Officer Response to above comments

Details of the consultation that took place, the feedback received, and applicant's response can be read in the submitted Statement of Community Involvement (SCI) and summarised in the Statement of Community Involvement section of this report. In particular, the materials presented throughout the consultation process included computer animated views from a range of reference points within and around the Barbican Estate, a 3D fly through and a sectional scale drawing showing the impact of the proposals along London Wall and Aldersgate Street to show height and mass at that time (June 2022).

Principle of Development and Land Uses Proposed

Raise concern at the approach taken in defining the development brief for the LWW Site, and lack of consideration that the City of London Corporation (COLC) as applicant has made to other strategic priorities set out in the NPPF and the development plan as a whole.

Considers development plan policy and other material considerations in respect of the use of the site.

Considers that site falls within "North of the City" Key City Place area in Local Plan (not Cheapside and St Pauls as set out in Planning Statement in application).

City Plan 2040 limited weight in decision making. Falls within Smithfield and Barbican Key Area Of Change adjacent to identified residential area. This draft strategic vision does not focus on delivery of office growth but encourages culture led mixed use development, supports residential development in appropriate locations and seeks to enhance the special character of the area.

Raise objection to the increased level of office provision due to concern that such growth in this location will have a detrimental impact on the distinct character, environment and heritage of this part of the CAZ, contrary to policy.

Officer Response to above comments

These matters are addressed in the land use section of this report and the relevant site designations are set out in the Site Context and Designations section of this report. In particular, the proposed development includes cultural and retail floorspace as well as office.

Concerns raised relating to the Office Market Research Report, in particular that:

the terms of reference are biased in favour of development with no assessment of alternative economic scenarios;
more evidence required to support the statement that companies have been more footloose across Central London;
no data provided with regard to older stock not meeting future minimum energy efficiency demands;
no analysis of needs of specific sectors and indication of likely source of tenants and no evidence provided to suggest sufficient demand for prime space in lower size transactions;
not clear whether PTC work to understand capacity for additional floorspace input into CoLC as applicant;
inadequate evidence that office space around Farringdon and Barbican stations is particularly sought after; and
question claim that LWW link two sub markets as significant visual barrier of 200 Aldersgate Street remain.

Officer Response to above comments

There is no planning policy requirement for an assessment of alternative economic scenarios.

It should be demonstrated that there is no demand for a similar level of need for cultural use. The submitted Culture Plan is vague and speculative with a weak vision and no sense of coordinated strategy. No specific cultural partnerships have been identified and relies heavily on Destination City which is being reviewed.

Query why opportunity not taken to provide housing on site.

Officer Response to above comments

Matters relating to land use are addressed in the land use section of the report. In particular, the proposed development includes cultural and retail floorspace as well as office use.

Retrofit and Re-use vs Demolition – Embodied Carbon Review

BQA had review by Simon Sturgis of Targeting Zero LLP undertaken of the proposals in relation circular economy, the reduction of carbon and meeting net zero. Their full review is at Appendix B in their objection and their main conclusions are summarised below, as follows:

- The proposals are not optimising the carbon emissions impacts and as a result are in direct opposition to UK National policies, GLA policies and the City's policies. These include the City's new sustainable guidance for developers dated 12 December 2023, covering retrofit and reuse, energy and whole life carbon and the circular economy. Their conclusion is that the planning application proposals ignore this new guidance.
- There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to six options selected for detailed examination. These six options excluded 'option two' for a 'Major Refurbishment', which is the option that is most consistent with the approach favoured by the commercial bids in this City's market testing exercise.
- The conclusion of the planning application submission reports is exactly the same as previous reports in May 2022, namely that a 'Major Refurbishment' approach is to be rejected in favour of 'new build'. This appears to demonstrate that the latest optioneering exercise is purely 'window dressing' to prove a pre-ordained choice 'new build', and that a 'major refurbishment' option has not been seriously investigated by the design team in detail as 'new build' was always the intended outcome.

Officer Response to above comments

The approach taken to optioneering and an assessment of carbon impacts are addressed in the sustainability section of this report.

Design, Public Realm and Landscaping

A review of the submitted Design and Access Statement (DAS) has been undertaken by Jan-Marc Petroschka ARB, a resident of the Barbican Estate and member of the BQA. A schedule of his comments is attached to this statement at Appendix C. Mr Petroschka's evaluation argues that numerous statements, assumptions, assessments, and conclusions drawn in the DAS are misleading, flawed, and/or factually incorrect. He also comments that option appraisals have been inadequate, and that important and relevant design considerations, such as the local character, history and other site-specific qualities were wholly ignored. As a result, it can only be concluded that the basis for the design of the proposals is unsound.

Townscape and Views

Mr Petroschka has also reviewed the submitted TVBHIA and his conclusions are attached to this statement at Appendix D

In particular, Mr Petroschka states that while many of the post-war office blocks on London Wall have been replaced and the density of the urban fabric increased, all new office blocks strictly follow the perpendicular grid of the post-war plan, continue to contain and define the urban street space and public realm, break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context and their immediate neighbours, including the Barbican Estate. All developments place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks. None of the above prevailing qualities were applied to the two proposed development blocks. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining Conservation Areas, but also to the setting of the immediate and wider neighbourhood.

Not suitable for tall buildings –

The BQA are aware that Draft Strategic Policy S12 in City Plan 2040 defines a tall building as being over 75m AOD (therefore applicable to two of the buildings included in the LWW Proposals) but does not identify the LWW Site as being one of the tall building areas that are proposed to be identified as suitable for tall buildings.

Officer Response to above comments

Design and tall building matters are addressed in the tall building, architecture, strategic views, heritage and the NPPF paragraph 208 sections of this report.

Heritage

Review by Alec Forshaw concludes that the proposals cause widespread harm to a large number of heritage assets. This includes the complete loss of two undesignated heritage assets, and less than substantial harm, but nevertheless considerable harm to and erosion of significance of several Grade I, Grade II, Grade II* scheduled monuments, some directly abutting, and the setting of three Conservation Areas. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm, requiring the balance of harm against public benefits in line with Paragraph 202 of NPPF. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere, nor other public benefits which would offset the great weight that must be given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

Officer Response to above comments

The heritage impacts of the scheme are addressed in the tall building, architecture and strategic view and heritage and NPPF paragraph 208 sections of this report.

Biodiversity and Ecology

The BQA note that a Biodiversity Net Gain assessment has been undertaken and is submitted alongside the planning application. There appear however to be discrepancies in the reported net gain in biodiversity units as reported in the submitted Planning Statement compared to those reported in chapter 10 of the Environmental Statement submitted with the application. Furthermore, given the habitat survey of the LWW Site was updated in May 2023, it is queried why Biodiversity Net Gain Metric 3.0 is used to assess the LWW Proposals rather than Biodiversity Net Gain Metric 4.0 which was published in March 2023.

Officer Response to above Comment

A condition is recommended to require an updated Biodiversity Net Gain Assessment to be undertaken at further detailed design stage. BNG provision has been calculated at 27.05% as detailed in Chapter 10 of the ecology chapter (the value in the Planning Statement should also say 27.05%, rather than 24.11%). As is noted in the assessment report, Natural England advice was “to continue using the same version of the metric as has previously been used for continuity. Updates to the metric can cause discrepancies between metric definitions/classifications and in value outcomes that may not accurately reflect changes to the scheme design”. For this reason, the use of Metric 3.0 is acceptable.

Transport

Concerns relating to-

a. The operational impact of the LWW Proposals with three new buildings and a changed Ironmonger's Hall. b. The impact of Phase 2 works relating to the removal of the St. Paul's Gyrotory system. c. The impacts relating to the demolition of the existing buildings and the construction of the LWW Proposals on residents and other sensitive receptors (schools, businesses, Barbican Centre, St Giles Church and public and private gardens) within close vicinity to the LWW Site.

A fundamental concern relates to the proposed access and egress arrangements for vehicles to the redeveloped LWW Site. At present, access to service the buildings on the site is via a one-way system with access from London Wall and egress via the Aldersgate Street ramp. The latter is used primarily by residents accessing the Thomas More House (TMH) car park along with service and delivery vehicles supporting the residential community. The proposed development will abandon this 'through route' with all vehicles entering and exiting via the Aldersgate Street ramp.

BQA concern is that the residents use of the Thomas More Car park will be severely impacted, likelihood of congestion on ramp, in the single lane sections of the proposed router and in the underground service yards, increase in traffic on the ramp will cause noise and air pollution for nearby residents and CLSG sports field. There will be frequent occasions when vehicles entering the ramp will be queued at the intercom barrier and backing onto Aldersgate Street, thus jeopardising safety for all road users at the top of the ramp onto Aldersgate Street. It will create delay for emergency vehicles entering via the ramp and exiting onto Aldersgate Street.

BQA considers that this 'single entry/exit route' is a fatal design flaw and should be withdrawn and replaced with a 'through route' which reduces the risks and serious adverse impact on a major residential community.

Officer Response to above comments

These concerns are recognised and considered in detail in the Highways section of this report.

Impact of Phase 2 of the St Pauls Gyrotory works. The Transport Assessment (TA) makes clear that demolition and construction on the LWW site and the highway scheme are

interdependent - see paragraphs 6.4.49 and 6.4.50. Phase 2 of the Gyrotory works is intended to happen when construction commences at the rotunda. The demolition of the rotunda and construction of the new highway layout cannot begin before 2028 in order to allow time for the many governance and consent processes that will need take place both within the CoLC and by TfL to have been completed - see paragraph 6.4.50 of the TA. The implication is also that the sale of the LWW Site must be completed by this time in order that the applicant can enter into the required section 278 agreement with the highway authority for the necessary highway works.

The BQA raise concern that there is no up-to-date modelling of the likely traffic flows, travel times, congestion etc when the LWW Proposals are complete.

Officer Response to above comments

These are addressed in the Highways section of this report. It is acknowledged that more traffic modelling will be required and it would be secured through a planning obligation.

Impacts during construction on residents and adjoining residential properties-

An initial review of the Draft Construction Environmental Management Plan (CEMP) has been undertaken by the BQA and the following comments are made. The BQA raise concern that almost no discussion or consultation with the local community has been undertaken in relation to the management and mitigation of construction impacts taking place over the course of a five-year period. A fundamental point of concern is the proposal that - from the commencement of development onwards - vehicles requiring direct access to the LWW Site will enter and exit via the existing ramp on Aldersgate Street.

The BQA consider this proposed re-routing to be impractical and unacceptable and that it should be prohibited. Further concerns during the construction phase are the suspension of bus stops and cycle bays where these are heavily used by residents and those attending/working at St. Bart's Hospital. Furthermore, it is considered that the impact of suspending public transport facilities for a 5+ year period on people with disabilities has not been assessed and is likely to be significant.

Concern regarding welfare space which would be a huge temporary structure which would overlook the CLSG sports

field and most residents' flats in Thomas More House and Mountjoy House for at least a 5-year period. The BQA considers this to be totally unacceptable and that it should be prohibited by means of an appropriate planning condition.

Officer Response to above comments

This is addressed in the Highways section of the report and by condition which requires the submission of a detailed Construction Logistics Plan. Approval of the relocation of bus stops would be required under this condition and in liaison with TfL buses to ensure an appropriate level of provision. The location of the welfare space would also need reconsideration.

Daylight, Sunlight and Overshadowing and Solar Glare

Anstey Horne were instructed by the BQA to review the submitted assessment in relation to daylight, sunlight, overshadowing, solar glare and light spillage within the Environmental Statement. Anstey Horne's report is at Appendix F to the main objection letter. Their main conclusions are that there will be significant impact in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight. They further conclude there will be significant Vertical Sky Component (VSC) daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant No Sky Line (NSL) daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight.

Officer Response to above comment

The significance of the impact to each building as a whole is discussed in the Daylight and Sunlight section of the report and concludes that overall whilst there are some impacts in excess of BRE guidance, due to the context of the individual properties assessed it is not considered that the proposal would result in unacceptable impacts overall.

Anstey Horne additionally conclude that there will be major adverse and significant incidences of solar glare to residents within Monkwell Square.

Officer Response to above comment

The potential solar glare arising to this receptor is major adverse and the effect is significant. Mitigation measures through design are recommended and to be secured by Planning Obligation/condition.

Anstey Home also consider that further information is required to be submitted, namely-

VSC daylight results on a room by room basis;

VSC daylight results on a room by room basis without balconies;

NSL contour plots to establish the layout used within the analysis; ‘

A clear sky’ solar glare analysis to fully understand the potential for solar reduction at key road junctions;

An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP ‘2011’ Guidance Notes; and

Confirmation of the location of the areas of additional light spill on the façade of Mountjoy House and that they do not coincide with the location of windows serving habitable rooms.

Officer response to above comment

The results for VSC by room are summarised in the table 13-16 within the ES Volume 1 Chapter 13 and the results for VSC by room without balconies is summarised in paragraph 13.6.40. The layout used in the analysis is shown on the Daylight Illuminance drawings within ES-Volume III Appendix 13-B. The submitted daylight and sunlight chapter includes baseline light spill measurements in Table 13-13. The results (Appendix ES_VOL_III - APPENDIX_13-E) show the additional lux levels arising to the proposal not including light from neighbouring properties and the drawing in plan (2614-25-03 within appendix ES_VOL_III - APPENDIX_13-E) shows that material light spill would not Mountjoy House. The analysis of solar glare submitted shows the parts of the façade from which solar glare may occur across the day and year. Glare magnitude is not assessed and would be affected by the final choice of glazing. Choice of glazing will be finalised as part of detailed design post planning. The applicant has confirmed that solar glare analysis for the flats at 2-6 Monkwell Square is based on two viewpoints slightly in front of these flats and, in our opinion, adequately identifies the potential for solar glare from the proposed facades.

Anstey Horne request clarification of various points, namely-
To verify the accuracy of the 3D modelling and analysis,
confirm which properties are modelled from measured survey
and which are modelled from photogrammetric survey;
Confirm how the windows and their locations have been
modelled where photogrammetric survey has been used;
Confirm the solar glare results within Appendix 13-F,
including the angles on the field of vision on the solar glare
result drawings.

Officer Response to above comments

The methodology is set out within the ES Volume 1 Chapter 13. The 3D model of the existing site including the window positions was constructed on the basis of a 3D photogrammetric survey, site photography and OS information. The applicant has confirmed that the black circles shown on the solar glare results correspond to increments of approx. 10 degrees from the central field of view. The full circle therefore covers 60 degrees either side of the centre point.

Archaeology

The Environmental Statement Chapter on Archaeology has been reviewed and the following comment is made-

Archaeology scoping document and desk based assessment fail to consider the heritage assets of the Aldersgate site of the LWW site particularly any potential remains of Thanet House and its garden/environs. More specifically-

Not made clear who owns land between the Museum and the remains of the City Wall. Report seems to assume part of Barbican's group of gardens but not the case.

Focus on Roman remains and the much rebuilt city wall, other areas threatened by disturbance not considered.

Inadequate as summary of the whole site's medieval significance.

Contend that area of Jewish cemetery extend beyond footprint of Bastion House and potential for survival of remains greater than suggested.

Officer Response to above comments

The ownership of the land is not a matter for the Archaeology report. The archaeological significance of the site and the impact of the proposed development is addressed in the Archaeology section of the report and by the recommended conditions.

GLA referral

In statement conclude that redevelopment proposals not accord with one or more provisions of the relevant

development plan and thus the planning application is required to be referred to the London Mayor.

Officer Response to above comments

The application has been referred to the GLA as is set out above.

Public Benefits/planning balance

Comments on public benefits listed in planning statement explaining why they are not benefits or why they would also apply to other forms of development on the site. Planning balance in planning statement is not a full and considered planning balance and does not consider all the necessary questions. BQA conclude that overall they do not consider that the public benefits outweigh the harm that the proposals would bring to heritage assets and in relation to other matters, the failure to comply with a number of policies of the adopted Development Plan and the clear guidance in the NPPF as a show to deliver beautiful and attractive development, in accordance with the prevailing character of an area. As a result they conclude that planning permission should be refused.

Officer Response to above comments

This is addressed in the planning balance, NPPF paragraph 208 section of this report.

Additional letter from Barbican Quarter Action dated 05 April 2024

1. Despite existing and emerging planning policy and guidance on national, London wide and local level, the applicant (CoLC) has never seriously assessed a major refurbishment and retrofit scheme for the site, in contravention of the Localism Act 2011 and National Planning Policy Framework.

2. On 11 November 2021 the architects Diller Scofidio + Renfro with Sheppard Robson issued Re-Use Study Options for the Museum of London and Bastion House. Three options were appraised: 1) Existing Condition; 2) RE-Use; 3) Partial Re-Use. Existing condition included light refurbishment without recladding to improve energy performance, neither full upgrade of MEP systems, nor change of use or upgrade of lifts. Option 2 and 3 proposed partial demolition and new build to different degrees; both options removed Bastion House due to structural safety concerns. The study concluded about Option 2, Re-Use: *“We believe this option is the most viable scenario that retains a significant portion of*

the existing building.” (This study was only released following a FOIA request.)

3. From the outset, due to stated safety concerns, a full retrofit option was never appraised. However, these concerns were not substantiated and were in fact later disproved. Please refer to point 6., 15. and 16.

4. The applicant (CoLC) stated in its own Whole Life Carbon Assessment of Part Retention and Redevelopment Proposals for London Wall West, May 2022, Point 4. Existing Site & Buildings Analysis, 4.2.3 Disproportionate Collapse: *“Disproportionate collapse is the most significant engineering challenge for Bastion House. (...) Disproportionate collapse was likely to be a contributing factor in the catastrophic failure of (...) the Ronan Point disaster in London in 1968. (...) Accordingly, the challenges associated with potential disproportionate collapse which arises from the unique transfer structure and column design at Level 3 of Bastion House, means that reuse of Bastion House is not considered feasible from an engineering perspective.”*

5. Ronan Point was built using Large Panel System (LPS). Bastion House, however, is a monolithic, in-situ (poured in place), reinforced concrete form of structure, and is not prone to disproportionate collapse – by the very nature of its construction.

6. Bob Stagg of Alan Conisbee and Associates, Consulting Engineers, was commissioned by the Barbican Quarter Action to carry out a structural peer review of Bastion House and the Museum of London in September 2022. He reported that Bastion House and the MoL complied with all current Building Regulations and the buildings were in better condition than many other concrete buildings of that era. Strengthening of either building was not needed (the report is attached in the appendix). At a meeting in October 2022 between Bob Stagg and the applicant’s (CoLC) structural engineer, Duncan Campbell from Buro Happold, Stagg’s assessment and report were discussed and not contested. However, the applicant (CoLC) never withdrew their claims.

7. As a result of the disproportionate collapse hypothesis, the May 2022 Whole Life Carbon Assessment only considered two options for their interim appraisal: Part demolition and full demolition. In both options Bastion House was demolished *“due to the inherent engineering safety challenges”*.

8. Despite the previous and un-retracted safety concerns over the structural integrity of Bastion House, in April/May

2023 the CoLC undertook a brief 30-working day Soft Market Test, inviting developers to put forward detailed proposals for the retention and adaptation of the Museum of London and Bastion House for a new use. The CoLC received several credible offers for the existing buildings, as confirmed by Christopher Hayward, Chair of Policy and Resources, at City Question Time 15 June 2023.

9. The results and proposed schemes of the Soft Market Test were neither published, nor shared. Developers had to sign non-disclosure agreements. Why? The answer is clear: the greenest building is that which already exists and with a deep retrofit almost any existing building would outperform a demolition and new build option. This was demonstrated shortly before by the City of London's own Planning Advice Note, Whole Lifecycle Carbon Optioneering, by Hilson Moran 2022, page 20, *Figure 11. Examples of initial embodied carbon payback during building operational lifecycle for different options, indicative only.*

10. The credible Soft Market Test proposals and offers were around and above £50,000,000.00 for the Museum of London and Bastion House – that figure is in the public domain. All proposals would have resulted in a change from museum and office block to alternative uses. All would have required substantial investment and major refurbishment to change, convert, adapt, subtract and add to the buildings, and upgrade their fabric.

11. In response to the BQA peer reviews and the Soft Market Test, the Whole Life Carbon Assessment of this planning application retrospectively appraises eleven options from *Do Nothing* to Redevelopment, however, without any change to prior conclusions. Contrary to the results of the market test, this WLCA, albeit mentioning a major refurbishment as one of the options, dismissed and excludes this Option 2 from the full evaluation.

12. We consulted Simon Sturgis, of Targeting Zero, expert, an innovator in delivering a low carbon, resource efficient, built environment. He is a member of the British Council for Offices Sustainability Group, an advisor to the EU Commission, UKGBC, Green Construction Board, RICS, BRE, CIC, CIH, BSi and an 'Architects Journal' Awards judge. He has lead UK thinking and produced industry guidance and advises the UK Parliament, the Greater London Authority, British Land, English Heritage, and many others. Sturgis demonstrated clearly that Option 2, Major Refurbishment, performs far better than any other option in relative terms (per m²) and in overall terms. With only a small amount of

(embodied) carbon released by a major refurbishment through internal and external alterations, and upgrade of the façade, we achieve a radical reduction of operational carbon emissions. (Please refer to appendix of first BQA objection.)

13. The fundamental flaw in the applicant's (CoLC) approach is the baseless, unproven and misleading initial assumption that Bastion House could not be retained for structural reasons.

14. Surprisingly the structural issue was only questioned by the LPA (CoLC) shortly before submission of the planning application, on 02 October 2023. According to an email from Bob Roberts, Interim Executive Director Environment, CoLC, the Arcadis (third party) report "*did include relatively minor comments regarding the optioneering methodology, one of them was that it was unclear on what the structural assumptions were based. I am quite sure that the applicants have done a structural survey – can you send this over, please?*" (Please refer to email released following FOIA request in the appendix.)

15. Even their own engineers distance themselves in this submission from the applicant's (CoLC) prior hypothesis of disproportionate collapse: "*We would stress that in its present condition and left unaltered the Bastion House structure is not considered inadequate. It is only in scenarios where the structure is to be significantly alternated or extended that compliance with the current regulations would need to be demonstrated.*" (Carbon Optioneering Study, Including Dashboard 1 and Dashboard 2, Buro Happold, page 11.)

16. After all, original structural drawings of the buildings were available: In Appendix 15 – Archaeology of this planning application is the archaeological desk-based assessment Museum of London and Bastion House, November 2023. Author is the Museum of London Archaeology. The assessment included structural drawing by the engineers Charles Weiss & Partners: Figure 42, Existing Foundation Details Museum of London (dwg. no. 964-L-251, 30/10/1979); Figure 43, Basement and Lower Ground Floor Sections Museum of London (dwg. no. 964-MI-50, April 1970); Fig 44 Existing Foundation Plan Museum of London (dwg. no. 964-MI-56, February 1971); and Fig 45 Access Ramp and Road Details Museum of London (dwg. no. 964-M-9/1, September 1971).

17. This information was available despite the applicant's claim in their Whole Life Carbon Assessment, May 2022,

page 11: *“The original structural design calculations for the development are not available in the London Metropolitan Archive. The original calculations would have provided information on the building’s structural design life. In the absence of the original brief and calculations we need to rely on what we know was good practice at the time of the building’s conception and development.”*

18. Demolition and construction account for 62% of UK waste and are responsible for 15% of CO2 emissions. Their environmental impact goes far beyond waste and carbon emissions; it includes: 1) The depletion of raw materials, such as sand, gravel and virgin wood; 2) Air pollution, particularly in urban areas: Dust, particulate matter and toxic substances are released during demolition, clearing and excavations, from the production and transportation of materials, and site activities causing a serious threat to our health and the natural environment; 3) Transport issues through increased road traffic. 4) Water contamination from demolition waste and run-off; 5) Habitat disruption and biodiversity. 6) High energy consumption through use of heavy machinery.

19. A comprehensive retrofit scheme would have significantly minimised all these environmental impacts over the proposed redevelopment and contributed to achieving Net Zero by 2050.

20. We object to the exclusion of a retrofit scheme from the Whole Life Carbon Assessment, when this would have delivered the least carbon intensive and the most environmentally friendly scheme. Retrofit first is a better fit for national, local and City of London planning policies, guidelines and net zero targets. The deliberate exclusion stands in direct contravention to good planning practice, to planning law and to meaningful pre-application consultation.

21. We object to misleading information being released, and knowing or intentionally not being withdrawn or rectified, which has or may have unduly prohibited proper process, influenced advice and decisions by the Local Planning Authority (CoLC), and therefore the outcome of this planning application.

22. We object to the environmental damage of this planning application, which, in a best-case scenario, would release around 56,000 tonnes of embodied carbon through demolition and construction. Calculations show that a comprehensive retrofit scheme could have been saved over 65% of carbon waste. Furthermore, the estimated Whole Life Carbon intensity (kgCO2e/m2 GIA) of a retrofit scheme

would outperform the proposed demolition and new build scheme, even over a 60-year period.

23. We object on the grounds that carbon has to be saved now to achieve net zero by 2050. Time is running out. We do not have the luxury of waiting for 60 years for a new build to outperform an existing structure. We need urgent action now. We need to radically reduce the amount of carbon released and waste produced today by demolition and new build.

24. Instead of the CoLC showing clear leadership and vision in addressing climate change it falls short of its own promises, policies, guidance.

25. Below a selection of existing and emerging policy and guidance ignored with the unfounded hypothesis of disproportionate collapse:

- City of London, Local Plan 2015.

Core Strategic Policy CS15: Sustainable Development and Climate Change. 3.

Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.

- City of London, Local Plan 2040.

10.2 Policy DE1: Sustainable Design. *Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options.*

All major development must undertake an assessment of the options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note, and should use this process to establish the most sustainable and suitable approach for the site.

- City of London, Planning for Sustainability, Supplementary Planning Document, November 2023:

"In the City of London context, retrofitting existing buildings contributes to preserving and enhancing the sensitive character of conservation areas, creating an architecturally innovative environment, and contributing towards making the City a leading leisure and culture destination. The CoLC will welcome applications that set strong precedents in this regard and that promote new ways of thinking about repurposing buildings as the most effective way to drive down carbon intensity of development and create a unique sense of place. Thus, retrofit and reuse respond to developers' and occupiers' wishes to create, live or work in the most sustainable environment possible. CoLC is strongly

	<p><i>supporting shifting the creative focus of architects, engineers and designers to the transformation of existing buildings into sustainable, characterful and interesting architecture.”</i></p> <ul style="list-style-type: none"> • National Planning Policy Framework, December 2023: Chapter 2. <i>Achieving sustainable development, paragraph 8. Achieving sustainable development means that the planning system has three overarching objectives, a) economic – to help build a strong, responsive and competitive economy; b) social – to support strong, vibrant and healthy communities; and c) environmental – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</i> • National Planning Policy Framework, December 2023: Chapter 14. <i>Meeting the challenge of climate change, flooding and coastal change, paragraph 157. The planning system should support the transition to a low carbon future in a changing climate (...) It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.</i> <p><u>Officer response to above comments</u> The additional letter does not raise any new issues that haven’t already been considered and responded to within this table, or within the Sustainability section of the ensuing report.</p>
<p>Barbican Association (Planning Committee) Sub letter dated 11/02/2024</p>	<p>Writing on behalf of the Barbican Association (BA), a Recognized Tenants’ Association representing the 4000+ residents of the Barbican Estate, to object to the above applications relating to the site at London Wall West. The objections submitted by the Barbican Quarter Action group are endorsed, of which the BA is a member, but we make these additional points on behalf of our members.</p> <p>In summary, the grounds of objection include:</p> <p><u>Significant loss of residential amenity</u> The proposed massing of the buildings will cause substantial loss of light to many residents in the neighbouring Barbican Estate, particularly those blocks nearest to the site, namely Seddon, Thomas More and Mountjoy Houses.</p>

Overshadowing, light spill, solar glare, and noise.

The risk of nighttime light pollution.

Loss of privacy and overlooking. The buildings not only overlook many residential properties but also that of the City of London School for Girls.

Officer response to above comments

These matters are addressed in the Noise, Daylight/sunlight and overshadowing, overlooking and light spill sections of the report.

Concerns about access to the Thomas More carpark during the construction phase (see below). The plans for a single access for all construction traffic via the ramp from Aldersgate Street to the Thomas More car park have not been properly thought through and are simply unworkable.

Officer response to above comment

This is addressed in the Highways sections of the report and a construction logistics plan would be required by condition. A recommended informative advises the applicant that access concerns for local residents and other users in the vicinity of the site have been raised based on the indicative construction logistics proposals submitted. Access requirements for all nearby residents, workers etc. would need to be considered in detail through consultation processes. This would need to address servicing to Ironmonger's Hall during construction. Access to Thomas More car park should be retained where possible and closure would not be supported/agreed to, save for exceptional circumstances where this was unequivocally unavoidable.

Concerns about noise. Not reassured, for example, that noise from the outside and event spaces will not cause nuisance to residents, given the suggestion that the event spaces should be required to end activities at 11pm. This implies that residents are to have no quiet at all during their waking hours.

Officer response to above comment

This is addressed in the Noise section of the report.

Significant harm to heritage assets

These proposals will cause substantial harm to the heritage of the area and they ignore the cultural history of the site.

The design and massing of the buildings sit totally out of character with both the listed Barbican Estate which it borders and the neighbouring buildings in Aldersgate Street, London Wall and St Martins le Grand. These proposals would have a major negative impact on the surrounding area.

The removal of the Rotunda, which has acted as a gateway to the Barbican Estate and was located near the site of the original Aldersgate through which James VI and I entered the city when he came from Scotland to London in 1603, will eradicate these important links to the country's past. It also remains the southern gateway to the Culture Mile (now replaced by Destination City), linking the South Bank and Tate Modern to St Paul's Cathedral and on to the Museum of London and the Barbican Centre.

To the South, the Grade 1 listed St Botolph's church would be dwarfed and suffer shading for most of the day whilst the viewing line to St Pauls Cathedral would be lost. To the North, East and West all buildings will be dwarfed by the proposed new office blocks, causing significant harm, inter alia, to the setting of the Grade II listed Barbican Estate, the Grade II* listed Barbican landscape, Postman's Park and the Grade 1 listed churches of St Giles and St Botolph without Aldersgate.

A view of one of the Barbican's iconic towers from St Martin Le Grand to the south would be completely obscured by the bulk of the Rotunda Building. Given the stated aim of the developers to provide a gateway to the cultural offerings of the area, it is ironic that one of the existing cultural offerings (namely the Barbican Estate) should be obscured from view by what is just another office building.

Officer response to above comments

This is addressed in the Design and Heritage section of this report.

Lack of cultural benefits

The City is in the process of ramping up the concept of Destination City, replacing the previous Culture Mile initiative. The London Wall West site should surely act as a gateway to this significant cultural area and not act as a monolithic obstruction. The London Plan 2021 recognised this area as one of London's strategic cultural areas.

We note that the cultural plans for the site are vaguely specified and uncertain.

Overall the proposals would have an adverse effect on the existing cultural elements of the area: the new buildings block the visibility of the cultural events and exhibitions already on offer across the iconic Barbican Estate and its Arts Centre.

Officer response to above comments

This is addressed in the Land Use and Cultural section of this report.

Servicing and construction plans unworkable

Currently the Museum of London and Bastion House are served by a dedicated service road, running one way in from London Wall and out near the middle of the ramp from Aldersgate Street to the Thomas More carpark, part of the Barbican Estate.

The Delivery and Servicing Plan proposes that during and after the construction of the buildings (which will be considerably larger than those currently in place) there will be no dedicated access to the commercial buildings and proposes that access be shared with residents' traffic down the ramp from Aldersgate Street to the Thomas More carpark. No real justification for this proposal for shared single access is given, nor consideration of its disadvantages.

Total predicted traffic flows will more than double and restrict access for residents, their deliveries and for emergency vehicles.

The proposal that during the construction phase the ramp from Aldersgate Street to the Thomas More carpark should be restricted to construction traffic only is completely unrealistic.

Officer response to above comment

This is addressed in the Highways sections of the report and highway matters would be subject to Conditions.

Office-led development is not the best use of the site

No evidence has been provided to demonstrate that these office blocks will actually be occupied. There are no anchor tenants, so the proposals are speculative. We believe that this application is inconsistent with the draft City Plan 2040 as the London Wall West site is not identified as being in one of the priority areas for office development and, as previously indicated, is inconsistent with the City's flagship retrofit first policy. It is an implied priority site for housing.

Officer response to above comment

This is addressed in the Land Use section of the report. In particular, it notes that there is a need for other parts of the City to provide office floorspace. In the Offices Topic Paper as part of the evidence base for the City Plan 2040, which looks at capacity modelling within areas of the City for an increase in office floorspace, the Site is within the 'rest of the City' category, which is modelled at being able to achieve an office floorspace uplift of

145,000sq.m. The proposals would achieve a significant contribution towards this uplift requirement.

Environmental impact

The buildings and Highwalks proposed for demolition contain a very high level of embedded carbon, making demolition the most damaging of options for the site.

The use of the London Wall West site for offices removes the site as a prime candidate for housing, next to the City's largest residential cluster.

If the City of London Corporation is serious about wanting to make the City an attractive destination, then it needs to add harmonising and complementary components, not destroy existing heritage ones.

This development offers little in the way of cultural benefit and obscures existing cultural elements. Some of what is on offer (for cultural businesses) will depend on developer agreements to make rents and service charges affordable.

It offers little extra green space.

Officer response to above comment

This is addressed in the Sustainability, Design and Heritage and Planning Balance sections of the report and subject to Conditions.

Letter dated 06 April 2024

An additional letter was received from the Barbican Association on the above date raising the following comments:

All of our previous concerns and objections remain, which we summarise later in this letter. At the outset however we wish to register our profound dismay at the City's total lack of regard and adherence to consultation best practice. Despite promises made to the contrary, the City's public consultation on these proposals has, in our view, been completely inadequate. The City has failed to separate its role as both applicant and Local Planning Authority which renders the opinions voiced in the submitted Statement of Community Involvement as to the consultation process debatable at best. Over 500 planning documents have been uploaded to the City's planning portal, including over 50 additional documents uploaded in the last four weeks without explanation. The timescale for comment was limited to less than 21 days over the Easter period.

Officer response to above comment

The 21 day period for the third round of consultation was extended in order to account for the Easter Period in line

with the City's Statement of Community Involvement. Additional documentation has been uploaded for information, for example the applicant's response to comments from the City of London Access Group. Such documents are not being consulted upon. An application of the proposed scale needs to be accompanied by extensive information in order to establish its impacts.

Questionable speed and process in dealing with these applications:

We would point out that the sheer haste with which this application is being processed is both questionable and concerning in the extreme. The planning applications for these huge and complex proposals were received on 21st November 2023 and validated just two days later. Notice of the application and the first consultation period was sent out by the City on 12th December 2023, just ahead of the Christmas and New Year holiday period, making it difficult for many people to digest and comment on the many hundreds of pages of documents that had been uploaded onto the planning portal. In addition, these documents – many of which were in multiple parts, hard to download and lacking any helpful indexing - were extremely difficult to get to grips with and therefore very challenging to ensure effective public comment in a timely manner.

The more recent additional amendments to the planning applications, with over 50 additional documents uploaded in the last four weeks alone without any explanation make further mockery of the consultation process. The publication of so many documents at this late stage - with no explanation whatsoever as to what amendments have been made - make it almost impossible for anyone to review and respond accordingly. We would also note that the timescale for comment was less than 21 days as it was over the Easter period. Given that material information from the applicant was still being uploaded to the planning website as late as 25th March 2024, the timescale for determining the application should surely have been extended.

Officer response to above comment

Consultation periods have been extended in order to account for the holiday periods in line with the City's SCI. The information that has been uploaded to the website is labelled. Some of the information has been uploaded is for information and is not for consultation.

Applications have already been approved by the Chief Planning Officer

Our concerns regarding the whole process were further fuelled by the notice issued on 2nd April 2024 by the City Of London's Environment Department which stated that "*These applications will be considered by the Planning Applications Sub-Committee on 17 April 2024 and the Chief Planning Officer will recommend that they be Approved*" - four days before the current consultation closing date for comments of 6 April 2024.

This can only indicate that the City has already moved to approve this application and will therefore ignore any further objections. This is a totally unsatisfactory situation (is it even legal?) and we would request that the consultation closing date be deferred to allow a realistic timetable for any further representations from the public to be made once clear and proper explanations have been given.

We note, however, that this is not the first time that the City as Local Planning Authority has taken decisions out of committee scrutiny as both the 81 Newgate Street and 65 Gresham Street applications were recommended for approval without being taken to committee for debate and scrutiny. It is discreditable that the City has done so again with these applications for London Wall West.

Officer Response to Comment

The recommendation is not final until the report has been printed and this would be after the end of the third consultation period. The 81 Newgate Street and 65 Gresham Street schemes were determined in accordance with the scheme of delegation.

Unseemly haste to get these applications through to Committee:

We can only conclude that this unseemly haste to curtail the consultation period has been made in order to meet the target committee meeting date of 17th April 2024 – an extra date recently added to the Planning Applications Sub-Committee's meetings schedule specifically to debate these applications. A time scale of less than six months from validation of the applications to committee is extraordinary given the complexity of the proposals. Surely the City as LPA should recognise its legislative responsibilities and ensure that all the public information is correct - and then allow a 30 day consultation period as the EIA regulations require rather than rush to meet such an unnecessarily tight target committee date. Why has this not happened?

Officer Response to Comment

There are statutory determination periods for applications. Government guidance states that "Once a planning application has been validated, the local

planning authority should make a decision on the proposal as quickly as possible, and in any event within the statutory time limit unless a longer period is agreed in writing with the applicant". The statutory time period for determining a valid application accompanied by an Environmental Statement is sixteen weeks.

What is happening to the Ferroner's House application?

It may be worth mentioning at this stage that a "simple" application for a *"Two storey extension to the existing office building at Ferroner's House"* (planning reference number 23/01320/FULL) was received by the City on 1st December 2023 but was not validated until 27th February 2024. We use the word "simple" as permission has already been granted three times previously for such an extension in 2015, 2018 and 2021 and this application is made on precisely the same grounds.

How bizarre indeed is it to have one current planning application seeking approval for the demolition of Ferroners' House to make way for the proposed London Wall West application and another seeking permission for its extension. It surely cannot be coincidence that the determination deadline for this "simple" application is the 23rd April – 6 days after the Planning Applications Sub-Committee's meeting to determine the vastly more complicated London Wall West scheme. This does not reflect well on the City as it appears to be manipulating the date schedule in favour of the London Wall West application.

Officer response to above comment

Each application is considered on its own merits. The Ferroners' House application is under consideration.

City Plan 2040 launch deferred until after the 17th April meeting

Formal consultation on the new draft City Plan 2040 was originally scheduled for launch on 15th April 2024. We now learn that this launch has been put back to 18th April 2024 i.e. a day later than the Planning Applications Sub-committee meeting date which is due to debate the London Wall West proposals. This is a deeply worrying, indeed even manipulative, move by the City and reflects very badly indeed on the whole Planning process relating to these applications. The City of London has stated that *"A key objective of the draft City Plan is to ensure that the Square Mile transitions to a zero carbon city by 2040. Since the Plan was drafted, the way whole lifecycle carbon (WLC) of development is measured and assessed through the planning system has evolved significantly (including through strategic planning policy and guidance, and the production of the City Corporation's Carbon Options Guidance) and increased*

importance has been given to encouraging the retrofit of existing buildings...”

On 8th March 2024 the City issued a release regarding the successful approval of the Draft City Plan 2040 by the Court of Common Council at its recent meeting. It stated that:

‘The City of London Corporation has today formally approved the local plan for the Square Mile, known as ‘City Plan 2040.’ Following its successful journey through the Planning & Transportation and the Policy & Resource Committees, earlier this year, ‘City Plan 2040’ has now been approved by the Court of Common Council, the City of London Corporation’s primary decision-making body.....The decision means that the finalised plan will now be published for public consultation, before examination by an independent planning inspector and finally, being sent to the Secretary of State for approval, later this year.....’

Strong emphasis on Retrofit first

The draft City Plan 2040 focuses on the need to retrofit first. By way of example, we include a selection of the policies within the Plan which include:

Environmental objective: • *Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a ‘retrofit first’ approach to development*

Strategic Policy S4: Offices - 3. *Promoting the retrofitting of existing office buildings for office use and upgrades to their environmental performance and the quality of accommodation.*

Policy OF1: Office Development - Office development should: • *Prioritise the retrofitting of existing buildings;*

Strategic Policy S8: Sustainable design - 1. *Takes a ‘retrofit first’ approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options; 2. Seeks opportunities to refurbish existing buildings, improving their environmental performance; 3. Minimises whole lifecycle carbon and contributes towards a net zero carbon City*

Reason for the policy - 12.1.2. *The built environment is a major contributor to carbon emissions. Development should not only seek to minimise emissions but also find opportunities to improve wider sustainability. Retrofitting existing buildings will in many cases result in lower whole lifecycle carbon emissions (in total, and per square metre) than demolishing and redeveloping sites, and helps to minimise the use of materials. As our climate changes, development must play a role in helping to make the City more resilient to extreme weather conditions and the impact of changing climatic conditions.*

12.1.4. *The design approach to each site in the City will be unique and there is a need to consider a broad range of*

factors through an iterative design process. While sites won't share a singular route through the design process, **this City Plan places significant importance on achieving sustainable development through a 'retrofit first' approach. An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the whole lifecycle carbon of different development approaches.**

Policy DE1 : Sustainable Design - 1. Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options.

12.1.15. As new developments are large consumers of resources and materials, the possibility of sensitively refurbishing or retrofitting buildings should be considered in preference to demolition

City of London therefore acting with total disregard to its own planning policies

As can be clearly seen from the policies above, the City is acting with total disregard to its own planning policies in its processing – and ultimate support and approval - of the London Wall West applications. The City has issued a number of press releases boasting of its focus on retaining and refitting existing business in order to meet its net zero targets but has cynically delayed the launch of the Draft City Plan 2040 consultation until after the 17th April 2024 Planning Committee meeting, thereby seeking to benefit from the current less onerous planning policy regime and avoid the further weight that will be attached to the emerging one.

We have to comment that this reflects badly on the City leadership in pushing through and supporting these London Wall West applications which fly in the face of these emerging policies. The City should be setting an example and adhere to its own policies rather than arbitrarily ignoring them for financial gain.

Officer Response to Comment

The application has been assessed in accordance with policy. The sustainability section of the report assess the re-use of the proposed buildings and carbon implications.

FT article reflects badly on developer bias in the City planning process

An article published in the Financial Times titled "City of London promises flexibility in drive to entice big companies" on 15th February 2024 hardly makes for reassuring reading – apart from for developers of course.

In this article Chris Hayward, the Policy Chair at the City of London Corporation, is quoted as saying "that there are no

“deal breakers” for the financial district as it seeks to entice big companies to relocate their headquarters from other parts of the capital or overseas. (he)said the authority was “hungry for growth” and would adopt a “flexible” approach in negotiations with developers in an effort to attract companies to the Square Mile. “I have a policy: there is no such thing as deal breakers,” Hayward told the Financial Times in an interview. “We sit down with the investors, the developers with the potential tenants, and we make things work.”“I always say to my planning officers: remember... these [developers] are our clients, these are the people who are investing, taking the risk investing in our city. And we have to make it work for them,” said Hayward.

Perhaps this, together with the questionable delay of the draft City Plan 2040 consultation, goes a long way to explaining why the London Wall West application is being rushed through the planning process with scant attention either to legislative policies and guidance or the City’s own planning policies.

Officer Response to Comment

The Local Planning Authority has followed due process in the determination of this application and has carried out a thorough assessment of the proposals.

Our previous objections remain undiminished

Our previous objections, dated 11 February 2024 remain undiminished and focus, inter alia, on:

- **Significant loss of residential amenity** – the disproportionate scale of the increase in height and mass of the proposed buildings will cause loss of daylight and sunlight, overshadowing, light spill, solar glare, noise and night time light pollution to all neighbouring properties, the majority of which are residential

- **Loss of privacy and overlooking** – not just for many residential properties but also the City of London School for Girls.

- **Significant harm to heritage assets** – the proposals and loss of architectural coherence will cause significant harm to the setting of Grade 1, Grade 2 and Grade 2* heritage assets with little wider benefit to the City of London.

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- **Paucity of perceived cultural benefits** - cultural plans for the site are vaguely specified and uncertain, with only c10% of the total site to be apportioned to culture

- **Harmful environmental impact** - having publicly and repeatedly announced that “retrofit first” is to form the

	<p>cornerstone of the City’s planning policy, we question why this policy was ignored in relation to the London Wall West site. This runs counter to all accepted sustainability considerations including at national level, notably NPPF 2023, section 14. The justification for demolishing Bastion House was that the building was structurally unstable. This has, however, been proven to be untrue and supports the view that Bastion House – together with the Museum of London building - could and should be repurposed.</p> <ul style="list-style-type: none"> - Soft market test flawed and not followed up - the City Corporation’s soft market test for interested parties to express their interest in retaining and repurposing the site was flawed from the outset, being too short a period of time for any interested party to adequately assess the site. The three credible responses seem not to have been properly followed up whilst news that the City of London Police may make temporary use of Bastion House and the City of London School for Girls of the Museum of London serve to confirm that these buildings remain fit for use - Totally unworkable access arrangements – both for the construction phase and servicing during the life of the building - Proposed removal of roundabout - the impact of the loss of the roundabout that the new development proposes will be substantial on traffic flow and give rise to major congestion, delays and inconvenience throughout the area, not least given the proposals for the new St Paul’s gyratory system. How can a scheme that proposes such a major change to the existing road layout be assessed by Officers and the Planning Applications Sub-committee without the input of TFL? We also make the observation that this proposal has not been subject to a full consultation. <p><u>Officer Response to Comment</u> The previous grounds of objection are noted above.</p>
Trustee of the Aldersgate Flame	<p>The relocation within the development site is acceptable to the Trustees of the Aldersgate Flame if the location is accessible and allows the public gatherings mentioned. My objections are based on the fact that the Landscape Masterplan Artefacts Strategy wrongly states that the Trustees of the Aldersgate Flame have agreed this siting shown. In a PowerPoint presentation to me it was shown as indicated (and it seems the best place proposed), but no plans were sent to the Trustees following the presentation</p>

	<p>and no formal or informal written or verbal approval was given. Further, the plan shows the sculpture resting on the pavement whereas previously it had been raised in a garden area that gave it more prominence and a height that allowed the reading of the text to be facilitated to a wider number of people. Such siting would be preferred. There is reference to the artefact being refurbished and the Trustees would ask and require that the Flame is refurbished and the lettering highlighted to the standard required by the Trustees.</p> <p><u>Officer response to above comment</u> This is noted and the exact location of the Aldersgate Flame is recommended to be secured by condition, notwithstanding the approved drawings.</p>
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Objections

As of midday on 8th April 2024, a total of 965 letters of objection have been received against all three applications under consideration. It should also be noted that some contributors have commented more than once. The table below provides a summary of the points raised within the objections and an Officer response.

Comment	Officer Response
Inadequate consultation and concerns with planning application process	
<p>In adequate consultation in advance of the application submission:</p> <ul style="list-style-type: none"> • There was a lack of involvement in the original proposals and the proposals have not changed as a result of feedback. Objections and concerns have not been adequately considered and the proposals go against resident's wishes and do not address community needs. • There has been a lack of honesty in consultation process and the City should treat the residential population with more decency and respect. • The pre-application consultation was inadequate: the website contained inaccurate information and was not kept up to date. The visual material provided on the website and shown at public events was misleading and did not include dimensions and positioning of proposed buildings. 	<p>The applicant's consultation process is set out and considered in the Statement of Community Involvement section of the report. These comments apply to the City as landowner and the applicant.</p>

<p>A scale model was not delivered until the consultation was closed.</p> <ul style="list-style-type: none"> • There was no consultation with nursery school to advise that school was to be demolished. • There has been absolutely no consultation with local residents about these plans affecting the Thomas More car park. 	
<p>The period of consultation for the planning application has been inadequate and covered the Christmas period.</p>	<p>Whilst the initial consultation period covered the Christmas period, the consultation period deadline was extended until 31 January 2024 in order to account for this. As has been set out previously:</p> <p>Nearby residential occupiers were notified directly of the applications by letter on 12/12/2023.</p> <p>The applications were advertised in the press on 12/12/2023.</p> <p>Site notices advertising the applications were posted in 20 locations on 07/12/2023.</p> <p>Furthermore, there have been two subsequent rounds of consultation.</p> <p>Therefore, it is considered that there has been adequate time for responses to be submitted.</p>

<p>Concerns that the website was not allowing comments to be uploaded.</p>	<p>There was a short period of time when comments could not be uploaded. However, this was soon rectified, and comments could still be emailed directly to the LWW email address which had been clearly advertised on application publicity.</p>
<p>Concern that application made by City and approval to come from City. Where are the checks and balances to ensure that there is no conflict of interest in this important process.</p>	<p>The planning process allows local planning authorities to determine applications made by public bodies and this is a common occurrence. However, particular processes are followed to ensure that the planning decision making is separate and these are set out within the handling note which is available to the public to view.</p>
<p>With over 500 files within the planning application, how do planning committee members ensure that they fully understand the extent of the plan and every aspect of the impact has been considered properly? Or are they simply going to rely on the officers' report to the committee to base their decisions?</p>	<p>This committee report provides detailed assessment of all the aspects of the proposal along with summaries of the main issues. In addition, Planning Committee Members have the opportunity to view the application documentation, visit the site, listen to the presentations from officers, applicants and objectors and to ask</p>

	<p>questions to ensure that they understand the proposals and the consideration of the main issues.</p>
<p>Question whether correct notices served for planning application-</p> <ul style="list-style-type: none"> • The red-line for both applications directly overlaps Mountjoy House, including the south western corner of the building itself and the ancillary areas beneath. It will directly have an impact on the areas to which leaseholders own or have rights over within the terms of their lease. • As well as connecting to the podium walkway, major changes are proposed to the resident car parking area which also provides the only resident access to adjacent open space and none of the residents were formally served notices on as required by the DMPO (as confirmed by the Applicant's application form). 	<p>This has been raised with the applicant who have confirmed that the correct notices have been served.</p>
<p>Request impact on environment for residents is subject to third party review.</p>	<p>The Environmental Statement has been subject to a third-party review from Trium Environmental Consulting LLP and the Daylight/Sunlight Review has been subject to an independent review by Delva Patman Redler. The third-party assessment reports have been published online with the application documents for people to view.</p>
<p>There has been a deluge of documentation throughout the application process which is difficult for a lay person to discern and assess. Transparency, good process and good governance are in short supply.</p>	<p>Three consultation periods have been carried out in conjunction with the</p>

	<p>application as is set out in the consultation section of the report. The information is dated and labelled on the website for people to view. The application documentation included an overview of the information that had been submitted for consideration.</p>
<p>The letter from the City's Environment Department dated 2 April stated that the applications are recommended to be approved, which is four days before the closing date for comments on the 6 April, which is ultra vires.</p>	<p>The recommendation is not final until the report has been printed and this would be after the end of the third consultation period, being 6 April.</p>
<p>The submitted documents for planning are misleading and/or inaccurate, including the following:</p>	
<p>Misleading renderings and vague plans that avoid showing the impact of the scheme when viewed from the Barbican Estate. At no point is the potential view from Thomas More House nor the side of Mountjoy shown. The promotional materials for the development, including the 3D model, fail to accurately represent the massing, scale, and proximity of the proposed development to adjacent buildings. Visualisation is limited and optimistic, they avoid and flatter rather than be realistic.</p>	<p>The accuracy of the information submitted has been specifically addressed in the Design and Heritage section of the report.</p>
<p>Vagueness about the development, particularly cultural use.</p>	<p>Further details of the proposed cultural use are discussed in the Land Use section of the report and would be subject to condition to secure a Cultural Implementation Strategy.</p>

<p>The glossy visual representations are misleading, showing the area bathed in sunlight with a wide diversity of plant species thriving. With the massing of the proposals, and the area having no sunlight for most of the year, it unlikely that any plant species will thrive.</p>	<p>The Thermal Comfort section of the report considers the microclimate. Final details of landscaping would be provided at detailed design stage.</p>
<p>The Documents, Drawings and Reports, appear to have been made to complicate rather than communicate and the documentation about the scheme is chaotic and confusing. Not clear what amended documents contain.</p>	<p>Due to the scale of the proposal, and the Environmental Statement there are a large number of documents. The Environmental Statement includes a non-technical summary. There is a cover letter relating to the amended documents in respect of the second round of consultation.</p>
<p>There also appears no consideration or detailed plans submitted to deal with changes to a listed property which is again highly improper.</p>	<p>Drawings are submitted to show the changes to the listed Ironmongers' Hall and Barbican Estate interfaces including demolition drawings.</p>
<p>Where is the independent review report on the Whole Life Carbon Assessment?</p>	<p>The Whole Life Carbon Assessment submitted with the application has been subject to a third-party review by Arcadis. This was made publicly available on the website when the final version was received.</p>
<p>The Health Impact Assessment of November 2023 is untrue. For example, in the Health Impact Assessment of November 2023: 6.4 Air quality, noise and neighbourhood amenity 'Does the proposal minimise construction impacts such as dust, noise, vibration and odours?' and</p>	<p>The Health Impact Assessment is based on the findings of the ES. As noted in the report, mitigation</p>

<p>'Does the proposal minimise noise pollution caused by traffic and commercial uses?' evaluates potential health impact for both as 'neutral' when they're clearly both 'negative'.</p>	<p>measures and monitoring mechanisms would limit the impacts of construction on human health. A scheme of protective works, which would need to accord with the City's Code of Practice for Deconstruction and Construction Sites, would be required by condition.</p>
<p>The ES states that there is an increase in open space provision, but no analysis (comparable amounts and diagrams) to support such an assertion.</p>	<p>The amount of open space as existing and proposed is discussed in the Public Realm section of the report. The existing public realm is 9,080sqm and this would be increased to 13,032 sqm.</p>
<p>The Planning Statement also states that the emerging local plan should not be given any weight yet, then seeks to draw support from it in the justification for the proposals.</p>	<p>The weight to be given to the emerging plan is addressed in the Policy Context section of the report.</p>
<p>Have visited the exhibition of the model and reviewed a number of the planning documents, including some which state that Wallside is owned by the Corporation of London which is incorrect. That is the subject of separate correspondence, including confirmation that the documents are incorrect in this respect from the City Solicitor's Department, but the fact of that error raises concern about what else may be incorrect in the assumptions made by this application.</p>	<p>The documents submitted with the application have been available for public consultation and subject to scrutiny by officers and third-party reviews as appropriate. An updated site location plan was submitted in order to rectify the Wallside matter.</p>
<p>Question independence of third-party reviews.</p>	<p>The third-party reviewers have checked that there are no conflicting interests.</p>

	They are commissioned by the local planning authority to give professional independent advice.
<p>The multidisciplinary role of Buro Happold in the application creates a challenge to objectivity and the Buro Happold documents do not acknowledge the City Corporation as either applicant or client.</p>	<p>Buro Happold are acting for the applicant only in this application and their multidisciplinary role is not problematic in this sense. It is not necessary for all documents to state that the City Corporation are the applicants.</p>
<p>A contract to the value of £37K was awarded to Donald Insall Associates to act as the City of London Corporation's agent including the provision of a report on the merit of listing the buildings. Given how fundamental the Certificate of Immunity (COI) is to the London Wall West scheme, it is a surprise that a copy of the report prepared by Donald Insall has not been published along with the other application documents. All the information relating to the COI and the evidence base for the application should be in the public domain during the LWW consultation</p>	<p>It is understood that this report was commissioned by the City Surveyors. It was not submitted as part of the planning application.</p>
<p>Monkwell Square and the residential properties within it have been completely omitted from the Social Value Strategy Report and the Environmental Statement-despite those who live in Monkwell Square being identified as community stakeholders and the commitment to “Hold regular liaison meetings with other high risk sites within 500m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised”. In particular-</p> <ul style="list-style-type: none"> • Table 8.17 in the Environmental Management Statement Vol 1 fails to include the residential properties in Monkwell Square (Monkwell House and Wallside), Mountjoy House, the Postern and Roman House when 	<p>Table 8-17 (p 8-24 of Volume 1 of the ES) does not list all properties affected but gives examples and it states surrounding sensitive locations, including residential properties (e.g. London House and Thomas More House). A Construction and Environmental Management Plan is recommended and</p>

<p>looking at loss of amenity due to dust and impacts of PM on human health during demolition and construction.</p> <ul style="list-style-type: none"> • The air quality analysis should be corrected to refer specifically to Monkwell Square residential properties given that they will be significantly affected by air quality deterioration. • As stated in The CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT PLAN1478965 page 103 - "A suite of construction dust and Particulate Matter (PM) mitigation measures have been outlined for inclusion in an Air Quality and Dust Management Plan (AQDMP), which is expected to be secured via condition. However, this mitigation should also be given consideration within the D&CEMP:" • In 5.4 with regard to Air Quality, the LWW site has been classed as 'high risk' which causes Multiplex to recommend mitigation measures. Areas for action include communication with stakeholders, site management procedures, daily monitoring of air quality, preparing and maintaining the site, and the operation of vehicles/machinery. There has been no communication with residents about Air Quality or discussion about mitigation measures. 	<p>would be secured by condition which would include mitigation measures for dust and particles. Discussions will be required with stakeholders including affected residents prior to any demolition/construction work commencing should planning permission be granted.</p>
<p>Provided copy of the map referred to in the City of London (Bridgewater Square) Appropriation Order 1965. This illustrates the area of land within the scheme's boundary which was appropriated as public open space. This appropriation was the result of City Corporation's need to utilise part of Bridgewater Square for the access ramp to Bunyan Court. Bridgewater Square was acquired by City Corporation under the Open Spaces Act 1906 and is to remain an open space under the London Squares Preservation Act 1931. Could you please confirm the current status of the appropriated land within the scheme in relation to the 1931 Act.</p>	<p>It is correct that a small piece of land within the scheme boundary was appropriated to open space in the City of London (Bridgewater Square) Appropriation Order 1965. It is likely that it remains held by the City for this purpose. The grant of planning permission would not override the application of the Open Spaces Act 1906 or</p>

	<p>London Squares Preservation Act 1931 should they apply. The relevant area would remain as open space within the proposed scheme (it is located within the Barber Surgeons' Gardens area).</p>
<p>The illustrations are not to scale which is misleading.</p>	<p>The submitted plans are to scale. The verified views show how the proposal would appear in its surroundings and in relation to the scale of surrounding development.</p>
<p>The City is not developing the site themselves so the final outcome will be different</p>	
<p>There is no guarantee that developers purchasing the site with planning permission will adhere to the plans - particularly in respect of cultural uses, amenity (including green areas) and food outlets.</p>	<p>Planning permission would be needed for different/material variations to the current proposals. These would be considered against the proposals in the development plan and carefully assessed taking into account any benefits such as cultural and green areas.</p>
<p>Objection to proposed use as offices- there is an oversupply or lack of demand for office space</p>	
<p>There are already too many offices, the demand for offices is reducing with many empty offices in the City. The analysis of office demand in the application is inadequate. Developing the site for offices risks deepening desolation during weekends and after working</p>	<p>The proposed development for a significant increase in Class E office floorspace accords with</p>

<p>hours, exacerbating the disparity between built form and residents.</p>	<p>the primary strategic aim of the Local Plan 2015 and the emerging City Plan, being to deliver new, Grade-A office floorspace to maintain the City's position as the world leading international finance and business centre.</p> <p>This is considered in the Land Use (Provision of Office Accommodation) section of the report. Vibrancy is addressed in the Land Use, Public Realm and Design sections of the report.</p>
<p>The development is speculative with no tenant lined up. Concerns about the amount of money local authority is spending on pursuing a speculative development.</p>	<p>Local planning policy identifies a need for office accommodation. This concern largely relates to the Corporation as landowner and developer, rather than local planning authority.</p>
<p>The proposed development would not be the most beneficial use for the site or the best use of land.</p>	<p>This is considered in the Land Use (Provision of Office Accommodation) section of the report.</p>
<p>If the previous scheme for the Centre of Music was viable why is so much office space necessary.</p>	<p>A viability report has not been submitted (nor is one required in planning terms in this instance) with the application to demonstrate why the amount of office floorspace is required in</p>

	<p>terms of viability. Nonetheless as explained in the Land Use (Provision of Office Accommodation) section of the report, the provision of office floorspace on the site accords with policy.</p>
There is a need for alternative uses apart from offices	
<p>Alternative uses have not been sufficiently explored and the proposal should be for other uses, for example –</p> <ul style="list-style-type: none"> • residential accommodation. Need for housing is increasing, including affordable housing. • museum • educational use i.e. new secondary school, City of London school, Guildhall school, university use • workshops • retail • community provision • new storage/visitor attraction for London Metropolitan Archives • healthcare facilities e.g. medical/dental clinic • concert hall • artist studios • provision for the elderly, both residential and sociable • small-scale retail units • public green space • hotel • Jewish museum 	<p>As well as offices, the proposal includes retail uses (Class E uses) as well as flexible cultural space (sui generis use) which could be used for some of these suggested uses such as educational space, community provision, workshops, museum. A financial contribution would be sought towards affordable housing.</p>
<p>Should find an interim use given 8-10 year timeline relating to the demolition and rebuild.</p>	<p>It is agreed that meanwhile uses would be welcome and would be explored through the Culture Implementation Strategy that would be secured by condition.</p>
Object to loss of cultural destination for community/visitors	

<p>Replacing the museum with an office use goes against the City's plans and vision as set out within the local plan and the City's long-term vision for the area. This proposal does not fit the City's designation of the Culture Mile and the Destination City strategy and visitor strategy.</p>	<p>The proposal does include some cultural use. The loss of the Museum use in relation to this is addressed in the Land Use (Cultural use) section of the report.</p>
<p>The site has significant historical and cultural potential and the loss of the cultural use would be a wasted opportunity. Investing in spaces that foster creativity, entertainment, and community engagement would align with the spirit of the Barbican's cultural heritage.</p>	<p>The proposal would include cultural spaces and it is recommended that these are conditioned to ensure that they are delivered.</p>
<p>It is significant that the Museum of London, an educational and cultural facility, was located here, indicating the City's sense of priorities when it was built. It is totally inappropriate for it to be replaced by office buildings.</p>	<p>The cultural significance of the site is recognised and the proposal would include cultural space across different levels of the site, along with opportunities for the roman walls to be more accessible.</p>
<p>Repurposing the Museum of London site for cultural and public use could enrich the community and enhance the area's cultural vibrancy.</p>	<p>The proposal would include spaces for cultural use as set out within the Land Use section of the report and the Corporation as local planning authority has a duty to determine the applications before them.</p>
<p>The reason the Museum of London was closed and moved to Smithfield was so London could finally get a world-class Acoustic Concert Hall.</p>	<p>The reason that the Museum of London moved to Smithfield was due to the limited size of the existing</p>

	<p>London Wall building and the constraints of the site as is set out in the background section of this report.</p>
<p>If the City of London does not have the resources to maintain the buildings itself, has the City considered transferring responsibility for the buildings to a public institution or charity outside of the City?</p>	<p>This is a matter for the Corporation as landowner.</p>
<p>The development goes against the City's former declared philosophy and planning to have high rise office building clusters in the City's eastern areas, with cultural activities, tourist attractions and residential accommodation towards the west.</p>	<p>This is addressed in the Land Use section of the Report. In particular, it notes that there is a need for other parts of the City to provide office floorspace. In the Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'rest of the City' category, which is modelled at being able to achieve an office floorspace uplift of 145,000sq.m.</p>
<p>The site should remain a cultural use with tourist link to St Pauls and make most of history and cultural potential of the site. As the City aspires to be an important cultural destination for visitors, these plans insert unwelcome barriers and break the route from the Barbican to St Paul's. Visitors will focus on the Southbank.</p>	<p>It is agreed that the history and cultural potential of the site are important and the proposed cultural use is discussed in Land Use (Culture) section of the report. The visual link with St Pauls are assessed in the Public Realm section of the report.</p>

<p>The amount of development earmarked for culture is too small at 1% of the development.</p>	<p>The proposed cultural use would consist of approximately 12 % of the GIA sqm of the development as set out within the Land Use section of the report.</p>
<p>The development gives almost no recognition to local history and cultural heritage, with only cursory acknowledgement given to the Roman walls and overlooks the importance of preserving and integrating the layered history of the site, which is integral to the city's cultural heritage. This could include the Jewish history of this area, the links with Shakespeare and the Roman Wall, as well as a much better gateway to St Paul's and Tate Modern and connections through to the Barbican Centre/Culture Mile.</p>	<p>As explained with the Land Use (Culture) section of the report, the use of the cultural spaces is not yet finalised and further engagement with stakeholders is encouraged and uses which recognised the cultural heritage of the area would be welcomed. More details would be required by condition, in particular the Cultural Implementation Strategy. Some form of interpretation of the history of the Jewish Cemetery would be secured through the Cultural Strategy.</p>
<p>The economic tourist footfall of the area will be jeopardised by loss of character. Visitors are not going to be attracted by yet more bulky office blocks.</p>	<p>The proposal would include public spaces and cultural spaces to make it an attractive destination for visitors.</p>
<p>Too much focus on financial return</p>	
<p>Profit/greed given too much priority over well being of residents and short term financial gain needs to be weighed against drawbacks of scheme. Scheme for repurposing Bastion House and the Museum of London</p>	<p>The profit generated by the City of London Corporation is not a matter for the local</p>

<p>site should be considered even if they do not return as much money as the new proposal.</p>	<p>planning authority in the determination of this application. The local planning authority has a duty to consider the proposals in relation to the policies of the development plan and other material considerations.</p>
<p>The City of London's reputation as a sponsor of architectural and cityscape excellence will be damaged by the implementation of the proposed scheme.</p>	<p>The reputation of the City of London in this respect is not a matter for the local planning authority in the determination of this application. Nonetheless, officers are satisfied that the proposed development would be of a high-quality design as is explained within the Design and Heritage section of this report.</p>
<p>It is clear the planning authority is only doing this for money, but what it should also consider is the best use of the land itself.</p>	<p>The proposals have been made by the City of London as landowners rather than by the planning authority.</p>
<p>The CoL could fund the Smithfield Museum and Market relocation from other City funds. Short term cash funding needs do not justify permanent damage to the neighbourhood.</p>	<p>This is a matter for the Corporation as landowner and developer not as local planning authority.</p>
<p>Object to demolition of existing buildings on heritage/cultural/design grounds and loss of gateway to Barbican</p>	

<p>The Museum of London and Bastion House are internationally recognised icons of British post war urban design. Designed by Powell&Moya architects of 1951 festival of British Skylon and are fine examples of architecture that are part of the City's architectural heritage. Buildings are of architectural merit and should be listed.</p>	<p>The significance of these buildings is addressed in the Design and Heritage section of the report.</p>
<p>The Museum of London and Bastion House are integral to the Barbican's world-famous townscape, they were designed together, and the space makes sense as one. The proposed demolition will disrupt the ensemble of Barbican, Bastion House and Museum of London.</p>	<p>The relationship of the Museum and Bastion House to the Barbican is addressed in the Design and Heritage section of the report.</p>
<p>Demolition of post war architecture should not occur because it is out of fashion but should be retained for future generations to learn from.</p>	<p>This is addressed in the Design and Heritage section of the report.</p>
<p>The existing buildings are well bedded in their historical context and contribute to important visual connections in the wider vicinity, for example the former Museum of London has the sense of old London lanes, the brick rotunda references the Roman city walls and the Museum tiling echoes Barbican Centre.</p>	<p>The significance of the existing buildings in terms of their relationship to their wider context is addressed in the Design and Heritage section of the report.</p>
<p>The modernist Bastion House is beautiful and minimal standing on a stone plinth, which looks perfectly at home due to the warm materials and human scale.</p>	<p>The architectural values of Bastion House are addressed in the Design and Heritage section of the report.</p>
<p>The site overlooks St Paul's and at the moment is marked by a peaceful rotunda. The site is significant because marks an ancient gateway to the City and now also acts as a Gateway to the Barbican. These buildings are integral and form part of a thoroughfare used since before the Romans.</p>	<p>This is addressed in the Design and Heritage and Archaeology section of the report. Specifically, the new Rotunda building would be prominently situated on the terminating view at the northern end of</p>

	<p>Martin's Le Grand with views into the new public space. The proposals would improve the legibility and intuitive wayfinding of from St Paul's Cathedral.</p>
<p>The Estate is purposely designed with a perimeter wall, with selected access points. The proposal would demolish the walls and drops much of the area down to street level. Additionally, the new plans cover up the present rotunda which echoes the ancient walls of the City of London. The plans will destroy the concept of the Barbican as a whole, cutting off and breaking up the outer defence walls, the podium walkway, and destroying the double tower above the drawbridge which articulates the gateway to the 'Barbican'.</p>	<p>This is addressed in the Design and Heritage section of the report. Notably the Barbican Estates' raised podium would remain intact along with the key elements of significance. Activating London Wall and providing level access are positive elements of the proposals.</p>
<p>The existing buildings have unique features, for example the interior aspect of the rotunda.</p>	<p>This is addressed in the Design and Heritage section of the report.</p>
<p>The Twentieth Century Society has recommended that these buildings should be preserved and included the Museum of London Bastion House complex as one of the Top Ten Heritage Buildings at Risk from demolition, redevelopment or neglect in 2023.</p>	<p>The views of the Twentieth Century Society as outlined in their response to consultation, have been addressed and given due weight in the Design and Heritage section of the report.</p>
<p>The buildings or some of the features could be retained and reused, for example the blue brick rotunda could be a landscape feature capable of re-use as part of the scheme.</p>	<p>Re-use is addressed in the sustainability section of this report.</p>
<p>Other buildings which were previously marked for demolition are now being refurbished and reused with considerable care and money spent e.g., western end of</p>	<p>The limitations of the existing buildings are addressed in the</p>

Smithfield and why cannot this be done for these buildings?	Sustainability section of this report.
Object to proposed mass, scale and design of proposed new buildings	
New buildings are too large in scale and massing in comparison with the existing and represent an overdevelopment of the site. The proposed New Bastion House will be more than two and a half times the volume of the current Bastion House and the proposed Rotunda building more than twice. The mass of the proposed new Bastion House would be greater and have a greater presence.	Considerations in relation to scale and massing are addressed in the Design and Heritage section of the report.
The new buildings scale and massing is out of proportion with the surroundings including the existing heritage buildings of the Barbican estate. Scale - the sheer bulk and design of the two towers that will form the development is completely out of character and proportion with the neighbouring Barbican Estate. They will replace existing buildings that work within the overall context of the estate.	This is addressed in the Design and Heritage section of the report.
The proposal would dominate the lower end of Aldersgate and other buildings in the area.	This is addressed in the Design and Heritage section of the report.
The positioning and design of the buildings does not respect local character, grain and street patterns and would create a canyon effect.	This is addressed in the Design and Heritage section of the report.
The design of the new buildings is average, unimaginative, uninteresting glass, bland and fails to take account or draw inspiration from the unique character of the Barbican and surrounds. Development could be anywhere.	This is addressed in the Design and Heritage section of the report.
The proposal fails to appreciate this fundamental concept of the Barbican as a perimeter wall and treats the 'fortification' as an inconvenience to be done away with. It demolishes the walls and drops much of the area down to street level.	This is addressed in the Design and Heritage section of the report. Notably the Barbican Estates' raised podium would remain intact along with the key elements of

	significance. Activating London Wall and providing level access are positive elements of the proposals.
The proposal would create an eyesore completely out of keeping with the surrounding streets, the Barbican Estate London Wall and St. Pauls.	This is addressed in the Design and Heritage section of the report.
These buildings feel completely disconnected from the original idea for the neighbourhood.	This is addressed in the Design and Heritage section of the report.
The planned buildings are enormous and not human in scale.	This is addressed in the Design and Heritage section of the report.
The proposed design falls far below the architectural quality of what already exists on this pivotal site. The form, massing, materiality and colouring of the proposed volumes ignore context and are over scaled.	This is addressed in the Design and Heritage section of the report.
The towers are clumsily placed and disregard a clear precedent for buildings at the south-west of the Barbican Estate - as established by One London Wall and 200 Aldersgate, which are stepped to honour the intended visual connections between the Barbican and St Paul's. The development would have a devastating impact on townscape views in and around the Barbican public realm.	This is addressed in the Design and Heritage section of the report.
Proposal is of little architectural merit and do not fit into the architectural context of London Wall. Glass towers bland and not people friendly.	This is addressed in the Design and Heritage section of the report.
New North building should be omitted. Removing the North Building will permit the expansion of the proposed Aldersgate Plaza into a more useable open space and will open up the setting of the front of Grade II listed Ironmongers Hall, especially the view of the Hall and its gardens from Aldersgate.	The North Building provides a degree of enclosure to the Ironmongers Hall and creates an enclosed protected public space. This is further addressed in the Design and Heritage sections of the report.

<p>The proposals fundamentally change the character of the area from classic twentieth century buildings to a vast pair of modern city office blocks.</p>	<p>This is addressed in the Design and Heritage sections of the report</p>
<p>This would be an unwelcome precedent as permitting such a significant alteration that impacts this listed estate provides succour to those who propose similar outsized development nearby.</p>	<p>Each application is treated on its planning merits and the proposals are unique to the circumstances of this site and its setting at a local level.</p>
<p>There is a negative cumulative impact when looking at the recent development nearby including the Cripplegate institute and recent planning permissions along London Wall.</p>	<p>The cumulative impacts are considered as part of the assessment of the townscape and heritage impacts. This is addressed in the Design and Heritage sections of the report.</p>
<p>The form and massing of this scheme have been generated by negatives - particularly the need to dodge protected views and this is apparent in the resulting form. Positive design generators such as responding intelligently to changing work patterns, context and climate change appear to be absent.</p>	<p>The design of the scheme is addressed in the Sustainability, Design and Heritage sections of the report.</p>
<p>The towers proposed are strange in form and wholly ill at ease with their surroundings.</p>	<p>Design matters are addressed in the Design and Heritage sections of the report</p>
<p>This is the start of the ancient Great North Road. The new proposal relegates it to just a bend in the road.</p>	<p>Design matters are addressed in the Design and Heritage sections of the report</p>
<p>Proposed development neglects rich history of the site, including its Roman, Shakespearean, Wesleyan, and Jewish cemetery influences.</p>	<p>This is addressed in the Design and Heritage sections of the report. The cultural elements and heritage interpretation provide an opportunity to celebrate historic connections and this</p>

	will be secured by condition.
Harm to nearby heritage assets	
The visual impact of proposed buildings will compromise the architectural integrity of the listed Barbican Estate and of Bastion House and the London Museum.	This is addressed in the Design and Heritage section of the report.
The proposal would be harmful to nearby heritage assets including the setting of listed buildings including the Barbican Estate, conservation area, Registered Park and Garden. the proposed scheme will cause substantial harm to the setting of designated assets including the Barbican Estate and landscape, St. Giles Cripplegate and Postman's Park including the Watt's Memorial.	This is addressed in the Design and Heritage section of the report.
The Barbican Estate and Gardens will be adversely impacted by the excessive heights of new towers obscuring or depreciating the aesthetic quality of existing views and setting. The overall impact will seriously harm the appreciation of the Barbican's significance value within the City.	This is addressed in the Design and Heritage section of the report.
Existing openness through site will be reduced and cause harm to the Barbican estate including the Registered Landscape.	This is addressed in the Design and Heritage section of the report.
Harm to historical views including; <ul style="list-style-type: none"> - Views of St Pauls - of nearby buildings including the views of the Barbican Estate from the St Paul's end of Aldersgate will be severely diminished due to the size of the proposed buildings. - The building takes away from views of St Paul's Gyratory from Aldersgate Street and the Barbican - an important route through the City - The ancient sight line down Aldersgate Street will be lost. The site is of historic importance. It stands near the beginning of one of the oldest roads in the country, linking London to the North and culminating at St Paul's. What this development would do is effectively present a huge visual block from both north and south, whereas what is needed is a transition with references both to the Barbican Estate and to the heritage of the area. 	This is addressed in the Views and Design and Heritage sections of the report.

<p>- The skyscraper would destroy the distant view of the Barbican towers.</p>	
<p>Failure to identify 140/150 as non-designated heritage assets (NDHAs) and lack of objectivity of CoLC's consultant, Ken Powell, in his submissions which advised Historic England's decision to recommend to the Secretary of State (SoS), Digital, Culture Media and Sport (DCM&S) not to list 140/150.</p>	<p>This is addressed in the Design and Heritage section of the report.</p>
<p>Object to omission of Museum of London, Bastion and Ironmongers Hall from Conservation Area.</p>	<p>These issues were considered and assessed when the designation of the Conservation Area was agreed by members in 2018.</p>
<p>Inadequacy of submitted Townscape, Visual and Built Heritage Impact Assessment (TVBHIA).</p>	<p>The TBHVIA is a comprehensive document and is proportional to the scale and impact of the development and consistent with the level of assessment required for similar planning applications. The document has been independently reviewed.</p>
<p>The exposure of the flank and rear walls of the Listed Ironmongers' Hall makes walls that were not intended to be exposed into main elevations, to the detriment of the listed building; this amounts to serious harm to the setting of the Ironmongers Hall and therefore to the Hall itself.</p>	<p>This changed setting of Ironmongers Hall is addressed in the Design and Heritage section of the report.</p>
<p>Privatisation of views to St Pauls.</p>	<p>The publicly accessible Rotunda roof terrace and cultural spaces will provide views towards the Cathedral and will be part of the public experience referred to</p>

	in the Cultural section of the report.
The scheme would also threaten the heritage aspect of the site, including Roman structures and important guild buildings.	The impacts on scheduled monuments and relevant Livery Halls are discussed in the heritage section of this report.
New highwalk ruins the view of Ironmongers Hall (and the new Aldersgate Plaza) from Aldersgate Street, including from London House.	This is addressed in the Design and Heritage section of the report.
Object to the part demolition of Ironmongers' Hall, the only livery hall to be constructed between the wars, whose authenticity and craftsmanship are stated in the listing and would be severely compromised if altered or rebuilt. The proposal would impact on the significance of the listed building and its setting, a delightful juxtaposition of quirky traditionalism within the brutalist context.	This is addressed in the Design and Heritage section of the report.
Harm resulting from overshadowing including to the Grade 1 listed St Botolph's church and the green space of Postman's park would suffer shading for most of the day, with loss of what should be a protected view of the church tower.	This is addressed in the Design and Heritage and Daylight and Sunlight sections of the report in relation to heritage assets and potential light infringements to St Botolph's. Postman's Park is not within the daylight overshadowing analysis submitted due to its location south of the scheme, the park would not be affected by overshadowing or loss of sunlight amenity.
In relation to the applications for Listed Building Consent for altering the Barbican highwalks that there is no mention of the works required to Thomas More House Service Yard – these are not 'ancillary' works but central	Listed building consent application 23/01277/LBC includes the alterations to the

to the proposed shared access during and after construction.	Thomas More service yard.
Loss of highwalks	
The highwalks which envelop both these buildings are an integral part of the design of the Barbican Estate and should be preserved. Demolition of these buildings destroys these iconic walkways and it will no longer be possible to walk around the perimeter of the Barbican at podium level. The removal of these access points means that a significant part of the original architect's original design concept is thus corrupted and destroyed.	This is addressed in the Public Realm, Highways and Design and Heritage section of the report. Areas of highwalk would be re-provided as part of the proposed scheme.
The high walks are an essential access route for residents and visitors around the Barbican Estate and towards St. Pauls and the City. The proposed demolition of the rotunda and highwalks removes an important and accessible navigation route that allows separation of pedestrians from traffic which is used and valued and enables avoidance of pollution on Aldersgate Street and London Wall. The proposed new pedestrian routes would be less safe than existing walkways which are open.	Pedestrian access is addressed in the Highways and public realm sections of the report. While parts of the proposed highwalks would be lost, the proposal would include the provision of new attractive pedestrian routes.
The Highwalks network has been eroded by successive developments.	Pedestrian access is addressed in the Highways and public realm sections of the report.
Access to the estate would become restricted and overcrowded.	Pedestrian access and comfort is addressed in the Highways and public realm sections of the report.
Requires pedestrians from the northern and western ends of the estate and the Golden Lane estate to walk with traffic to access St Pauls station and Barts Hospital. This seems suboptimal in terms of road safety.	Pedestrian access is addressed in the Highways and public realm sections of the report.
New highwalk should be scrapped as it is not required.	Pedestrian access is addressed in the Public

	Realm and Highways sections of the report.
The Barbican system of highwalks separates public spaces from roads. The new proposal lacks this separation of spaces. Pedestrian and vehicle routes compete for available space, leading to poor access for both. The need to provide pedestrian space at street level leads to restrictions in vehicular access that could be avoided.	Pedestrian access is addressed in the Public Realm and Highways sections of the report.
It is requested that consideration is given to the design to enable residents approaching the Barbican from the west (Montague Street) continue to have a direct route onto London Wall.	Pedestrian access is addressed in the Highways and public realm sections of the report.
Impact on microclimate - wind	
Proposed high buildings would cause excessively high winds.	This is addressed Wind Microclimate section of the report.
Overshadowing/enclosure to open spaces	
The existing open spaces including Barber Surgeons Gardens, Monkwell Square and part of the Barbican Garden, Postman's Park will be overshadowed by large office blocks reducing light to public spaces.	The impact of overshadowing on public spaces is addressed in the Daylight/sunlight and Overshadowing sections of the report.
With the new HSBC building at one end of St Martins Le Grand and this huge glass scheme at the other- the street will become a dark canyon where no trees can survive.	The Thermal Comfort section of the report addresses the impact of the scheme on the street level experience.
The Barbican was designed to have space, light and views around it, not to be enclosed by high buildings.	The impact of overshadowing on public spaces is addressed in the Daylight/sunlight and Overshadowing sections of the report.
This overbearing development will cause environmental impoverishment in Aldersgate Street which will be darker with more gusty wind. It creates a hostile street	The Wind microclimate section and Thermal Comfort section of the

<p>environment for pedestrians and cyclists which, again, is contrary to policy of reducing car use. Will create lightless corridors around the Aldersgate area (you can see examples of this around the new Moorgate developments, specifically on Fore Street and Fore Street Avenue), which creates an unpleasant city environment.</p>	<p>report address the impact on nearby public spaces.</p>
Amount and quality of green space and biodiversity	
<p>Amount of green space would be low and would be a further reduction. Would have preferred a greener scheme.</p>	<p>The green areas are explained within the Sustainability and Public Realm sections of the report.</p>
<p>New public spaces would be very enclosed and design of public space would not encourage visitors.</p>	<p>The design of the public realm is assessed within the Design and Heritage (Public Realm) section of the report.</p>
<p>The proposal would be ecologically damaging. It would remove habitat for wildlife and does not follow the City's commitment to biodiversity. The proposed landscaping and tree planning would be inadequate and in particular the landscaping for Barber Surgeon's Garden and the design of the footpath would undermine biodiversity.</p>	<p>This is considered in the Sustainability section of the report and conditions are recommended including an updated Biodiversity Net Gain Assessment.</p>
<p>Concern for natural environment especially for the bats that roost in the tree in the museum's Rotunda, and in the undercroft.</p>	<p>A bat survey was submitted with the application, and a pre-commencement condition is required to require further survey work.</p>
<p>The proposed open spaces would be in shadow and dark for most of the day.</p>	<p>The quality of the open spaces is addressed in the Thermal Comfort section of the report.</p>

<p>Concerns that the proposed development does not maximise landscaping and tree planting opportunities at ground level (for example 14 trees and 2 tree groups would be removed and whilst 100 new trees are proposed, the majority of these are proposed at podium level and above rather than at ground level).</p>	<p>The proposed level of greening is assessed in the Sustainability section of the report.</p>
<p>It has been shown in recent studies that planted trees and foliage at regular high-level storeys of high rise buildings do not sustain any long term benefits. Maintenance becomes highly expensive and repair is often not fully considered.</p>	<p>There are opportunities for increased biodiversity value for green roofs and spaces as discussed in the Sustainability section of the report and conditions are recommended to require further details of green roofs and landscaping, along with maintenance.</p>
<p>No consideration has been given to the way the ornamental landscape between the two towers might be more meaningfully linked to the larger linear landscape running between the Barbican and London Wall.</p>	<p>The landscape design is addressed in the Design and Heritage section of the report</p>
<p>Concerns that the Barbican and St Alphage's Gardens Sites of Importance for Nature Conservation within the site will become damaged or degraded during demolition and construction works.</p>	<p>The Demolition and Construction Management Plan (D&CEMP) is to be secured by condition which will include measures to protect breeding birds, bats, and local wildlife sites (SINCs).</p>
<p>With the massing of the proposals, and the area having no sunlight for most of the year, it unlikely that any plant species will thrive.</p>	<p>The Thermal Comfort section of the report considers the thermal comfort of the proposed open spaces which merges the effects of wind, air temperature,</p>

	<p>humidity and solar radiation data at a seasonal level to gain a holistic understanding of microclimate. The findings of these do not suggest that plant species will not thrive.</p>
<p>Failure to obtain up to date species monitoring information (the Ecological Assessment is flawed with a failure to obtain up to date species monitoring information from GiGL. Barbican Wildlife Group and others in the City are submitting weekly species monitoring reports to GiGL yet BH have latest species sighting dating from 2020).</p>	<p>The level of information provided is satisfactory and Greengage, the third-party reviewer has confirmed that it would not normally be expected to obtain more up to date information from GiGL (Greenspace Information for Greater London CIC).</p>
<p>Requested that there is a mechanism to secure a minimum of 10% biodiversity net gain. Request conditions relating to-</p> <ul style="list-style-type: none"> • Arboricultural Method Statement; • Long term management and maintenance of landscaping and biodiversity; 	<p>Conditions are recommended to require an updated biodiversity net gain assessment, landscaping maintenance and Arboricultural Method Statement.</p>
<p>The proposed green facades do not replace loss of green space.</p>	<p>The proposed development includes green roof areas and green spaces and this is addressed in the Sustainability section of the report.</p>

<p>The design of the open spaces appear to present several opportunities for criminal activity to take place unhindered by being visible.</p>	<p>The detailed design of the open spaces would be subject to conditions to include further information to ensure safety in design.</p>
<p>Residential Amenity - Increased sense of enclosure, loss of outlook and loss of light to Barbican estate and other residential buildings</p>	
<p>Height and massing of the proposed buildings would cause unacceptable loss of daylight and sunlight to neighbouring properties, including loss of winter sunlight.</p>	<p>This is addressed in the Daylight/sunlight and Overshadowing sections of the report.</p>
<p>Detailed points raised in relation to daylight/sunlight assessment and the impact upon Monkwell Square in particular.</p>	<p>This is addressed in the Daylight/sunlight and Overshadowing sections of the report.</p>
<p>Residents would feel hemmed in due to tall buildings in very close proximity with loss of openness, visible sky and external views.</p>	<p>The sense of enclosure experienced by nearby residents is addressed in addressed in the Daylight/sunlight and Overshadowing sections of the report.</p>
<p>Overshadowing of residential blocks will create additional energy costs as winter solar gain is key element of estate's heating plan.</p>	<p>The degree of overshadowing is addressed in the Daylight/sunlight and Overshadowing sections of the report.</p>
<p>Residential Amenity - Loss of privacy to residents</p>	
<p>Residents of Mountjoy House will lose privacy. The nearest building will be only 20 metres from Mountjoy House.</p>	<p>This is addressed in the Residential amenity section of the report.</p>
<p>The first (and higher) floors of the North Building will form a permanently occupied viewing area into the living rooms and bedrooms of the 1st-4th floor flats in London House. This overlooking will result in a significant decrease in the privacy.</p>	<p>This is addressed in the residential amenity section of the report.</p>

Proposal will result in overlooking from viewing terraces.	This is addressed in the residential section of the report.
Due to loss of privacy, the proposed changes would significantly decrease quality of life of residence and especially young children living in the Barbican and area nearby.	This is addressed in the residential amenity section of the report.
The proposed new building over the Rotunda will overlook all residential properties especially in Thomas More House.	This is addressed in the residential amenity section of the report.
Bearing in mind the recent decision of the Supreme Court finding against the construction by the Tate Modern of a viewing gallery which allowed unobstructed views into adjacent flats, the corporation should not be allowed to build public spaces which would similarly allow visitors in particular to the proposed cafe on the 11th floor, an unobstructed view into residential spaces from restaurant. Could restaurant face south instead?	This is addressed in the residential amenity section of the report.
City of London Girls' school	
Loss of light and overlooking to the school including the playing fields.	This is addressed in the sections on amenity and Daylight/Sunlight.
Additional solar glare	
To residents and to drivers.	This is addressed in the Solar Glare section of the report and by Unilateral Undertaking.
Light spill/Light pollution	
Offices tend to leave lights, regardless of whether anyone is working there at the time so this is not only causing pollution but an unnecessary waste of resources.	This is addressed in the Light Spill section of the report and condition to require full lighting strategy.
All of the flats in London House fronting Aldersgate Street, bedrooms and living rooms, will be affected by night-time light pollution from the offices on the north-western side of the Rotunda Building.	This is addressed in the Light Spill section of the report and Undertaking/condition

	to require full lighting strategy.
Increased noise and disturbance from development once built	
The detrimental noise and impact of all the activity/use of the new buildings and thoroughfares has not been duly considered.	This is addressed in the Noise section of the report and conditions.
Object to an "outdoor" concert venue because there has been no prior consultation or impact investigation of the likely effect of this on Barbican residents.	This is addressed in the Noise section of the report and Conditions are recommended to control noise from the proposed restaurant/cultural uses including prohibition of music and controlling hours of use.
The proposed new 160 seat restaurant not needed, wanted or warranted.	This is addressed in the Land Use section of the report. The proposed retail/food & beverage floorspace is acceptable, as the mix of uses would provide a complementary use to the offices within the proposed buildings on site as well as provision for other workers, visitors and residents of the City.
Object to late night noise from entertainment.	This is addressed in the Noise section of the report and Conditions are recommended to control noise from the proposed restaurant/cultural uses including prohibition of music and controlling hours of use.

<p>No information is provided about the use and potential restrictions on the cultural uses and amenity areas to limit noise and disturbance.</p>	<p>This is addressed in the Noise section of the report and Conditions are recommended to control noise from the proposed cultural uses including controlling hours of use.</p>
<p>The proposed roof garden on the North Building is a potential source of noise and disturbance, inside and outside working hours, to all of the flats in London House fronting Aldersgate Street.</p>	<p>This is addressed in the Noise section of the report and Conditions are recommended to control noise from roof terraces including prohibition of music and controlling hours of use.</p>
<p>The highly visible and easily accessible new highwalk is a potential site of noise and disturbance from antisocial behaviour to all of the flats in London House fronting Aldersgate Street. This would be potentially far worse than any noise and disturbance from the sparsely-used and largely concealed Museum of London highwalk that runs along the east side of Aldersgate Street at this location. This would need to be policed and controlled by the same measures that should be put in place to prevent antisocial behaviour in Aldersgate Plaza and all of the other new open spaces in the development.</p>	<p>This is addressed in the Noise and Overlooking sections of the report.</p>
<p>Noise from plant has potential to cause nuisance.</p>	<p>This is addressed in the Noise section of the report and Conditions are recommended to control noise from plant.</p>
<p>Request conditions relating to –</p> <ul style="list-style-type: none"> • Events Noise Management Plan for all external events; • Measures to prevent anti-social behaviour at night in the public realm; • Restriction of event activities undertaken in external places; 	<p>This is addressed in the Noise section of the report and Conditions are recommended to ensure that the living conditions of the occupiers of nearby properties are safeguarded.</p>

<p>A noise assessment should be carried out to take into account the potential loss of enjoyment of the sound of St Paul's bells from the flats and leisure spaces including the tennis courts.</p>	<p>This would not be a material planning consideration.</p>
<p>Reduced air quality, noise and disruption during construction</p>	
<p>Length of time of construction and phasing of demolition would result in more disruption.</p>	<p>This is addressed in the Highways section of the report and conditions are recommended to limit disruption.</p>
<p>A continual cycle of demolition undermines the very attractiveness of offices in the City. it also increases the risks of the plan falling through as the extended timetable carries high levels of inherent financial and operational risks for non completion.</p>	<p>The reasons for demolition are examined in the Sustainability section of the report.</p>
<p>Level of noise will mean flats uninhabitable during day, particularly Mountjoy house given single glazing, windows not be able to open, harm to school playing grounds. There is a significant risk that the levels of noise could exceed the Unacceptable Adverse Effect Level (UEAEL)– which national policy in the Noise Policy Statement for England (NPSE) and the Noise PPG state should be avoided to prevent significant medically definable harm.</p>	<p>This is considered in the Noise section of the report and addressed by conditions.</p>
<p>Cumulative impact as with other developments, the noise and disturbance from existing developments has already had an adverse effect.</p>	<p>This is recognised. This is addressed in the Noise and Highways section of the report and conditions are recommended to limit disruption.</p>
<p>Construction noise and disturbance will have a disproportionate impact upon the ill, elderly and housebound resulting in mental and physical harm.</p>	<p>This is addressed in the Health Impact section of the report and the Equality Act section.</p>
<p>Reduced air quality and increased dust. The dust arising from demolition constitutes impairment of air quality and presents a health hazard for those living and working.</p>	<p>This is addressed in the Air Quality section of the report and by condition.</p>

<p>Harmful to resident's health including children during construction and to health of girls using sports area next to building site.</p>	<p>This is addressed in the Health Impact section of the report.</p>
<p>Safety and security concerns.</p>	<p>This is addressed in the Security section of the report and conditions are recommended.</p>
<p>Closure of Barber Surgeons Garden for length of construction. The demolition and construction activities threaten the local wildlife habitats and the limited green spaces in our urban environment, which are crucial for biodiversity and resident well-being.</p>	<p>Conditions are recommended to limit disruption so far as possible as set out in the Ecology section of the report.</p>
<p>Construction traffic will cause disruption to busy road routes, served by local buses that community relies upon and will inconvenience all in the immediate neighbourhood.</p>	<p>This is addressed in the Highways section of the report and conditions are recommended to limit disruption.</p>
<p>Impact of closure of London Wall, pavement closures, closing bus stops restricting pedestrian access especially for elderly.</p>	<p>This is addressed in detail in the Accessibility and Highways section of the report and conditions recommended.</p>
<p>The proposed use of the Thomas More Service Yard accessed via Aldersgate for construction traffic only during construction work is unworkable. To require car owning residents from Thomas More and Mountjoy and other Barbican residents, along with service vehicles, to gain alternative access to the car park by using the back exit/entrance located 90 metres further north along Aldersgate Street is unfeasible. The roller shutter is too low for most service vehicles. There is a hairpin bend which is too tight for most cars to negotiate, which means a long detour round Seddon Car Park before exiting via a one-way tunnel, the only throughway from one car park area to another. The underground route has little ventilation and the greatly increased traffic will make this an even more polluted area. <i>(see also general comments on use of car park below)</i></p>	<p>This is addressed in detail in the Highways section of the report and conditions recommended.</p>

<p>Those with mobility impairments currently rely on being able to get taxis and transport from the bottom of the car park accessed via the ramp and would not be able to walk to the street for taxis.</p>	<p>This is addressed in in the Accessibility and Highways section of the report and conditions recommended.</p>
<p>Concern for safety of pedestrians using Thomas More car park and ramp and conflict with construction vehicles. Concern for health and safety of: residents and their visitors who access the Barbican Estate on foot and bike via the ramp on a daily basis; pupils at the adjoining City of London School for Girls who, because of their young age, may have a less developed appreciation of risk; and members of the public walking along Aldersgate Street who will be at risk from increased traffic flow in and out of a dark, sloped, concealed entrance.</p>	<p>This is addressed in the Highways section of the report and conditions recommended.</p>
<p>All construction traffic shown as entering the ramp from the southbound carriageway of Aldersgate Street. If any of that traffic plans to enter from the northbound carriageway, large lorries trying to turn right across the southbound carriageway are likely to have a severe and adverse impact on traffic flows on both carriageways leading to even more noise and particulate pollution to local resident.</p>	<p>This is addressed in the Highways section of the report and conditions recommended.</p>
<p>Loss of access to Wood Street.</p>	<p>This is addressed in the Highways section of the report and conditions recommended.</p>
<p>Request conditions regarding-</p> <ul style="list-style-type: none"> • Stakeholder Communications Plan; • Air Quality and Dust Management Plan, including air quality monitoring; • Construction Logistics Plan; • Demolition and Construction Environmental Management Plan; • Noise and vibration monitoring during demolition and construction works; • Landscape/tree barriers incorporated into the detailed design to protect people from air pollution (as identified in the Air Quality Positive Statement) 	<p>This is addressed in detail in the Air quality, Noise and Highways section of the report and conditions recommended.</p>

Demolition and sustainability, the existing buildings should be retained	
Object to demolition rather than refurbishment on environmental grounds. Demolition is unnecessary, out of step with modern thinking and reuse of the existing buildings would be a more environmentally sustainable way forward. There doesn't appear to have been any serious attempt to consider the possibility of retaining and/or retrofitting Bastion House and the former Museum of London building.	This is addressed in the Sustainability section of the report.
Retention and re-use of the existing buildings should be the primary consideration, not demolition and rebuilding, especially as new office buildings appear to be intended to have a short life. The new proposal buildings are designed for a maximum lifetime of 25 years and this is not sustainable.	This is addressed in the Sustainability section of the report.
The buildings and surrounding areas to be demolished contain a very high level of embodied carbon and large amount of carbon would be released. The currently preferred option is in fact the highest whole life carbon option of all those considered.	This is addressed in the Sustainability section of the report.
Proposed demolition would be contrary to City of London Corporations' aim of achieving net zero in its own operations by 2027 and its commitment to achieve net zero for the Square Mile by 2040. It would be contrary to the Climate Action strategy.	This is addressed in the Sustainability section of the report.
The City Corporation flaunts its zero-carbon policy while at the same time proposing a scheme involving demolition and new build at London Wall West.	This is addressed in the Sustainability section of the report.
Plans for demolition are partly based on the assertion that Bastion House is structurally unstable, however this has been proved incorrect. The buildings are safe (contrary to the applicant's discredited Buro Happold report) and can be retained and altered. Reviews by Simon Sturgis, Targeting Zero and Bob Stagg, Conisbee Structural Engineering of the Whole Life Carbon Assessment (WLCA) conclude that "their reports show that WLCA is flawed and misleading. It is built on the assumption that	This is addressed in the Sustainability section of the report.

<p>Bastion House is at risk of disproportionate collapse. The review by Consibee Structural Engineers contradicts this. It is not reasonable that the retained engineer failed to address any issues arising out of the Ronan Point collapse. There were significant structural changes to the design of Bastion House between the November 1968 “second scheme” and the final approved drawings of 1971/72. In particular, there was a significant change in the number of columns supporting Bastion House – from five either side to two – between Powell and Moya’s November 1968 “Second Scheme” Report and the physical building, the plans for which were approved in 1969, with construction beginning in 1972. This is surely credible evidence of a full engineering re-assessment of the building’s structural strength. That is supported by the contribution of Charles Weiss in Appendix D to the November Report – LMA file reference GLC/DG/AR/07/013.</p>	
<p>The actual carbon assessment falls short as it does not consider the retention and retrofit of Bastion House and ignores the impact of its demolition on the scheme’s carbon footprint.</p>	<p>This is addressed in the Sustainability section of the report.</p>
<p>Time given to put together proposals to retain and retrofit existing buildings was inadequate which meant that the alternative options for the site were pursued in an absurdly small time-frame, before the decision above was taken. Why is there no serious consideration of alternatives? The soft market test results which gave only 31 days to come forward with an alternative scheme based on retention and retrofitting demonstrated that there is an appetite and a will to halt the "demolition first" reflex of the City and seriously consider the environmental impact of such a reckless and unjustifiable approach. The soft market test in the context of a nearly three-year project was only agreed to by the City as a result of being put under pressure by the Barbican Quarter Action campaign, which of itself raises questions about pre-determined outcomes sought by interested parties at the Guildhall. Why has the soft market testing on the retrofitting been dismissed?</p>	<p>This is a question for the City as landowner. Details of the soft marketing exercise have not been submitted as part of this application.</p>

<p>Submitted Carbon Optioneering Study includes nine optional interventions. However, only two options considered further – partial demolition and redevelopment and full redevelopment.</p> <p>Why were other options including option 2 ruled out at the outset? This is the most environmentally sustainable option.</p>	<p>This is addressed in the Sustainability section of the report.</p>
<p>Buro Happold has failed to use its Option 2 - major refurbishment with a continuing office use for Bastion House and a mixed use for the Museum building, which I understand was the choice of the responders to the soft marketing exercise - for comparison in its latest WLCA. Implication that planning officers have been complicit in determining what options were included in the Optioneering Study. The decarbonisation of Citigen would also benefit Option 2.</p>	<p>This is addressed in the Sustainability section of the report.</p>
<p>Bastion House floor heights with slab to slab height of 3.10 metres suggests there is scope for either increasing the floor to ceiling height with a new ceiling or simply removing the existing one and so exposing the bottom of the slab and services.</p>	<p>The applicant's structural report stated that for risk/insurance reasons intumescent paint or fire boarding of the structure to comply with fire safety regulations would further reduce floor-to-ceiling heights. This is addressed in the Sustainability section of the report</p>
<p>The Arcadis independent Review of the Carbon Optioneering Report identified 11 key issues. Six of these received the comment "Report would benefit from clarification". Arcadis also express doubts about the way the carbon estimates were calculated.</p>	<p>This is addressed in the Sustainability section of the report.</p>
<p>The application being considered does not comply with the City of London Corporation's own Responsible Investment Policy and millions were spent on museum building not so long ago</p>	<p>This is a matter for the Corporation as landowner and applicant.</p>

<p>Information shared to date re CO2 emissions is inaccurate and ignores the short life span of a new build development.</p>	<p>This is addressed in the Sustainability section of the report.</p>
<p>The whole life carbon study does not seem credible. The proposal to demolish demonstrates very little reality on circular economy and reuse, and the report has minimal information on retention/adaptation/reuse/extension of the existing buildings. The submission does contain studies showing the low carbon footprint of the proposed buildings, but misleadingly does not compare this adequately or realistically with alternative options combining retention of existing buildings. The objection here is clear, the evidence provided suggests misleading representation that this tabula rasa & 'maximised' development is good for the environment. It is not. It is not in keeping with policy.</p>	<p>This is addressed in the Sustainability section of the report.</p>
<p>Regarding the calculation of embodied carbon emissions, only the area of a building is taken into account but its volume must be relevant in order to ensure the embodied carbon in walls and other vertical structures is taken into account.</p>	<p>The Gross internal Area (GIA in m² is a measurement commonly used for benchmarking the carbon intensity of each option but takes into account the total floor area of each design option which includes stairwells, corridors, and internal partitions. It also considers multiple floors so it incorporates a lot more than just area. In addition, the design options for both refurbishment and new build includes volumetric elements such as walls.</p>

<p>Proposed materials not sustainable. The preferred option includes figures that use 50% cement replacement by a hard to source material derived from coal fired power stations which is not environmentally friendly. Proposed cladding not sustainable.</p>	<p>This is addressed in the Sustainability section of the report.</p>
<p>Commitment to reuse of materials not clear and although the developers claim that a considerable amount of material will be available for use elsewhere, this will depend on its being moved to a so far unidentified site that requires these pre-used materials and in reality almost all will be scrapped.</p>	<p>This is addressed in the Sustainability section of the report.</p>
<p>Materials</p>	
<p>Proposed cladding is not necessarily safe.</p>	<p>Details of all materials including cladding would be required by condition and the safety of the proposed material would be addressed under the Building Regulations.</p>
<p>Increased traffic, footfall, traffic congestion and impact on highway safety due to traffic rerouting and removal of roundabout</p>	
<p>At highway level, concerned at the proposal to remove the Rotunda roundabout and introducing two-way traffic at the junction of London Wall and Aldersgate Street. The roads here are already very congested and cannot believe this has been properly thought through. It could result in further congestion, what would que times be.</p>	<p>The removal of the rotunda roundabout and introduction of two way traffic has been the subject of traffic modelling and discussions with TfL as explained in the Highways section.</p>
<p>The proposed new road layout ignores the needs of traffic existing this car park to travel north up Aldersgate Street and towards Goswell Road. Right turns from this ramp are illegal, so traffic currently uses the Museum rotunda roundabout to head north. In the new traffic scheme there is no roundabout. Northbound traffic will have to make some kind of larger circuit of the City in order to head</p>	<p>This is addressed in detail in the Highways section of the report and conditions recommended.</p>

<p>north, or make an illegal and dangerous turn. The scheme needs to resolve this issue so that traffic can head north from the service road.</p>	
<p>Already the junction of Aldersgate St/Fann street is overburdened by traffic trying to turn around on Aldersgate street, mostly by turning into the private access ramp to the Bryer Court basement car park.. The re-arrangement of the roundabout beneath the current Museum will cause significantly greater traffic flows along Aldersgate Street/ Goswell Road as far as Old street. There appears to be no modelling of this aspect of the impact of the scheme.</p>	<p>This is addressed in detail in the Highways section of the report and conditions recommended.</p>
<p>Existing public transport and road networks stretched to limits, introducing additional developments without addressing infrastructure challenges exacerbates the problem. The size of the planned development also indicates a need for significantly increased policing, cleaning, traffic management, perhaps access roads, general keeping the public space clean and in order. Has this aspect been given due consideration?</p>	<p>The application has included data on additional trip generation to consider the impact upon public transport and road as explained in the Highways section of the report. A management plan for the public areas which would include cleaning, management etc is recommended to be required by condition.</p>
<p>The planned scheme also plans to include car parking - not needed in a central London location where cars should be actively discouraged. Plans should promote walking, public transport and non-motorised wheeled transport (1)</p>	<p>This is addressed in detail in the Highways section of the report and conditions recommended.</p>
<p>Concern about cycle routes through the development, in particular how they will cycle towards the East of the development. Likely that cyclists will choose to cycle through Monkwell Square and the Barber Surgeon Hall Gardens. The possibility of this needs to be prevented by Planning restrictions and conditions.</p>	<p>This is addressed in detail in the Highways section of the report.</p>

<p>Proposal will worsen safety for cyclists and pedestrians and in particular pedestrian access will be more dangerous as the crossing will be on a blind bend.</p>	<p>This is addressed in detail in the Highways section of the report.</p>
<p>Predicted increase in poor air quality due to additional traffic lights and two way traffic.</p>	<p>This is addressed in the air quality section of the report.</p>
<p>The traffic modelling that supports this application is out of date and does not properly include the areas that will be impacted by the development. Particularly concerning is that the modelling is based on the TfL LMAP approved Future Base LinSig model for Region 11. Region 11's most northerly point does not include the entrance to ramp into the Thomas More car park, which we now have been informed will handle two way traffic into and out of the proposed development. Most worrying is the MMQ length (Mean Maximum Queue Length) for southbound Aldersgate traffic at the AM peak. This is estimated to increase from 5.1 to 22.8 PCUs (Passenger Car Units) A PCU in queue is about 10 metres giving a MMQ of 228 metres. This means the traffic will be backed up from the roundabout to Beech Street. The report is silent on the standard deviation of this MMQ length. If it follows normal traffic distribution patterns it means that traffic in the AM peak will often be backed up as far as Fann Street.</p>	<p>This is addressed in detail in the Highways section of the report and conditions recommended.</p>
<p>The traffic document does not appear to address how this traffic will flow when the barrier on Moor Lane is down as circumnavigation of the rotunda will no longer be possible. This problem could be easily resolved by removing the right-turn prohibition for westbound traffic on London Wall at the Wood Street junction. The resultant traffic flow would be low as only vehicles seeking to access Fore Street would take that route.</p>	
<p>Inadequate access and servicing arrangements-ramp to Thomas More car park</p>	
<p>Thomas More Car Park's existing ramp is the sole point of access to five residential blocks, for daily deliveries and services, in particular emergency vehicles, as well as taxis, and cyclists. The proposal would result in significant congestion in Barbican service yard and</p>	<p>This is addressed in detail in the Highways section of the report</p>

<p>access to this area will be very much restricted so deliveries and basic services will be heavily impacted.</p>	
<p>More car park ramp and will result in an increase of noise and air pollution for local residents and school. In particular, large vehicles will be idling and polluting the air adjacent to the girl's playing fields. Question if this would be proposed if it were boy's playing fields.</p>	<p>This is addressed in the Noise, Air Quality and Highways section of the report, and by Conditions.</p>
<p>The car park ramp is a key access route for Barbican residents of all ages and would increase the safety risk for children, elderly and disabled persons due to the material increase in traffic. Many residents are partially-sighted, fragile, elderly, having cancer treatment, can only walk with assistance. It's irresponsible to propose they share a car park area where they go to pick up their packages and wait for dial-a-taxi disabled rides with construction vehicles and would result in harm to those with disability issues.</p>	<p>This is addressed in detail in the Highways, Accessibility, Health Impact and Equalities Act sections of the report</p>
<p>The large increase in traffic and complicated traffic light system proposed is going to cause big delays and inconvenience to all existing residents and will unquestionably pose a greater risk to safety.</p>	<p>This is addressed in detail in the Highways section of the report</p>
<p>There will be vehicles queuing in Aldersgate to gain access.</p>	<p>This is addressed in detail in the Highways section of the report</p>
<p>There is no explanation provided as to why the existing one-way system and exit ramp on London Wall will be removed and why these new developments cannot be served by a separate access route in and out.</p>	<p>This is addressed in detail in the Highways section of the report</p>
<p>The proposal is antithetical to the plan to turn the nearby Beech Street Tunnel into a zero-emission street.</p>	<p>This is addressed in the Air Quality section of the report.</p>
<p>The large volume of traffic using the only access route in and out for the three new buildings and the Ironmongers' Hall will prevent and delay access to the car park by emergency vehicles.</p>	<p>This is addressed in detail in the Highways section of the report</p>

<p>The Thomas More Car Park and ramp will be the only access point in and out of the development for all traffic which will affect how emergency vehicles would ever be able to gain access.</p>	<p>This is addressed in detail in the Highways section of the report</p>
<p>Existing users of the Thomas More House Car Park ramp will be severely troubled by this proposal because there is a strong likelihood of chaos and congestion at busy times of day. The use of the slope by pedestrians, children, and cyclists will become very unpleasant and dangerous. It will impact particularly on the old and incapacitated.</p>	<p>This is addressed in detail in the Highways section of the report</p>
<p>The use of the TMH car park to house their rubbish is unacceptable.</p>	<p>This is addressed in the Noise</p>
<p>The Delivery and Servicing Plan states that there will be a “let in, let out” arrangement for delivery vehicles at the Aldersgate Street service ramp, during both construction and operation. Surely this doesn’t work? All of these commercial vehicles turning left onto Aldersgate Street will be routed into a complex new junction with exits only onto London Wall or towards St Paul’s; there will no longer be a convenient roundabout at the Rotunda around which vehicles can turn to travel north, out of the City. Surely it will be better to reconfigure Aldersgate Street kerbs etc to facilitate turning right out of the service ramp exit?</p>	<p>This is addressed in detail in the Highways section of the report</p>
<p>Residents using the Thomas More car park will lose access to the four electric car charging points because the City intends to take the space for access to the new site both during the construction phase and thereafter.</p>	<p>This is addressed by Condition</p>
<p>The design of the planned vehicle and service access to the three proposed buildings. Existing users of the Thomas More House Car Park ramp will be severely troubled by this proposal because there is a strong likelihood of chaos and congestion at busy times of day. It will impact particularly on the old and incapacitated. This objection alone has the potential to form the basis of a legal challenge by Barbican Estate leaseholders with</p>	<p>This is addressed in detail in the Highways section of the report</p>

regard to their contractual right to full and unfettered vehicle access to their relevant car parks.	
Impact of retention of Ferroners' House	
The design of the proposals assume that Ferroners' House will be demolished. However, the freeholder of Ferroners' House, the Ironmongers' Company, have submitted an objection to the scheme stating "the scheme will be unable to proceed if the City Surveyor is unable to agree terms with the company over a potential acquisition of the freehold of Ferroners' House..." This throws uncertainty into the proposals for the LWW site as it would not be possible to provide the proposed stairs and lift which form the pedestrian link from the lower to upper level of this site without Ferroners' House.	Matters of land ownership are not material planning considerations. If the applicant is unable to deliver the proposals as they stand because of land ownership matters, any revised proposal would require planning permission in its own right.
Public benefits insufficient	
An event space on the top would be inaccessible and irrelevant and a roof top terrace at this location is not a unique public benefit that offsets the substantial heritage and environmental harm that these proposals will cause(2)	This is addressed in the planning balance section of the report.
There is limited provision for public toilets.	The provision of public toilets is addressed in the Public Realm section of the report.
Request that a detailed Social Value Strategy is required, with further engagement with the local community to maximise opportunities for neighbouring residents.	Further engagement with the local community is encouraged and required by condition.

General comments

Comment	Officer Response
Query why a rendered image (not a weak outline) isn't included of the development's	This is a verified wire line view, and this is supported by the verified rendered views 16,17, 18 in the

<p>effect on the view from Barbican Station bridge in TVBHIA Part 40.</p>	<p>TBHVIA. Collectively these demonstrate the visual impacts of the development in the round in the kinetic approaches from the north towards the site along Goswell Road and Aldersgate Street.</p>
<p>The submitted Buro Happold's Social Value Strategy Report appears to lack objectivity and, in parts, especially regarding pre-application consultation, is misleading. The role of the Strategy also appears to be misleading and the list of stakeholders requires editing, particularly regarding exclusions and misdescriptions.</p>	<p>This is a qualitative document that is informed by other documents forming part of the submission. The list of stakeholders that were engaged in consultation is listed in full in the Statement of Community Involvement.</p>
<p>Material delay to the need to improve the condition of the Barber Surgeon's gardens and deliver biodiversity net gain in removal of the surplus path, and a substantive proposal to improve the biodiversity on the eastern boundary, e.g. through improved hedgerow along the east boundary to the new entrance next to the Barber Surgeons Hall.</p>	<p>The landscaping proposals for Barber Surgeons' Gardens will be subject to further details through condition</p>
<p>Safety risks on London Wall and in the Barber Surgeon Hall Garden (see Appendix 5). Concerned that the proposed removal of the rotunda will harm residential amenity given that it will be much more difficult for tradespeople, couriers and residents to access Monkwell Square and Wood Street North from the east of London, which is the main origin of traffic. There is a complete ambiguity about what alternative routes will remain feasible because the relevant documents are meaningless given that the maps have been presented in "mirror image".</p>	<p>Pedestrian routes are addressed in the Public Realm section of the report.</p>

Support

15 letters of support have been received as of midday 8th April 2024.

It is noted that all material planning consideration raised in the representations above are being dealt with in this report.

Comment
<p>From Chair of Museum of London-</p> <p>Scheme is imaginative solution to what we in the Museum know to be a site filled with inherent difficulties with building that are not sufficiently charismatic to warrant the levels of investment that would be required to bring them up to standard. Know buildings are not fit for purpose and that for certain parts real problems of having one building sitting on top and of going through another.</p> <p>Scheme would have transformative effect on London Wall, a part of the city that is soulless and anti-people.</p>
<p>As Principal of the Guildhall School of Music and Drama, support plans. Transform site that it currently blighted by the current condition of the former Museum of London building and an outdated office building. Great confidence in DSR having worked with them on the original centre of music proposal. Design proposal provide a much needed link to the Barbican arts centre and Guildhall school and appear to create realistic mix of commercial and cultural facilities. School have been consulted on the emerging plans and are particularly interested in the cultural offer and in particular the potential of including practice and teaching space to underpin our expanding educational portfolio. The Guildhall school would very much welcome the opportunity to occupy in some form the cultural space offered.</p>
<p>Current building dated and unwelcome representing barrier. Rotunda and surrounds are a hangover from very worst of car centric mid-century planning with dead zone and hostile to pedestrians (3)</p>
<p>Current Bastion House is a useless blight that detracts from otherwise well thought out design (3)</p>
<p>Proposal appears sensitive to design of Barbican (1)</p>
<p>Proposal appears to provide impressive amenity (1)</p>
<p>Much needed transformation. Proposals have ability to regenerate ugly and underused corner and deliver public realm benefits and much needed economic activity on Aldersgate Street (3)</p>
<p>Developer has listened to residents' concerns and maintained and improved highwalk access to the Barbican (1)</p>

Welcome investment. As resident of Barbican fully support this scheme and comment that the Barbican Association is anti-development NIMBYism that does not represent views of majority of residents and is perfect example of unreasonable objections that result in the City struggling to attract investment (1)
Robust conditions and section 106 obligations necessary to secure the public benefits (1)
Buildings would be costly to modernise and could never provide high quality facilities which city deserves. Noise and nuisance from any refurbishment works would far exceed the disturbance from total demolition and rebuilding (1)
Although I love the brutalist Barbican, as a local resident and worker, I absolutely loathe the museum of London building and Rotunda roundabout. In particular the part under the covered section adjoining the museum. It is awful to walk and cycle past. Demolishing Bastion House would not be a loss to the Barbican as a whole (1)
As a local resident I might be one of the rare people in support of the proposal. Despite the inconvenience of the building works the existing London Well West is an eye sore and in desperate need of an upgrade. The proposals look great, I like the amount of green space/biodiversity being proposed, it would make the Barbican more welcoming and give better views of St. Paul's Cathedral. I just hope it doesn't take as long to build as the development at Moorgate Station (over 10 years) (1)

Policy Context

74. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

75. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which will be published for Regulation 19 consultation in the Spring of 2024. It is anticipated that the City Plan will be submitted to the Secretary of State in Summer 2024. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

76. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of very limited weight and will not be referred to in this report.
77. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
78. The National Planning Policy Framework (NPPF) states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”. Other relevant sections of the NPPF are set out in the following paragraphs.
79. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
80. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
- a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
81. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

82. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
83. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
84. Paragraph 91 of the NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
85. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
86. Paragraph 97 states that planning decisions should provide the social, recreational and cultural facilities and services the community needs.
87. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”.
88. Paragraph 116 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
89. Paragraph 117 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.
90. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that “The creation of high quality, beautiful and sustainable

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

91. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
92. Paragraph 136 of the NPPF states that ‘Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...’
93. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
94. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 157 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
95. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

96. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
97. Paragraph 203 of the NPPF advises, "In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness."
98. Paragraph 205 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
99. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
100. Paragraph 208 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

101. Paragraph 209 of the NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

102. Paragraph 212 of the NPPF states “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

Statutory Duties

103. The Corporation, in determining the planning application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
- To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

104. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

105. In considering whether to grant planning permission for development within a conservation area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area (S.72(1) Planning (Listed Buildings and Conservation Areas) Act 1990. When considering the impact of proposed development on a conservation area it is the entirety of the proposal which is in issue.

106. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Supplementary Documents

107. The Barbican and Golden Lane Conservation Area Appraisal (2022) is pertinent and articulates: the special character and appearance of the conservation area and identifies; the boundary and fringe setting; the character of the sub area to the south; and indicative views which capture the spatial complexity of the Estate. The Barbican Listed Building Management Guidelines (Vol II) 2012 sets out the special interest of the residential listed buildings provides detailed guidance regarding alterations and physical management of the residential elements of the Barbican Estate. The Barbican Listed Building Management Guidelines Landscape (Vol IV) 2012 sets out: the history and special interest of the estate landscape; includes good practice guidelines; and identifies significant vistas.

Considerations in this case

108. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, the documentation accompanying the application, consultation responses, letters of representation and the statutory and policy framework.

109. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.

110. The principal issues in considering this application are:

- The economic benefits of the proposal.
- The appropriateness of the proposed uses, including the new cultural offer.
- The appropriateness of tall buildings on site.
- The appropriateness of the architecture and urban design and the new public realm.
- The impact on strategic views in the London Views Management Framework and on other strategic local views.
- The impacts of the proposal on the setting and significance of heritage assets
- The potential impacts of the development on buried archaeology and the Pre-Expulsion Jewish Cemetery.
- The acceptability of the proposal in accessibility terms.

- Whether the proposed highway and transportation arrangements are acceptable.
- Acceptability of the scheme in terms of its environmental effects – solar glare, daylight and sunlight, thermal comfort, noise and vibration, air quality, contaminated land.
- The outcome of the Health Impact Assessment.
- Impact of the scheme on residential amenity.
- Acceptability of the sustainability credentials of the scheme including appropriateness of the demolition of the existing buildings on the site.
- Acceptability of the proposed security, suicide prevention and fire safety arrangements.
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan, including the paragraph 208 balancing exercise.
- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and the Human Rights Act.
- The requirement for financial contributions and other planning obligations.

Economic Issues and the Principle of Development

111. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
112. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.
113. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.

114. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
115. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
116. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041.
117. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
118. London Plan Policy GG2 sets out the mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well-connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth,

renewal, and place-making, strengthening London's distinct and varied character.

119. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.
120. The London Plan projects future employment growth across London, projecting an increase in City employment of 176,000 between 2016 and 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
121. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
122. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
123. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries

and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.

124. The draft City Plan (2040) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1,200,000sqm during the period 2021-2040. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

125. The application site is located within the 'North of the City' policy area in relation to Strategic Policy CS5 of the adopted Local Plan 2015, and within the Smithfield and Barbican Key Area of Change in the draft City Plan 2040 versions, covered by Strategic Policy S23.

126. The Smithfield and Barbican Key Area of Change is intended to be a general strategic area where mixed-use development, including those which are culture-led, are encouraged on appropriate major sites. The London Wall West site is one such site. The site is also within the Barbican and Golden Lane Neighbourhood Area and Neighbourhood Forum, which were designated by the City Corporation on 18 July 2023.

127. The Strategic Objective in relation to supporting a thriving economy within the emerging City Plan 2040 states that to support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.

128. Paragraph 15.8.3 of the emerging City Plan (2040) identifies the Smithfield and Barbican Key area as a key area of change where the City Corporation will "enable a range of cultural and artistic activities... [which] will attract a substantial increase in visitors to this part of the City and enhance the area's attractiveness of businesses, residents and visitors". Strategic Policy S24 (Smithfield) states that the City Corporation will support the relocation of the Museum of London to Smithfield.

129. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets

in accordance with these expectations. These aims are further reflected in the Corporations 'Destination City' vision for the square mile.

130. The proposed scheme would deliver on the City's objectives and support the City's economic role by providing an uplift of 56,211 sqm (GIA) of flexible office floor space alongside a complementary retail and cultural offer and extensive public realm.

Land Use

131. This section of the report provides an overview in respect of the proposed site composition and mix of uses before appraising the acceptability of the proposed uses and the loss of existing uses where relevant.

132. The proposed development includes three commercially led mixed-use buildings, providing a total of 56,211 sqm (GIA) of new Grade A Office (Class E) floorspace. Within the Class E floorspace, the applicant has committed to providing 88 sq.m of nursery floorspace, following concern raised through public consultation about the loss of Hatching Dragons, which is discussed in detail below.

133. The 17-storey (above ground) New Bastion House would sit alongside the Roman Wall Garden, accommodating new Grade A office floorspace and private amenity area and roof terrace at the top of the building with new publicly accessible restaurant at ground floor level and maker studios at podium level.

134. The 14-storey (above ground) Rotunda building sits to the southern peninsula of the site adjacent to the remodelled road network at the junction of Aldersgate Street, St Martin's Le Grand and London Wall. This building would accommodate new office floorspace and café space at ground floor level. A cultural and food & beverage offer would be located at the top of the building, known as the Cultural Cap, which also includes a free to access public viewing terrace.

135. In addition to the Cultural Cap at the top of the Rotunda building, the main cultural offering of the proposed development would be located at lower ground, ground and highwalk levels between the two main buildings which frame it.

136. The other proposed new building, the North building, comprises ground plus 4-storeys for further office floorspace.

137. An exhibition area for the Roman Gate is proposed within the London Wall Car Park. As part of these works, some of the existing car park would be

removed to facilitate accessible pedestrian and cycle access to the new exhibition area and new publicly accessible cycle hub, therefore a reallocation of space away from private car parking to cycle parking and Blue Badge car parking spaces. The alterations to the car park are discussed at length in the 'Transport' section of this report.

138. Over 50% of the proposed development site is covered by public realm and green space through the creation of a continuous landscape and public realm at highwalk level.

139. A breakdown of the existing and proposed land use split (GIA) is set out below:

Land Use	Existing GIA (sqm)	Proposed GIA (sqm)	Net change GIA (sqm)
Office (Class E(g)(i))	16,887	56,211	39,324
Retail/Restaurant (Class E(b))	0	1112.4	1112.4
Cultural (Sui Generis) [Total]	0	8182.9	8182.9
Cultural (Sui Generis) – Food & Beverage & Retail	-	968.5 (12% of total)	-
Cultural (Sui Generis) – Event/Exhibition/Venue	-	7214.4 (88% of total)	-
Livery Hall (Sui Generis)	439	480	41
Museum (Class F1(c))	15,188	0	-15,188
Bar (Sui Generis)	287	0	-287
Public Car Park (Sui Generis)	1458	594.2	-863.8
Cycle hub (Sui Generis)	0	703	703
Total	34,259	67,283.5	33,024.5

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

Provision of Office Accommodation

140. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand and encourage the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation

suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.

141. The predominant use of the proposed development is as office space, comprising of 56,211 sq.m (GIA) of Commercial/Office Floorspace (including lobby) Class E (a net gain of 39,324 sq.m of office floorspace on this site). The office space is classified as Grade A office space.
142. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. The draft City Plan 2040, in Policy S4, seeks to deliver 1.2 million sqm net of new office floorspace in the period between 2021 and 2040. The apparent significant reduction in the 2040 City Plan compared with the previous City Plan 2036 target for office floorspace (2million sqm) is largely due to the passage of time and the significant office floorspace completions in the 2016-2021 period, totalling 835,000sqm. Overall, comparing the City Plan 2036 and City Plan 2040 floorspace targets is indeed similar due to the 2016-2021 period being met by completions.
143. At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or was permitted in the City. 370,000sq.m of flexile office floorspace was approved in 2022.
144. The Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'rest of the City' category, which is modelled at being able to achieve an office floorspace uplift of 145,000sq.m. The proposed development would deliver a significant amount of this floorspace target for areas outside the Eastern Cluster and Fleet Valley, providing a net gain of office floorspace of 39,324 sq.m.
145. The proposed office spaces are designed to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with options which offer a range of interior environment amenity, floor area, and choice of outlook. This would accord with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.
146. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. An Affordable Workspace Management Plan would be secured by condition,

which shall include details of specification, layout, facilities, operation and management.

147. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in an additional 39,324 sqm (GIA) of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Proposed Retail/Food and Beverage and Loss of the existing Bar (Sui Generis)

148. There is no existing retail floorspace on site and the site is not within a Principal Shopping Centre or on a Retail Link as defined in the Local Plan 2015 or the emerging Local Plan 2040. Policy DM20.4 of the Local Plan 2015 states that proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated and policy CS20 states that new retail development should be focused on Principal Shopping Centres so that they become attractive shopping destinations. Policy S5 of the draft City Plan 2040 supports proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand and supports provision of retail uses that provide active and publicly accessible frontage across the City where they would not detract from the viability and vitality of the PSCs. Policy S5 requires major retail development over 2,500 to be located within or near PSCs and requires a Retail Impact Assessment for schemes outside of PSCs of 2,500 sqm.

149. The proposed retail floorspace comprises 1,112sq.m GIA (Class E(b)) in addition to the ancillary F&B provision associated with the cultural use (sui generis).

150. The new spaces proposed would be fit for purpose in the context of the changing retail market, being flexible and adaptable in layout and support of the long-term vitality and vibrancy within the City and they would complement the neighbouring residential and commercial uses. The proposed retail component of the scheme would create active frontages that would enhance the public interest and vitality of the public realm across the site.

151. As the proposal would not provide in excess of 2,500 sqm of retail floorspace a retail impact assessment is not required (this approach accords with paragraph 94 of the NPPF).
152. The proposal would result in the loss of the existing bar on the site at podium level (287 sqm of sui generis floorspace). Policy DM20.3 of the Local Plan seeks to resist the loss of retail units outside PSCs unless it can be demonstrated that they are no longer needed. The applicant has provided details in respect of the constraints of the existing buildings on the site and the proposal would provide 1,112sqm of accessible retail floorspace which would offset the loss of the bar.
153. The proposed retail/food & beverage floorspace is acceptable, the mix of uses would provide a complementary use to the offices within the proposed buildings on site in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with Emerging City Plan Policy OF1. A condition is recommended to secure retail uses falling within Class E and Sui Generis as proposed, and to prevent the change to any other use within Class E.

Proposed Cultural floorspace.

154. Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:
- Providing, supporting and further developing a wide range of cultural facilities including the cultural quarter focused on the Barbican complex, the Guildhall School of Music and Drama, the Guildhall Art Gallery and City Libraries.
 - Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
 - Protecting existing cultural facilities where they are need.
 - Providing visitor information and raising awareness of the City's cultural and heritage assets.
 - Allowing hotel development where it supports the primary business or cultural role of the City.
155. Policy DM11.1 of the Local Plan seeks to resist the loss of existing visitor, arts and cultural facilities unless:
- Replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities or
 - They can be delivered from other facilities without leading to or increasing any shortfall in provision; or

- It has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

156. The draft City Plan 2040 under policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.

157. Place specific policies CS5 of the Local Plan 2015 and policy S23 of the draft City Plan 2040 promote cultural development in the Barbican area. In addition, the site is within the area covered by the Culture Mile BID which has been formed to promote the northwest area of the City as a major UK destination for culture and leisure.

158. The provision of cultural offers within development proposals is of increasing importance. The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.

159. The existing site accommodates a total of 15,188 (GIA) of cultural floorspace in the form of the former London Museum.

160. As is set out in the background section of this report it is intended that the London Museum will move to the General Market and Poultry Market – former market buildings in Smithfield. The existing London Wall site has several constraints which were preventing the Museum from reaching its potential as a world class visitor destination. The Smithfield site would provide the Museum with 13,332 sqm (GEA) of cultural space and improved ground level presence in one of the most historically significant areas of London.

161. Planning permission has been secured for the Museum's move under applications 19/01343/FULEIA and 19/01344/LBC and works have commenced on site to implement the planning permission and listed building consent. It is anticipated that the London Museum will fully reopen in Smithfield in 2026.

162. Whilst the application proposal would provide less (7,005.1 sqm GIA) cultural floorspace (8182.9 sqm (GIA) sui generis proposed) than is on site at present (15,188 sqm GIA, Class F1(c) existing), it is not considered that the proposal would result in a conflict with policy DM11.1. This is given that replacement facilities for the Museum have been secured and are being provided within the

vicinity of the site which meet the needs of the City's communities in accordance with policy DM11.1(1).

163. The cultural offer for the proposed site is set out in the submitted Cultural Plan in accordance with policy CV2 of the draft Local Plan 2040. The Cultural Plan for the site was prepared by the Contemporary Art Society Consultancy and informed by research into the City's cultural provision, to identify gaps in provision as well as to help inform the development of a cultural offer that would complement as opposed to compete with the cultural offers available in the vicinity of the site. This was in addition to undertaking engagement with community groups and stakeholders, including the City's cultural institutions, the City of London Education Strategy Unit, Livery Companies, St Paul's Cathedral and Historic England. As a result of feedback from evidence gathering it was identified that the site's cultural programme needed to:

- Appeal to a wide range of audiences – including those that have not previously visited the area
- Complement the existing world-leading cultural offer across the City of London
- Celebrate the unique City of London context and histories
- Provide genuine opportunities for local people, including artists, performers and makers.

164. The proposed scheme would provide the following cultural spaces:

Internal:

The central cultural hub – This is the cultural development located between the Rotunda and New Bastion buildings, with the main entrance approached from the Central Plaza. It is envisaged that this would be a performance venue (up to 275 seats) and is the heart of the cultural offer, providing linkage with other cultural offerings on the site. It is a flexible, multi-format performance space that transforms between lecture auditorium, classroom, double-height exhibition space and music venue.

The Gallery (Ground Level) – This would be the showcase for creativity and culture produced on the site. Its glass frontage with openable elements activates the Rotunda Arcade (the direct link between the plaza and Aldersgate Street).

The Workshop (Lower Ground Level) – The Workshop is 950 sq.m of exhibition and production space with a generous 4 m height and 9 m column grid that would allow large format exhibition and production planning. Given its lower ground location it could equally be used for light and sound sensitive exhibitions. The space has connections with the Culture Cap lobby to the east (see below) and to the Roman Gate and Barber Surgeon's Garden to the east.

Culture Cap – The Culture Cap is located at roof level within the Rotunda building. It comprises multiple elements:

- Culture Cap Venue – an internal flexible space with panoramic views of London and St Paul’s Cathedral as a backdrop. It is designed to be able to host music, site specific exhibitions or educational events with seating for up to 150 people.
- Culture Cap Restaurant – A food and beverage offer to support the cultural offer.
- Viewing terrace – A freely accessible viewing terrace that would be richly planted with views to St Paul’s Cathedral.

A reception area for the culture cap is provided in the ground floor of the Rotunda building, accessed off Aldersgate Street with express lifts to the culture cap elements at roof level. It would contain a winter garden and lounge seating. The lobby also connects down to the lower ground floor gallery and the central event space.

Highwalk Studios – Highwalk Studios are a cluster of studio spaces at Highwalk level within New Bastion House. The intention is that they would provide views of makers/artisans at work. The suite of spaces includes studios, common work and support facilities and public facing display spaces.

West Gate of the Cripplegate Fort – Enhanced public access to view this significant piece of archaeology, allowing for further interpretation of the historic significance of this part of the site.

External

Public Realm – The Central Plaza could be used for cultural programming (subject to acceptability in amenity terms). The setting of the wall in Barber Surgeon’s Garden would be enhanced by the re-landscaping of the area and improved access. Collectively the public realm enhancements would unify the site and its cultural content.

165. Given the duration of the construction programme for the scheme it is considered premature to ‘lock in’ a cultural operator for the site at this time. Notwithstanding, to demonstrate the usability and value of the proposed cultural spaces, the submitted Cultural Plan sets out three ‘test fit’ scenarios to demonstrate how the spaces could be used in the future and possible partnerships. Each option is informed by research and identifies possible partner organisations that could occupy such spaces. The scenarios cover:

- A City Laboratory – A model for a single anchor tenant that occupies all interior spaces. Possible partners could include: St Paul’s Cathedral, Museum of London Archaeology, New London Architecture, Barbican Centre, Gresham College Lectures.
- Experimental Music Hub – This model includes music rehearsal, education and performance spaces. Possible partners could include: London Symphony Orchestra, LSO Discovery, Aldgate School, Guildhall School of Music and Drama, Barbican Centre.
- London Wall West Makerspaces – This would provide a unique production facility hub as a connection point with the City’s Livery Companies, to bring making back to the City. Possible partnerships: connection with Livery Companies, Food for All, Makerversity, D Lab.

166. Cultural elements of the existing site would be integrated into the proposal, details of which would be secured by condition. These include:
- Wesley Memorial (Aldersgate Flame)
 - Bronze Plaque Commemorating John Wesley
 - Bull and Mouth carving
 - Metropolitan Drinking Fountain
 - Crest and decorative projecting bracket sign of the Ironmongers' Company (at entrance to Shaftsbury Place)
 - Blue Plaque – Site of Thanet House
 - Metropolitan Drinking Fountain and Cattle Trough Association cattle trough
 - City of London Wall Walk Plaques
 - Bull and Mouth Carving
167. Furthermore, opportunity would be sought to incorporate a form of marker or interpretive piece in respect of the Jewish Cemetery within the public realm in Barber Surgeons' Garden. Details of which would be secured by condition and agreed with the Committee for the Preservation of Jewish Cemeteries in Europe.
168. A public art strategy is required for the site to include existing and new public art in the public realm and on buildings secured by condition. This is required to cover the commissioning process, artistic merit, deliverability, siting, maintenance and management and stakeholder engagement with the community, Culture Mile BID and City Arts Initiative. Local Plan Policy CS11, DM 11.2 requires protecting and commissioning new public artwork and draft Local Plan CV2 and CV6 encourage the provision of new permanent and temporary artwork which is high quality, inclusive and diverse as well as protecting existing artwork.
169. It is considered that the proposal would provide a robust cultural offer for the site that would act as a new destination for the City in line with the Destination City Agenda and the following policies of the Local Plan 2015: CS11, DM11.1 and CS5 and policies CV2 and S23 of the draft Local Plan 2040. While the proposal would result in the loss of some cultural floorspace on this site, this is acceptable in policy terms given that the London Museum would be relocated to Smithfield.

Cultural Floorspace and the Sequential Test

170. The sequential test set out at paragraph 91 of the NPPF applies to planning applications for main town centre uses. The definition of main town centre uses in the Glossary to the NPPF is broad and includes retail, leisure, entertainment, offices, arts, **culture** and tourism development. The NPPF states (at paragraph 95) that where an application fails to satisfy the sequential test, it should be refused. London Plan policy SD7 indicates that the sequential approach is to be fulfilled when considering proposals for main town centre uses. The adopted Local Plan, policy CS20, applies the sequential test to retail development in the

City but does not specifically apply the test to other main town centre uses. The City define town centres as the Principal Shopping Centres. Compared to traditional town centres, the City's PSCs are limited in terms of scale and size, and simply focused on retail frontage and retail accommodation.

171. A sequential test has not been submitted in respect of the proposed amount of cultural floorspace. The failure to undertake a sequential assessment in this case is technically a breach of national planning policy and could constitute a reason for refusing planning permission. However, officers take the view that despite the fact that national policy indicates that where an application fails the sequential test it should be refused, there are particular circumstances in this case that the benefits of the scheme outweigh the breach of national policy. The particular factors which justify a departure from NPPF policy approach include: the fact that the site is currently in museum use and that the proposals are located within an area where cultural development is supported by the Local Plan and the draft City Plan 2040.

Proposed Public Viewing Gallery

172. Local Plan policy DM10.3 and draft City Plan 2040 policies S8, S14 and DE5 seeks the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City.

173. A new free to access public viewing gallery is proposed at the top of the Rotunda Building, as part of the Cultural Cap. The space would provide a panoramic view over the west of the City, and of St Paul's Cathedral, providing a valuable space for culture as well as expansive views over London for all to enjoy.

174. The number of people the space could accommodate at any one time would be carefully managed (and secured via a management plan) to ensure evacuation and safety of all those visiting. The space would be accessed via the Culture Cap lobby at ground level, where there would be a concierge desk and two dedicated lifts to take members of the public from the lobby to the Culture Cap and terrace.

175. The space would contribute to the network of free to enter viewing galleries across the City and internally would incorporate a cultural element.

176. The public viewing gallery would be open all year round (except Christmas Day, Boxing Day, New Year's Day) and during the hours of 10am to 7pm or nautical dusk whichever is the later and would not be closed for private events during those hours. There is no need for a booking system for users.

177. A Culture Cap and Public Viewing Gallery Management Plan would be secured by condition which would specify the finer details of the operation of the space.
178. The proposals for the public viewing gallery are in accordance with Local Plan policy DM10.3, draft City Plan 2040 policies S8, S14 and DE5, which seek the delivery of high-quality, publicly accessible elevated viewing spaces.

Nursery

179. There is currently a children's day nursery on the site, within Ferroners' House. It is evident from the planning history that the nursery does not have planning consent, given its operation commenced prior to the introduction of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. At the time that the use commenced, a day nursery would have fallen within Class D1 of the Town and Country Planning (Use Classes) Order 1987 and the use of Ferroners' House is Sui Generis.
180. Notwithstanding the above, the day nursery has been on the site for a number of years, and has not resulted in any issues by way of noise/disturbance and therefore it is unlikely that enforcement action would be taken. As a result, the loss of the current nursery site is a material consideration in the determination of this case.
181. Under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 a day nursery falls within Class E, which is the same category as office use. A significant amount of new Class E space is being proposed across the site and therefore the applicant has advised that accommodation could be found within the proposed development for the nursery if required. Re-provision of the nursery as part of the proposed development would be secured by condition.
182. This approach would be supported in line with policy DM22.1 of the Local Plan 2015 which seeks to resist the loss of social and community facilities in the City unless replacement facilities are provided on site or within the vicinity which meet the needs of the users of the existing facility.
183. There is an increase in overall floorspace to the Livery Hall as the apportioned land use figures includes the stair core at all levels, and the area at lower ground floor that is proposed to be given to the Ironmongers' Hall for their servicing requirements. This lower ground space in the existing situation belongs to Bastion House.

Land Use conclusion

184. The City Plan 2040 states at para 8.1.1 that the Barbican is identified as a strategic night-time location of national or international significance in the London Plan.
185. Destination City, the City Corporation's flagship strategy, seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.
186. Strategic Policy S23 of the City Plan 2040 states that the City Corporation will: 'Encourage culture-led mixed-use development on major sites in the area; identify and meet residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space; seek to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings; requiring improvements to pedestrian and cycle routes for all within and through the north of the City...'
187. Comments were raised in public consultation about the Proposed Development not being for residential use, given its location adjacent to the Barbican Identified Residential Area, although it should be noted that the Site is not within the identified residential area. Policy DM21.1 of the Local Plan and draft policy HS1 of the emerging City Plan states that "new housing must not prejudice the primary business function of the City".
188. The proposed development for a significant increase in Class E office floorspace accords with the primary strategic aim of the Local Plan 2015 and the emerging City Plan, being to deliver new, Grade-A office floorspace to maintain the City's position as the world leading international finance and business centre.
189. The London Plan 2021, in policy D3(a), encourages a design-led approach to optimise the best capacity of land by ensuring that development is of the most appropriate form and land use for the site, and in policy E1(a) encourages the improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. The London Plan in policy SD5 reinforces the importance of office floorspace within the Central Activities Zone (CAZ) (which the site sits wholly within) and encourages intensification of office floorspace within the CAZ through redevelopment and refurbishment.
190. Local Plan 2015 policy CS1 seeks to ensure the long-term provision of office floorspace of the highest quality.

191. The provision of an additional 39,324 sq.m (GIA) of Class E office floorspace is therefore welcomed in the spirit of the aims of the adopted Local Plan and emerging City Plan, and Officers consider that the site has been optimised in line with the aims of the London Plan Policy D3.

192. The provision of the cultural floorspace (sui generis) is also welcomed in the context of emerging policy S6 (Culture and Visitors) and the Destination City initiative. The provision of retail/F&B floorspace to complement the other proposed uses on site as well as neighbouring commercial and residential uses is also welcomed. The re-provision of nursery floorspace is also welcomed.

193. Overall, it is considered the proposed development is in accordance with policies CS1, DM1.2, DM1.3 and DM1.5 of the Local Plan 2015 and S4 of the emerging City Plan 2040, as well as the aims of the London Plan 2021, in delivering growth in office floorspace and employment, and policies S6, S23, S8, S14 and DE4 of the draft City Plan 2040.

Design and Principle of a Tall Building

Principle of a Tall Building

194. There is one existing tall building, Bastion House, on the application site (17 storeys and 86.7m AOD).

195. The proposal includes two new buildings, New Bastion House (17 storeys and 86.7m AOD) and the Rotunda (14 storeys and 75.3m AOD). These would be defined as tall buildings under the provisions of the adopted Local Plan (CS13 para 3.14.1) and emerging City Plan 2040 (S12(1), >75m AOD) pursuant to London Plan D9 (A).

196. Notwithstanding the existing presence of Bastion House, there are objections to the siting of tall buildings in this location and the BQA notes the emerging S12 City Plan Policy does not identify the LWW Site as being one of the tall building areas that are proposed to be identified as suitable for tall buildings. Conversely, the City's Conservation Area Advisory Committee raise no objection, while noting that part of New Bastion House falls within the Barbican and Golden Lane Conservation Area.

197. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a City Cluster (Local Plan policies CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 with

the addition of a smaller proposed Cluster in the Holborn and Fleet Valley area (S12 (2) and S21).

198. The application site falls outside the 'Eastern Cluster/City Cluster' policy areas in the adopted Local Plan and emerging City Plan (CS7, fig. G; S21, fig. 28), and the proposed Holborn and Fleet Valley Cluster in the emerging City Plan (S12, fig. 14).
199. London Plan policy D9 B (3) stipulates that tall buildings should only be developed in locations that are identified as suitable in Development Plans. While seeking in an overarching sense to cluster tall buildings within the Eastern Cluster, the City's adopted Local Plan defines areas in which tall building proposals would be inappropriate in principle and should therefore be refused (CS14 (2), fig. N). These areas include conservation areas, St Paul's Heights, St Paul's protected vista viewing corridors and Monument views and setting.
200. Where a site lies both outside the Cluster and these inappropriate areas, then it would trigger CS14 (3), under which tall buildings would be permitted elsewhere in the City only on those sites which are considered suitable in relation to skyline, amenity and heritage impacts. With reference to this policy, the majority of the application site lies outside these inappropriate areas and therefore a tall building here could be acceptable, subject to consideration of the criteria in CS14 (3).
201. However, a small part of the application site is within the Barbican and Golden Lane Conservation Area (not shown on fig. N as it was designated in 2018, after the adoption and publication of the 2015 Plan). The boundary of the conservation area is drawn around the edge of Bastion House and the Museum site, but the application site encompasses land beyond the footprints of the existing buildings and resultingly, to the north and east, lies partly within the conservation area. Most pertinently, part of the proposed New Bastion House, as a result of its slightly larger footprint, would fall within the conservation area.
202. As such, the proposals would fall within an area identified as inappropriate for tall buildings and conflict, in part, with CS14 (2) and London Plan policy D9 B (3). This is considered a minor conflict with the policy, reflecting the complexity of this part of the City and the way in which the boundaries of such disparate entities as policy designations and application sites do not always align precisely, but sometimes overlap.
203. Emerging City Plan 2040 specifies, in accordance with London Plan D9, areas where tall buildings would be appropriate in principle. As mentioned above, the 2040 Plan identifies such areas in the existing City Cluster and the new proposed Cluster at Holborn and Fleet Valley. The application site is not within either area, so would be considered inappropriate for a tall building in principle in respect of

the 2040 Plan. However, this Plan is shortly to undergo Regulation 19 Consultation and consequently its provisions can be afforded only very limited weight compared to the adopted 2015 Plan.

204. Notwithstanding this, in *R (OAO LB of Hillingdon) v. Mayor of London* (2021) [EWHC 3387 (Admin)] the High Court held that London Plan policy D9 B was not a pre-condition or 'gateway' to the application of the criteria in D9 C, a qualitative assessment of the impact of a proposed tall building. In other words, even where a proposed tall building falls outside an area identified as suitable in a Development Plan under part B, the impacts of the proposed tall building as set out in part C should still be considered.

205. An assessment against London Plan policy D9 C and D is made below, with reference where relevant to other sections of this report for more detail. It is found that the proposal would satisfy the criteria in C and D. Similarly, an assessment against the criteria in CS 14 (3) and it is found the proposal would satisfy those criteria. Although, as discussed below, the proposal would cause less than substantial harm to the significance of designated heritage assets, there is clear and convincing justification for the proposals, alternatives have been explored, and there are clear public benefits which outweigh the harm.

206. Taking all these matters into account, it is considered that the proposal would accord with London Plan policy D9 C and D and Local Plan policy CS14 (3) but would conflict with London Plan policy D9 B (3) and Local Plan policy CS14 (2). These policy conflicts are addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

Tall Buildings – Impacts

207. This section assesses the proposals against the requirements of D9 C (1-4) and D of the London Plan. The visual, functional and environmental impacts are addressed in turn.

Visual Impacts – C (1)

208. The site is located within the north-west locality of the City, in an area strongly characterised by post-war development, closely neighbouring the southern edge of the Barbican Estate. The general character of the locality is of large, modern, mid-rise buildings interspersed with fragmentary survivals of ancient monuments and historic buildings of a finer scale and grain. The Barbican Towers form striking skyline features and there are a small number of other >75m existing tall buildings in the locality, as follows:

- 200 Aldersgate Street (107.8m AOD)
- 88 Wood Street (101.9m AOD)
- Alban Gate (100.7m AOD)
- Bastion House (86.7m AOD)

209. In this context, the proposal would fit into an established context of tall buildings, with one new tall building, New Bastion House, on the same site and to the same height as its predecessor, and for a second new tall building, the Rotunda building, at the lower height of 75.3m AOD.

210. The impact of the proposals upon the City and wider London skyline in long range views has informed the optimisation of the site and the overall height and form of the proposed tall building.

211. Long range views, (D9 (C1; a; i) have been tested in the TBHVIA including views 1-10, A1, A2, B1-B14, B19- B25, A-O and Appendix B and Addendum Panoramic Views. Some of the objections from statutory consultees relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.

212. In baseline and cumulative panoramic views, the proposal would be a glimpsed, incidental presence, partly or mostly occluded by other buildings, with only the uppermost storeys visible. In baseline and cumulative river prospects, the proposal would be a discreet and recessive presence, its uppermost parts only glimpsed above and among development further south of the site. The proposal would preserve the characteristics and composition of the panoramas and river prospects except from Hungerford Bridge (LVMF 17B.1 and 17B.2), in which the uppermost storeys of New Bastion House would slightly erode the silhouette of the spire of St Bride's Church, which is seen against clear sky in these views. Historic England have reached a similar conclusion. As such there would be a small degree of conflict with D9 (C1; a; i).

213. Mid-range views of the proposal (D9 (C1; a; ii) have been tested in the HTVIA at 12-13, 14A, 15, 16, 17, B15-B19, A3- A5. Objectors have raised concerns about the impact of the scheme in these views both in townscape and heritage. Officers acknowledge these but reach different conclusions as to the scheme's impact.

214. Viewed north along St Martin le Grand (view 12-13), the southern aspect of the Rotunda Building would replace the Lauderdale Tower as the termination of the view, rising to a similar height as the foreground buildings. From this viewpoint, the double-height sculptural base, textured vertical fins and faceted, verdant balconies would come together memorably. Atop, the prominent cuboid picture window of the elevated cultural space and roof terrace would positively signal a visitor destination. The development would be of an appropriate scale and high

design quality, providing an interesting and complementary focal point to the view and sitting comfortably with the foreground pale stone buildings.

215. From Goswell Road, Barbican Bridge, and Aldersgate Street (Views 16, A5 and 17) moving south the Rotunda building would be visible and New Bastion House would be revealed. The development would be prominent and indeed fill skyspace but needs to be assessed as part of a contemporary kinetic journey. The proposed scale would not be uncharacteristic of this established townscape which now defines the Aldersgate junction and the refined detail, light colouration, and materiality which would positively integrate with the existing townscape, heights, massing and palette. The wider development and the Rotunda building would be a worthy architectural addition as a way finder in all directions. In many other mid-range views, the development would either be screened by intervening development such as from Smithfield and Charterhouse Square where visible, would be partially screened and integrated into the layering of the city as an unobtrusive addition with modest skyline presence.
216. As such the proposal is considered to make a positive contribution to the local townscape in terms of legibility, proportions and materiality, and would comply with D9 (C1; a; ii).
217. Immediate views of the proposal (D9 (C1; a; iii) have been tested in the at Views 13, 15,18, 19-28, A6- A9, B26-B31). Through the application process local views have been extensively scrutinised and particular consideration given to the views out of the Barbican Estate, especially the vantages from the highwalks and the public spaces around the Arts Centre complex. Historic England and third-party objections have raised concerns about the impact of the scheme in these views. Officers acknowledge these but reach different conclusions as to the scheme's impact.
218. At these distances the massing and scale of both blocks would be visually impactful, bold and transformative. The combination of the split design of each blocks with sheer outer faces and cascading inner faces, central public space and multifarious geometries (depending on the viewers' orientation) would reduce any sense of singularity or excessive density, and would create diverse and picturesque moments in many of the immediate views. The proposal would sit comfortably in an established backdrop of existing buildings of comparable scale and would present highly articulated and varied elevations to views of and from the Barbican Estate, and views from nearby streets like Foster Lane and Noble Street.
219. The proposal would positively transform the views from St Martin Le Grand and Aldersgate Street, creating a porous, people-prioritising and verdant place at street level framed by landmark new buildings, with curving, faceted elevations

framing the central landscaped space. New views of the Barbican Estate would be revealed, enticing pedestrians towards it; the active frontages, planting, thoughtful design and mixed uses of the ground floor layout would promise a memorable experience abuzz with culture, dining and respite from the commercial City.

220. As such, the proposal would have a direct and positive relationship with the street and would be of an appropriate scale, and would comply with D9 (C1; a; iii).

221. In relation to D9 (C1; b), the proposal would reinforce the spatial hierarchy of the locality and aid legibility and wayfinding. It would achieve the landmark potential of the application site in a way the existing buildings fail to deliver. The new tall buildings would be a high-quality, suavely compelling architectural moment that would confer a new sense of identity on this important node in the locality, introduce a convincing new terminus to the views along Aldersgate Street and reinforce the legibility of the Barbican Estate by achieving greater architectural distinction from it. They would aid wayfinding by achieving better interconnections with that Estate than the existing buildings on the site. The proposal would substantially enhance pedestrian movement and wayfinding across the application site in dramatic improvement compared with the impermeability and confusion of the existing site condition. Accordingly, the proposal would comply with D9 (C1; b).

222. In relation to architectural quality and materials (D9 (C1; c)) the scheme would be exemplary. The disposition of the three blocks about generous, green and fully accessible new public realm, the suavely curving forms of New Bastion House and the Rotunda building, the more contextual and innovative north block would all amount to very high-quality design. In design and materiality, the scheme would be a persuasive foil to the Barbican Estate and would be an exemplary exercise in placemaking, delivering a far more usable and human-scale place than the existing buildings. Materially, the scheme would be a rich mix of more textured GRC, contemporary metallic and glazed elements, all used judiciously and set off with abundant greening. A complete description and assessment of the proposed buildings and public spaces is given in the architecture and urban design section of this report. In this respect the proposal would comply with D9 (C1; c).

223. In relation to D9 (C1; d), a full assessment of the proposal's impact on heritage assets is given in the heritage section of this report. Officers have identified the following impacts:

- St Bride's Church – low level of less than substantial harm through the proposal's slight erosion of its sky silhouette in the view from Hungerford Bridge

- St Botolph Aldersgate – low level of less than substantial harm through the proposal's background presence in views from Postman's' Park
- Postman's Park Conservation Area – slight level of less than substantial harm through the proposal's background presence in views from Postman's' Park

224. As such, there would be a small degree of conflict in relation to D9 (C1; d). Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved. Historic England and other third parties allege higher degrees of harm to these assets and further harms to other heritage assets. Officers have reached different conclusions for the reasons set out in the Heritage section of this report.

225. For the reasons set out in detail in this report, it is considered that there is a clear and convincing justification for the proposal, that sufficient options were explored as part of an optimisation exercise to avoid and mitigate harm to heritage, and that the proposal would deliver public benefits that would outweigh the harm caused.

226. In respect of D9 (C1; e), the proposal would not be visible in relation to the Tower of London World Heritage Site. The development site is not located within the local setting of the WHS and the Zone of Theoretical Visibility (ZTV TVBHIA Appendix C) shows that there would be no intervisibility between the proposed development and the WHS.

227. In respect of D9 (C1; f) the application site is set well back from the banks of the river and is outside the Thames Policy Area. The proposal would have no impact on the surrounding scale, open qualities and views of the River Thames.

228. In respect of D9 (C; 1; g), the proposal would not cause significantly adverse reflected glare, as is set out in the solar glare section of this report. Detailed solar glare assessments were carried out in parallel with the design to ensure the proposals do not generate solar glare effects that pose danger to users of the transport network. Further details to ensure protection from solar glare would be submitted by condition to ensure compliance with D9 (C; 1; g).

229. In respect of D9 (C; 1; h), the potential light pollution impacts arising from the proposed development have been assessed and are set out within the Light Pollution section within the report. The proposal has been designed to minimise light pollution. This was a specific consideration especially in LVMF Views 13B.1 and 13B.2, 17B.1 and B.2 and views from Thomas More Highwalk which how there would be an insignificant change at night compared with the existing situation. A condition has been included which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and external

lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. These would be provided and assessed as part of the relevant condition in order to mitigate the scheme's impact, particularly on residents. The proposal would comply with D9 (C; 1; h).

Functional Impact

230. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials, emergency exits have been designed to ensure the safety of all occupant these issues have been covered in more detail in the, fire safety, suicide prevention, security, and public access, inclusivity, noise and vibration and transport, sections of the report. The buildings are not of a height to interfere with aviation, navigation or telecommunications equipment. This is equally the case for any tower cranes associated with the construction of the buildings. The buildings will not have a significant detrimental effect on solar energy generation on adjoining buildings. The proposals are considered to be in accordance with London Plan Policy D9 (C; 2; a-f).

Environmental Impact

231. The proposals have been found to provide safe and suitable levels of wind, and daylight and sunlight and temperature conditions would not compromise the comfort and enjoyment of the proposed new open spaces, Highwalks and pedestrian routes. These are addressed in the daylight, sunlight and overshadowing, thermal comfort, and noise and vibration sections of this report. Further details of the external materials would be provided by condition in order to ensure safe and comfortable levels of solar glare and solar convergence. Additionally, the design has given consideration for how the proposals can assist with the dispersal of air pollutants and would not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses (see noise section of this report for further details), preserving the comfort and enjoyment of surrounding open space.

232. It is considered the proposal would meet the environmental considerations of Policy D9 (C; 3; a-c).

Cumulative Impacts

233. The cumulative effects are addressed in the context of the following and addressed in Chapter 17 of the Environmental Statement:

- Interaction effects: the accumulation of different predicted effects generated by the proposed development upon the same sensitive receptors; and
- In-combination effects: the combination of predicted effects from adjacent or nearby scheme(s) together with those predicted for the proposed development

Many of the receptors considered are affected by single, isolated effects. The following cumulative environmental effects have been assessed and discussed elsewhere in the report:

- Non-motorised users on the local highway network subjected to interactive severance, road safety, and pedestrian/cycle delay/amenity effects. Overall, no significant interactive effect;
- Local businesses and local employment subjected to interactive effects associated with the generation of operational jobs, contribution to local regeneration objectives, and increases in commercial floorspace. Overall, significant interactive effect will not be any greater than effects predicted in isolation;
- Ironmongers' Hall could experience adverse interactive effects on the built heritage asset and effects associated with vibration from piling. Conditions are attached to monitor structural implications.

During construction, significant in-combination cumulative effects have been identified as follows and are addressed in the report:

- Atmospheric Green-House Gas (GHG) concentration during construction will lead to potentially significant adverse effects on the global atmosphere and rising global GHG emissions
- An increase in employment during construction will lead to a direct, medium-term, temporary moderate beneficial socio-economic effect

During operation, significant in-combination cumulative effects have been identified for the following and are addressed elsewhere in the report:

- Reduction in surface water runoff and flood risk and effect on the combined sewer network;
- Removal of baseline safety exceedances in St Martin's Le Grand;
- Gross direct employment resulting from the cumulative schemes would have a long term, permanent, moderate beneficial effect on employment within Greater London, creating at least 27,000 jobs;
- GHG emissions resulting from the operation of the proposed development will cause a major adverse effect on the global atmosphere amongst rising concentrations of GHG emissions globally;
- Cumulative effects on townscape and heritage are included within the TVBHIA and assessed in the relevant sections of the report.

234. It is considered the proposal would meet the cumulative impacts of policy D9 (C; 4a)).

Public Access

235. The Rotunda building includes a free to enter public assessable area at the top of the building. The accessible roof terrace of the Rotunda building includes an outdoor space at roof level, with herbaceous and tree planting measuring approximately 90sqm. In addition to this, the interior space that is related to the exterior roof terrace includes a further 117sqm of indoor publicly available space. The new publicly accessible space and roof terrace will provide a new public vantage point of St Paul's Cathedral and the wider City. The publicly accessible cultural uses would be prominent and visible to passers-by and have been thoughtfully positioned to be obvious and legible to potential users. These spaces would be supported by appropriate signage and wayfinding measures to ensure entrances are clearly legible, the details of which are reserved for condition. The proposed scheme would therefore deliver free to enter, publicly accessible areas and they would contribute towards an improved pedestrian experience and amenity at ground floor level and Highwalk level.
236. It is considered that the proposal would meet the considerations of Policy D9 (D).

Tall Building, Conclusion:

237. Overall, Officers conclude that the proposal would conflict with CS14 (2) and therefore London Plan policy D9 B (3). Whilst the site would not be in either of the areas identified as suitable for a tall building in the emerging City Plan 2040, and therefore conflicting with S12, this Plan is shortly to undergo Reg. 19 consultation and can therefore be afforded only limited weight.
238. As a matter of planning judgement, officers conclude that the proposal complies with London Plan policy D9 C and D but conflicts with D9 B (3), CS14 (2) and emerging City Plan 2040 S12. These policy conflicts are further addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the planning balance.

Architecture, Urban Design and Public Realm

Architecture

239. The proposal would be a stellar and imaginative transformation of the site, delivering a sustainable, vibrant, mixed-use place area which would bring about a significant uplift in floor space and make the best use of land. The development proposals have evolved with numerous iterations following a design-led approach that optimises the site capacity to accommodate significant growth. Core CAZ

activities would be intensified including employment, complementary commercial and cultural uses supported by a significant uplift in quantum and quality of public spaces and routes creating a healthy, diverse and reimagined place. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-3, 5 and 6 growth which is socially, economically, and environmentally inclusive.

240. There are extensive and consistent objections to the proposals set out in the consultation section including:

- i) the proposed density, massing and, height of the tall buildings are imposing, unsympathetic and inappropriate for the scale, fail to follow the established orthogonal grid of the neighbourhood and historic urban grain of this sensitive and densely populated residential mixed-use area;
- ii) the architecture of the tall building elements are alien, amorphous, generic and bland with no regard for context;
- iii) loss of space and light between buildings when compared to existing.

241. Notwithstanding these objections, and the small degrees of policy conflict identified, it is considered that the proposal would accord with the design-led approach of London Plan Policies D3 and D8. The development would deliver a design solution which makes effective use of limited land resources in accordance with Local Plan Policy CS10 and emerging City Plan 2040 policy S8.

242. The site lies in the north-west of the City, on the southern edge of the Barbican Estate. The area is variable in character, inconsistent and dominated by the postwar extension to London Wall, with large mid-rise modern commercial blocks and hard edges and inactive frontages which are the legacy of the post-war urban vision for the area, segregating roads and pedestrian routes through a network of Highwalk and pedways. To the north lies the Barbican Estate which, due to its inward character, functions, and architectural singularity, presents an air of detachment from the London Wall Route XI of which Bastion House, the Museum of London, City Tower and the Highwalk are remnants.

243. There have been many objections on the grounds that the proposal and the Rotunda building in particular would cause harm to the existing and historic townscape. Officers disagree with this view, and conclude that the diverse character, disparate townscape and morphology and established, variable building heights of this place would, in principle, be compatible with a development of the scale and character proposed.

244. The postwar/post-modernist and contemporary townscape has little cohesion with varied architecture and materials. There is a coarse commercial urban grain to London Wall, with large floor plates and blocks unrelated to one another and positioned orthogonally to London Wall enclosing the street. Since the 1990s, newer development along London Wall has attempted to reintroduce more

humanised large commercial buildings to bring pedestrians back to ground level, reintroducing street level activity and entrances and revealing archaeology and creating public spaces, including 88 Wood Street, London Wall Place and the implemented City Place House. This has also been combined with integrating a reimagined form of the Highwalk to improve connections into the Barbican to the Arts Centre and Barbican podium, one of the largest public spaces in the City, and east/west via the new the Highwalk connected with the Moorgate Station.

245. Aldersgate Street junction was formerly an historic route and gateway into the Roman City of London and was significantly altered with the construction of the MoL and London Wall. This is now a hostile, congested and vehicle-dominated environment enclosed by the architecturally unrelated large commercial buildings of 200 Aldersgate Street (22 storeys), 1-2 London Wall and the awkward rotunda of the Museum with development stepping down in scale at the St Martin le Grand corner. North of the junction, Aldersgate Street comprises large floorplate commercial buildings on the western side, typically of seven to nine storeys, with some finer grain historic buildings surviving in the stretch just north of the Barbican Underground Station, such as the NatWest bank. The Barbican Estate informs the setting of the townscape to the east, and there is a highwalk connection across Aldersgate Street to connect the Estate with the Barbican underground station.

246. The residential uses of the Barbican and Golden Lane Estates to the north creates a quality of contrast with the surrounding commercial enclave of mixed architectural character and period. Intermingled with the large commercial entities are pockets of historic buildings and archaeology including remnants of the Roman London Wall (including the remains of the Aldersgate, buried below street level), St Giles Cripplegate and Livery Halls and open spaces. These are experienced as separate and happenstance moments of historicity, rather than combining to form a coherent, self-contained historic environment; the ancient roots of the road itself (Aldersgate Street/A1) are largely intangible and therefore not, in principle, sensitive to change on adjacent sites such as that proposed.

247. The former Museum is low level which provides open views into the Barbican north and south but covers nearly the entire development site acting as a podium building surmounted by and complicatedly entwined with Bastion House. Under the proposal, these existing buildings would be demolished and replaced with two angled singular midrise blocks interspersed with public spaces. The BQA and others object that the proposed development does not adhere to the established orthogonal grid in their form.

248. Instead, the two blocks would have a more dynamic rounded and sculptural form, both the proposed Rotunda Building and New Bastion House are aligned on the same north/south axis as the existing Bastion House and as other tall commercial developments on London Wall, thus responding directly to the urban

layout and character of London Wall. The arrangement of the proposed buildings within the site would frame the existing streets and external gardens and spaces, as well as the new external gardens and spaces that form part of the proposed development, and thus continue to contain, define and reinforce the urban street space and public realm.

249. At the lower levels the building line would slightly encroach further eastwards into Barber Surgeons Garden but elsewhere would be set back replacing built form with the cascading and lush Northern Gardens, the New London Wall Plaza and Glade. On the upper levels the floor plates would be larger than existing Bastion House in all directions. The height of the successor is no taller than the existing however, it is acknowledged that the massing is increased so it would be closer to Mountjoy House and have a strong visual presence on London Wall and Monkwell Square. New Bastion House is arranged on the same north-south axis as the existing Bastion House and so the relationship of its massing with the Barbican is not fundamentally altered. The Rotunda Building is set further south from the Barbican and at a lower height than New Bastion House to ensure variation on the skyline and would introduce a significant shift in scale contrasting with MoL but consistent with surrounding taller development. The tiered and stepped verdant balconies, serrated building lines and varied elevations would be a radical and positive aesthetic transformation.

250. The height and massing of the North Building steps down considerably in proximity to the Barbican Estate. This third block mediates massing of Ironmongers Hall as well as the lower foothills of the Barbican fringe compatible with the Turret, the sports pitches of the CLGS, Mountjoy House and Thomas More House.

251. The development vision has evolved and is based on the fundamental characteristics of modern placemaking enshrined in the NPPF and the National Design Guide. The layout and built form would respond to metropolitan and local contexts and the overall character of the proposal is directly inspired by the changing character of London Wall, Aldersgate Street and the geometry and urban greening of the Barbican Estate. The disposition of three blocks would bring active ground floors towards the southern more commercial part of the site fronting London Wall and Aldersgate Street and softer green spaces adjoin and connect into the residential and quieter spaces of the Barbican Estate and Barber Surgeon Gardens.

252. Central to the development is to reorientate buildings towards London Wall, following the established angled grid along London Wall, and to introduce new routes to generate movement into external and internal spaces at ground and highwalk level, introducing complementary mixed-use, attractive and safe public spaces to enjoy nature and heritage. The existing inaccessible and complex

character of the Museum of London and Bastion House sites would be transformed into a more porous, inclusive, outward-facing ground level presence and legible new quarter.

253. The tall buildings, New Bastion House to the east and Rotunda Building to the west, are conceived as an architecturally expressive and dynamic pair. They would have generous floor plates similar to other surrounding commercial buildings, would form landmarks into the City from the north and south and architecturally frame a central plaza and raised urban glade and portal to a cultural hub. A modestly scaled commercial block positioned to the north fronting Aldersgate Street would mediate between the scale and architectural language and materials of these midrise blocks and the existing southern edge of the Barbican Estate and the Ironmongers Hall.

254. The proposed building locations and heights were design-led and influenced by a number of key constraints and aspirations:

- To maximise the development potential for the site in line with the strategic City context
- The delivery of a viable, people-focussed project;
- Improved public spaces and routes;
- Minimising impacts to residents;
- Reconfiguration and improving pedestrian experience of the Aldersgate/London Wall junction;
- Opening up of Ironmongers Hall;
- Delivery of public cultural space; and
- Responding to LVMF considerations and townscape analysis

255. The siting, massing and architectural expression of the scheme were rigorously tested and went through many iterations to arrive at the proposed coherent scheme, taken forward by the applicants as the optimal proposal for the site. The designs have been refined to avoid or minimise harm to heritage assets through amendments to height, massing, and design. The development has also sought to coherently reconcile the unique context of varying grids, orientations and geometries of roads, spaces and building lines.

256. The massing and form of the proposed scheme has been developed through a close analysis of long and short townscape views. This has been guided by the site's position on London Wall/Aldersgate Street and the potential impacts on designated heritage assets including St Paul's Cathedral, the Barbican Estate, Ironmongers Hall, St Botolph's Church without Aldersgate and Postman's Park and emerging developments in the City of London, and the proposal's appearance in the background of important London View Management Framework (LVMF) views. The silhouette of the proposed massing was also informed by macro views

from Millenium Bridge (13 A.1 and 13B.1) and Hungerford Bridge (17B.1 and 17 B.2). As a result of all these the following key amendments were made:

- To relieve the space between the buildings and create a sense of expansion and openness to the public realm, the inner faces of the two primary buildings were tapered outwards towards the top. This improves openness and daylight to central public spaces and increases visual permeability.
- The footprint of New Bastion House and height of the Rotunda building were reduced to mitigate impacts on the setting and significance of St Brides Church spire form LVMF 17 B.1 and 17B.2.
- The height of New Bastion House was reduced by four storeys to match the existing Bastion House height to reduce impacts on the Barbican Estate and the St Paul's Cathedral from Millenium Bridge and the South Bank (LVMF 13A.1 and 13 B.1).
- The width of the new Bastion House and Rotunda buildings was also reduced in direct response to phase 3 (June 2022) consultation feedback. The rotation of the Rotunda building was also increased. This had several benefits including improved views through the site from the Barbican Estate and Highwalk to the North. The public space at the centre of the scheme benefitted from improved sunlight access, and a greater feeling of openness of views north and south. The narrower floorplates allowed more percentage of the floor to have optimised daylighting conditions (noting that this also gave rise to less efficient floors as the core size was not able to be reduced.) The overall breadth and proportion of the buildings evolved into a much more slender forms.
- In response to public feedback, one of the three bridges over London Wall originally proposed to be removed was reinstated, redesigned with a raised threshold connecting from the central Highwalk to the east end of One London Wall. The Highwalk route was effectively expanded and added to replicating the existing connection to the west of the site parallel to Aldersgate Street, enclosing Aldersgate Plaza and connecting to the north into John Wesley Highwalk.
- The design of the North building was radically revised to have an independence of form and materials to serve as a transition building between the Turret of The Barbican Estate and the two focal buildings of the development.

New Bastion House and Rotunda Building:

257. The western Rotunda Building would occupy the remodelled southern peninsula, a 14 storey (75.3m AOD) mixed-use building, with commercial, food and beverage and cultural spaces arranged across multiple levels, crowned by an elevated public cultural space.

258. To the east New Bastion House would occupy the same location and be set at the same height as the existing Bastion House, though it would be of a slightly

wider profile. It would be of 17 storeys (86.7m AOD) and would provide commercial accommodation accessed at ground level from the new plaza with private amenity areas and roof terrace to the top level of the building. A publicly accessible restaurant accessed from London Wall ground level would wrap around the east elevation of the building and overlook Barber Surgeon Gardens and the Roman Wall.

259. The height, massing and appropriateness to townscape is addressed in the D9 section of the report in long, mid-range and local views. The Rotunda and New Bastion House would be architecturally expressive. They would not be identical but would playfully mirror one another across the central open square and connecting glade with rotational massing and geometries blending into one another. Their facades would have a dual identity, mediating externally between the hard commercial buildings of London Wall and Aldersgate Street, and internally with the 'softer' public and landscape spaces between the buildings and Barbican residential blocks and landscape to the north. This split façade identity would purposely create a slenderer impression of the massing. The corners of the two primary buildings are carved away and rounded echoing 1 London Wall which would both soften their appearance and open up views between them.

260. The bases of both buildings would be well defined, and in geometry and texture reference the Barbican. Attractive, double-height, pale slender columns would be exposed and visible outside the largely glazed building facades. These would flare outwards, petal-like, to become the soffit surfaces above highwalk level, spreading out and merging with one another into a consistent, repeating unit around the base. These soffits would be deep, undulating overhangs and arcades, defining and framing the street level active uses and podium spaces beneath New Bastion House and Rotunda buildings. The motif would wrap organically around the plaza and extend into the Aldersgate arcade, providing an appropriate level of enclosure, human scale and visual interest to the ground floor.

261. The 'petals' would cluster around and clasp the base and be drawn upwards into a series of individual fins to the top of the building on the Aldersgate Street and Monkwell Square elevations. The fins would be variegated and twist and form a vertical veil which in long views would form a calm, opaque foil. A mediation of the overall scale would be produced by a sawtooth profile in plan, along with incidental moments of the fins as though 'pinched' together in places. These external fins would provide solar shading, as would a surface frit on the glass between the fins. The pattern of the fins across the facade would vary between New Bastion House and Rotunda, both breaking the uniformity of the façades, creating a secondary scale and providing visual interest, privacy and a degree of playfulness between the two blocks.

262. Contrastingly, the inner facades would have a sweeping geometry of cascading, rectilinear, planted balconies framing the internal plaza and forming a valley which would merge with the highwalk glade and tumble down to the main entrance to the public cultural hub, glade and plaza at the heart of the site. These softer internal tapering facades with stepped, sawtooth profiles would further articulate the mass of the buildings and also open up oblique views into the Barbican Estate. They would have a more domestic scale echoing the hanging gardens of the planted residential balconies of the Barbican. Elements of a contrasting, warm-toned material would be incorporated to create increased sense of solidity and would be reminiscent of the timber window framing and shutters around the Barbican Estate.
263. These opposing internal and external facades are tied together with a cascading architectural expression which would sweep and weave into one another to the northern elevations facing the Barbican. This device, together with the tapering floor plates to the summit, would present a slender and visually interesting building form. The southern aspects would be bolder, with geometries framing more assertively, and appropriately, the more bustling context of London Wall. These more linear, vertical elements would contrast well with the grid of the Barbican and the combination of curved and rotated forms would integrate the buildings with the similar geometry of surrounding buildings such as 200 Aldersgate and One London Wall.
264. The crown of the roof envelope has been carefully considered and screens the plant and roof top equipment. An articulated silhouette of feathered fins to the east and west elevations would gently terminate the vertical facades. The top floors of the internal elevations would be distinct from the lower floors, with a double storey more heavily fritted and glazed to provide an overall lightness of expression.
265. The roof levels are designed to maximize green planting, but also maximize the potential for renewable energy with photo-voltaic array located where possible. The overall intent is to create a synthetic visual between different elements. PV cell and mechanical louvers are designed to have the same size, rhythm, and spacing, and to equalize their tonality to reduce prominence. The roof gardens and spaces have been designed according to Policies DM 10.2 and DM 10.3 of the Local Plan 2015.
266. The existing buildings present hostile, often blank and inactive elevations at ground and highwalk levels. The proposed development would be supported by the strong cultural components and other complementary uses prominently located at ground and highwalk levels, utterly transforming the pedestrian experience of this site with active frontages, new routes and new public spaces. The development would connect a range of public cultural experiences both existing and new across the site, through accessible internal and external routes.

The proposed circulation and public access points to lifts and staircase have been designed to be prominently positioned and inclusive.

267. The central cultural hub would anchor the vibrancy of the main plaza as a place which, together with the bowl-shaped glade, would be an engaging and attractive architectural feature. The entrance to the London Wall Plaza and cultural hub would be well-signposted by the dramatic, cantilevered glade and oculus and soffit acting as a canopy that would define an outdoor gathering space below. Beneath the glade is entry to a flexible multi-purpose event space with double height volume extending down to the lower ground floor. The elevation would be glazed and visible from the street to invite passers-by to look in and would be fully openable to flow into the public plaza in good weather.
268. Additional exhibition spaces and cafés would all be glazed and these uses would line and activate the east/west arcade. The arcade route would be architecturally engaging and inviting formed by continuing the distinct language of the 'petals' motif framing the passage.
269. The Rotunda would contain extensive and connected cultural spaces, prominently and centrally positioned at lower ground level connecting through to a rooftop cultural space with access to a public roof terrace approached from street level lobby via express lifts. The Roman Gate exhibition area within the London Wall car park would be a reinterpreted exhibition space as a part of the total space allocated to culture across the site. New Bastion House would include floorspace for cultural providers and food and beverage areas overlooking Barber Surgeon Gardens and the London Wall scheduled monument. The mix of uses and their highly prominent location within the public routes and spaces would create a greatly enhanced and more socially and economically inclusive place.
270. The architectural finishes, materials and design detail would be high quality expressive, enticing, and contextual, drawing inspiration from the Barbican Estate. The external veils would transition between rough texture of the petals and soffit to the smoothest of scoop details and the twisted fins have been conditioned to be GRC and would have a similar contrast in surface textures of bush hammered and smooth concrete. These external elevations due to the tightness of the fins would have an overall opacity and solidity. Internally, facades have contrasting, warm-toned materials with GRC soffits defining floor plates and projecting balconies reminiscent of the wood window framing and shutters around the Barbican Estate. Glazing would be a combination of fritted, back painted and clear glazing positioned to mitigate microclimate and impacts to residential amenity.

North Building:

271. This would face Aldersgate Street, adjacent to Ironmongers Hall, and would enclose the northern elevation of a new public space referred to as Aldersgate Square which is discussed in the urban design section. The North Building would be a modestly scaled 5-storey block (37.45m AOD to top of main roof level and 39.6m AOD to top of lift overrun). The building would be dedicated to office accommodation with one lower ground level for back of house plant and servicing. A small roof terrace would be located on the southwest corner of the North Building for use by building occupants. The rest of the roof around the inset mechanical penthouse would consist of planted green space and is designed to create a calm, minimal rooftop element.

272. The North Building was originally conceived as a sibling to the two larger new buildings proposed. However, in response to consultation and pre-application discussions, the concept was revised with a more singular design response that sets it apart from them and which better responds to the Ironmongers' Hall and Barbican Estate. In design, the building would echo the brick materiality of its immediate neighbours, Ironmongers' Hall and the Barbican Turret, employing an arch motif which is prevalent across the Barbican complex, but manipulated and inflecting it to delightfully contrasting effect. The building would be most visible from Aldersgate Street and Thomas Moore Highwalk, and seen from these vantages the building's scale, massing and colouration would knit effectively into the existing context.

273. Weaving around the block at first floor level, the new stretch of Highwalk would add further visual interest integrated as a deeply expressed recess, introducing planting to Aldersgate Street and further connecting the Barbican Estate and the proposal.

274. The main office entry to the North Building would be located to the north of the newly created Aldersgate Plaza. This entrance would have an active relationship with the public plaza, which is elevated from the street level, providing a more generous and secluded entrance sequence for visitors. The entry would be level with the plaza and a stair and ramped route would allow for accessible access from the pavement running parallel with Aldersgate Street.

Site-wide:

275. The roofs to the tall buildings would incorporate dedicated BMUs traversing on twin tracks raised above the upper roof deck. The BMUs would park out of view when not in use below the roof parapet level on a dedicated lift table. When not in use these would be hidden below the roof line, so it would not be visible in any key views. The North Building is proposed to be maintained externally via platforms and abseils.

276. The development as a whole has been designed with sustainability in mind and this is detailed in the relevant section of the report. The façade design has been informed by relevant solar, wind, view and radiation analyses as well as responding to the materiality of local context taking references from the Barbican resulting in better informed building responses.
277. On the outer west face of the Rotunda and east faces of New Bastion House the fins would contribute to reducing solar heat gain. For the larger buildings, the projecting elements of the inner facades would create elements of self-shading, recalling the deep recesses of the Barbican residential terraces. The convex shaping of the buildings would also reduce vortex shedding and accelerations of wind, while the relief and texturing of the facade creates surface roughness to reduce wind energy as it travels around the buildings.
278. The roof levels are all designed to optimise greening, but also maximize the potential for renewable energy with photo-voltaic array located where possible. The overall intent is to create a synthetic visual between different elements. PV cell and mechanical louvers would be designed to have the same size, rhythm, and spacing, and to equalize their tonality as much as possible to unify the roof into a single entity.
279. The existing car park entry and servicing ramp off London Wall is proposed to be demolished and servicing consolidated with access via the ramp connected to Aldersgate Street. Access to the ramp and the service areas for New Bastion House, Rotunda building, North Building and Ironmongers' Hall, as well as access to the Barbican car park, would be secured with a gate and security check point integrated into the North building. All servicing access and facilities would be provided below ground level, not visible from the street or neighbouring properties. The Ironmongers' Hall would have a dedicated waste store and servicing location separate to the other buildings.
280. Urban greening is intrinsic to the proposal, both on buildings and in the public realm, taking inspiration from the Barbican Estate. It would be achieved by several means: treating the whole new podium level as a continuous landscape / public realm surface, increased in area by creating a new artificial ground plane above the northern service yard. In addition, the buildings would have a light touch-down with inset facades at the lobby and podium levels which creates a series of covered outdoor arcade spaces at both street and Highwalk level. The overall tapestry of public spaces would consist of a series of spaces each with its own scale, distinct character and atmosphere. This would provide a range of types of space and environments for members of the public to experience around the site.
281. The planting strategy is for practical and deliverable urban greening with infrastructure and soil depths compatible with the site. There would be a variety

of planting types across the site including the retention of existing trees and wildflower planting in Barber Surgeons Hall Garden adjacent to the Barbican Lake and within the Ironmongers Hall Garden. The planted plaza, streetscapes, podium, balconies and terraces would all contribute to a complex matrix of planting typologies. The whole would act as an extensive urban greening infrastructure system enhancing biodiversity, supporting pollinators and reducing urban heat effects, enhancing health and wellbeing and reducing surface run-off after heavy rain. The overall UGF factor would be 0.41.

Architecture conclusion

282. Overall, the proposal would optimise the use of land, delivering high quality, mixed-use space and a new, multilayered place woven through with cultural opportunities. It would be an exemplary architectural response, comprising thoughtful and characterful design which would positively transform the locality. Sustainability, microclimate, streets, people, urban greening and spatial planning have all been fundamental to the design of the proposal, which would make effective use of limited resources and deftly navigate complex level changes. The built forms and public spaces and landscape character areas are inextricably interlinked with architecture and would be engaging and distinctive. In the majority of visual experiences, the bulk, height, massing and quality of materials and design approach are appropriate to the character of this part of the City. The proposal would be a suave new addition to the architectural character of the locality, a foil to the brutalism of the Barbican Estate, providing an oasis of green, people-focused space amidst a hard-edged urban landscape. The proposal would constitute Good Growth by design and would comply with NPPF and National Design Guide policies, Local Plan design policies CS10 and DM10.1, DM10.2 and DM10.3, emerging City Plan policy S8 and DE2 and London Plan DE3 and DE4, contextualised by its Good Growth objectives GG1-6).

Public Realm

283. The proposal would create a destination for a broad demographic with a mix of uses and activities. Several new public spaces would be created, the Central Plaza, the Glade, Aldersgate Plaza, the Northern Garden and the Roman Gate viewing area, each with a unique character. In addition, existing public spaces including Barber Surgeon's Gardens would be improved. New and/or improved routes, the Rotunda Arcade and alterations to the Highwalk Network are also included in the development proposals. There is 9,080sqm of existing public realm on site, including both hard and soft landscaping, which would be improved. The proposals would deliver in total 13,032 sqm, a significant uplift of 3,952sqm (43.5% by area) of new public space. This additional public realm is roughly equivalent to the size of a 20 tennis courts, this is a remarkable amount of new

public realm which would be delivered in a high-density urban environment. The proposals represent a drastic improvement in quality, in addition to quantity, as is explained in the subsequent paragraphs.

284. The proposals represent best-practice in Urban Design and Placemaking, the layout of the ground plane with its arrangement of routes, spaces and uses will transform a hostile, traffic dominated environment into a lively and accessible destination, perfectly situated on the pedestrian and cultural desire line between the Barbican, St Paul's Cathedral, Millenium Bridge and the Tate. The site currently has poor public realm at ground floor level, road infrastructure dominates the environment and there is little in the way of activity and vibrancy at ground floor level, a consequence of the environment being uncomfortable for people. It is one of the few places in the City of London with such a harsh environment, the proposals would radically amend its condition insofar as possible.

285. The proposals represent compliance with Policies D3, D8, T1 and T2 of the London Plan 2021, as well as CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies S10, AT1, S8, DE2, DE3 of the emerging City Plan 2040, and, the City of London Public Realm SPD and the City Public Realm Toolkit. The creation and/or improvement of new and existing public spaces and routes exceeds policy compliance, it is considered by officers to be a significant benefit of the scheme. When compared to other planning applications in the City of London, it is unusual to see such a comprehensive re-design and improvement to so many public routes and spaces in one application.

Layout and disposition of buildings, uses and public spaces

286. The placement and orientation of the two main buildings allows for the creation of new public spaces and routes, these new publicly accessible areas would be appropriately framed by active uses, this arrangement would add vibrancy and activity to the area not only throughout the week but also on evenings and weekends, the proposals embody the wider aspirations of Destination City. The Rotunda building would be prominently situated on the terminating view at the northern end of St Martin's Le Grand, offering glimpsed views into the new public space, furthermore, when approaching the site from the south, pedestrians would have improved visibility of the improved crossing facility and the raised base of the building would open up views into the southern plaza. The proposals would improve the legibility and intuitive wayfinding of the northerly desire line from St Paul's Cathedral, pedestrians will understand more clearly where they can go on a key route to one of the City's key cultural destinations, the Barbican Centre, the proposals represent an improvement on the existing condition.

287. Holistically, the proposals work with the wider highways and transportation proposals for the area. The Rotunda building is positioned over the arm of the existing gyratory which is proposed to be removed, this opens up an opportunity to create a new public square between the buildings, a similar move to remove one arm of a junction has been executed effectively outside the National Gallery at Trafalgar Square, prioritising the provision of public space and pedestrian routes whilst still allowing access routes for vehicles elsewhere. New and revised pedestrian crossing arrangement over London Wall would open up a more direct and accessible route into the site. Overall, the urban fabric, the arrangement of the building and spaces, would be more user friendly, safe, attractive, legible and accessible.

288. The siting and design of the Central Plaza is robust, it would be enclosed by the proposed cultural use, the 'culture cap' reception, café space, and tree planting to the south, this arrangement of active frontages would create a high-quality amenity space for both the public and the occupants of the buildings. At the northern end of the square, views into the activity of the proposed auditorium, paired with the arched bowl of the densely planted park cantilevering above would 'layer' a mix of symbiotic uses. The orientation of the buildings would be north-south, this would maximise direct sunlight penetration into the proposed public spaces by keeping the southern aspect open. The 'oculus', or the cavity in the cantilever, would funnel light into the entrance space of the auditorium, at ground floor level there would be a small amphitheatre around the entrance, with an arrangement of seating which would provide a welcome mat to the cultural use where people could meet, rest and dwell. The south side of the square would be bound by dense landscaping to enclose the space and separate the public square from the noise and visual intrusion of the London Wall vehicular route, improving the appearance and function of the streetscape. Social seating would be positioned to encourage people to face one another, fostering social interaction, the seating would be provided at a range of heights in order to be comfortable and inclusive for all users. Furthermore, a free drinking water fountain would be secured through condition for location in this space. This enveloping of the new square would create the optimal conditions for encouraging positive and active street life, encapsulating the essence of Destination City. The proposals represent a radical transformation of a traffic dominated peninsula into a new publicly accessible and inclusive destination for the City of London by delivering a new public square of 1,488sqm.

289. From the Central Plaza, lifts and stairs would take pedestrians from ground to first floor level, the stairs and lifts have been positioned carefully to maximise visibility, they would be obvious and legible when approaching the Central Plaza from the south. The proposed ground level arrangement, with the new pedestrian crossing and the lifts/stairs would provide a more direct and accessible route across London Wall and up into the Barbican and towards the Barbican Centre,

one of the City's key cultural destinations. The Museum of London currently has a central garden, the Rotunda Garden, despite having some charm, is tucked away and its location is not particularly obvious to visitors, it is underutilised as a space. Similarly, the existing pedestrian journey through the site is confusing and difficult to navigate, currently pedestrians have to enter a staircase on the south side of the street and cross a bridge, the proposals would deliver improved legibility and accessibility for pedestrians by delivering clearer and more direct pedestrian routes, which would have attractive dwell spaces along each route/direction. Generally, the proposals work well with the site levels, there are currently dramatic level changes on each side of the site, the proposed routes and connections reconcile these levels in a positive manner insofar as possible and effectively connect each part of the site.

290. The route underneath the Rotunda building, the Rotunda Arcade, would preserve and enhance east-west pedestrian permeability through the site at ground floor level, connecting Aldersgate Street to London Wall in a direct manner, this route would be visible when viewed on the pedestrian desire line from the north (Barbican Station). It would be interesting and vibrant, lined with active uses, framed by facades, soffits and surface materials which would create a visually interesting environment, a stridently different environment to the existing underpass, measuring at 228sqm it would be a significant improvement on the existing condition for pedestrians. The pedestrian route would appear more attractive than the existing vehicular underpass and it would benefit from being segregated from vehicular movement, the existing route has large volumes of vehicular traffic, the generated pollution and noise creates a poor environment for people. Greening to the west of the Rotunda building would also improve the appearance of Aldersgate Street on the desire line from the Barbican Station.

291. 'The Glade', measured at 796sqm, is the landscaped bowl between the Rotunda and Bastion buildings, would be visually prominent and interesting, encouraging people up to the landscaped podium. The dense landscaping and raking arms of the bowl would create an enclosed and tranquil area, it would be a space with a unique character. 'The Glade' would appear and read as a set piece in the wider townscape, a unique and interesting architectural moment which would provide visual interest at a raised level, the materiality of the soffit would extend behind the glazing beneath, and into the cultural auditorium, echoing a design quirk of the nearby Barbican Centre, where external and internal appearance follows a common architectural language. Paths and routes around the edge of the glade would allow for public access and interaction, these routes, lined with seating, would provide opportunities to stop, rest and dwell, as would the flexible and programmable lawn space at the centre. To the west of 'the Glade', under the overhang of the Rotunda building, an area finished in rubberised mulch surface is intended to be used flexibly, it could be used for exercise activities classes or similar, this area offers 250sqm of new public realm which

would be protected from inclement weather. In addition, new routes and paths, lined with greening and new surface materials, between the glade and the flexible space would create high quality public realm at first floor level.

292. The re-provision of the high walks would contribute additional north-south permeability at a high level, indicative imagery suggests the proposed highwalks around the site would establish a harmonised aesthetic with the proposed architecture, improving the appearance and visual amenity of the streetscape, the detailed design and appearance of the highwalks would be agreed through condition, in consultation with the City of London, subject to feasibility and detailed assessments which may alter their design and appearance. Furthermore, new pedestrian links to the Barbican Highwalks would be established. These new routes would make a further, positive contribution to pedestrian access. In addition to the re-provided high level connection over London Wall, the internal highwalks at podium level on the site would provide 2,326sqm of walking space. All of the above is considered to be a benefit of the proposals.

293. Moving round to the west of the site, Aldersgate Plaza (392sqm) would be a new, smaller public space in front of Ironmongers Hall. Similar to the current location of the Central Plaza, this area is currently sealed off by a hard border. The existing Museum of London building has a very defensive street level presence, it not only segregates Ironmongers Hall from Aldersgate Street, but also Ironmongers Hall from the rest of the site, the proposal would logically stitch together the entire area at both ground and first floor level, again, a dramatic improvement in Urban Design terms. Ironmongers Plaza would have soft landscaping, tree planting and a material palette in line with the City Public Realm Toolkit and the City of London Public Realm SPD, it would be an attractive and welcoming space and would deliver improved public access at ground floor level. In this space, the northern entrance of the cultural space would be visible, there would be glimpsed views when travelling south along the pedestrian desire line from Barbican Station to the site. A staircase and lifts up to level one would connect Aldersgate Plaza to 'the Glade' and the Aldersgate Highwalk. Tree planting in the square would make it attractive and would provide climate resilience through shade and shelter. Furthermore, greening and landscaping on Aldersgate Street, in addition to Ironmongers Plaza, would enhance the appearance of the street and make it a more welcome and inviting environment for pedestrians. Access to the cycle hub and cafe space and their facades would add a degree of activation to the west of the site, generally, the proposals would result in the site having an improved interface with Aldersgate Street.

294. Both Barber Surgeons Gardens and the Northern Garden would have refreshed spaces with new paths, seating and landscaping, improving and expanding the provision of green infrastructure around the periphery of the site. Existing trees would be retained and new seating would be provided, giving

additional opportunities for people to dwell and enjoy the space. The positioning of routes and seating in Barber Surgeons Gardens, alongside the proposed relandscaping, would create more opportunities for people to enjoy the historic monuments, enhanced views of the archaeology and remains would create an attractive and unique garden. Barber Surgeons Garden is currently pleasant, but the proposed development would also create an enhanced relationship between the buildings and these spaces through the provision of new access to the garden with new entry points, and new active frontage and use in the Roman Gate Viewing Area, this space in total would amount to 3,271sqm of improved public realm. At the northern end of Barber Surgeons Garden, a new stepped route would connect Barber Surgeons to the Northern Garden, a cascading water feature would line the stepped route, high level routes, lifts and ramps would offer access and new views into the space. On the south side of the space, a new access lift, stairs (with a cycle rail) and a ramp would improve accessibility, new facades and active frontage (the entrance to the lower floor cultural offer) on the existing London Wall car park access would greatly improve the buildings interface with the gardens. Additional access would be provided by opening the gates from Monkwell Square. Interpretive signage and plaques, secured through condition, would tell the story and history of the ruins. These interventions represent a significant improvement to the space itself and how the buildings interact and relate to the green spaces. The design and delivery of the proposals for Barber Surgeon's Garden and the Northern Garden will be coordinated with City Gardens throughout condition stage.

295. Alongside the improved highwalk connections, the Northern Garden would enhance east west permeability through the site with more accessible and aesthetically pleasing routes and dwell spaces, currently, there is no pedestrian permeability in this part of the site. The Northern Garden would be constructed over the existing service vehicle ramp and service yard area, offering a greener, more pleasant environment over the existing condition, it would pleasantly mask the service yard/parking area and would help to contain any noise and disturbance, this partly existing, partly new space would provide 1,992sqm of high quality public realm.

296. In summary, London Wall and Aldersgate Street would be opened up to public-facing, permeable, visually interesting and well-lit publicly accessible spaces, which would provide a good level of interest and passive surveillance to the street. The spaces to the north and east would also be improved, wrapping both of the proposed buildings in high quality public realm. The proposals make a substantial provision of new and improved public spaces, totalling 13,032sqm of external public realm, in addition internal uses on the lower floors of the building which would add animation and vibrancy on a local level, creating the conditions for a radically improved area.

Active frontages

297. In terms of active frontage at ground level, the proposals would have a café, the culture cap entrance and the exhibition space. The curation, programming and mixed-use nature of the proposals would result in a public realm which functions at different times of day and on different days of the week, appealing to a range of audiences and attracting a diverse range of users to the site. The provision of shaded dwell space, with seating and a retail offer would create an environment where people can meet, dwell and rest.
298. The entrances to publicly accessible spaces would be prominent and visible to passersby, access and circulation to the culture cap, exhibition space, cycle storage and cafe, have been thoughtfully positioned to be obvious and legible to users, with appropriate signage and wayfinding measures to ensure entrances are clearly legible, the details of which are reserved for condition. The natural passive surveillance offered by the orientation of these uses, paired with the proposed lighting, would create a safe environment for all. Furthermore, the additional mix of proposed uses would generate activity on evenings and weekends to put ‘eyes on the street’, encouraging safety through community stewardship. As a result, the proposals would create an engaging piece of public realm, suitable and welcoming for those of all ages.

Public realm, management, cultural and programmable events

299. The publicly accessible ‘interiors’ at basement, ground and upper levels would complement the public realm, which would include cultural curation and programming secured via the Cultural Implementation Strategy, building on the City’s range of inclusive and accessible buildings.
300. An appropriate management, curation and programming of the public realm, both internal and external, would be ensured via condition. A Public Realm Management Plan and Cultural Implementation Strategy will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8 and guidance in the (draft) Public London Charter. Overall, the proposals appear to maximise public access through the provision of publicly accessible internal and external spaces, this is a positive aspect of the proposals.

Public Toilets and Changing Places

301. Policy DM22.2 of the City of London Local Plan (2015), Policy HL6 the Draft City Plan 2040, and Policy S6 of the London Plan (2021) require the provision of

a range of publicly accessible toilets and changing places within major developments that have high levels of public access and pedestrian footfall. This policy requirement is reviewed in this section of the report as it is related to public realm experience. A detailed appraisal of wider access and inclusivity matters is set out in the Access and Inclusivity section of this report.

302. At this stage no Changing Places are proposed as part of the development and the provision of one would result in a more inclusive environment. The applicant has advised that this could be reviewed at detailed design stage as part of the tenant fit out. Provision of a Changing Place toilet would be secured by condition.

303. A range of toilet facilities within accessible WCs would be provided across the development,

- a. In the 'Rotunda' building:
 - i. 11th floor – 12 WCs associated with the cultural space and restaurant and cafe with provision of accessible WCs
 - ii. Ground floor – 1 accessible WC in the Culture Cap reception, 3 WCs in the cafe space, 9 WCs in the central lobby space, with provision of accessible WCs
 - iii. Lower Ground Floor Level - 6 WCs associated with the cultural space including an accessible WC
- b. In the 'Bastion' building:
 - i. Ground floor – 2 WCs associated with the office entrance, WCs associated with the restaurant and cafe space including provision of an accessible WC
- c. In the North building:
 - i. 1 accessible WC in the office reception
- d. In the London Wall Car Park:
 - i. Lower ground floor level – Re-providing the existing WCs, including 3 toilets, 3 urinals and an accessible WC

304. It is proposed that access to these facilities would be aligned with the opening hours and operational requirements of each use. The aforementioned policies seek high levels of public access to toilet facilities, and to ensure that facilities are situated in close proximity to busy and active uses with appropriate wayfinding and signage for ease and convenience. The detailed design, hours of access, wayfinding and signage would be agreed through condition once future occupiers and their operational requirements have been established. The provision of a range of facilities across multiple areas of the development is considered to be acceptable.

305. The proposed servicing strategy would separate vehicle servicing access from areas of high pedestrian footfall or dwell spaces insofar as possible, allowing the public realm to perform a variety of functions without being disturbed by the presence of large vehicles. In addition, the existing service yard and car park would be decked over with a new landscaped space, concealing the activity and providing new, attractive landscaped areas. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience of the surrounding public realm, in accordance with London Plan (2021) Policies D3 (4) and D9.
306. Hostile Vehicle Mitigation (HVM) has been sensitively incorporated in the public realm, through the use of a mix of “softer” measures such as a HVM compliant planters including dense landscaping and tree planting, with a limited number of bollards. The proposals are considered to be in accordance with City of London Local Plan (2015) Policy CS3.
307. Overall, the proposals would be accessible and welcoming to all, and would provide streets and public spaces which would dramatically improve the urban environment. Walking and cycling are the most sustainable transport modes, the proposals rightly prioritise them, the proposed development would enhance the streetscape in terms of attractiveness and functionality for those users, it is reachable from numerous public transport interchanges on foot, with good cycle lane provision in the vicinity and high-quality cycle facilities with prominent and legible entrances. The provision of cycle storage in the public realm and a legible cycle access lift and cycle ramps to the parking in the basement would prioritise the needs of active travellers and provide high quality facilities to support and encourage active travel.

Greening

308. DM 10.2 of the Local Plan and S8(7) of the emerging City Plan and London Plan Policy G5 requires major development proposals to contribute to the greening of the city by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. The proposals include provision of a substantial number of trees and planting across the site area. Urban greening is detailed further in the Urban Greening section of the report. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed buildings, and public realm and is considered to be compliant with London Plan

policies D3, D8, G1, G5 and SI13, and City of London Local Plan (2015) Policies DM10.2, DM10.4, CS15, DM15.5, DM19.2.

Materials

309. The proposed approach would seamlessly stitch the site into its wider urban context. The use of York stone paving at ground level and complementary materiality for seating and other built surfaces would harmonise the aesthetic of the public realm with its adjacent context, this would be particularly helpful in re-enforcing the character of the pedestrian desire line northwards from St Paul's towards the site, St Martin's Le Grand has a distinct character and identity, the appearance of the public realm on the application site would mediate between the classical/traditional aesthetic of St Martin's Le Grand and the Modernist, Brutalist aesthetic of the Barbican.

310. At ground floor level, the use of York stone paving would create a consistency in the design and appearance of the adjacent streets and the public spaces. This would suggest to pedestrians that the space is publicly accessible in a welcoming manner. The new public realm would be a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Public Realm Toolkit, with final detail reserved for condition. The proposals would also rationalise and minimise street clutter.

311. At first floor level, the use of a rubberised mulch surface is considered positive, it would be suited to exercise classes and outdoor performances and would be specified through condition to be aesthetically coordinated with the rest of the public realm. Towards the central plaza the landscape design statement suggests a yellow colour which would mediate between the use of Yorkstone Paving at ground floor level and the more traditional barbican aesthetic at the upper levels. On the transition between the Barbican highwalks and the upper-level public space a different colour/treatment would be specified through condition to sensitively mediate between two different material approaches. The submitted drawings suggest the material but not the colour. Timber decking would be used at first floor level under the cantilever of the Rotunda building, this area is intended to be used flexibly and could be used for exercise classes, outdoor performances, or other programmable events. Given the protection from inclement weather, the surface treatment here is considered appropriate. The materiality of the public realm and all associated furniture is considered to be acceptable, it is in accordance with Local Plan (2015) Policies DM10.1, DM10.4, London Plan (2021) Policies D3, D4 and D8.

Lighting

312. Lighting would play a key role in the success of the development, to keep people safe and secure, to contribute to placemaking and to enhance heritage. Initial concepts have a multifaceted approach, cognisant of residential amenity and sustainability to minimise obtrusive light as much as possible. The TBHVIA has also provided some nocturnal experiences including views 20N and 26N. The final proposals will develop the positive impacts of the lighting strategy, to realise social and ecological benefits. Initial concepts have been presented for the different character areas within the public realm and buildings including the London Wall and Roman Gate Ruins. A final detailed Lighting Strategy would be subject to condition to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with the City of London Lighting Supplementary Planning Document (SPD) 2023, Local Plan Policy DM 10.1 and Draft City Plan Policies S8, DE3 and DE9, and with regard to impacts on heritage assets. The final design will deliver low level and architectural illumination which enhances the pedestrian experience.

Design Review Process

313. One of the objections questions why the scheme has not been through a design review process in accordance with policy D4 of the London Plan (Delivering Good Design).

314. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design.

315. In respect of D4 A, the applicant's evolution of site development was designed and this is detailed in the Tall Building, Architecture and Urban Design section of the report.

316. With regard to D4 B, the pre-application process including formal meetings, workshops using visual tools and site visits since 2021 has applied a holistic lens to the design analysis to optimise the potential of the site. Officers with expertise in sustainability, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.

317. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. At an early stage, transport and pedestrian data informed options for the road layout, cycle routes and potential for pedestrian crossing and officers have been working collaboratively with TFL. Environmental microclimate, daylight and sunlight analysis informed the massing and design treatment as well as the public realm and landscaping.

318. Wider engagement by the applicant with “Londoners” is set out elsewhere in the report.
319. Part D4 C has been met and a detailed design and access statement has been submitted.
320. In respect of D4 D, the proposals have not been referred to an independent design review but have undergone a rigorous local “borough” process of design scrutiny as required by the policy. In addition, the applicants undertook pre-application engagement with the GLA and Historic England. The GLA strongly encouraged use of the London Review Panel service but this is not mandatory for this scheme and this service was not progressed in this instance. At application stage the GLA have responded that the proposals would not result in a strategic impact and do not wish to comment.
321. At application stage the proposals have been reviewed by the City of London Conservation Area Advisory Committee. The Committee accepted these proposals as a significant improvement on what was already there, especially for the public realm, and decided to offer no objection to the application. The further greening of the space by Barber-Surgeons Hall and the further opening up of a section of the historic London Wall was welcomed. The imposition of conditions especially over materials and the further involvement of the Committee as the scheme evolved was requested. The City of London Access Group also scrutinised the applications and detailed feedback is provided in the relevant section of the report.
322. In relation to D4 E, parts 1-6, there has been a “City” level of scrutiny comprising extensive officer topic based reviews over multiple pre-applications; external input has been provided by other experts as set out above; feedback has been recorded and provided to the applicants; the evolution of the proposals is summarised in the DAS; and within the Committee report.
323. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity and avoid deferring large elements of the development to the conditions. The recommendation is also supported by a robust relevant condition to ensure the scheme is implemented to an exemplary standard. F (4) an informative is attached to encourage the retention of the application design team or a future team to be of an equal quality and experience to be employed through to construction and completion stage.

324. Overall, the application process has adhered to the intentions of London Plan D4 Delivering Good Design.

Design and Public Realm Conclusion

325. The proposal amounts to a thoughtful, complex and high-quality design exemplar. Various conditions are proposed to ensure that the promise of the proposals is fully realised at detailed design, construction, and operational stage in accordance with D4 of the London Plan.

326. Overall, it is considered the proposal would optimise the use of land, delivering high quality office space, and a multi-layered series of flexible cultural opportunities externally and through the buildings. It would improve the site's interfaces with and contribution to its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 DE2 London Plan D3 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.

327. The proposed public realm would be in compliance with policies D3, D8, T1 and T2 of the London Plan 2021, as well as CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies S10, AT1, S8, DE2, DE3 of the emerging City Plan 2040, and, the City of London Public Realm SPD and the City Public Realm Toolkit. The creation and/or improvement of new and existing public spaces and routes exceeds policy compliance, it is considered by officers to be a significant benefit of the scheme. When compared to other planning applications in the City of London, it is unusual to see such a comprehensive re-design and improvement to so many public routes and spaces in one application.

Accuracy of information in assessing the Design Impacts

328. There have been objections regarding the Design and Access Statement and a suggestion that the content is misleading.

329. The images in the Design and Access Statement are for illustrative purposes and are not accurate visual representations. The model within The London Centre which has formed part of the public consultation material is accurate at 1:500 scale.

330. There have also been objections to the use of a wide-angle lens in relation to the TVBHIA. The TVBHIA includes Accurate Visual Representations (AVRs, also

known as verified views) of the proposed development from a set of viewpoint locations that were agreed with CoL planning and design officers. The AVRs were prepared by specialist visualisation firm, Miller Hare, and the visualisers methodology for the production and accuracy of these images is included in Appendix D of the TVBHIA. Section 3 (Assessment Methodology) of the TVBHIA outlines the methodology behind lens selection for the verified views. The choice of lens used to photograph a view, and consequently the horizontal field of view (HFoV), is made on the basis of the requirements for assessment, which may vary from view to view. The human eye has a HFoV of about 110°. ‘Normal’, or ‘Standard’ lenses (36–60mm in 35mm film format) cover between 62° and 40° so in an urban situation frequently do not provide the necessary context for a full appreciation of the human experience of the view. Where the wider context of the view should be considered – and in most situations a viewer would naturally make use of peripheral vision in order to understand the whole – it is logical to use a wider-angle lens (24–35mm in 35mm film format) which would cover a FoV between 84° and 64°. A 24mm camera lens has therefore been used for the majority of the verified views to capture the appropriate context that the human-eye will experience and the full/ appropriate extent of the site/ development to show the effect that it has upon the receptor location. This approach is aligned with best practice guidance for assessing visual effects in an urban environment, as outlined in the London Views Management Framework Supplementary Planning Guidance (LVMF SPG, 2012) and the Landscape Institute’s Technical Guidance Note on Visual Representation of Development Proposals (TGN 06/19). The visual information and methodology followed is consistent with other major planning applications submitted to the City of London.

Strategic Views

331. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor’s London View Management Framework (LVMF) SPG, protect and enhance views of historic City Landmarks and Skyline Features and secure an appropriate setting and backdrop to the Tower of London. Policy S23 of the emerging City Plan 2040 seeks the same and takes into account the Tower of London World Heritage Site Management Plan (2016).

Tower of London World Heritage Site

332. The site is not located within the Local Setting of the Tower of London and the proposal would share no intervisibility with the World Heritage Site in any of the Representative Views identified in the LVMF or the Local Setting Study. The Zone of Theoretical Influence (TBHVIA Appendix C) shows that there would be no

intervisibility between the proposed development and the WHS, including its local setting area. View B13 demonstrates the development would not be visible from LVMF10A.1 North Bastion.

London View Management Framework Impacts

333. The LVMF designates pan-London views deemed to contribute to the capital's identity and character at a strategic level.

334. The buildings are sited to avoid conflicting with designated Protected Vistas towards Strategically Important Landmarks (SILs), including St Paul's Cathedral and the Tower of London (ToL). The development would be visible in several River Prospects and also to comparatively slight degrees in the London Panoramas. The development lies outside all elements of the viewing corridors for the Panoramic strategic views.

335. For clarity, the proposals would not be visible within the wider views: LVMF 4A.1 and 4A.2 Primrose Hill and LVMF 5A.2 Greenwich Park; LVMF 6 Blackheath Point; LVMF 7 The Mall to Buckingham Palace; LVMF 8 Westminster to St Paul's Cathedral; LVMF 9 King Henry VIII's Mound, Richmond to St Paul's Cathedral; LVMF 10A.1 Tower Bridge; LVMF 11 London Bridge; LVMF 12 Southwark Bridge; LVMF 16B.1 and 16B.2 Gabriels Wharf; LVMF 20 Victoria Embankment between Waterloo and Westminster Bridges; LVMF 21 Jubilee Gardens and Thames side in front of County Hall, LVMF 22; Albert Embankment between Westminster and Lambeth Bridges along Thames Path near St Thomas's Hospital; LVMF 23 Bridge over the Serpentine, Hyde Park to Westminster; LVMF 24 Island Gardens, Isle of Dogs to Royal Naval College; LVMF 25 The Queen's Walk to Tower of London; LVMF 26 St James' Park to Horse Guards Road; and LVMF 27 Parliament Square to Palace of Westminster. Therefore, impact of the proposal in these views are not assessed.

336. The Proposed Development or elements of the development would be visible in the following LVMF views for which verified and non-verified images have been produced and included in the HTVIA:

- View 1A.1 and 1A.2 Alexandra Palace (non-verified as minimal visibility)
- View 2A.1 Parliament Hill (non-verified as minimal visibility)
- View 3A.1 Kenwood (non-verified as minimal visibility)
- Views 13A.1 and 13 B.1 Millenium Bridge (verified)
- Views 15B.1 and 15B.2 from Waterloo Bridge;(verified)
- Views 17B.1 and 17B.2 from Hungerford Bridge;(verified)
- View 18B.1 Westminster Bridge (verified)

LVMF Panoramic Views

LVMF 1A.1-2 Alexandra Palace

337. This is an iconic broad and deep panorama from the northern suburbs back across the Thames basin and towards Central London. The dark summit of the existing Bastion House would be glimpsed between taller buildings. The taller elements of the development would also be partially visible from these viewpoints surrounded by similarly scaled and taller existing buildings and partially screened by trees and would be barely appreciable but overall would read as part of the mid-rise urban background which characterises the composition of each view. The development would be a minor incidental element of each view and would not screen any landmark buildings. The development would be set well to the left of the Cathedral and distinctly separate from the Strategic Landmark.

338. In baseline and cumulative scenarios, the viewers ability to recognise and appreciate St Paul's Cathedral would be preserved as would the characteristics and composition of the identified landmark elements: the London Eye, BT Tower and The Shard. It would also leave unaffected views of other identified features. The proposal would integrate into the overall composition and be in accordance with the guidance LVMF SPG (paras 60, 63, 88 and 89).

LVMF 2A.1 Parliament Hill:

339. Parliament Hill from the summit and east of, is another famous strategic panorama of London from one of its best-known peaks. The upper storeys of the existing Bastion House are currently glimpsed and the proposed New Bastion House would be visible in a similarly incidental manner due to its modest height from this viewpoint. A sliver of the Rotunda building would also be visible. Overall, the uppermost parts of the proposal would be visible in combination with surrounding similarly scaled existing and taller buildings and appreciable as part of the mid-rise urban background which characterises the composition of each view. The development would form a minor element of each view and would not screen any landmark buildings. It would be set well to the left of St Paul's Cathedral and distinctly separate from the Strategic Landmark.

340. In baseline and cumulative scenarios development would be visible well to the left of the Cathedral as part of wider existing development and would not be prominent on the skyline. The development would preserve the viewers ability to appreciate and recognise the Strategically Important Landmark. The proposal would also preserve the characteristics and composition of other identified landmark elements: the BT Tower and the Shard. It would also leave unaffected views of other identified features. The proposals are considered to be in accordance with the guidance LVMF SPG (paras 60, 63 99-100).

LVMF 3A.1 Kenwood

341. This is another Hampstead Heath view from one of the finest historic homes in North London. The existing dark form of Bastion House is barely visible and the New Bastion House and Rotunda building development would be equally incidental additions visible from this viewpoint, integrating with surrounding similarly scaled existing buildings and appreciable as part of the mid-rise urban background which characterises the composition of each view. Due to its modest height, it would form an almost incidental element of the view and would not screen any landmark buildings. The midrise tall elements would be set well to the left of St Paul's Cathedral and distinctly separate from the Strategic Landmark.

342. In baseline and cumulative scenarios, due to the distance of the development from St Paul's and the surrounding wider development context, the development would not compromise the ability to appreciate and recognise the landmark in this view and the development would not be visually prominent on the skyline. The proposal would continue to preserve the characteristics and composition of other identified landmark elements and would also leave unaffected views of other identified features. The proposal is in accordance with the guidance LVMF SPG (paras 60, 63 119 and 120).

LVMF River Prospects:

LVMF 13A.1 and 13 B.1 - Millenium Bridge (Views 9 and 10)

343. This stretch of the river has a distinct character being directly opposite St Paul's Cathedral as the Strategically Important Landmark and is one of best places to appreciate the Cathedral at close quarters. The Cathedral dominates the middle ground of the view where its monumentality, architectural details and rich embellishment can be enjoyed. The silhouette rises above a low horizontal skyline relieved by the wider 'Wrenscape' skyline of steeples and spires.

344. From Millennium Bridge, the proposal would maintain the existing apparent height of Bastion House where it would be seen above St Paul's Cathedral. The mass and form of New Bastion House has been sculpted accordingly to respond appropriately to the Cathedral when seen from these viewpoints. The successor would be same height as Bastion House with an enlarged footprint, which would result in a minimal increase of visibility in these views.

345. In 13A.1 (View 9) the proposed Rotunda Building would be fully hidden by the Cathedral and New Bastion House would sit some distance to the right of the Cathedral. Similarly to the existing Bastion House, the summit of New Bastion House would be visible in the foreground of Shakespeare Tower of the Barbican Estate, at its base and would also appear behind the spire of St Augustine Watling

Street. It is noted the LVMF does not identify St Augustine as a landmark or within the view and therefore the impacts on this spire are assessed in the City Landmarks and Skyline Features section.

346. Barbican Towers are identified as 'also within the view'. The upper storeys and silhouettes of Lauderdale and Shakespeare Towers are striking vertical elements on the skyline, Cromwell Tower being partially concealed by 88 Wood Street and the spire of St Nicholas Cole Abbey and Blake House lower and largely concealed. The Towers are experienced within an urban layered composition. The base of Shakespeare Tower is currently partially occluded by 1 London Wall and the existing Bastion House. Due to the wider footprint of New Bastion House, the proposed occlusion would extend slightly further across and the skyline to both the left and right but there would be no further vertical concealment.

347. Historic England identify a minor impact on the view and thereby, although not made explicit, infer harm to the Cathedral. This harm is identified at the lower of the scale of less than substantial harm. This position is echoed by the Surveyor to St Paul's Cathedral. However, the final Historic England position, set out at the end of their letter, does not reference the Cathedral as a designated heritage asset where there is harm to significance nor is the view referenced. Historic England also note an adverse encroachment on Shakespeare Tower.

348. Officers reach a different conclusion. New Bastion House would be of a similar height to the main body of the Cathedral and closer to it than Bastion House currently is and an identical height to existing. However, clear sky remains visible between the Cathedral and the new building and there would be no challenge to the primacy of or ability to appreciate the Strategically Important Landmark. Officers agree with the position of the Cathedral that a reduction in height would be a desirable but, on balance, find that the proposed development would preserve the existing status quo and as such result in no harm.

349. In relation to Shakespeare Tower, officers consider the increased occlusion of the base of the tower would be incidental, and there would be no further vertical encroachment on the tower. Shakespeare Tower is sufficiently robust and its overall vertical presence, the silhouette with cutout balconies and relationship with Lauderdale Tower and Cromwell Tower would be preserved. As an element within the view the Lauderdale Tower would be easily appreciable and recognisable.

350. From 13 B.1 (View 10), the proposed Rotunda Building would be fully hidden. A small amount of the top of New Bastion House would be visible where the top of the existing Bastion House is at present. It would appear just above the redeveloped Millennium Bridge House, at the base of Shakespeare Tower of the Barbican Estate. New Bastion House which would have a lighter appearance than

the existing Bastion House, ensuring that the proposed development would appear as a recessive element in the background skyline.

351. The essential character of LVMF 13A.1- 13B.1 would be retained including in nighttime, with the contrast between the modern towers, historic spires and the illuminated dome and peristyle of St Paul's Cathedral. The river itself provides a layer of darkness animated with pockets of light which contrast with the geometric forms of the buildings as they rise above the riverbank. The proposal has been designed to minimise light pollution from internal and external lighting including the roof top conservatory, which is inherent in the façade, and will be secured in detail via condition, including aviation lights. There will be no other form of external lighting that will be visible in these views. The development has been designed in accordance with the details and technical requirements of the draft Lighting SPD and the Corporate Lighting Strategy. Overall, lighting will be managed to ensure the development would not command or distract unduly from other elements of the composition.

352. In cumulative views the emerging Millennium Bridge House scheme (currently under development) would be visible in the foreground and to the right of St Paul's Cathedral. It would screen a small part of the eastern elevation of New Bastion House in 13 B.1 however, the overall impact would be the same as for the proposed development in isolation.

353. The proposal would preserve the characteristics and composition of the identified landmark elements, St Pauls' Cathedral and Millennium Bridge and would an appreciation of other elements within the view. The development would preserve the existing setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them, and there be would no harm the characteristics or composition in accordance with LVMF SPG guidance para 70, 72 and 236.

LVMF 15B.1-2 – River Prospect, Waterloo Bridge (Downstream):

354. LVMF 15B comprises two Assessment Points, 15B.1 and 15B.2 and the kinetic experience between them. It is an iconic London view with important views east towards St Paul's Cathedral and the City of London. St Paul's Cathedral is identified as the SIL. There is a clear, long-established relationship between the Cathedral and the City Cluster as two distinct forms with space between them which is integral to the composition of the view as a whole. The Cathedral the pre-eminent monument with clear sky around it, rising above, atop Ludgate Hill, a lower riparian setting of historic buildings and landscapes. The modern tall buildings of the City Cluster form the background to the right, demarcating the central financial district.

355. St Bride's Church (Grade I), the Old Bailey (Grade II*) and the Barbican Towers (Grade II) are identified in the LVMF SPG description as being of secondary status as 'also in the view', rather than as key landmarks. St Bride's spire is visible as a vertical element against clear sky. The dome and gilded statue of the Old Bailey is visible to the left of St Bride's; however, 200 Aldersgate forms the backdrop to the copper dome, and it is only the gilded statue of Lady Justice which is visible against the open sky. Bastion House is currently visible at the midpoint of the kinetic view and in 15 B.2.

356. In baseline kinetic experiences in 15 B.1 the development would be occluded by foreground development. At the midpoint in the kinetic view St Brides spire is backdropped and framed by existing taller buildings. New Bastion House would read as part of this layering and be very slightly visible, backdropping the lowest tier of the spire in a similar manner to the existing Bastion House and in a way which generates no additional impact. Moving to the centre of the Bridge, at 15B.2, the proposed development would be largely occluded by foreground buildings and trees.

357. The implemented scheme at 120 Fleet Street would appear on the left of the frame, its cascading profile dropping down to the Salisbury Square also being implemented. In the cumulative scenario, 65 Fleet Street developments, which would partly obscure the lowest tier of St Bride's at this point. The top of New Bastion House would remain visible to the right of St Bride's, with the existing taller Milton Court building rising beyond it. The slight obscuration of the base of St Bride's would result from the consented schemes and not from the proposed development. Overall, the character and quality of the view would be maintained.

358. Overall, in baseline and cumulative scenarios, the development would preserve the existing setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them, and there would not harm the characteristics or composition of the view in accordance with Policies HC4, CS 13 and the associated LVMF SPG guidance para 70,72, 266-267.

LVMF 17B.1-2 – River Prospect, Golden Jubilee/Hungerford Footbridges (Downstream)

359. LVMF view 17B.1 and 17 B.2 and the kinetic viewing experience between them are directed downstream from the Golden Jubilee / Hungerford Footbridges, with St Paul's the Strategically Important Landmark the centrepiece of the view. The footbridge provides enhanced viewing experiences to the east owing to the elevated viewing location. The LVMF guidance identifies the setting of St Paul's Cathedral within the view as the singular most important structure which should be preserved or enhanced.

360. St Bride's Church (I) spire is identified in the LVMF SPG as a 'landmark' whilst the Old Bailey (II*) has a secondary status and is listed as 'also in the view'. Both historic buildings are described as "distinctive vertical elements seen against the sky" (Ref. 1-8, para. 300). To the immediate left of the Old Bailey is 200 Aldersgate which forms a partial backdrop to the lower element of the Old Bailey's dome and a clustered form on the skyline with the spire of St Bride's. The three Grade II listed Barbican Towers punctuate the skyline to the left of this and are also noted in the LVMF SPG as secondary buildings that are 'also in the view'. The upper stories of Bastion House are currently visible within the view to the right of St Bride's Church spire.

361. The development would be set some distance from St Paul's Cathedral and so preserve the setting of the SiL. In the kinetic viewing the top of the Rotunda Building would backdrop and be set below the top of the lowest tier of St Bride's extending on either side of the spire and there would be partial loss of clear sky behind the spire in 17B.1 and, to a much lesser extent, in 17 B.2. In the kinetic experience, New Bastion House steps up and is further to the right of the spire and to a certain extent this part of the development would replace the more abrupt edge of the existing dark Bastion House in the view with a more layered and visually recessive backdrop. Despite the partial backdropping the verticality and distinctive tiered profile of the spire of St Bride's, already seen as part of a dense urban skyline setting, would remain a clearly legible feature of the view. However, the juxtaposition of the proposal with St Bride's would be slightly reduce the ability to appreciate this key landmark.

362. In the baseline scenario, the implemented scheme at Salisbury Square development would occlude the lower parts of the dome of the Old Bailey (Grade II*), while allowing its gilded statue to be visible above. The proposed Rotunda building would be concealed behind the Salisbury Square development and so therefore not impact any further upon the skyline profile of the Old Bailey.

363. In baseline and cumulative scenarios, the proposal's impacts on the spire of St Bride's would result in some limited conflict with Policy HC4 (A), and SPD para 72 harming the contribution of landmark elements in baseline scenarios. Otherwise, the proposal would preserve the setting of St Paul's as the Strategically Important Landmark and other identified landmark elements and the juxtaposition between them, and there be would no harm the characteristics or composition of the view in accordance with LVMF SPG guidance paras 73, 305. Historic England identify harm to St Bride's in this view discussed, further in the indirect impacts to listed buildings section.

View LVMF 18B.1 Westminster Bridge: downstream – at the Westminster bank

364. The Westminster Bridge downstream location extends across the north pavement of the bridge. Two Assessment Points are located in the place. 18B.1 represents views towards the Lambeth bank, where the London Eye, County Hall and the Shell Centre are prominent.

365. Bastion House is currently visible at the lowest mid-point in the background of the London Eye. New Bastion House would have a similar visual impact being as incidental as the proposed of the same height and the lighter materiality would result in the silhouette of the building reading as more recessive. The proposals would have a neutral impact on development in the view should and would not dominate landmark buildings or diminish their relationship with the river.

366. The proposal would not affect the Golden Jubilee/Hungerford Bridges, The London Eye or Whitehall Court as landmarks within the view and would preserve the characteristics and composition and would preserve an appreciation of those other feature in accordance the associated LVMF SPG guidance paras 72,73 and 326.

Summary of LVMF Impacts

367. The development would preserve the setting of St Paul's as the Strategically Important Landmark. In LVMF 17 B.1, and to a lesser extent 17 B.2, the baseline proposals would result in minor backdropping of St Bride's Church. Otherwise, the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, all other identified landmark elements and the juxtaposition between them, and there be would no harm to the wider characteristics or composition.

368. On balance due to the identified impacts the baseline and cumulative proposals would conflict to a small degree with Local Plan Policy CS 13(1), draft City Plan 2040 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LMVF SPG.

369. The Mayor has raised no objections to the impacts on these LVMF views.

City of London Strategic Views

370. The development site is not situated within the St. Paul's Heights Policy Area or the Monument Views Policy Area. In terms of Historic City Landmarks and Skyline Features, the scheme is sited so as to potentially affect St Paul's Cathedral, Barbican Towers, Old Bailey, St Giles Cripplegate, St Augustine Watling Street and St Bride. The potential impacts on these are evaluated below.

Monument Views

371. Local Plan policy CS13 and the Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City.
372. The proposal is not sited in the Monument Views Policy Area and is outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.
373. The proposal would not be in the 'Immediate Setting' of the Monument, as defined in the Protected Views SPD (Figure 8), leaving it preserved in accordance with the guidance at paragraphs 4.16-17 of the SPD. The proposal would be visible in the distance View B14 outside of any identified protection areas and would largely be concealed by 88 Wood Street.
374. There would be no impact on significant local views of and from the Monument, thus protecting their contribution to the overall heritage of the City, in accordance with Local Plan Policy CS 13 and associated guidance in the Protected Views SPD.

St Paul's Heights & Viewing Points

375. The site is situated approximately 500m to the north of St. Paul's Cathedral, and there is no intervisibility between the development site and the area surrounding the Cathedral or along the processional route to St. Paul's Cathedral from the west along Fleet Street. The proposal would not be visible and would be out of scope of most of the identified Viewing Points of St Paul's identified in the Protected Views SPD (Figure 3).
376. The upper storeys of the Rotunda and New Bastion House would be glimpsed in the kinetic riparian sequences, particularly in those orientated towards the Cathedral between Hungerford and Millennium Bridges and slightly from the South Bank of Southwark Bridge within LB Southwark at View B10 but with no intervisibility with the Cathedral. In these experiences the development would consistently be incidental, sitting low on the horizon above the foreground buildings.
377. From Blackfriars Bridge in View 7, New Bastion House would very largely be concealed, but not entirely screened, by the foreground extensions to 81 Newgate Street (under construction). A sliver of the top of the proposed Rotunda Building would be visible further left but is unlikely to be discerned due to the layered roofscape in that part of the view. In baseline and cumulative experiences, the

overall composition and quality of the view would be preserved. The proposed New Bastion House would be wider (but not higher), and overall, the wider setting of St Paul's Cathedral would retain its primacy.

378. The mass and form of the taller elements of the development have been sculpted to respond positively to the riparian setting of St Paul's Cathedral. From Millennium Bridge and Bankside, the existing height set by Bastion House is maintained and so where there is intervisibility with the Cathedral there would be no change to the current impacts. In View A2 New Bastion House would be observed to the right of the apse of St Paul's Cathedral as is the existing building, although the proposed lighter materiality would be more recessive. In LVMF 13A.1 and 13 B.1 from Millennium Bridge (Views 9 and 10) there would be no interaction with the Cathedral with the development set to the right. In Bankside at the viewing plaque (View 8), an almost imperceptible sliver of Bastion House would be perceived above the nave and quire respectively. The Surveyor to the Fabric of St Paul's Cathedral have raised concerns over the visual impact of New Bastion House in this view of the Cathedral from the south and the associated heritage impacts. Whilst agreeing that, in principle, reducing the height of New Bastion House could result in an enhancement of the Cathedral's setting, officers take a different position on the impact of the proposals whilst attaching great weight to the significance and national importance of the Cathedral.

379. The proposals would have an almost identical impact to the existing Bastion House, in View 8 and all these related experiences the development would not be readily noticed due to the small amount visible, the prominence of St Paul's Cathedral and the number of other more clearly visible buildings seen within its close setting. The proposed increase in footprint and widening of the sliver would be undetectable and there would be no further harm, preserving the current status quo. The proposed lighter materiality would have a slightly mitigating effect. The form of St Paul's Cathedral in the foreground would remain commanding, unblemished, legible and appreciable. The proposed development would not reduce the viewer's ability to appreciate the Cathedral.

380. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. From the Golden Gallery View 11 the upper parts of the proposed Rotunda Building would appear to the right of 200 Aldersgate and in front of the Barbican Estate's Thomas More House, to the left of One London Wall. The roofscape of New Bastion House would appear beyond One London Wall, where the existing Bastion House is seen at present. The roofs would appear flat and well-composed, concealing the plant and BMU equipment in such elevated views. The linear form of Thomas More House would remain partly visible beyond the proposed Rotunda Building.

381. From the Stone Gallery View B15 the upper storeys of the proposed development would sit between the towers of the Barbican which would remain entirely legible. The tall elements of the development would be low on the horizon partially concealed by foreground development. Whilst there would be some concealment of the Barbican Estate, to which the Twentieth Century Society have objected, the robust architectural complex would remain strongly present and the development would seamlessly integrate into the existing established townscape of modern buildings of varying heights, many taller than the proposed development and varied materiality and styles. There would be no impact on the viewing experience from these public galleries.

382. The development would not be visible from Fleet Street, Watling Street, St Johns Street, Amwell Street and Farringdon Road. From Cheapside and Cannon Street/ New Change junction.

383. Overall, the proposal has been designed to preserve local views of St Paul's Cathedral, its setting, backdrop and skyline presence. In baseline and cumulative scenarios, the proposals would comply with Local Plan Policy CS 13(2) and S13 and associated guidance in the Protected Views SPD and LVMF SPG.

Views from other publicly accessible elevated viewing areas

384. From 1 New Change (View B16) southeast of the site. St Paul's Cathedral is the primary viewing experience. The upper stories of the proposed development would sit between the towers of the Barbican which would remain entirely legible. The tall elements of the development would be low on the horizon partially concealed by foreground development. In baseline and cumulative scenarios, the development represents a further addition to an already established tall building and midrise context and would remain secondary in the view. The overall viewing experience would be preserved.

385. From the viewing gallery at the Blavatnik Building (View A1) within the Tate Modern the Rotunda building would appear partially to the right backdropping the Cathedral and rising to the full height of the drum and infilling existing clear sky. This is not a pristine view of the Cathedral which has an urban context surrounding the silhouette. In baseline and cumulative scenarios, the proposed development would not affect an appreciation of the Cathedral or other key aspects of the skyline. The overall viewing experience would be preserved.

Other Borough Strategic Views

386. Relevant views from LB Lambeth, Westminster CC, LB Southwark and LB Islington have been considered and tested and there is little visibility (Relevant Views included in Appendix B).

London Borough of Lambeth Local Views:

387. Lambeth's adopted Local Plan Policy Q25 (Views) designates a series of Panoramas, Landmark Silhouettes and Roofscape Views which are of local interest. It seeks to protect their general composition and character from harm. Further visual management guidance is contained in a draft Local Views SPD. The Local Views of relevance here are: Panorama View viii) National Theatre terrace and ix) from Queen Elizabeth Hall Roof Garden and xviii where the proposal would be visible low on the skyline but peripheral to the visual experience and from low on the horizon sitting between the Barbican Towers and City Point (reference TBHVIA Views G and H)
388. Overall, it is considered the proposal would protect the general composition and character of these Local Views. LB Lambeth have been consulted with no response.

London Borough of Southwark

389. Southwark's adopted Policy P22 identifies borough views of significant landmarks and townscape and seeks to preserve and where possible enhance these views those relevant include View 1 One Tree Hill (TBHVIA ViewA) where the development would be virtually imperceptible screened by development clustered around the Shard.
390. Overall, it is considered the proposal would protect the general composition and character of these Local Views. LB Southwark responded with no comments.

City of Westminster

391. Westminster's Metropolitan Views SPD identifies and describes the significance of views of metropolitan importance including views that are enjoyed from well-known public spaces and those featuring an exceptional townscape or landscape, including visually prominent landmarks. Views 42 A and B (Waterloo Bridge), View 43 Golden Jubilee Bridge (A and B) and View 44 Westminster Bridge have been reviewed within the LVMF section of the report and the proposals preserve the key elements of the composition identified within the guidance. View 22 (Somerset House) is also tested in View O and the development is not visible.
392. Overall, it is considered the proposal would protect the general composition and character of these Local Views. Westminster City Council responded with no comment.

London Borough of Islington

393. Islington's adopted policy DH2 Part J of this identifies a number of local views (LV1-8) including important views towards St Paul's Cathedral which must be protected and enhanced. Those relevant include View 4 from Archway and View 5 Hornsey Lane Bridge the proposed development would be located around the base of the Shard as part of a layered midrise urban context. There would be no impact on the Cathedral.

394. Overall, it is considered the proposal would protect the general composition and character of these Local Views. LB Islington have been consulted with no response.

City Landmarks and Skyline Features, Views Of:

395. The proposal would affect views of historic City Landmarks and skyline Features which, in accordance with CS 13, should be protected and enhanced for their contribution to protecting the overall heritage of the City's landmarks in accordance with Local Plan Policy CS13(2). These are addressed individually below:

St Pauls' Cathedral:

396. The impact on skyline panoramic and river prospect views is assessed in the LVMF, public roof terraces and indirect heritage impacts sections of the report.

397. As well as the impacts addressed in the preceding paragraphs, there are happenstance views of isolated elements of the Cathedral lantern, ball and cross from the Barbican Estate from St Thomas More Highwalk (View 26, 26 N and A8), which would be concealed by the Rotunda part of the development. The Surveyor to St Paul's Cathedral have identified a very low level of residual harm in the loss of these views and urge this is taken into the weighting process. Officers reach a different conclusion. These are fleeting and partial experiences where the Cathedral has negligible, partial and unplanned skyline presence. From Wallside (View 27) and from the Barbican Arts Centre internal public staircase overlooking the Lakeside (B31) the more significant partial silhouette of the dome and lantern of the Cathedral would be preserved.

398. There are numerous objections to the loss of private views of the Cathedral from the Barbican Estate. This is not a material planning consideration. There are also objections to the loss of views of the Cathedral from Aldersgate Street and the Rotunda. This has been assessed and the Cathedral is not currently visible along Aldersgate Street or from the existing MoL Rotunda.

399. As set out in the combined relevant sections of the report, in the baseline and cumulative scenarios, the proposals would preserve views of and the ability to appreciate the Cathedral as a Skyline Feature. The development would deliver a new opportunity to enjoy views of the Cathedral on the skyline from the New Bastion House roof terrace and cultural space.

St Augustine Watling Street:

400. The proposals would be seen together with St Augustine spire in View 9 and 10 and there would be some slight increased backdropping of the Portland stone spire and leaded steeple by New Bastion House in both the baseline and cumulative scenarios. This is not a pristine experience already partially backdropped by existing buildings on the site and 1 London Wall. Overall, St Augustine's existing skyline presence and ability to be appreciated would be preserved.

St Nicholas Cole Abbey:

401. The proposals would be seen together with St Nicholas Cole spire in View 9 and 10 and there would be some virtually imperceptible backdropping at the base of the hexagonal leaded spire by New Bastion House in both the baseline and cumulative scenarios. Overall, St Nicholas Cole's existing skyline presence and ability to be appreciated would be preserved.

Barbican Towers:

402. These are a prominent ensemble on the City skyline as experienced from riparian locations where their distinct vertical geometry and serrated balconies can be appreciated and are easily recognisable (Views 7,8, 9, 10). From Millenium Bridge and Blackfriars Bridge there would be a slight intervisibilities with Shakespeare Tower and Cromwell Tower and New Bastion House in a similar manner to the existing tall building as there would be no further increase in height. Impacts would be incidental and the Towers landmark status on the skyline would be preserved.

403. The Twentieth Century Society, BQA and many others raise objections to the blocking of the view of Lauderdale Tower citing this as an important wayfinding landmark from St Martin Le Grand (View 12). The Rotunda Building would replace the existing low scale MoL building, itself without a landmark presence in this view. From this one approach, the Rotunda building would obscure Lauderdale Tower, but would compensate for this by facilitating new views of the Barbican Estate towers, particularly Cromwell Tower from the new public plaza. On balance it is

considered the landmark status of the Barbican Towers in mid-range views would be preserved.

404. Overall, in baseline and cumulative experiences, the proposal is considered to preserve views of and the ability to appreciate these City Landmarks and impacts on the Estate as a listed building are further discussed in the Heritage section below.

Old Bailey:

405. In baseline and cumulative scenarios, the proposed Rotunda building would be obscured behind the implemented scheme at Salisbury Square in views from Hungerford Bridge, meaning there would be no further diminishment of the clarity of the Old Bailey dome on the skyline from LVMF17B.1 (View 2T) and the proposal would not affect the visual clarity of the Old Bailey as a Skyline Feature.

St Bride's Church:

406. In baseline and cumulative scenarios there would be a slight diminishment in the clarity of the Portland stone tiered spire of St Bride's Church on the skyline from LVMF17B.1 (View 2T). The Rotunda building would extend behind both sides of the lowest tier of the spire and partially erode the clear sky backdrop. Overall, the proposal would slightly erode the clarity of St Bride's Church spire as a Skyline Feature.

St Giles Cripplegate:

407. There have been numerous objections to impact of the development on this important skyline tower. The skyline presence is best appreciated from within the Barbican Estate. From the Lakeside (Views 20, 21) Gilbert House Bridge (Views 22 and from St Giles's Terrace (View 23) the stone and brick tower with panelled parapet and pinnacles command the foreground and site proud of the neutral backdrop of taller post war, post-modernist and modernist buildings, including the existing Bastion House, which provides the established skyline context. The proposed development would introduce additional taller buildings into this background of the skyline, but not in a manner that would distract from the primacy of the church tower and would merely integrate with the existing urban backdrop of similarly scaled modern buildings.

408. Overall, the proposal would preserve views of and the ability to appreciate St Giles' Cripplegate as a Skyline Feature.

Conclusion on City Landmarks and Skyline Features

409. The proposal would protect views of relevant City Landmarks and Skyline Features with the exception of some slight diminishment of the presence of the spire of St Brides Church. This would result in slight conflict with part of City Plan policy CS 13 (2), draft City Plan Policy S13 and CoL Protected Views SPD.

Overall Conclusion on Strategic Views

410. The tall elements of the proposal have been sited to minimise impacts on pan-London and strategic views and to preserve the setting of St Paul's Cathedral as the Strategically Important Landmark which go to the heart of the character and identity of the City and London.

411. In the baseline and cumulative scenarios, the proposal would slightly erode the clarity of St Bride's Church, in LVMF 17 B.1- B.2 and as a City Landmark and Skyline feature. As such, the proposal would conflict to a small degree with Local Plan Policy CS13 (1 and 2), Emerging City Plan Policy S13, London Plan Policy HC4 (A), GLA LVMF SPG and City of London Protected Views SPD. The proposal complies with Local Plan CS 13 (3) and London Plan HC4 (B-F).

Heritage

Designated Heritage Assets

412. Numerous comments and objections have been received, including from Historic England, the Twentieth Century Society, Barbican Association, Ironmongers Company, the Surveyor to St Paul's Cathedral, Barbican Quarter Action and other Barbican amenity groups and individual objections, all in respect of the impact that the scheme would have on designated heritage assets and historic context. The main points are:

- Museum of London and Bastion House are Non-Designated Heritage Assets and demolition would harm the significance of Barbican Estate (II); the Barbican and Golden Lane Estate Conservation Area and Barbican Registered Historic Park and Garden (II*);
- The proposal would result in harm to identified designated heritage assets including but not exclusively: St Paul's Cathedral; Ironmongers Livery Hall (II); Barbican RPG (II*); Barbican Estate (II); Barbican and Golden Lane Estate Conservation Area; Church of St Botolph (I); Postman's Park Conservation Area; St Giles Cripplegate(I); Scheduled Monuments within Barber Surgeon Gardens and Fort Gate ; Church of St Anne and St Agnes (I); and Foster Lane Conservation Area and harm to the cultural history of the site including loss of the ancient gateway into the City.

- This character of the area would be completely lost, and parts of the landscape and buildings would be altered to such a degree that they would become unrecognisable.

413. Officers have considered representations and carefully and afforded them considerable importance and weight. There is some consensus, but clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Indirect and Direct impacts

Registered Historic Park and Garden (RPG): Barbican Estate RPG (II*)

Significance:

- A pioneering post war landscape designed by Chamberlain Powell and Bon with later alterations by Janet Jack of BDP and now the largest public space in the City;
- The soft landscaping and the value of experiencing the architecture of the Barbican in the context of trees, foliage, and greenery;
- The planned and connected immersive as well as visual experiences of the public, communal, and domestic gardens combined with private cascading balconies, ponds, fountains, sculptures and flower beds are seamlessly integral to the architecture of the Barbican. The centrepiece is the Lakeside in front of the Arts Centre. Collectively the richness and variety of these spatial reservoirs are recognised to be as significant as the buildings themselves.
- The pioneering masterplan of a raised vehicle free podium of varied public spaces and the highwalks;
- The limited entrances reinforce the conception of the landscape as a fortified series of spaces from the surrounding streets.
- The consistent use of a small number of materials, and detailing across the Estate, delivering a powerful sense of visual continuity, unity and singularity.
- The successful designed relationships with ‘found’ historic elements including the Roman and Medieval wall, and the Church of St Giles Cripplegate and associated gravestones.
- The southern boundary lower-ground level carpark, interface with the school playing fields and truncated severing of Mountjoy Highwalk, are elements which appear unfinished, inconsistent and detract from the special interest of the garden.

Setting:

414. Due to the contained and raised conception of the RPG, the primary setting of the landscaped gardens are the Estate buildings and historic elements within it. The enclosed nature and raised level also segregate the wider townscape

adjacent to the Barbican, aside from glimpse views between buildings and from surrounding streets.

415. At the southern boundary tall the focus of the development site large modern commercial buildings forms a well-established and neutral part of the Barbican's setting, particularly along London Wall and Aldersgate Street. The scale and proximity of these tall buildings strengthen the isolation. The junctions with the development site including Ironmongers, the Museum buildings, John Wesley Highwalk and service entrance are unsatisfactory and detract from the quality and arrival experience into the RPG. The interfaces are poor in terms of functionality, legibility, inconsistent materials, a series of fragmented parts and indirect awkward pedestrian routes with multiple level changes.

Indirect and Direct Impacts:

416. The new podium-level public realm would be created along the northern edge of the site boundary as an extension to the RPG. The decking over of the car park with the Northern Garden woodland landscaping and routes, remodelling the John Wesley Highwalk junction and forming a proper boundary to CLGS would resolve these undistinguished elements of the RPG. The landscaping is set on a gradient, allowing the pathways through the space to seamlessly connect into the podium level to the south and to pass under a recreated Mountjoy Highwalk to the east. The removed Museum allows new the landscape to flow into Barber Surgeon Gardens leading down steps flanked by water terraces. This woodland character of the proposed gardens and the rectilinear, terraced pools and meandering pools of these parts would integrate into the mix of formal and informal characteristics evident in the adjacent RPG elements to the east within Barber Surgeons.

417. Historic England consider the decked landscape and supporting columned structure would overshadow and hide from view the service yard central to evidential and historic parts of the estate. Additionally, attention is drawn to the boundary between the Northern Garden and the CLGS which require careful consideration and some perceptible separation at detailed design stage.

418. The service area is not an inherent element of its significance. Historic drawings and models of the proposed Museum and Bastion House (Design and Access Statement section 2.7) suggest the exposed car park is a departure from the original intentions which were to cover the carpark with a high walk connection to the north of Ironmongers. Notwithstanding this the functional parts of the Estate and substructure of the podium is appreciated throughout the RPG including from: the lower levels of Barber Surgeon Gardens adjacent to the lake where direct views into the car park through railings are retained; Beech Street covered road; Silk Street service area; John Welsey House Highwalk views into service areas; and the lower ground service areas of the Arts Centre.

419. The detailed design of the interface between the new northern garden and CLGS, John Wesley Highwalk and Mountjoy House would be the subject of further conditions. Initial design intentions are set out within the Design and Access Statement and would be subject of further detail. Specifically, for the CLGS this is currently formed by a built-in planter and permeable galvanised fence and this will adjoin the decked over northern garden. The slab level of the proposed deck would be higher than the existing level of the playing fields and perimeter planter. The proposed edge of the new deck is to be constructed so that there is a gap between the old and the new structures.

420. The Northern Landscape would flow into Barber Surgeons' Garden in which remnants of the historic City Wall are located. These would remain as picturesque found ruined objects with increased wildflower planting and opportunities for enhanced interpretation to aid understanding. There would be a slight encroachment into the eastern boundary of the RPG due to New Bastion House building line and the accessible ramp providing entry direct from London Wall rather than via the convoluted existing 1970s staircase. These minor intrusions would increase permeability and better reveal the RPG to the public.

Conclusion:

421. Historic England identify harm to the RPG at the lower range of less than substantial harm and The Twentieth Century Society conclude substantial harm to setting and these conclusions are echoed by the extensive objections. Officers reach a different conclusion. Any loss incurred to the fabric of the highwalks and landscape where the site and the RPG adjoin would either be minimal or would entail loss of areas of low or no contribution to its heritage significance. The high quality new soft and hard landscape including woodland, wildflower and water features would complement the planned and historic elements which contribute to significance. The pedestrian connections into the RPG would seamlessly bed into the existing routes with an individual language remaining distinct of the Barbican style Highwalks. The overall improved accessibility and increased permeability would allow the RPG significance to be better revealed to the public. The completion of the originally planned Mountjoy Highwalk connection would be a heritage benefit. Taking into account the vast scale of the Registered Historic Park and Garden it is considered that there would be no harm to the significance or setting of the designated heritage asset and some minor enhancement.

422. The proposals have drawn support from the Gardens Trust as a statutory consultee for impacts on RPG noting in particular: the delineation between the new landscape and the Barbican; new gardens which stitch together with

enhanced accessibility and the landscape planting proposals. Further details are in the consultation section.

Barbican Estate (grade II)

Significance

423. The Barbican Estate, designed by Chamberlain, Powell and Bon, is a leading example of a modernist project in the high Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned, post-war, mixed-use scheme.
424. The Estate is a composition of towers and long slab blocks at raised podium level, separating pedestrians from vehicular traffic, which enclose private and public landscaped open spaces centred on a canal in a Le Corbusian manner.
425. It is of architectural interest for its compelling architectural narrative, which encapsulates the macro and micro design intent of the architects in a dramatic arrangement of buildings and spaces which are tied together by a consistent and well-detailed bush and pick-hammered finish.
426. It is of historic interest as a modern exemplar of comprehensively planned high-density urban living during the postwar recovery period delivering essential housing for the City of London, and for the associations with the architects.

Setting

427. The Estate's setting varies greatly around its perimeter, where a varying range of largely modern buildings, make a neutral contribution to its significance. There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. As such, tall and large modern commercial buildings of differing materiality and compositions form a well-established neutral part of the Barbican Estate's setting in this southern and western boundary. Their scale and proximity reinforce the enclosure and segregation characteristic of the Barbican Estate, albeit in a neutral way unrelated to heritage significance.
428. There are many objections to the demolition of the Museum and Bastion House due to their alleged contribution to understanding the significance of the Barbican. The Museum has commonalities being designed by Powell and Moya around a network of highways and referencing materiality found elsewhere in the Barbican. Whilst connected to the Estate as a raised podium structure, the former Museum is a marooned and a rambling outlier, lacking the sophisticated material application, spatial layout and crisp functionality underpinning the significance of

its megastructure neighbour. The former Museum forms an underwhelming entry point into the Estate with abrupt and unresolved adjacencies.

429. Equally Bastion House also by Powell and Moya is an unremarkable slab block and a remnant with Museum and City House of a former separate 1970s masterplan distinct of the Barbican Estate. Bastion House has a scale and geometry analogous with the Barbican Estate towers as appreciated from the southern Highwalks and St Giles Terrace but its materiality, colouration, modulated flatness and functions have no connection with the quality, masterplan and spatial qualities which define the special interest of the Estate. The robust identity and independence of the Barbican is intrinsic to its significance and there is a clear threshold of moving from the high-calibre entity into the fragmented Museum and Bastion House complex and Highwalks. Accordingly, the Museum and Bastion House are considered to be neutral elements of setting, which do not directly contribute to the significance of the listed building or an appreciation of it.

430. The Barbican Estate is appreciated as a standalone set-piece of architectural design and execution and this is supported by the Listed Building Management Guidelines Volume II. There is little reliance on the wider surroundings to aid appreciation or an understanding of the Barbicans historic, architectural and artistic values. Exception to this are identified as:

- The Golden Lane Estate by virtue of being a neighbouring example of post-war townscape and a precursor to the Barbican Estate demonstrating the evolution of Chamberlain Powell and Bon in ideas and execution.
- St Giles Cripplegate (Grade I), Ironmongers Livery Hall (Grade II), remains of the Roman and medieval City wall, including Bastions 12, 13 and 14 (Scheduled Monuments) provide a pre-war understanding of the site.

Indirect and Direct Impacts:

431. Officers conclude the demolition of Museum and Bastion House would not have an adverse impact on the significance of the Barbican as these are not considered to be elements within the setting which make a positive contribution to the wider significance of the Estate.

432. The proposed development would have intervisibility with the Barbican Estate both from within its setting and from views within the Estate. As assessed in the preceding sections on strategic views, the Barbican's architectural significance in skyline views would be preserved. Closer, in views from St Martin Le Grand (View 12) the townscape vista of Lauderdale Tower would be replaced with the Rotunda. The development would also facilitate new views (View 13) revealing more of the Estate from the attractive plaza.

433. From the western perimeter Goswell Road, Barbican Bridge, and Aldersgate Street (Views 16, A5 and 17) moving south the Rotunda building would be visible and New Bastion House would be revealed. The Twentieth Century Society, BQA and other extensive objections consistently raise concerns that the height and massing would detract from the setting of the Barbican Estate, positing that the lower-rise scale of the existing buildings on the western edge provides a human scale and complements the setting of the Barbican Estate
434. In these more general experiences of setting views from Goswell Road and Aldersgate Street the Barbican Estate including the unique Highwalks would remain dominant and legible in the foreground, and the proposed buildings would be complementary but distinct elements in its close southern setting, seen beyond. The lighter materials of the proposal would clearly differentiate the development from the Barbican as a complex, and the vertical fins and horizontal balconies would complement the defining motifs of the Barbican. The proposed North Building would appear adjacent to the Turret building of the Barbican, set at a similar height and expressed with an architectural language, form and coloration which would clearly complement and be distinct from and not competing as suggested by the Twentieth Century Society. This low-scale form would provide a spatial transition into the Barbican and to the Barbican Estate.
435. At the remodelled junction the journey towards the Cathedral would immediately be revealed. The Rotunda would serve as a positive landmark compared to the complex MoL and would in itself provide breathtaking public views from the rooftop terrace towards the Cathedral and onwards to Tate Modern.
436. The development would not have intervisibility with Golden Lane Estate as a positive contributor of setting. Whilst there is considered to be change to the setting of Ironmongers and Barber Surgeons Gardens and the scheduled monuments the contribution these elements make to understanding the historic significance of the Barbican would not be diminished.
437. Within the Barbican Estate, due to the scale of buildings within the Estate itself, the upper floors of the tallest parts of the proposed development would be visible from limited parts of the north and centre of the Estate (views 19-25, A5, A6, A8, A9, B26, B27). The proposed Rotunda Building would be noticeably taller than the existing building on that part of the site, however it would be lower than New Bastion House, with more limited visibility within the Estate, and, when seen, it would complement New Bastion House in terms of its design. It would be seen and understood within the existing large scale neutral commercial development which already characterises the southern setting of the Estate.

438. From southern locations the increased quantum of development on the site would be most impactful and Historic England identify middle to low range of harm to the Barbican Estate and The Twentieth Century Society substantial harm to setting and this is echoed in the extensive objections. Officers acknowledge this view but reach different conclusions. For instance, from Thomas More Walk (views 26,26N, A8 and A9), the development would be experienced collectively in an already complex setting of layered building heights and varied materiality. The taller elements of the development would be entirely distinct and architecturally detached in materiality and functions from the Barbican integrating with the comparably scaled background commercial buildings of London Wall and enclosing the southern edge at Aldersgate junction in a similar manner to existing buildings. The attractive accents of urban greening and horizontal balconies would soften and complement and not compete with the essence of the Estate. The North Building would appear lower and the bold patterning and dark brickwork would complement but not be blurred with the defined Barbican entity. Ironmongers, the Northern Garden and the school playing fields would maintain space and separation between the modern commercial context of the development site and the independence of the Estate.

439. Equally from Wallside (View 27) New Bastion House and the Rotunda would be bold additions into the wider setting but again the development would always relate to the background setting of similar neutral midrise and taller buildings which enclose and form the southern setting of the Barbican Estate. Where there is a slight degree of intervisibility with Mountjoy House the materials and articulation of the Barbican would retain primacy and be distinct.

440. Moving towards St Giles Terrace (views 22-23), the development would be largely screened by St Giles Cripplegate which is the primary focus with New Bastion House and the Rotunda distinctly recessive as background development. In view 24 and A7 closer to Mountjoy House looking south, Bastion House would be a similar height as its predecessor and orientated with the narrower northern elevation addressing the Barbican and tapering towards the summit. The Rotunda would occasionally appear, but its light colouration and modest height would ensure its distinction from Mountjoy House, at a similar height to that building. The complex geometry of Wallside Highwalk and Mountjoy House would remain dominant within the foreground and unrivalled by the proposed development.

441. In all these southern experienced where the development would be most impactful and the Barbican's fortress-like robustness would prevail. The key elements of significance: the overall sense of scale, the planned geometry articulation, the spatial qualities, complex functions and unrivalled materiality would all retain their primacy.

442. From Monkwell Square (view 28) to the east, New Bastion House would rise to a similar height as its predecessor behind Barber Surgeons Hall but with an extended footprint and clear sky would be preserved around Mountjoy House positioned to the right. The lightness of materiality and staggered footprint of the fins interspersed with planting would add visual interest and articulation compared to the existing dark and sombre expression of the current Bastion House. The architectural expression of the development would be entirely distinct from the language and materiality of Mountjoy House forming the fringe of this part of this part of the Barbican Estate.

443. Direct impacts are also considered under 23/01277/LBC and derive from alterations to: John Wesley Highwalk, extension of the Highwalk below Mountjoy House; the proposed decking over of the car park; and boundary treatment to the CLGS playground interface. Minimal original fabric of the existing highwalks would be lost in forging these new connections because they would join the highwalks where existing connections have already been established. In both cases the proposed new highwalks would be of a sensitive and contextual design whilst ensuring they are distinctly separate to the listed building. The other direct impacts to the car park and CLGS boundary have been assessed in the RPG section. The final details and samples of materials of all these elements would be conditioned to maintain quality and workmanship.

Conclusion:

444. The proposals would deliver a number of enhancements which would provide an improved southern boundary setting to the Barbican Estate introducing a defined and complete boundary incorporating soft landscaping and new highwalk connections. The extension of Mountjoy Highwalk would positively contribute towards significance fulfilling part of the original plans of the Highwalk for the Barbican. The development would change the setting to the south but would not challenge the pioneering mid-20th century masterplan, architectural language or qualities which underpin the significance of the Barbican Estate and its existence as a clear entity would remain fully appreciable. Taking the listed building as a whole it is considered that the proposal would preserve the setting and significance, both directly and indirectly, of the listed building and the extension of Mountjoy Highwalk would be a slight heritage benefit.

Conservation Areas

Barbican and Golden Lane Estates Conservation Area

Significance and contribution of setting

445. The conservation area boundary is tightly drawn around that of the two Estates and the grassy spur of land to the south containing the ruins of the Roman and medieval City wall.
446. Overarchingly, the significance of the conservation area can be summarised as the striking juxtaposition between two seminal post-war housing Estates which illustrate evolving trends in architecture, spatial and urban planning, and Modernism in general. The conservation area is defined by its pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary; also for the integration of the ancient remains of the Roman and Medieval City wall, including Bastions 12, 13 and 14 and the medieval church of St Giles Cripplegate in a strikingly modern context.
447. The wider setting of this large Conservation Area is informed by dense urban development, of a largely post-war, post-modernist and modern architectural character. The northern boundary abuts the London Borough of Islington, and this setting is typically lower rise with a mixture of modern and historic built fabric set out on a historic streetscape. To the east, there is again a mixed townscape around Moorgate, although largely comprised of large scale modern commercial buildings in the immediate vicinity of the Conservation Area – namely the redeveloped series of office blocks that were built along the road London Wall in the 1970s. To the south, the setting is principally formed by the main route of London Wall, Museum and Ironmongers, and further large-scale modern commercial buildings. As with the RPG the southern boundary is considered to be unsatisfactory in terms of quality and its fragmented unfinished form which makes no contribution to setting. To the south and west, late 20th century, mid-rise commercial buildings line Aldersgate Street, largely obscuring the more historic areas of Smithfield Market and Charterhouse Square which are adjacent these have a neutral presence.
448. Museum and Bastion House are not elements of setting considered to contribute to the special interest of the Conservation Area for reasons set out in the Barbican Estate Listed Building and Non-Designated Heritage Assets section. The Barbican and Golden Lane Estate Conservation Area is appreciated as standalone but neighbouring architectural masterplans. There is little reliance on the wider surroundings to aid appreciation or an understanding of their overall historic, architectural and artistic values.

Impact:

449. As with the listed building assessment Historic England identifies some harm through development in its setting, which would be in the middle to lower range of

less than substantial. The Twentieth Century Society maintain a position of substantial harm to setting. These conclusions are echoed by the many objections received which have often referenced views within the relevant SPDs and these are assessed below.

450. Officers reach a different conclusion as to the impacts and this position aligns with the CAAC. The Committee accepted that the proposals address the problems at an important intersection which currently presents an unwelcoming and unattractive approach to the Barbican and Golden Lane Conservation Area with poor public realm. The CAAC commented on the public realm, particularly welcoming the further greening of the space by Barber-Surgeons Hall and the opening up of a section of the historic London Wall. The CAAC also drew attention to issues around design refinement, maintenance and importance of conditions particularly materials and requested to be consulted on the evolution of the proposals and these points are acknowledged.

451. Impacts are largely confined to experiences within and across the southern parts of the Conservation Area and from west from Aldersgate Street. The SPD describes these southernmost areas of the estate as the 'foothills' of the Barbican, and notes the relatively low scale of the Mountjoy House, Wallside and the Postern. The SPD and Listed Building Management Guidelines include representative views to indicate the architectural and spatial complexity of the Conservation Area and this is a useful tool to assess the likely impacts of the development. The SPD notes that the views out of the two Estates, with glimpses of the surrounding City, are likely to change because the conservation area sits within the dynamic context of a densely developed urban centre. All views were reviewed during the design development process and where relevant are included in the THBVIA the supplementary views appendices where relevant. Most pertinent to the application are the following.

452. From Barbican Estate: Lakeside Terrace CA View 21 (view 19) the top of the tower of St Giles Cripplegate, 200 Aldersgate and Bastion House are all currently glimpsed above the foreground CLGS school building. The summit of New Bastion House would be similarly visible beyond the City of London Girls School. Its tapered north elevation would reduce the perception of its mass and its presence within the view. The proposed development would be incidental.

453. Moving to the Highwalk from Wallside CA View 26 (view 27) this looks towards the site in a south westerly direction from the Wallside Highwalk within the Barbican Estate. New Bastion House and the Rotunda would have a distinct materiality and identity distinct of the Conservation Area and relate to the comparable scale of background buildings. Mountjoy House would continue to dominate the foreground and the southern end of the Barber Surgeon Gardens,

the southern tip of the lake and part of the historic London Wall Scheduled Monument all within the boundary would remain legible and understood.

454. Moving to the western end of St Giles Terrace CA View 16 (View A7) where the horizontal Wallside Highwalk, Roman Bastion scheduled monument and Mountjoy House all dominate the foreground and are representative of some of the key characteristics of significance. Taller buildings characterise the background and the tapered northern elevation and New Bastion House would, like its predecessor, have a similar vertical presence within the setting in height and massing. The removal of the Museum would increase the landscaping and openness and provide views through to new Highwalk and attractive base of the new development. The vertical fins and cascading balconies would have a light appearance complementing but distinctive of the qualities of the Conservation Area within the foreground.

455. Barbican Estate: centre of Highwalk in Gilbert House CA View 12 (View B28) This view is at Highwalk level looking southwest across the central Lake, St Giles Cripplegate, CLGS and the related terrace with Mountjoy House beyond. The overhang of Gilbert House truncates the view and partially obscures Bastion House and the church tower. The proposed development would have limited impact on the visual experience appearing as a background development with established existing taller buildings. New Bastion House would continue to be largely obscured and the Rotunda building would be glimpsed at a low level to the right obscuring part of 200 Aldersgate Street. In all these representative views the fundamental elements of the conservation area which underpin significance would be preserved including: the spatial qualities; unfolding serial views; the historic components; the combination of built and unbuilt space; consistent materiality and the ambitious scale of the mega block.

456. Elsewhere from within the Conservation Area there would be relatively limited visibility of the proposed development as an element of setting due to the midrise scale and screening by intervening buildings. Whilst there are objections based on visibility from Twentieth Century Society and others the views assessment demonstrates that the crown of New Bastion House would often only be glimpsed in a similar manner as its predecessor from: Frobisher Crescent View A6, Beech Gardens B26, View B27 Defoe Highwalk View 25 and B27 Gilbert Bridge and Thomas Moore Residents Garden B29 and B30. There would be no visibility from within the Golden Lane Estate.

457. The proposed New North Building would be set lower and closer to the Barbican Estate. The dark brick and bold patterning of its exterior would complement the weathered concrete and sculptural motifs which identify the boundary with the Barbican. The proposed landscaping on the site, including

maintained and new connections into the Barbican Highwalk would improve movement and views at the southern edge of the Conservation Area.

458. Turning to the direct impacts on the Conservation Area, these derive from New Bastion House east elevation. The existing height would be replicated but the building line would project slightly further into Barber Surgeon Gardens. The proposed eastern elevation is considered to be significantly superior and engaging compared to the back of house elevations of Museum at garden level. The development would provide a bold but more attractive and interactive contribution to this part of the Conservation Area without detracting from the fundamental elements of significance.

459. The mid-20th century Modernist architectural language and arrangement of buildings and spaces evident in the Barbican and Golden Lane Estate Conservation Area are robust and exceptionally well defined as a clear entity and would remain fully appreciable. The integration of the City walls and St Giles Cripplegate within this strikingly modern context would also remain unchanged. The proposed development would be in keeping with the character and scale of the existing urban context of taller buildings to the south of the Conservation Area. The development would change the setting and have a direct and indirect impact but the developments contrasting language and materiality is considered accomplished, would continue the legacy of built forms and open spaces and would act as a foil to the iconic post war Conservation Area. The improved pedestrian connections and new landscaped spaces particularly to the Scheduled Monuments would provide a new positive interface adjoining and partially within the Conservation Area boundary.

460. Taking into account the overall scale of the Barbican and Golden Lane Estate Conservation Area as a designated heritage asset the development within the conservation area and within its setting is not considered to harm its character or appearance and would preserve the significance and contribution made by setting.

Ironmonger's Hall (grade II)

Significance:

461. The significance of Ironmongers Hall stems from both its architectural and historical interest as a rare example of an interwar, purpose-built livery hall. The present hall dates to 1925, constructed for the Worshipful Company of Ironmongers following air-raid damage to a previous iteration of the Company's Hall which was built in early 18th century on the site of the original medieval hall on Fenchurch Street. This necessitated the Ironmonger's move from Fenchurch Street to the present location. High historic interest is generated through connection with the Worshipful Company of Ironmongers, established in the City

of London since 1300. The hall is the only surviving pre 1930s structure in the immediate locality, following the clearance of the area after the Blitz which further enhances its rarity and historic interest in the local context.

462. The hall was designed by Sydney Tatchell, principally known for his additions to country estates. Many of these works are now listed, including 12 Devonshire Street (Grade II). The latter is of a very different style to that of the hall, reflecting a stone fronted French 'Dixhuitieme' style pavilion. The hall is therefore illustrative of the variety in Tatchell's work, and his selective use of historicist styles depending on the commission at hand. Notably, following completion of the Ironmongers Hall, Tatchell became vice president of the RIBA from 1931-33, and has also completed works for both the Barber Surgeons and Bakers livery halls. Moderate associative historic interest is drawn from the connection to Tatchell's work.

463. Relatedly, high architectural and artistic interest is generated as an example of the inter-war Tudor revival style. This is expressed in the proportions of the fenestration, use of timber to the upper storeys of the western wing, and use of red brick. The quality of craftsmanship to the building's construction and decoration are considered to be exceptional, generating high artistic interest. As such the Hall is considered a strong example of architectural historicism during the twentieth century. The selection of this style appears a deliberate one by Tatchell, who eschewed a more classical architectural idiom, such as seen at 12 Devonshire Street, to draw upon the medieval origins of the guild. The commemorative use of stained glass to reference previous occupiers of the site is similarly indicative of a historicist approach, deftly used to emphasise a sense of legacy and permanence despite the relatively recent occupation of the site.

464. Architectural interest equally stems from the planform of the building, which reflects the Hall's specific ceremonial use as a banqueting hall and archive. The circulation to the interior is clearly expressive of a deliberate and specific hierarchy, which also contributes to the building's architectural interest. Further historic evidential interest arises through the use of contemporary construction techniques such as a concrete raft to the base, steel frame and use of Akoustolith sound absorbing tiles within the Banqueting Hall.

Setting

465. The contribution of setting to an appreciation of this significance is defined by the post-war reconstruction of the surroundings. This principally includes the creation of the Museum of London and Bastion House as well as the wider Barbican Estate. As a consequence, the setting of Ironmongers Hall when first built is no longer readily appreciable due to the wholesale clearance of the historic streetscape. In order to clarify the current contribution of setting, the changes

between the historic setting of the building and those that arose during the late twentieth century are outlined below.

466. As first built the hall was located within Shaftesbury Place, a backland 'L-shaped' yard to the rear of Aldersgate Street. Before the arrival of the Hall this yard was occupied by dense tenements, enclosed by Edmund Place and Hamsell Street to the north and east respectively. These formed a roughly rectangular street block with a well-defined principal street frontage and back-land, yard area to the interior. In order to mitigate what was a cramped backland site, Tatchell deliberately curated the sense of arrival into the yard by aligning the entrance into the hall with the existing arch into the yard from Aldersgate Street. Notably the entrance wing projects considerably forward of the main north-south range. The distance between the Aldersgate Street arch and the projecting single storey entrance bay of the Hall appears to have been carefully determined so that the decorative relief surrounding the door into the Hall is framed by the arch when viewed from the street. Through establishing this formal axial approach from Aldersgate Street, Tatchell successfully masks the Hall's late arrival into the streetscape by co-opting the yard into what appears from the street as a courtyard which is ancillary to the Hall instead of pre-dating it.
467. Pre-war aerial photography has confirmed the Hall was largely screened from view in the surroundings aside from the western elevation. This established an appreciable hierarchy to the façades and approach routes to the hall, and this is reflected in the relative absence of decorative detail to the north, south and eastern elevations. The high placement of windows within the banqueting hall and use of stained glass within the principal rooms is further indicative of the inward character to the building, which drew little value from the outward views. A small courtyard to the east of the site provided some external circulation space, however this was lined with cloisters, re-affirming an inward facing aspect and character.
468. Following widespread damage from the blitz, original plans for creation of the Museum of London and Bastion House by Philip Powell and Hidalgo Moya, included the demolition of the Hall. The museum was originally envisioned with a pentagonal plan form, accessed via three radiating raised 'highwalks' above street level. A circular 'rotunda' to the south of the museum and London Wall was to provide a circulation space accessing the highwalks, connecting into a much larger network. Bastion House, a rectilinear brutalist office block, was to oversail the eastern elevation of the museum.
469. The retention of Ironmongers Hall was only secured after a public inquiry during which the architects outlined this would compromise the arrival experience into the museum. The design for the museum was ultimately modified by wrapping around the hall, but the but the massing and location of a new façade to Aldersgate

Street remained, demolishing the original archway into the yard. Consequently, the post war redevelopment of the surroundings fundamentally altered the arrival experience into the hall, with the visibility of the more subservient facades dramatically increased by raising of the public realm in the surroundings to high walk level. These new high-level public approaches are now the principal way in which the Hall is appreciated in the public realm, with long range and continuous views now possible in the approaches along the highwalk from the east and north. As such the importance of the arrival to the Western elevation is undermined, and obscuring the original intent of Tatchell's composition and its intrinsic hierarchy.

470. While the Hall is visible within these approaches (illustrated in views 26, 27 and A8) it appears marooned, with no clear sense of access as a result of the excavation of Shaftesbury Place to below ground level where immediately adjacent to the hall. This sense of dislocation is exacerbated by the oblique alignment of the approaches to the Hall from the Highwalk, creating an incidental, oblivious quality to these approaches and further undermining the status of the hall in the wider streetscape. A landscaped open area has been created to the north of the entrance range of the hall, however its location adjacent to the blank northern brick façade of the entrance wing, as well as the stepped means of access means that this also appears as an ad hoc addition and further confusing an understanding of where the Hall can be accessed from the public realm. The contribution of these views to the setting of the hall and an appreciation of its significance is therefore considered to be limited. The unresponsive character of these views is highlighted when compared to the treatment of St Giles Church (Grade I), which unlike the hall, formed part of the original designs for the barbican estate. St Giles is afforded a more generous open setting with clearly planned approaches along level access, as well as long range vistas which respond to the alignment of the church's façade.

471. Specifically with regards to the impact to the western approach, while a gap in the museum's frontage remains at ground level, nominally allowing access into Shaftesbury Place, this aperture no longer frames the entrance door's decorative surround. Views of the entrance door's decorative surround are cut-off when seen from the street front. The overall character of this approach is utilitarian and incidental, flanked by ventilation louvres on the façade to the museum. Additionally access to the hall is now via a bridge which crosses excavated ground either side as you pass under the museum. As a result, the hall appearing precariously perched on what remains of the ground level within the yard.

472. Whilst it is acknowledged this approach has retained a sense of enclosure, it is considered this no longer serves to enhance the sense of an ancillary courtyard to the hall but rather re-emphasises the backland character of the site, with the approach primarily experienced as an underpass. Later signage to aid wayfinding

to the Hall was added to the museum's façade on Aldersgate Street, but the location of the Hall remains not easily discernible from what once was the principal approach to the building.

473. Consequently, while the Hall is appreciated consistently with and within wider development of the Museum and Bastion House, these buildings are not considered to make a positive contribution to the hall's setting. While it is acknowledged the materiality and character of the hall, Museum of London and Bastion House create a sense of contrast, and are demonstratively different architectural styles, this contrast is experienced as unresponsive and incidental rather than picturesque in quality. It is noted that Fountain Court was retained, with this enclosed space now characterised by views of Bastion House which rises above the roofline surrounding the courtyard.

474. During the 1970s the two storey 'Ferroiners Hall' was added to the southern end of the north-south entrance range, replacing the former service entrance and a single storey extension. This later wing is evidentially of a later date and lacking the detail and character of the main building. This structure was excluded from the listed of the Hall in 2023, and is considered to detract from the sense of a complete composition and intact character to the hall, competing with the north-south range in terms of overall height and bulk. Other later additions include the creation of a lift tower and service stair at the junction of Ferroner's Hall with the south range, as well as further additions to the Banqueting Hall.

Proposals

475. The proposals include the demolition of the Museum of London, Bastion House and Ferroner's Hall. A new open space is proposed west of the Hall, creating a new public square known as Aldersgate Plaza with level access to the hall from Aldersgate Street, covering over the existing open drop down to the lower ground level. The demolition of Ferroner's Hall and rebuilding of the southern end of the north-south range ensures the original projecting entrance wing is perceptible once again as the principal means of access into the hall. Further alterations to the hall include the better integration of the existing stair tower into the roof form of the Ironmongers' Hall, the introduction of vertical greening as well as a new ironwork perimeter fence to the northern boundary of the Ironmongers' Hall.

476. To the north and east of the hall a woodland area is proposed behind a new red brick retaining wall constructed parallel to the Hall's façades. This wall is lower than the existing boundary wall, enabling a more accessible character to longer range views of the Hall from the east and north. The woodland area slopes gently upwards to the northeast, rising to meet the Highwalk level. Landscaping continues to the southeast corner of the hall allowing a closer approach to the hall's fabric from the north, south and east. These alterations are considered to

resolve the marooned nature of the hall as it is currently experienced from these directions. The change in ground level also reasserts the subservient nature of these facades, and emphasises the legibility of the historic main approach to the building from the west.

477. Three new buildings are proposed as part of the redevelopment within the immediate surroundings. To the north on Aldersgate Street, the 'north building' rises to 39.6 metres, and comprises a sculptural dark brown brick building which will flank views of the Hall from Aldersgate Street. This building is set forward from the hall and will enclose views in the approach towards the Hall from Aldersgate Street from the north. To the south, the Rotunda would extend northwards but remain set back from the Hall's southern elevation. A series of steps and glazed platform lift accessing the highwalk is positioned between the Rotunda and the hall, located on the site of the old Ferroner's Hall extension. It is proposed that the high walk continues across Aldersgate Plaza at first floor level, connecting the Rotunda to the North Building.

478. The Twentieth Century Society and others have raised objections with regards to the impact to the hall, finding that the widening of the existing 'glimpsed' view from the Aldersgate Street to full allow sight of the western facade to be a harmful departure from the original design intention. They also consider the loss of an enclosed character and 'glimpsed' quality of views from the east and north to be harmful. They also consider the loss of the Museum and Bastion House, to be harmful, finding them to be positive contributors to the Hall's setting. The Twentieth Century Society also considered that the proposed buildings would also appear intrusive, through an 'overly complicated' massing which would 'visually compete with and distract' from the hall. Historic England welcome the removal of the Aldersgate Street building and the creation of a new public open space which would improve views of the listed building.

479. The Ironmongers representation's welcome the opportunities to improvements of the public realm surrounding the hall, and are supportive of the requirement of the loss of the Museum but raise concerns over the 'height and bulk' of the proposals, as well as concerns over further enclosure through the creation of a high walk parallel to the Aldersgate frontage, the potential loss of light and of noise pollution through the placement of cultural centre and surrounding walkway. Additional concerns were raised over the impact of noise and vibration during the construction phase.

Indirect Impact – Setting

480. The Twentieth Century Society has identified a substantial impact to setting and numerous objections have been received including from BQA and other

objectors. Historic England do not raise objections. The indirect impacts of the proposed changes to setting of the hall can be categorised into the following: (i) the reduced sense of enclosure, including the increased visibility of the western range of the hall from Aldersgate Street, as well as new glimpses of the hall from the south and east (Views 13 and 27) and loss of Shaftesbury Place an ancient alley; (ii) the loss of the Museum and Bastion House; (iii) an increase in height to the built environment to the south and east; (iv) the general change from a mid-twentieth to contemporary architectural character in the surroundings; (v) the extension of the highwalk, both where parallel to Aldersgate Street, as well as wrapping around the southern, eastern and northern façades and vi) The impact of noise and vibration during construction and operation phases. These changes are all considered to be 'indirect', affecting how the hall's setting contributes to an appreciation of its significance.

481. Assessing these in turn, in respect of (i) it is acknowledged that the increased visibility of the hall from Aldersgate Street would reduce the sense of enclosure in the approach from the west. However, as demonstrated above, this quality of enclosure is no longer appreciated as part a nuanced, formal arrival sequence. While when first built Shaftesbury Place was fundamentally experienced as ancillary to the hall itself, this enclosure is currently appreciated as an experiential barrier which sublimates the hall within the late twentieth century scheme which rose around it. Therefore, the loss of enclosure when taken together with the reinstatement of level access to the western approach and creation of a landscaped plaza to the west is considered to re-instate the historic importance of the western approach and would retain a public route and the alignment and remnant of a former historic alleyway, now sadly undermined in its current condition. This restores the original hierarchy to Tatchell's design, and retains the axial western approach from the street. While more visible, the hall remains set back from the main street frontage, with the highwalk which crosses the plaza creating additional protection from the road. The impact of this section of the highwalk is further discussed in the public realm section of the report. With regards to the new glimpsed views of the hall from the London Wall these are considered beneficial, allowing new viewpoints at ground level from which to appreciate the Hall's location, reasserting its importance and interest in the locality as a pre-war survivor.

482. Therefore, while it is acknowledged that the loss of enclosure represents a change from the existing character, and increased visibility of the Ironmongers in the round, this loss is not considered harmful to an appreciation of the building's significance, and as such officers disagree with the assessment of the Twentieth Century Society in this regard. It is noted that the representation from the Ironmongers themselves welcome a reduction in enclosure to the building, and raise concerns where this is retained through the location of the highwalk parallel

to Aldersgate Plaza. Historic England welcome the removal of the Aldersgate Street building.

483. In regards to (ii) officers do not consider Bastion House or the Museum to positively contribute to the setting of the hall. As outlined above, their alignment and massing appears un-responsive as they relate to the hall, and are clearly a product of the original design intention which included the Hall's demolition, resulting in the Hall's current 'marooned' character. While the materiality and character of the hall, Museum and Bastion House when perceived together create a sense of contrast and are demonstratively different architectural styles, this contrast is experienced as incidental rather than picturesque in quality and notably lacks the careful curation of views towards historic fabric seen elsewhere in the Barbican Estate. The loss of both buildings are therefore considered to have a neutral impact upon the contribution of setting to an appreciation of the Hall's significance.

484. In respect of (iii) while it is acknowledged there will be an increase in height in the surroundings through the development of the Rotunda and New Bastion House, a contrast in height between the hall and the surroundings is consistent with how the hall is presently perceived, with taller buildings seen alongside or in the backdrop of the hall in almost all views. The proposed buildings are set back from the Hall and allow it sufficient breathing-space. While the perceived height and breadth of the buildings in the surroundings will increase, this is not considered to detract from the present contribution of setting. Consequently, the overall impact of the increased height in the surroundings upon an appreciation of the building's significance is considered to be neutral. In views 26, A5 and A6 the Ironmongers would remain distinct from its setting due to its silhouette, scale, materiality and colour.

485. In respect of (iv), similarly the change from a mid-twentieth century architectural character in the surroundings to a contemporary architectural idiom is also considered to maintain the quality of contrast presently experienced in the Hall's setting. Whilst the materiality and massing of the proposed buildings differ from the existing context, they remain distinct from the fabric of the hall, ensuring the legibility of the Hall as a building separate from the wider Barbican estate remains. More specifically, the use of glazing in the proposals ensures a degree of reflectivity to the surroundings, increasing the legibility of the hall in longer range views as well as establishing a heightened sense of transparency. Officers therefore disagree with the assertion that the proposal would 'visually compete with' the hall, which would remain clearly distinct. Through the retention of this sense of contrast and differentiation, the overall impact of a change in architectural character to the surroundings is considered to have a neutral impact upon the setting and appreciation of the Hall's significance.

486. With regards to (v) the proposed of new areas of highwalk and elevated landscaping as well as the surrounding brick retaining wall are considered to create a more sympathetic landscaped setting to the hall, creating the impression of an ancillary garden setting in which the Hall is the principal structure. While this is a change from the existing and pre-war character of Shaftesbury Place, it is considered an improvement on the existing isolated and inaccessible quality of the hall in its present environment described above. The rise of the landscaping to Podium level in the south and east, reinstates a clarity to the hierarchy of the facades as originally intended by Tatchell, by offering a level of seclusion in views from the east, north and south, where the Hall is perceived in glimpses and filtered through proposed trees and vegetation.

487. As noted in the Ironmongers representation and others, a section of the proposed highwalk will cross Aldersgate Plaza at podium level, partially obscuring views of the western façade from across the street. However, when comparison is made to the existing condition of these views, (view 18), the visibility of the hall is overwhelmingly improved and is supported by Historic England, with sight lines towards the carved stone surround of the main entrance freely visible once more seen. The impact of the proposed new landscaping and highwalks is therefore considered beneficial, constituting an improvement to how the setting contributes to an appreciation of the Hall's significance through the creation of an appropriate garden setting and reassertion of the western elevation as the principal façade.

488. With regards to (vi) noise and vibration during construction, these impacts have been assessed within chapter seven of the EIA, and the impacts to the Hall once operational were found to be not significance. Impacts relating to noise impacts are addressed in the noise and vibration section of this report.

Direct Impacts

489. The direct impacts to the hall include i) the demolition of Ferroner's Hall and rebuilding of the north-south range including alterations to the roofline and rebuilding of the western façade as well as ii) the loss of light levels to the Hall's interior and iii) a minor alteration to the north elevation at lower ground level to provide a doorway access and to a dedicated lower ground servicing area.

490. With regards to i) these changes are welcomed, and considered beneficial in heritage terms by removing what was an oversized late twentieth century extension which is itself not listed. The proposals are considered to restore the emphasis on the north-south range of the hall, creating a more sympathetic resolution to where the original and later fabric interact. The overall impact of these changes to the significance of the building is therefore found to be beneficial. The other alterations are minor and affect areas of low significance.

491. With regards to the loss of light (ii) the daylight & sunlight report found that non-residential rooms, including the Banqueting Hall, are considered to experience minor adverse daylight and/or sunlight impacts, however these were not found to be significant in magnitude. Officers consider this level of impact to preserve the contribution of the stained glass to the character of the interior spaces. With regards to the Master's and Clerk's flat, the Master's flat faces north, is largely unaffected in daylight and sunlight due to its northern aspect, with negligible overall daylight and sunlight impacts. There is a minor to moderate adverse impact to daylight & a major adverse impact to sunlight to the Clerk's flat. The character of these spaces is considered to contribute little to the significance of the listed building. It is considered that the decrease would not affect an observer's ability to appreciate the contribution of the impacted rooms to the significance of the Hall, with an overall neutral impact upon significance.

76. As regards iii) the alterations at lower ground including a new door opening on the north wall to provide access to a new service bay is minor in an area of lower significance and there would be no harm to significance.

492. Overall while the scale of alteration in the Hall's surroundings is considered to be substantial, the scheme has been found to offer significant improvements to the Hall's immediate and wider setting, with an overall beneficial impact upon the ability to appreciate the hall's significance. The creation of an ancillary garden surrounding the Hall is welcomed, and considered to rectify the current marooned quality to the hall where the only level access is via the underpass on Aldersgate Street. The proposals have been shown to reassert the hierarchy of Tatchell's original design, removing late twentieth century unsympathetic additions. While the surrounding character of the architecture will change, this retains a sense of material distinction, with the hall continuing to be appreciated as a pre-war survival. The creation of new glimpses of the hall at ground level, are considered to re-assert the hall as an important historic structure in the local context, whilst remaining set back and protected. The overall impact would be to enhance the setting and therefore significance of the Hall.

St Giles-without-Cripplegate (grade I)

Significance:

493. One of the few buildings in the area that survived the bombing raids of 1940. Constructed in the 16th century and incorporating an earlier tower, the church was refaced in the 19th century and substantially repaired after WWII. It is a significant heritage asset, listed Grade I and an important part of the setting of the Barbican Estate and vice versa. The existing towers on London Wall impact on its setting.

494. Part of the special architectural interest of the Church is its Gothic design features, which have been faithfully restored and imitated in works carried out from the 19th century onwards. It also has historic value through its association with numerous well known historical figures, such as Oliver Cromwell, and for surviving the Blitz (1940-1), when most of the surrounding area was destroyed. It has further historic value due to its incorporation into the Barbican Estate masterplan in the post-war period, which further adds to its group value and provides its setting today.

Setting:

495. Despite the historic setting of the Church of St Giles being largely decimated in WWII, the location of the Church on the periphery of the City of London is still legible in relation to the visible remnants of the old City wall. The legibility of the City wall is further enhanced by the Barbican Estate landscape designs, which include the reinstatement of a watercourse beside the wall. The Church holds group value with the Grade II* listed Barbican landscape and the Grade II listed Barbican Estate, both of which were designed to incorporate the Church as an architectural and historical centrepiece within a site which otherwise appears to have been treated as a tabula rasa. The setting of the Church is therefore primarily informed by the Barbican Estate, including a highly formalised landscape and tall and largescale buildings in the Brutalist style. The remnants of the City wall also form an important aspect of the setting of the Church. These closer elements of the church's setting contribute positively to significance. No other buildings dating from before the 20th century exist in the area. Tall modern buildings on London Wall are visible within the setting of the Church, particularly in views looking across the Barbican landscape from the Lakeside Terrace (see Views 20, 21, 22, 23). This wider setting, including the application site, forms an established modern backdrop to the Church setting and makes no specific contribution to significance.

Impact:

496. Historic England note the new development would encroach in a similar manner to the existing Bastion House as they are broadly similar in height but consider the increase in mass and bulk would be more apparent and so cause some minor harm to its setting. The BQA raise objections due to perceived impacts on setting and these are echoed by many other consultees.

497. Views 19-24 indicate the potential impacts in the backdrop of the Church of St Giles from the Lakeside Terrace, St Giles Terrace and from the elevated Gilbert Bridge. In these experiences existing Bastion House is visible and has invisibility with the Church nave and tower. The proposed development would be more conspicuous as a pair of mid-rise buildings but would have a lighter skyline presence than the existing Bastion House. The setting would be altered, but the

Church would remain fully legible and dominant in the foreground. The proposed development would be more apparent but not distracting reading as part of the existing separate urban commercial background context unrelated to the Church which would retain its primacy in the foreground.

498. Overall the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

Cathedral Church of St Paul (Grade I)

Significance:

499. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

Setting:

500. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance.

- i) those wider strategic plan-London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and

where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.

- ii) The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
- iii) Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament Hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.
- iv) Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact:

501. The Surveyor to St Paul's Cathedral has identified the development as elements causing minor less than substantial harm to how the significance of the Cathedral is appreciated in views from Bankside and very low residual impacts to kinetic glimpse views from the Barbican Estate. Historic England have identified a minor degree of harm to View 13 A.1 inferring an impact on the Cathedral. Officers do not concur with this position whilst attaching great weight to the nationally significant heritage asset of the utmost importance.

502. As regards (I) the impacts on riparian experiences including from Hungerford Bridge, Waterloo Bridge, Millennium Bridge, Southwark Bridge, Blackfriars Bridge and from along the South Bank these are assessed in the Strategic Views and CoL Strategic Views section. The impacts in relation to the Cathedral are neutral and there would be no harm to identified elements of significance. There would be no visual impact as regards (II). In relation to (III) the panoramic views and the impacts to the Cathedral are assessed in the Strategic View section and the impacts are again neutral. As regards element (IV) There would be a minor degree of impact on less formal experiences of the Cathedral. The skyline presence from

Tate Modern public Viewing Gallery but as acknowledged elsewhere in this report this is not a pristine experience and the primacy and ability to appreciate the Cathedral would be preserved. From the Barbican Estate the occlusion of minor and incomplete parts of the Cathedral notably the lantern and ball and cross are again informal fleeting experiences. In other parts of the report these are not identified as harmful impacts which would erode the fundamental elements of significance, primacy or contributions of setting.

503. Overall, the proposals would leave the setting of the Cathedral preserved and there would be no harm to the setting and therefore the significance of the Cathedral.

St Bride's Church (Grade I)

Significance:

504. Church of 1671-8 by Sir Christopher Wren with spire of 1701-3, one of Wren's tallest and comprising five octagonal stages of diminishing height. The spire is one of the most distinctive and memorable on the city's skyline. The skyline presence when viewed from the bridges and banks of the Thames makes a significant contribution to significance, especially where the spire can be seen as part of the romantic historic skyline around the Temples to Blackfriars and in association with St Paul's. The church was gutted in the Blitz and restored by Godfrey Allen in 1957. It is of outstanding, national, architectural/artistic, historical, and archaeological significance.

Setting:

505. Elements of setting make a significant contribution to architectural and historic significance, in particular an appreciation of it. In relative order of contribution, it is considered that this derives from:

- Pan-London broad riparian views from the River Thames, its embankments and bridges, including strategic LVMF River Prospect views from Waterloo Bridge, Gabriel's Wharf, Hungerford Bridge, Southwark Bridge and London Bridge, where it can be appreciated as a landmark steeple atop the rising banks of the Thames, denoting the Processional Route and seen in complementary juxtaposition with Wren's masterpiece, St Paul's. These make a significant contribution to architectural/artistic and historical significance.
- Local, often glimpsed, sudden and fleeting local views from Fleet Street, St Bride's Avenue, Bride's Passage and Bride Lane allow for the Wren tower and steeple to be appreciated in an intimate townscape context. This makes a

contribution to architectural and historic significance, especially an appreciation of it.

- It's associated historic churchyard and enclosure by complementary historic buildings and streets. This makes a contribution to architectural and historic significance, especially an appreciation of it.

Impact:

506. As identified in the Strategic View and City Landmark section Historic England identify a mid-range of less than substantial harm to the setting of St Bride's Church from Hungerford Bridge LVMF 17B.1. Where the proposed development would be visible directly beyond St Bride's, it has been designed in terms of its mass, expression and materiality, so as maintain the legibility of the spire's profile on the skyline. However, the spire in views from Hungerford Bridge would be backdropped challenging the primacy and ability to appreciate the characterful Wren church as a distinctive vertical landmark on the skyline which is central to its significance. The backdropping is confined to lower tiers of the spire leaving the upper pristine. There would be a diminishment in the ability to appreciate the spire on the skyline and this would result in a low level of less than substantial harm. Otherwise, the proposals would have no impact on other elements of setting.

Church of St Botolph without Aldersgate (Grade I)

Significance:

507. The Church is of considerable historic and evidential interest and of medieval origin, Unusually, St Botolph Aldersgate was affected by the Great Fire of 1666 but wasn't rebuilt until 1789-91 on the site of the preceding medieval church. Churches dedicated to St Botolph, the patron saint of travellers, were built at Aldgate, Billingsgate and Bishopsgate. The presence and name of this church are important evidence for the demolished Aldersgate, which stood nearby. The church was completely rebuilt (with the exception of the east wall) between 1789 and 1791 under the direction of Nathaniel Wright (exterior) and Nathaniel Evans (interior). In 1831 the east front was demolished and the building shortened to widen Aldersgate Street.

508. The church has a more domestic scale and character unusual amongst City churches. Architectural interest derives from the decorative classical stuccoed eastern front with Ionic columns and pediment framing the Venetian window. The north, south and west elevations are modest brick elevations punctured with simple arched window openings characteristic of the 18th century. The low square

tower is of brick with a lead dome and small bell-cote. Internally the church is of considerable artistic interest with lunette windows to the central aisle. late 19th century-stained glass east window and wall monuments from the previous building and some late 19th century fittings of note.

Setting:

509. Elements of setting which make a significant contribution to the architectural and historic interest:

- Postman's Park is an amalgamation the churchyards of St Botolph, St Leonard Foster Lane and Christchurch Greyfriars and makes the primary contribution to significance. There is still a strong visual relationship between St Botolph's church and the former churchyards. The churchyard is a reflective and peaceful enclosed space in which to experience the domestic scale of the listed building and provides a tranquil segregation from the surrounding busy and vibrant, largely commercial townscape. These central gardens of Postman's Park enable appreciation of the bell tower and body of the Church, filtered by mature trees. The main elevation of the Church is viewed on Aldersgate Street (the northern end of St Martin's le Grand
- The finer-grain buildings on Little Britain contribute positively to its setting by illustrating the grain and character of the historic townscape in which the church was constructed and are seen alongside the Church in views from the centre of Postman's Park.
- The Church and space around it at the eastern are enclosed by large and tall modern buildings in close proximity, most notably 200 Aldersgate, 1 St Martin's Le Grand and One London Wall. Larger scale buildings around the Church. The top of the existing Bastion House is visible from the centre of Postman's Park, beyond the Church. These elements provide a good degree of enclosure but do not contribute to significance.

Impact:

510. Views 14A, 14B and A4 demonstrate that part of the top of both the proposed Rotunda Building and New Bastion House would be visible and the former would have some intervisibility with St Botolph's. There would be moments from the southern part of the centre of Postman's Park when the bell tower would be entirely backdropped by the Rotunda. Although the bell tower would remain legible in the foreground as a distinctive skyline feature the presence of the Rotunda in terms of scale and increased crowding would distract from the modest scale of the Church, particularly in view 14 B, where only the weathervane would retain a clear sky backdrop. Although the impact would be mitigated by the light and high-quality appearance of the crown of the Rotunda on the skyline, and mature trees would continue to filter these views, there would be a slight diminishment of primacy due to the scale and increased sense of enclosure the proposals would bring.

511. In baseline and cumulative scenarios, there would be a low level of less than substantial harm to the significance of the listed building, via change in its setting, through the proposal's background presence in views from Postman's' Park. Historic England and third-party objectors have identified a degree of harm to the setting of the listed building.

Church of St Anne and St Agnes (I)

Significance:

512. The Church was built in 1677-87. The designs have been attributed to Christopher Wren, although it is also thought Robert Hooke played a role in its construction. The central plan is legible externally, in the arrangement and shape of the pedimented gables. The body of the Church is red brick. The bell tower is stuccoed and positioned in the centre of the western end of the church. The church was damaged by bombing in WWII and was restored in the post-war period.

513. The building has architectural value in the high quality of its design and the external legibility of its central plan. The Church differs from many of the other post-Great Fire of London churches both in the central plan and its red brick elevations that have subtle ornamentation. The building has historical value through its association with Wren and Hooke, both of whom played a significant part in London's reconstruction post-1666. Past parishioners include John Milton, John Bunyan and John Wesley, adding to the building's historical value. It has further historical value due to its survival of WWII and subsequent reconstruction

Setting:

514. There is no clear visual relationship between the Church of St Anne and St Agnes and the site. The immediate setting of the Church is enclosed by mature trees to the east and south. To the west, it is largely hidden by taller buildings which adjoin its western side. To the south-east, the Grade I listed Goldsmiths' Hall is visible from the Church boundary but bears no particular relationship with the Church. The Church is almost entirely hidden in longer views due to the large-scale buildings nearby in all directions – Alder Castle (10 Noble Street) to the north, 25 Gresham Street to the east, 2 Gresham Street to the south and 1 St Martin's Le Grand to the west. It is experienced within a distinctly urban setting which is principally characterised by large and tall modern commercial buildings which provide a strong sense of enclosure but do not contribute to the heritage significance of the Church or its appreciation.

Impact :

515. View B18 indicates that there would be very little visibility of the proposed development in the context of the Church of St Anne and St Agnes. Its immediate setting would remain defined by mature trees and large-scale buildings in the close context in all directions. The setting of the Church would be very little changed and would remain the same in townscape character. The development has also been tested through digital modelling the development would not be visible from the north east end of Foster Lane or have intervisibility with the tower and the belfry as suggested by objectors.

516. There would be no impact on the heritage significance of the Church or its appreciation. Cumulative Assessment The cumulative schemes are not located close to the Church and the views assessment in Section 6 shows that the cumulative schemes would not be visible in relation to the proposed development and the Church of St Anne and St Agnes. There would be no cumulative effect on the significance of the Church.

517. Overall, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

Postman's Park Conservation Area

Significance:

518. This is summarised in the Conservation Area SPD as follows:

- An arresting and tightly defined juxtaposition of ruins, churches, medieval plot widths, grand official architecture and generous provision of green space;
- A varied street network with a tangible hierarchy of routes and spaces, preserving vestiges of the medieval street pattern;
- A varied mix of uses with quiet residential enclaves encountered alongside busy office developments, recalling the City's historic mixed-use character;
- Significant historic associations with important historical figures including Sir Christopher Wren, John Wesley and Rowland Hill;
- Poignant associations with past City communities through the three former burial grounds that comprise Postman's Park and the former burial ground of Christchurch Greyfriars;
- A significant and unusual commemoration of less well-known individuals in the form of the Watts Memorial to Heroic Self-Sacrifice;

519. An extensive array of heritage assets illustrating the development of the area from the Roman period to the present day, encompassing the Roman and medieval City wall and Aldersgate, medieval religious establishments, the Victorian General Post Office, burial grounds repurposed as public parks, WW2 bomb-damaged remains and an award-winning modern office de

520. Fourteen views are noted in the Conservation Area SPD, the majority of which are inward looking (Ref. 1-24, p.40). Of these identified views, of relevance to the site is: 3b. View of St Botolph Aldersgate.

Setting:

521. The setting of the Conservation Area is largely informed by further Conservation Areas. Only the southern boundary is adjacent to an undesignated part of the City's townscape which is comprised of more coarsely grained, commercial buildings which line the busy road thoroughfares of Newgate Street and St Martin's Le Grand. The northern setting includes large and tall buildings on Aldersgate and at the eastern end of London Wall, including One London Wall, Bastion House and 200 Aldersgate, all of which are visible on approach to the Conservation Area along St Martin-le-Grand and from within the Conservation Area itself, principally the eastern half which is defined by Postman's Park. The setting of the Conservation Area is one that is distinctly urban and largely informed by tall and large commercial buildings in close proximity to the Conservation Area. This setting does not contribute directly to the significance of the Conservation Area.

Impact:

522. The proposed development would be visible: on Aldersgate Street near the junction with London Wall; within most of the core area of Postman's Park; and glimpsed on King Edward Street. View 13 shows the transformation of the site in close views from the immediate setting of the eastern frontage of St Botolph's-without-Aldersgate on Aldersgate Street. Views 14A, 14B and A4 show that part of the top of both the proposed Rotunda Building and New Bastion House would be visible from within Postman's Park. The top of New Bastion House would appear in place of the existing building on that part of the site. The proposed Rotunda Building would be taller than the existing Museum and its top would appear close to and directly beyond the bell tower of St Botolph's Church in views from the south part of the centre of Postman's Park. It would not obscure views of the Church, which would remain a key feature in the foreground but its primacy as a focus within the heart of the Conservation Area would be slightly challenged. From the southern pathway of Postman's Park both the Rotunda and the New Bastion House would eventually come into view filtered by trees and experienced with a foreground of 1 London Wall and 200 Aldersgate. The scale of the rear elevations of the Little Britain have a fine urban grain and are detached from the tall building backdrop.

523. Additional impacts on the Conservation Area have been identified by objectors. Using a digital model there would be slight and fleeting visibility of the

development along Little Britain but no intervisibility with the listed buildings, New Bastion House would be evident above 75 Little Britain and glimpsed from King Edward Street. This impact is also demonstrated in View B17. This is consistent with the existing impacts where 1 London Wall and 200 Aldersgate Street appear fleetingly above rooftops and is reflective of the overall impact of the development from the west on the setting of the Conservation Area.

524. Where visible, the proposed development would largely be seen and understood in relation to an existing large scale, commercial setting to the Conservation Area on London Wall. The wider character and special interest of the Conservation Area as described in the Conservation Area SPD would largely be preserved.

525. However, there would be a diminishment to the backdrop of the bell tower of St Botolph's from an identified prominent view within the adopted SPD and within the heart of this most intimate and reflective part of the Conservation Area. Taking the modest scale of the Conservation Area into consideration, the change in setting would impact the character and appearance causing a slight level of less than substantial harm to the significance. Historic England and third-party objectors have identified a degree of harm to the setting of the Conservation Area.

Foster Lane Conservation Area:

Significance:

526. The special interest and character of the Conservation Area is highlighted in the Conservation Area SPD as follows:

- A small linear area, based on medieval Foster Lane and comprising a gently curving street, alleyways and open spaces;
- The massing, rhythm, material and architectural detailing reflect the neo-classical style which is a vital element of the City's character and appearance;
- The intimacy of scale is maintained by the relationship of a narrow street plan with open spaces and buildings that respect it;
- The concentration of Livery Halls in the area reflects a use that is unique to the City and its character. Together with churches, churchyards, open spaces and new buildings, the area reflects both the historic evolution of the City and its role as the financial centre of London.

Setting:

527. The Conservation Area is an intimate one. The wider townscape is little seen from within the Conservation Area and the characteristics which provide its special interest are reinforced by the intimate views and localised character within the

Conservation Area itself. The larger grain modern buildings outside of the boundary which form a contemporary make no contribution to our understanding of significance.

Impact:

528. New Bastion House would be glimpsed from parts of Foster Lane and Noble Street. View B18 (View 7 within the Conservation Area SPD) shows that the degree of visibility would be very slight and it would appear directly beyond an existing large scale commercial building in the foreground, One London Wall. The proposed Rotunda Building would be seen in views north along St Martin's Le Grand (View 12), looking past the western tip of the Conservation Area (which includes the Grade II listed St Martin's House). These glimpsed views of parts of the proposed development from the outer edges of the Conservation Area would not affect its character and appearance. The development would not be visible in a manner which would be prominent and obtrusive.

529. The proposals would preserve the character and appearance and setting and significance of the conservation area.

Scheduled Monuments

530. Two Scheduled Monuments which comprise fragments of the historic London Wall are included within the site boundary.

London Wall: section of Roman and medieval wall and bastions, west and north of Monkwell Square (reference 1018888)

Significance:

531. The Scheduled Monument is located to the north and west of Monkwell Square, and largely lies within the boundary of the Barbican and Golden Lane Conservation Area and the Barbican RPG with the western part located within the Barber Surgeons' Garden. It incorporates the standing and buried remains of parts of the Cripplegate Roman Fort and London Wall, and part of the former graveyard of St Giles's Church. This section of the Roman wall is part of the northwestern corner of the Roman Cripplegate fort, and therefore includes the buried remains of the Roman and medieval Town Wall, the fort wall, two internal turrets and four bastions. A section of ditch, which acted as external strengthening, is also included in this scheduled monument. It is located parallel to the walling which runs from the south-west to the north-east. This area was incorporated within the graveyard of St Giles's without Cripplegate. As such it is also holds medieval archaeological interest.

Setting:

532. This section of the City wall is not seen in long views and significance is largely seen and understood within its immediate setting. Part of the surviving wall and bastions sit within a green landscape which stretches from London Wall to the southern edge of one of the Barbican lakes and the Estate's gardens. The eastern and southern context is distracting and unsightly comprising the blank white tiled back of house base of Museum, the vehicle ramp positioned tight to the Monument and car park entrance. The surviving highwalk travels past the bastion at the south of the site but there is no dedicated pedestrian access. This immediate setting is in part exceptionally poor the Monument appears forlorn, neglected, and vulnerable and its significance cannot be easily appreciated.
533. Tall buildings also provide the wider neighbouring context and have done since the 1970s including Bastion House, One London Wall, 88 Wood Street and Alban Gate and the post-war landscape of the Barbican to the north.

Impact:

534. The immediate landscape setting would be positively transformed, made publicly accessible and be supported by heritage interpretation indicated by View 27 and the D&A Landscape Masterplan and Ground Level.
535. Both Barber Surgeons Gardens would have refreshed spaces with new paths, seating and landscaping, improving and expanding the provision of green infrastructure around the periphery of the site. Barber Surgeons Garden is currently pleasant, but the proposed development would also create an enhanced relationship between the buildings and these spaces through the provision of new access to the garden with new entry points. The landscape around the Monument would be significantly improved through the removal of the vehicle ramp existing planting schemes which would be connected through to the Northern Gardens through pathways and the cascading water features. The fabric of the Monument would not be affected and therefore its inherent special interest would not be eroded. The existing wild meadow planting would be retained and expanded preserving the naturalistic setting and biodiversity. The proposals include new public pedestrian routes at different levels (lower ground, street level and highwalk) also enhancing visitors' appreciation of the Monument with views from different vantage points. This will include a new length of highwalk that will follow the eastern edge of the New Bastion House building, enabling close aerial views over the City wall. The positioning of routes and seating in Barber Surgeons Gardens, alongside the proposed re-landscaping, would create more opportunities for people to enjoy the historic monuments, enhanced views of the archaeology and remains would create an attractive and unique garden

536. Accessibility to the garden would also be further improved from London Wall by a lift and stairs leading down from the street level into the garden and Cycle Hub below. A ramp traverses across the façade of New Bastion House providing a dedicated accessible route down to the garden whilst also creating a belvedere of the historic London Wall.
537. Historic England have objected to the building over of the Wall's historic but unseen ditch line and the pulling forward of the New Bastion House eastern elevation which would come slightly closer to and loom over the Scheduled Monument. The ditch line is not presently visible or appreciated in an area of landscape which is currently green space. The pedestrian ramp would cover the ditch line with shallow foundations and the proposed water feature would mirror the ditch line.
538. The upper levels of the proposed New Bastion House would be located closer to the Scheduled Monument than at present, however it would not extend over or close to the Scheduled Monument. There would still be significant space between them the Schedule Monument and the New Bastion House. Moreover, the proposals would create new multi-level viewpoints from which to view the remains, enhancing an appreciation of the form and extent of the Wall to better reveal its special interest.
539. The proposed development would introduce a change to the setting of the Wall, but in the area of setting which does not contribute to its significance. This change would be consistent with other tall development around the site. As such, in baseline and cumulative scenarios, it would not affect the setting and significance of this heritage asset, in terms of its above ground elements.
540. A separate Scheduled Monument Application will be submitted to Historic England and this has been conditioned. Further conditions are proposed to ensure physical protection to the monuments, archaeological supervision of all works in the vicinity and a Scheduled Monument Management Plan would be secured by condition, to deliver the provision of substantial high-quality interpretation connecting all parts of the London Wall in this area and enabling extensive public access and long-term maintenance. Conditions will reserve final details of all elements of the landscaping in Barber Surgeons Garden and these details will be worked through in collaboration with City Gardens

London Wall: the west gate of Cripplegate fort and a section of Roman wall in London Wall underground car park, adjacent to Noble Street (ref 1018889)

Significance:

541. The Scheduled Monument is located within an underground car park beneath the post-war roadway of London Wall, 12m south of Bastion House. It includes standing and buried remains of part of the Roman Cripplegate fort and the Roman London Wall. The standing remains of the fort survive well in this area, with information extractable about the construction process. It is the only known section of the Wall which was not later rebuilt. The scheduling notes that the Monument is of particular importance for the understanding of the Roman defences.

Setting:

542. As a result of its internal modern setting within a locked space within the car park, the Scheduled Monument is not accessible to the public. Its enclosed car park setting detracts and decontextualises the appreciation and understanding of the Scheduled Monument.

Impact:

543. The proposed development includes the facilitation of public access to this section of London Wall and improvements to the environment in which it would be viewed. The fabric of the Scheduled Monument would not be affected and therefore its inherent special interest would not be impacted. Public access would be created, therefore enhancing an ability to appreciate the heritage significance of the Scheduled Monument. The application would provide opportunities for interpretation and to make connections with the other fragments of the wall in Noble Street and Barber Surgeons Garden. This part of the application has been welcomed by Historic England.

544. The presentation of the Monument would be positively transformed, albeit in a way unrelated to heritage significance; the proposals would preserve the setting and significance of the designated heritage asset.

545. A separate Scheduled Monument Application will be submitted to Historic England and this has been conditioned. Further conditions are proposed to ensure physical protection to the monuments, archaeological supervision of all works in the vicinity and a Scheduled Monument Management Plan would be secured by condition, to deliver the provision of substantial high-quality interpretation and extensive public access.

London Wall: section of Roman and medieval wall and bastion at Noble Street (Scheduled Monument) reference 1018890

Significance:

546. The section of City wall on Noble Street is on the south side of London Wall. The Scheduled Monument runs parallel with Noble Street, located to its west. It includes the ruins and buried remains of approximately 80m of Roman and Medieval wall, and parts of the western side of Cripplegate fort, including two internal turrets and the foundations of a bastion. Further 18th to 20th century property remains, which utilised the Wall as their foundations, are included within the Monument. Opposite Oat Lane, Roman masonry fragments are visible above the garden level.

Setting:

547. The setting of the Monument today, is one of tall 20th and 21st century office buildings. Nonetheless, the southern end contains more historic fabric, with the church of St Anne and St Agnes (Grade I) located at the southern boundary. Its churchyard provides a green landscape in the adjacent vicinity of the wall. This open space provides a good space from which the Scheduled Monument can be appreciated. The backdrop of the Monument is formed by modern office buildings. However, Noble Street itself maintains a historic street pattern.

Impact:

548. The monument of London Wall on Noble Street will have its setting slightly altered in the view looking north from the corner of the Roman fort represented by (View B18) The new building is a slightly different mass to Bastion House and would intrude slightly further into the view of the monument along Noble Street. However, this view is currently compromised with Bastion House. Historic England consider this context and consider any harm to the Monument would be low and should be weighed against public benefits.

549. Officers consider the Monument's significance is seen and understood within its immediate sunken setting and the existing wider context is in part modern to the west. This immediate setting would be unchanged, the fabric would not be affected and the section of the Monument would remain fully appreciable. There would be no harm to setting and significance of the designated heritage asset.

550. The proposed development would provide an opportunity to celebrate the wider history of the Roman Wall and draw connections with the Fort Gate and Bastion 14 through heritage interpretation to be delivered through a Scheduled Monument Management Plan and Cultural Implementation Strategy secured by condition.

Non-Designated Heritage Assets

551. The existing buildings on the site are the former Museum of London building and associated office development of Bastion House, of 1968-76 by Powell and Moya. These buildings have been assessed and found not to qualify for listed status by Historic England. They are now subject to a Certificate of Immunity from Listing (COIL).

552. The Twentieth Century Society and other third-party objectors have argued that these buildings should be treated as a non-designated heritage asset (NDHA). Such assets are defined in the National Planning Policy Guidance (NPPG, para 039) as 'buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets'. Criteria for identification of sites as NDHAs are suggested in Historic England's Advice Note 7 (Local Heritage Listing). An assessment against these criteria is made below.

Asset type/Rarity:

553. These two criteria, listed separately in the HE note, essentially belong together. The Museum is as a prominent example of a post-war museum (comparatively few examples exist) and Bastion House as a now-rare survivor of a once-common building type: a postwar office block designed along Miesian principles. As such the site is considered to be of comparative rarity.

Age:

554. The buildings are approximately 50 years old, a relatively unremarkable timespan.

Architectural and artistic:

555. The COIL acknowledges the buildings to be somewhat awkward examples of Powell and Moya's output, which do not display to any great degree the qualities of 'humane modernism' which distinguished their work. The COIL does not identify any special architectural interest in either building. The limitations of the architecture and spatial planning of the buildings have been long acknowledged and have been a factor in the eventual relocation of the Museum.

556. Architecturally the buildings are considered unremarkable. Featureless and overbearing externally, the Rotunda is at most a curiosity of its kind, while the museum and podium of Bastion House consist of an awkwardly massed, simplistic

exercise in white tiles, strips of glazing and concrete columns without any particular architectural flair.

557. The tower element of Bastion House comprises a simple rectilinear volume of dark curtain walling raised up on concrete columns. It was described in the Architects' Journal (1996) as being 'in anonymous Miesian mode' and the COIL described it as 'mundane and perhaps old-fashioned in its treatment'. Although now a relatively rare example of its kind, it is not considered to hold any architectural qualities of note.

558. Resultingly the buildings are not considered to possess architectural or artistic interest.

Group value:

559. The COIL suggests the buildings have group value 'with the listed Barbican to the north and the scheduled monument to the east' but does not articulate why this is so. Officers disagree with this conclusion. Although contemporaneous with the Barbican Estate immediately to the north, and is designed in a modern idiom, the buildings are of a different architectural language. Further, they have an awkward relationship with the Ironmongers Hall immediately north and Barber Surgeons Hall to the east (and the remains of the Roman and medieval City wall) and diverge from these in architectural style, materiality and general character. As such, the buildings are not considered to possess clear group value with any of these neighbouring sites or with those modern developments in the wider vicinity such as 200 Aldersgate or 1 London Wall.

Archaeological interest:

560. The basements of the existing buildings have truncated the archaeological potential of their footprints. There is archaeological potential in the northern and eastern fringes of the site, beyond the footprints of these buildings, and this is treated under the archaeology section below.

Historic interest:

561. The former Museum building was the first purpose-built home of the Museum's collections, designed for the amalgamation of the City Corporation's collection, founded in 1826, and that of the London Museum, founded in 1912. It was designed by Powell & Moya, a significant C20 practice with much work of note to their name, including the Festival of Britain Skylon and Churchill Gardens. The COIL identifies some historic interest as a museum for the capital. Officers agree

that in this respect the museum possess a degree of historic interest, but that this is ultimately limited without the collections.

562. The COIL further identifies 'some' historic interest in Bastion House for its part in London's post-war masterplan but asserts that 'this interest is overshadowed by the redevelopment of London Wall and the wider erosion of these post-war aspirations'. Officers agree with these conclusions.

563. Overall, on balance, the former Museum building is considered to possess a limited degree of historic interest.

Landmark Status:

564. The former Museum building terminates views north along St Martin Le Grand, but its low scale and inactive frontages are without any especial landmark quality. In views west along London Wall and south along Aldersgate Street the former Museum and Bastion House are seen amongst modern buildings of comparable scale which reduce their prominence and they are not considered architecturally distinguished enough to be perceived as landmarks in these views.

565. Many objections, including from BQA, lament the loss of the MoL as a marker of the start of the ancient Roman Road. Whilst the ancient roots of the road are of general interest, the siting and design of the former MoL was not explicitly tied to this purpose.

Non-Designated Heritage Asset: Conclusion

566. In conclusion, the buildings meet, to a limited extent, two of the seven criteria suggested by Historic England for identifying non-designated heritage assets. On balance it is considered that the buildings do not possess enough heritage significance to warrant this status.

567. As such, they are considered to fall short of the criteria for identification as a non-designated heritage asset, and their demolition is not objectionable from a heritage perspective.

Barber Surgeons Hall:

Significance:

568. This neo-Georgian hall to the east of the site dates from 1969, designed by Kenneth Cross following a 29-year delay after the Blitz, which irreparably damaged the second hall. Its significance principally stems from its typology and historic values with the Barber's Company having a hall in the northwest corner of

the Roman Fort since the 1440s. To a lesser degree significance derives from associations with notable members and the establishment of the physic garden in Bastion 13.

Setting:

569. Elements which contribute to significance include those that reinforce historic and functional connections with primarily the Roman wall remains, the Barber Surgeon Garden setting as well as associations with surrounding Livery Halls including Plaisterers Hall and Ironmongers Hall. The Barbican Estate, Bastion House and MoL do not contribute to an understanding of significance.

Impact:

570. The proposed development would introduce a change to the setting of the Hall to the west but in the area of setting which does not contribute to its significance. This change would be consistent with other tall development around the site particularly London Wall. The improvements to the public access to Barber Surgeons, wildflower planting and the connecting northern garden would enhance and strengthen the landscape setting and significantly improve the immediate context. Overall impacts would be neutral to increasing an understanding of significance. As such, in baseline and cumulative scenarios, it would not affect the setting and significance of this heritage asset.

Indirect Impacts on other Heritage Assets

571. Setting of a heritage asset is defined in the NPPF as “The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.” Given the dense central London location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise was conducted so as to identify heritage assets the setting of which may be affected. The TBHVIA Fig 12.1 and 12.2 include lists of heritage assets which were scoped in. The designated heritage assets considered included but not exclusively so:

- Cripplegate Institute (Grade II)
- Goldsmiths Hall (Scheduled Monument)
- Memorial to Heroic Self Sacrifice (Grade II*);
- King Edward’s Buildings (Post Office) (Grade II*);
- St Martin’s House (Grade II);
- National Westminster Bank (Grade II) ;
- Smithfield Conservation Area.
- Gate Railings to Church of St Botolph (Grade II)
- Statue of Rowland Hill (Grade II)
- Gate and Railings to former Church of St Botolph (Grade II)

- Police Call Box at north east angle of Number 1 (Grade II)
- 9 and 10 Little Britain (Grade II)
- 12 Little Britain (Grade II)
- Church of St Vedast (Grade I)
- No 4 Foster Lane St Vedast Rectory (Grade II)
- King Edward Street Building (Grade II*)
- Charterhouse Square Conservation Area
- Golden Lane Estate (II)
- Golden Lane Estate Registered Historic Park and Garden

572. The settings and contribution to significance of these heritage assets would not be affected by the proposals due to the relative distance of the proposal from them and intervening development resulting in little intervisibility between them. It is the view of Officers that the proposed development would not harm the setting or the contribution that the setting makes to the significance of these heritage assets. The assets assessed in detail in this report are those affected by the proposed development. Other assets have been scoped out of consideration for the reasons given in the TBHVA (Officers agree with that scoping exercise). Officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the THVA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development. Officers are confident that the analysis that has been undertaken is sufficient to identify the heritage assets which may be affected, to understand their significance, and to assess impact on that significance.

Memorials, sculptures and plaques

573. Across the site there are a number of historic elements, public artworks and memorial plaques. These have been documented, will be removed, repaired, cleaned stored and reinstated in association and controlled under conditions with agreement from relevant stakeholders. The details of this process will be conditioned. Artefacts identified include:

- Wesley Memorial (Aldersgate Flame): The proposed location would be similar to existing, but the freestanding siting would enable an enhanced appreciation. The new location is being reviewed with the Aldersgate Trustees of the Methodist Church.
- John Wesley Commemorative Plaque: This will be positioned in a similar location to existing on an upstand planting edge.
- Metropolitan Drinking Fountain and Cattle Trough: This is currently located adjacent to the road kerb on London Wall. This will be repositioned to the back of the footpath improving visibility and will be supported by interpretation to be covered by a condition.
- London Wall Plaques: These dates from 1984 and many are lost. These will be remade and reinstalled in relevant locations.

- Jewish Cemetery Memorial; A new interpretation plaque will be installed on site to mark the historic Jewish Cemetery.
- Bull and Mouth sculpture is part of the Museum of London collection and will be removed from site.

Overall Conclusion on Heritage

574. The proposals would preserve the significance and contribution of setting of all the aforementioned heritage assets except that of St Brides Church (I), the Church of St Botolph (I) and Postman's Park Conservation Area, which would experience, via setting impacts, low to slight levels of less than substantial harm.

575. As such, the proposal would result in some conflict with Local Plan Policies CS12 (1), DM12.1 (1), CS13 (1 and 2), draft City Plan 2040 policies S11 (1), S13 (1 and 2), and London Plan Policy HC1 (C), and with the objective set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.

576. The proposals comply with policies CS 12 (2-5) DM12.1 (2-5) DM12.2, DM12.4 and DM12.5, CS13 (3) draft City Plan 2040 S11 (2-5), S 13 (3), HE1 and HE2 and with the objective set out in Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990.

577. Moderate heritage benefits are identified in the completion of the Mountjoy Close Highwalk and the enhancement of the setting of Ironmongers Hall.

578. The benefits and harms are considered as part of the paragraph 208 NPPF balancing exercise, and in the final planning balance at the end of this report.

579. Objections on heritage impacts have been received from Historic England, and The Twentieth Century Society, St Paul's Cathedral, BQA and many others. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Archaeology

580. The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that

archaeological remains have been lost due to deep basement construction or other groundworks.

581. London Wall West is located just to the north-west of the Roman and medieval city walls and Roman fort. Parts of the Scheduled walls are included within the site boundary. A Jewish cemetery of possibly 11th century date extends partially onto the north-east area of the site, within the Barber Surgeon's Garden and beneath Bastion House. This formed the only Jewish cemetery in England until 1290 when the Jews were expelled. No evidence for the cemetery is visible above ground. Jewish law strictly forbids the disturbance or excavation of Jewish graves, creating complexities around fully understanding the precise archaeological potential of the site. In view of the significance and sensitivity of this feature, specific commentary on how the proposals would relate to it is provided below.

582. The submitted Environmental Statement (ES) includes a chapter for archaeology and also a baseline report has been provided as an appendix (Appendix 15). The results of the pre-determination archaeological evaluation have been provided to GLAAS separately rather than submitted with the planning application, but MOLA have confirmed that the results of the evaluation have been used to assess the archaeological potential of the site and are included in the ES where relevant. The evaluation report should be submitted as part of any necessary ES revisions or updates.

583. The ES identifies a low potential for prehistoric remains, a moderate potential for Roman remains relating to use of the City by the Romans outside the city walls and possibly including burials. The potentials identified do not include the Scheduled Monuments themselves which will not be physically affected by the development. The ES identifies a moderate potential for remains of medieval and post-medieval date relating to the expansion of the city beyond the walls and the former burial ground of St Giles which also extends into the north-east part of the site (but is separate from the Jewish cemetery). Extensive truncation from previous and current structures and bombing has also been identified.

584. Section drawings of the basement and lower ground floor of Bastion House (provided in the baseline appendix) demonstrate that, below the slab in Bastion House, concrete pile caps have been excavated in a dense formation which would have removed all archaeological remains in this area well into the natural ground. Thus, the likelihood of the Jewish cemetery surviving within the basement of Bastion House is negligible.

585. A small area to the north of Bastion House, in the north-east part of the proposed development and including the Barber Surgeon's Garden, incorporates a small part of the projected extent of the medieval Jewish cemetery. No

construction work is proposed in this area and the archaeology baseline states that the landscaping work here will be carried out through ground that has been raised by 1m in height.

586. As submitted, the proposals included elements that would have encroached into the projected extent of the medieval Jewish cemetery, including supports for the Highwalk connection and the enlargement of the existing service runs. Through subsequent negotiations, revisions to the proposals have been agreed which remove these impacts. The structural design for the Highwalk connection and northern garden has been revised and the additional services rerouted elsewhere within the scheme, meaning only replacement of the services within their existing runs would be required. The details of these elements would be secured via condition.

587. Additionally, in view of the sensitivity of the medieval Jewish cemetery, it is recommended that a plan be produced which shows the area of the Jewish cemetery within the site and also indicates a 'no dig' zone around this area, outside the current basement of Bastion House. The 'no dig' area should be incorporated into the landscaping method statement, the SUDS, the method statement for new services and the Construction Management Plan. This should be secured by condition and the 'no dig' zone demarcated on site by solid fixed barriers for the duration of the construction work.

588. As such, the proposal would result in no harmful impacts to the medieval Jewish cemetery, which would remain undisturbed. The anticipated Roman, medieval and post-medieval archaeology which may survive elsewhere on the site is likely to be of low-moderate significance and, in places, very truncated. Although the proposal would have an impact on these other remains, it is considered that these impacts could be outweighed through the benefits brought by the proposals, including the transformation of the visitor experience at the Roman Fort Gate, new interpretation for the City walls and digital and artistic interpretation of the heritage of the site.

589. A full suite of archaeological conditions is attached to secure further evaluation, protection and recording of the archaeology, and the public benefits outlined above.

Access and Inclusivity

590. The proposals have been assessed to ensure that they meet the highest standards of accessibility and inclusive design as required by London Plan Policy D5, Local Plan 2015 policy DM10.8 and draft City Plan 2040 policy HL1. These policies seek to ensure that the City is inclusive and welcome for all, with no disabling barriers and that it is responsive to the requirements of all users. Policy

HL1 of the draft City Plan 2040 further seeks to ensure that the City is a place that promotes equity, diversity and social inclusion in the design and use of buildings and public spaces, including through the provision of spaces that are free to access. Policy CV2 of the draft City Plan 2040 relates to the provision of Arts, Culture and Leisure Facilities and states that the provision of arts, culture and leisure facilities should be encouraged where they would contribute to the enjoyment, appreciation and understanding of the City's heritage in a way that is inclusive, welcoming, and accessible for all. Policy CS19 of the Local Plan 2015 encourages additional publicly accessible open space.

591. The environment at present is not welcoming and inclusive, with many barriers to access. There is potential for significant improvement including greater cross-site permeability, improved vertical access in both external and internal environments, improved access to Barber Surgeons' Hall gardens, creation of more green and quiet spaces and better wayfinding. There is also potential for inclusive cultural provision.

592. The City of London's Access Officer and City of London Access Group (CoLAG) have commented on the proposals and an appraisal of the key access matters is set out below.

Site arrival experience

593. The accessible parking bays would be at basement level in the existing London Wall car park. Two existing accessible spaces would be retained and three additional spaces would be provided in conjunction with the development in accordance with minimum London Plan standards set out in policy T6.5. No on street spaces or designated drop off points are proposed. BS 8300 (the code of practice detailing approaches to meet the required inclusive design of buildings for meeting the needs of disabled people) requires that the spaces should 'normally be within 50 m of an accessible entrance'. The travel distance between the outer bay and external lift is 80 m and its 90 m to the exhibition area. These distances exceed best practice. BS 8300 recommends that where distances would exceed 50m seating or rest points are provided. Information should also be made available for visitors including whether the spaces could be reserved and travel distances to different spaces on site. Details of car parking management and information would form part of an accessibility management plan which would be secured by condition and details of the design and location of suitable seating and resting points would be secured by condition and provided at detailed design stage.

594. For pedestrians arriving at the site, CoLAG comment that there are lots of crossing options on arrival to the site at present and as part of the proposals they would be consolidated into two 'scramble' crossings. With increased footfall

around the site CoLAG question whether this would be sufficient and would pavement widths be large enough to support this. A full appraisal in respect of pedestrian comfort is set out in the transportation section of this report, where it is concluded that proposed pedestrian comfort levels would be acceptable.

595. For cyclists, 5% of cycle spaces should be suitable for larger cycles to meet London Plan policy T5B and London Cycling Design Standards 8.2.1. The dimensions of wider cycle storage locations are indicated on the plans and the size of the cycle lifts should meet London Cycling Design Standards. The cycle parking would be subject to further design development with details contained within an Accessibility Management Plan which would be secured by condition.

596. The site accommodates significant level changes from below ground to the highwalk. Step free access would be provided from the street to highwalk level with four accessible lifts that would be spread across the site. Lift access is more limited in the northwestern corner of the site and the applicant has advised that this is due to new graded routes in this location and the close proximity of an existing lift within the Barbican Estate at the stair tower on the John Wesley highwalk. Details of the size of all lifts, turning areas, landing widths, wayfinding associated with the lifts and lift management would be provided at detailed design stage secured by condition through the Accessibility Management Plan.

Public Realm and Landscape

597. The landscaping proposed would broadly support greater accessibility and permeability of the site, with more opportunity for changing level between ground and highwalk. There are clear benefits for inclusive access from a new step-free route connecting the Northern Gardens to the highwalk, with appropriate landing points, more intuitive wayfinding and planting. This would allow people who require step-free access to move through the site without dependence on mechanical lifting devices. At detailed design stage further information should be provided on gradients, crossfalls, planting, details of security measures (for example bollards), seating, surface materials, boundary edges, lighting, hazard protection and appropriate resting points throughout the public realm. It is recommended that an inclusive public realm strategy be secured by condition to cover these matters.

Building approach and Interiors

598. No revolving doors are proposed which is welcome. Final details of entrance door widths and design, reception area design (desk, seating, sanitary facilities), fire evacuation lifts, corridor widths, accessible toilets, the layout of restaurants, rooftop seating, window manifestations and identification of provision of calm rooms and quiet working areas for staff that have sensory, neurological or

information processing differences would need to be provided at detailed design stage via condition in order to secure the optimum layout in accessibility terms.

599. At this stage no Changing Places toilet is proposed as part of the development. The provision of one would result in a more inclusive environment. The applicant has advised that this could be reviewed at detailed design stage as part of tenant fit out. Provision of a Changing Places toilet would be secured by condition.

Construction

600. Concerns have been raised by CoLAG regarding the construction phase of the development and how access issues for Barbican residents need to be considered, particularly if residents that currently use the Thomase More House ramp are to be rerouted to using the Seddon House entrance on Aldersgate Street. The Construction Logistics section of this report (under the highways section) acknowledges the concerns from residents about the proposed construction arrangements. This section of the report further states that as part of the more detailed Construction Logistics Plan (secured by condition) alternative access proposals would be required in order to enable residents to continue to access the Thomas More car park during the construction phase. The applicant will be required to engage with Barbican residents to establish a suitable access strategy throughout construction should planning permission be granted.

Delivery and Servicing

601. CoLAG members further expressed concern over the proposed servicing arrangements and the safety implications for Thomas More House users. It should be ensured that the proposal would not result in safety implications for users of the Thomas More Car Park because of the proposed servicing arrangement. The transport section of this report assesses the proposed servicing arrangement, a Delivery and Servicing Management Plan would be required by condition which would detail measures to manage the vehicles in order to ensure that the service yard operates in a safe way and would not have implications for pedestrian safety.

Access to Culture and Open Spaces

602. The free to access viewing gallery and the opening up of the Roman Wall viewing area are welcomed in terms of allowing inclusive access to cultural opportunities and the City's heritage. Notwithstanding, at present a platform lift is proposed in the Roman Wall viewing area that is not considered to be inclusive of all users. Notwithstanding, new generation platform lifts are designed to operate without the need for continuous pressure and its is recommended that this type of platform lift is used, details of which would be secured by condition.

603. The Culture Strategy (to be secured by condition) should demonstrate how the proposed cultural spaces would be inclusive in terms of procurement, programming, provision of opportunities and layout.

604. The extent of the proposed publicly accessible open space and public realm is welcomed and is a benefit of the scheme in accordance with policy CS19 of the Local Plan 2015.

Access Conclusion

605. Subject to conditions requiring the submission of further design details, an Accessibility Management Plan and an Inclusive Public Realm Strategy it is considered that the proposal would meet the highest standards of accessibility and inclusive design as required by London Plan Policy D5, Local Plan 2015 policy DM10.8 and draft City Plan 2040 policy HL1. The revealing of heritage assets and making them accessible for all would accord with policy CV2 of the draft City Plan 2040 and the provision of publicly accessible open space accords with policy CS19 of the Local Plan 2015.

Highways and Transportation

Public Transport and Access to Local Amenities

606. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The nearest London Underground stations are Barbican and St Paul's, which are located approximately 430m (a walk of 5 minutes, approximately) to the north and south respectively. Barbican station is served by the Hammersmith and City, Circle and Metropolitan lines, whilst St Paul's is served by the Central line. Within the walking distance threshold established in the PTAL methodology are Moorgate, Farringdon, Bank and Mansion House stations. Liverpool Street station is slightly outside the walking distance threshold for the PTAL calculation but would be a realistic option for travel for some; Liverpool Street station is also served by the Elizabeth Line and London Overground services. Moorgate provides a second option for accessing the Hammersmith and City, Circle and Metropolitan lines accessible from Barbican as well as access to the Bank branch of the Northern line.

607. An extensive range of train services can be accessed within convenient walking distance of the Site, including Moorgate (c.550m), Liverpool Street (c.850m) and City Thameslink (c.800m). A significant number of bus services

would be within an 8 minutes' walk (or 640m) from the site. It was identified within the Transport Assessment (TA) that 22 services would be accessible, providing a total of 157 bus services per direction per hour.

608. An approximate walk distance of 500m has been applied and assessed as part of the TA to understand the availability of local amenities within walking distance to the site. As would be expected for a site within central London, there are a large number of local amenities within 500m of the site, with at least 32 identified within the TA submitted including a mix of food, outdoor open spaces, leisure facilities etc. Areas are identified that can be reached by cycle to / from the site within a 10, 15 and 20-minute cycle based on typical cycling speeds. Key destinations that can be reached within a 10 to 15-minute cycle include Southwark, Hoxton, and Islington, and a 20-minute cycle from Bermondsey, Millbank, and Highbury. The site is approximately 200 m from Cycleway C1 and 250 m from Cycleway C11.

609. The site is therefore considered well located to enable and encourage sustainable trip making in accordance with policy T1 of the London Plan which seeks to ensure that all development makes the most effective use of land, reflecting its connectivity and accessibility by existing public transport, walking, and cycling routes.

Trip Generation

610. Within the Transport Assessment (TA) a trip generation forecast has been conducted for the site which identifies the net change in trips that would result from the proposed development.

Existing Trip Generation

611. The assessment has used TRICS (Trip Rate Information Computer System) travel data from similar developments within London with a PTAL rating of 6B which are considered suitable comparator sites. The two main existing land-uses are commercial offices and the Museum of London. The existing trip generation for the site has predominantly been calculated from the TRICS survey database and references to other data sources have been applied where necessary.

612. Trip rates for the commercial element have been established via TRICS only. The trip rates applied for the museum have also been established via TRICS but have also been cross-referenced with annual visitor data (which was collected whilst the Museum was still operating), and this confirms that the trip rates applied are sound.

613. The assessment identifies that the existing development would generate 569 two-way trips during the AM peak (08:00-09:00) and 1,041 two-way trips during the PM peak (17:00-18:00).

Proposed Trip Generation

614. The assessment for the proposed development has also used TRICS travel data from similar developments within London, applying sites with a Public Transport Accessibility Level (PTAL) rating of 6B which are considered suitable comparator sites given the sites accessible location.

615. The same trip rates applied for the existing development have been applied to the commercial office element of the proposed development. The proposed mode share for the commercial office element of the scheme has however been adjusted to reflect emerging travel patterns within the City since Covid-19; this adjustment was agreed at the pre-application stage on account of the proposed operational opening year of 2033/34, and through discussions with Transport for London. The adjustments predominantly reflect a higher use of walking and cycling as modal choices for travel, which is in keeping with modal changes in the City and sustainable travel objectives central to transport planning policy.

616. For the cultural element ('Sui Generis'), TRICS was also used to determine suitable trip rates for the proposed Cultural use at the Site. The TRICS database has limited representative site surveys available in this category as detailed within the TA which is common but not preferable from a statistical assurance perspective (with a range of sites often preferred). One site was identified as being representative and has been referred to within the assessment. On account of the limited comparable sites being available, the trip rates applied were multiplied by a factor of four to ensure that the applied trip rates are robust.

617. The proposed mode split for the Sui Generis land use has been based on the mode split for the former Museum as they reflect similar user-profiles in terms of journey timing and origins / destinations. The mode shares have been adjusted to reflect the 'car free' nature of the development and an expected increase in cycling trips as noted above.

618. Trips to the proposed food and beverage (F&B) use on-site would likely in the majority form 'linked trips' (i.e. visitors would visit this element of the proposals as part of an existing trip linked to other nearby amenities, such as offices). Nevertheless, 75% of the trips 'generated' by the F&B element have been included within the assessment for robustness. Ordinarily, a linked trip assumption of 25% would be considered more representative and an assumption of 75% of these trips being new trips is therefore considered robust.

619. TRICS was used to determine trip rates for the proposed F&B use at the Site. The mode share for the proposed F&B use has been derived from the sites selected in the TRICS database.
620. The assessment identifies that the proposed development would generate 1,921 two-way trips during the AM peak (08:00-09:00) and 2,672 two-way trips during the PM peak (17:00-18:00). When considered against the existing baseline, the assessment identifies that the proposed development would generate a net increase of 1,382 two-way trips during the AM peak (08:00-09:00) and 1,630 two-way trips during the PM peak (17:00-18:00).
621. Given the increase in two-way trips expected, the applicant has undertaken a multi-modal trip impact assessment and has also proposed a number of measures to mitigate the impacts expected on the surrounding transport networks. The more strategic transport impacts are considered in detail below (cycling, buses, and London Underground / rail), with more local impacts considered separately further within this report, in the context of the proposed St Paul's Gyrotory Project Highways Works which will impact the local context around the site.

Strategic Transport Impacts

Cycling

622. The TA states that the proposed development will generate a net change of 276 and 299 cycle trips during the AM and PM Peak Hours, respectively. These trips have been distributed on to the cycle network by reference to 'Journey to Work' 2011 census data. The analysis indicates that cyclists would travel to / from the following directions: 22% north, 44% south, 20% east, and 14% west. The cycle trips have been distributed on to the local road network; the analysis indicates that the proposed development would generate up to an additional 2.6 cyclists per minute on the adjacent links and therefore the residual cumulative impact on the road network will not be significant.

Bus

623. The proposed development will generate a net change of 81 main mode bus trips during both the AM and PM Peak Hours. These trips have also been distributed on to the network by reference to 2011 Journey to Work census data. Additional bus trips have been accounted for on the assumption that some travelling by rail may additionally use bus services as a 'last mile' trip; it has been assumed that no London Underground passengers would use the local bus network as a final mode due to the availability of numerous London Underground stations in proximity to the Site. The analysis forecasts that the proposed development would generate a maximum of 2.5 additional passengers per

service during the peak hours which is not considered significant. A proportion of these last mile bus trips could feasibly be undertaken by active travel, such as walking and cycling; measures to encourage the use of active travel are set out in the Framework Travel Plan and Cycle Promotion Plan, detailed versions of which would be secured by condition. It is therefore concluded that the proposed development is not expected to generate a significant impact on the local bus network.

London Underground, Rail, Elizabeth Line, Docklands Light Rail

624. The proposed development will generate a net change of 540 and 524 trips across these modes during the AM and PM peak hours, respectively. The trips have been distributed across networks by reference to 2011 Census data; trips have been distributed based on which station travellers would use to reach their origin most easily. The analysis shows that demand would be distributed across numerous stations; this is expected considering the very high PTAL level of the Site and the stations in proximity.

625. In addition, 2019 NUMBAT data (a Transport for London dataset) has been used to distribute the peak hour demand at each station across four 15-minute intervals at London Underground stations. A line loading assessment for the London Underground has been undertaken using the NUMBAT data, which indicates the peak hour demand forecasted on each line per direction across the four 15-minute intervals. The analysis shows that the maximum increase in passengers per Underground service is seven on the northern line northbound from Bank. The results of this analysis demonstrate that impacts are not expected to be significant.

Local Context – St Paul’s Gyrary Project Highway Works

626. When considering the transport impacts of the scheme on the local context the City of London’s St Paul’s Gyrary project is relevant. Background to the project is set out in this section of the report.

627. The City of London Corporation is working on designs to transform the streets on the 1970’s St Paul’s gyrary. The intention is to make these streets safer for pedestrians and cyclists and create a greener, more pleasant environment in line with the aims of the City of London Transport Strategy (May 2019). The Site is located at the north-eastern tip of a gyrary system extending from Newgate Street and Cheapside in the south to the Rotunda roundabout in the north. The Rotunda roundabout forms part of the site boundary and would therefore be directly affected by the wider gyrary proposals.

628. The gyratory area is currently traffic-dominated and uninviting for those other than motorized vehicles, causing significant severance for pedestrians between St. Paul's Underground station and the Museum of London. Road user safety provided by the applicant in the TA (the most recent 5 years' road traffic collision data for the Active Travel Zone study area was sourced from TfL in summer 2023) has also been identified as a particular concern at the Rotunda roundabout, especially for cyclists.

629. Proposals for the area, have been under consideration since at least 2013 and were adopted in 2015 as part of the Cheapside and Guildhall Area Enhancement Strategy.

Scheme Overview

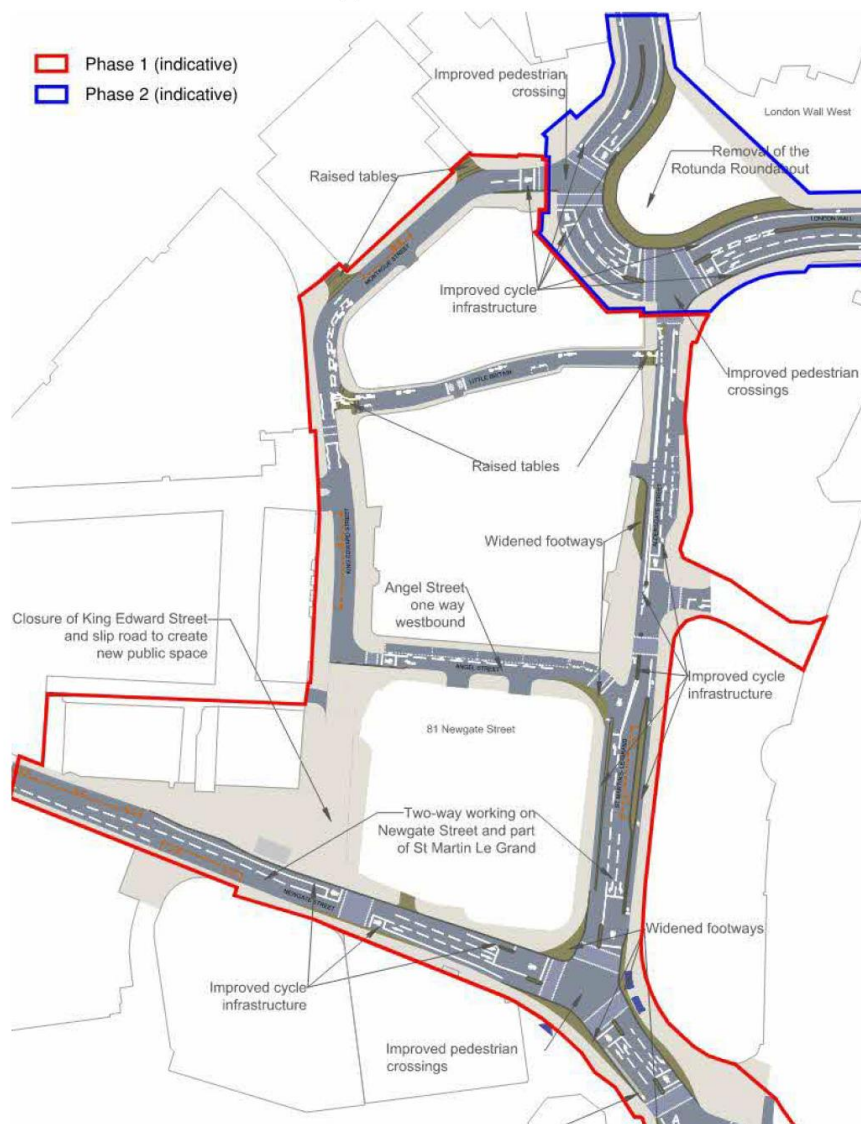
630. The St Paul's Gyratory project aims to transform the streets and public realm between the Museum of London and St. Paul's Underground station through:

- The removal of the Rotunda roundabout;
- The introduction of two-way working for traffic to reduce vehicle speeds and create safer streets; and
- The provision of public realm that is more suitable for the needs of business, residents, and visitors.

631. The London Wall West development proposals require substantial changes to the operation of the highway at the northern end of the gyratory around the rotunda and therefore provides an opportunity to coordinate the highway changes of these two developments to deliver the overarching objectives of the gyratory project.

632. The gyratory works would be delivered in two separate phases that are illustratively indicated in Figure 2 below.

Figure 2 - St Paul's Gyratory Transformation Project Overview



633. Phase 1 is at a comparatively more advanced stage of design to Phase 2, and public consultation on this element has been completed. The highway layout of this element is at detailed design stage, and it is expected that a request for Gateway 5 (the process to enable the Local Authority to start works) will be submitted this autumn. If successful, works would commence in Autumn, with funding in place to enable delivery.

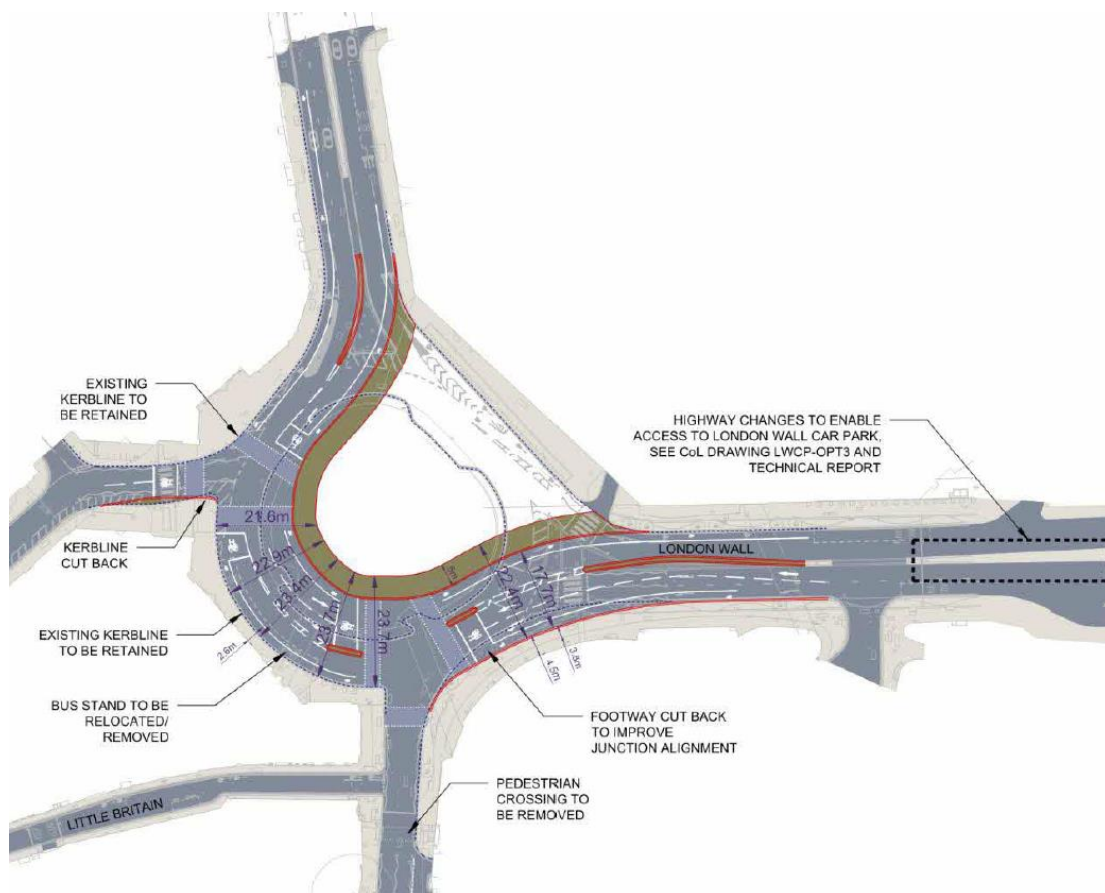
634. The Phase 2 proposals are intrinsically linked to the proposed development (and associated on-street changes to the highway and surrounding walking / cycling networks proposed).

635. For clarity, the two respective phases of the St Pauls Gyratory project can be independently delivered and are not reliant on one another.

636. It is Phase 2 (shown in blue below) which specifically relates to the proposed development; the road would be diverted to the south to create a new consolidated peninsular site. The Rotunda roundabout would in effect be removed and replaced with a signalised arrangement. The delivery of the proposed development would necessitate the implementation of the 'Phase 2' element of the St Pauls Gyratory project. In this regard, the proposed development and Phase 2 are considered co-dependent.

637. A more detailed image of the Phase 2 element of the scheme is provided in Figure 3 below.

Figure 3 – Phase 2 of St Paul's Gyratory Transformation Project



638. It can be seen in Figure 3 that the Phase 2 proposals would see Aldersgate Street and London Wall connected via a two-way road broadly following the alignment of the south-western section of the existing roundabout. The roundabout carriageway would be widened to allow for two-way running, cycle lanes and turning lanes. The north-eastern segment of the roundabout would be

stopped up to enable the proposed development and would in effect result in the centre of the roundabout being subsumed into a peninsula of the existing site.

639. Transport matters that would be impacted by the proposed changes (i.e. the more local transport impacts) have therefore been assessed against the future Rotunda junction proposals, as summarised below. A separate chapter dedicated to the traffic modelling process and associated results is provided further within this report.

Local Transport Impacts

Walking

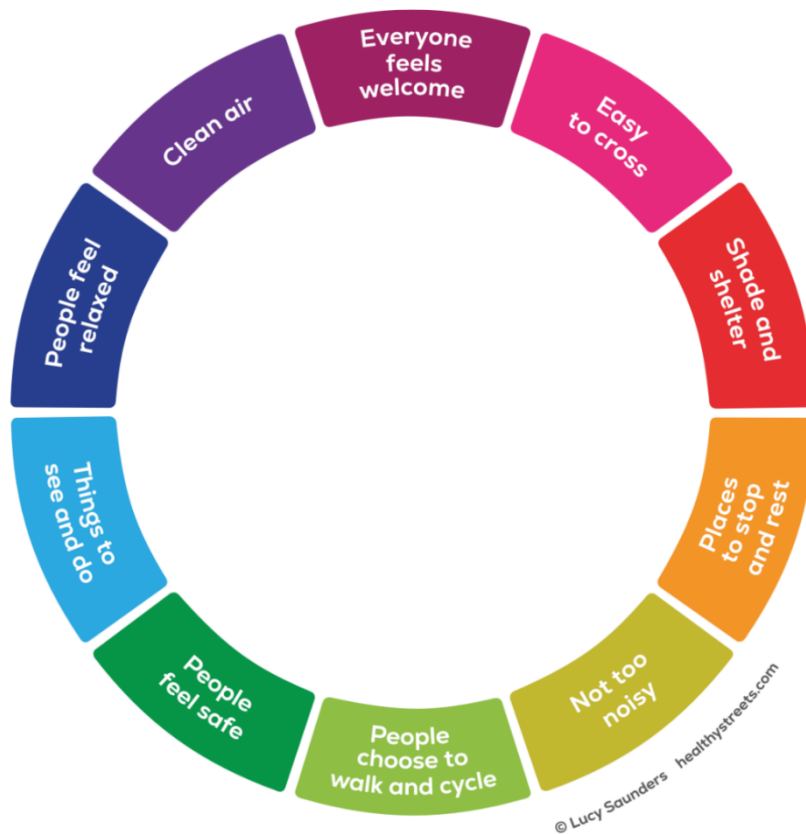
640. The proposed development is forecasted to generate a net change of 1,111 and 1,337 walking trips during the AM and PM peak hours, respectively. Various assessments have been undertaken by the applicant which consider the uplift in walking trips forecasted and the proposed improvements to the Rotunda roundabout. These assessments and the associated results are summarised below.

Healthy Streets Design Check

641. The Healthy Streets Design Check tool is a spreadsheet tool used to score the health of existing streets against the 10 Healthy Streets Indicators. The tool is able to identify how different measures and design interventions can improve the health of the population. The tool and the scoring system implemented advises designers and decision makers on how a project fits with Healthy Streets policy.

642. The ten indicators are summarised in Figure 4 below and, as it can be seen, assess proposed street improvements from a holistic design perspective.

Figure 4 – Healthy Streets Design Indicators



643. Elements of street designs are scored from 0-3 against specific design measures and criteria (as defined by TfL), linked to each of the 10 Indicators. Schemes more closely aligned with health policy aspirations therefore generate higher scores than comparative schemes that are less closely aligned.

644. Policy T2 of the London Plan requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets indicators in line with Transport for London Guidance. The applicant has undertaken two Healthy Streets Design Checks assessments (London Wall and Aldersgate) within the TA and has applied the tool per Transport for London guidance. The tool has been used to assess the proposed changes included as 'Phase 2' of the St Paul's Gyratory Project Highways Works noted above.

645. The assessments demonstrated that the proposals would significantly improve the on-street experience of users, with Indicator scores as set out below.

Street	Existing	Proposed	Net Change
London Wall	62	72	+10
Aldersgate	60	68	+8

646. It can be seen that the proposals would materially improve the experience of pedestrians from a Healthy Streets perspective. The improvements observed relate to design items bedded into the proposals, such as the provision of new resting points, street level planting, improved crossing capabilities, new on-street cycle parking, and a more ambivalent street environment.

Pedestrian Comfort Study

647. In addition to the more holistic Healthy Streets Design Check, the applicant has undertaken various pedestrian comfort assessments; these assessments more narrowly focus on the ease of movement and levels of crowding.

648. The Weekday Peak Hours have been assessed as these periods represent 'worst-case' scenarios.

649. 595. Historic survey data from previous studies has been referred to within the assessment. The existing AM demand matrix has been generated largely based on pedestrian survey data collected in 2014 as part of the Barbican and Golden Lane Area Strategy (Publica, 2015) – in Appendix City of London Cultural Quarter (Space Syntax, 2014). This was the only set of survey data available that covers the wider site. In order to validate the survey data applied, the 2014 pedestrian flows on Aldersgate Street North were compared with pedestrian count data from the 2019 City Streets Traffic Survey, and spot surveys were also undertaken in February 2022. When comparing the count datasets, the data was found to be relatively consistent with no significant growth experienced between the years and pedestrian volumes remaining similar across the years. It is therefore agreed with officers that the data can be relied upon as a representative dataset.

650. It was agreed with CoL officers through pre-application discussions that a new survey conducted at the time would not give an accurate representation of the pedestrian demand given the COVID pandemic.

651. Nevertheless, a 15% increase was applied by the applicant to the baseline flow in the future demand scenario to represent any increase in background demand between now and when the development is complete. The approach is therefore considered robust, especially when considered alongside the robust assumptions applied as part of the proposed trip generation assessment.

652. Pedestrian comfort linked to the proposals has been assessed by the applicant by applying three different modelling approaches, each determined to be optimally suitable to the specific context they have assessed. Three modelling methodologies have been utilised, to best suit three different typologies of public realm, namely footways, pedestrian crossings and 'waiting areas' at the end of pedestrian crossings. As these each have distinctly different characteristics and different levels of activity are considered 'comfortable' in these differing

environments, it is appropriate to use methodologies that take these considerations into account. On the basis that multiple assessments have been undertaken, the overall approach to pedestrian modelling / design is considered robust. Each assessment approach and the associated results are discussed in turn below.

Pedestrian Comfort Levels

653. Transport for London (TfL) Guidance states that Pedestrian Comfort Levels (PCL) classify the level of comfort based on the level of crowding a pedestrian experiences on the street. Pedestrian crowding is measured in pedestrians per metre of clear footway width per minute. It is noted that these results simply reflect the level of crowding on pedestrian links and do not account for more holistic factors (such as those included within the Healthy Streets Design Check) which influence the on-street experience (i.e. crossing environment, safety, desire lines etc.).

654. Pedestrian Comfort Levels are graded A+ (Comfortable) to E (Uncomfortable) and a target of B+ is commonplace across the City. TfL's own guidance suggests that scores of C+ are acceptable for office and retail developments.

655. The applicant has undertaken static PCL assessments on specific links around the site for the existing and proposed scenarios. An assessment has been undertaken at specific points along the links identified to establish the level of crowding (and therefore comfort) at these specific locations.

656. The Pedestrian Comfort Levels (PCL) for the existing AM and PM Peak Hour scenarios indicate a comfortable level of service along the main links with PCL scores varying between A- and A+. The PCL link results reported by the applicant for the baseline scenario are summarised in the table below.

Table 6.9 Summary of Key Link-Flows for Baseline AM and PM Peak

Link	Width (m)	AM Peak			PM Peak		
		ppm	ppmm	PCL	ppm	ppmm	PCL
A1 Aldersgate North 1	2.9	14	4.8	A	22	7.6	A-
A2 Aldersgate North 2	2.3	17	7.4	A-	18	7.8	A-
B1 Montague Street 1	5.4	3	0.6	A+	4	0.7	A+
B2 Montague Street 2	4.5	8	1.8	A+	10	2.2	A+
C1 Aldersgate South 1	5.3	23	4.3	A	25	4.7	A
C2 Aldersgate South 1	4.3	19	4.4	A	23	5.3	A-
E2 Noble Street	2.5	17	6.8	A-	17	6.8	A-
F1 London Wall 1	4.4	5	1.1	A+	6	1.4	A+
F2 London Wall 2	3.1	22	7.1	A-	26	8.4	A-
G1 Highwalk 1	8.1	3	0.4	A+	5	0.6	A+
G2 Highwalk 2	4.2	5	1.2	A+	12	2.9	A+

657. The PCL link results reported by the applicant for the proposed development scenario are summarised in the table below.

Table 6.10 Summary of Key Link-Flows for Proposed Development AM and PM Peak

Link	Width (m)	AM Peak			PM Peak		
		ppm	ppmm	PCL	ppm	ppmm	PCL
A1 Aldersgate North 1	2.9	22	7.6	A-	32	11.0	B+
A2 Aldersgate North 2	2.3	19	8.3	A-	22	9.6	B+
B1 Montague Street 1	5.4	4	0.7	A+	4	0.7	A+
B2 Montague Street 2	4.5	9	2.0	A+	14	3.1	A
C1 Aldersgate South 1	5.3	26	4.9	A-	27	5.1	A
C2 Aldersgate South 1	4.3	31	7.2	A-	36	8.4	A-
E2 Noble Street	2.5	19	7.6	A-	22	8.8	B+
F1 London Wall 1	4.4	22	5.0	A	26	5.9	A-
F2 London Wall 2	3.1	24	7.7	A-	28	9.0	B+
G1 Highwalk 1	3.9	5	1.3	A+	9	2.3	A+
G2 Highwalk 2	3.1	7	2.3	A+	17	5.5	A-

658. It can be seen that the vast majority of the wider area would generally continue to operate at a higher comfort level range of A+ to A-, with some B+ PCL scores recorded in the PM Peak Hour (only), which would be a slight reduction from the existing scenario (which achieves minimum PCL scores of A-). The PCL scores for the proposed AM Peak Hour would continue to range from A+ to A-.

659. Whilst the introduction of PCL scores of B+ would be a slight reduction from the existing scenario, a PCL score of B+ is in keeping with the City’s target of B+ per the Draft City Plan 2040 Policy AT. It is also well in excess of TfL’s minimum requirement of a C+ per TfL’s Pedestrian Comfort guidance document. Given that there would only be a handful of locations which would score B+, and these would be limited to the PM Peak Hour only, it is considered that these PCL scores are acceptable when considered on balance against the wider design benefits that would be delivered, as highlighted by the Healthy Streets Design Check (e.g. new resting points, street level planting, improved crossing capabilities, new on-street cycle parking, and a more ambivalent street environment).

Pedestrian Comfort Levels (Dynamic Modelling / Pedestrian Flow Simulation)

660. In addition to the PCL spreadsheet assessment, a dynamic flow simulation model was used to assess pedestrian comfort in more detail. This more comprehensive modelling exercise includes consideration of variable route widths and localised obstructions. The results of this modelling exercise are presented in a series of heat maps and the approach considers interactions across a wider study area (vs the standard PCL approach which considers individual links / locations).

661. This additional modelling exercise demonstrates that the key circulation routes around London Wall West would generally operate at acceptable PCL B+ scores (or better) for the proposed development in both the AM and PM Peak Hours. As with the PCL link assessment, this would represent a slight reduction from the existing scenario in some locations, which generally achieves minimum PCL scores of A-, although it is noted that some areas in the existing scenario do also already operate at a PCL level of B+. The results of this modelling exercise are therefore considered acceptable.

662. As might be expected, higher densities were observed at the pedestrian crossings and walkways on account of the signalised crossings proposed and the requirement for pedestrians to wait to cross. The pedestrian crossings and related waiting areas have further been reviewed using Fruin's Level of Service. Fruin Level of Service (LoS) can alternatively be used instead of Pedestrian Comfort Levels in this instance, as this approach is better at representing conditions experienced by static or semi-static pedestrian movements.

Level of Service (Dynamic Modelling / Fruin Level of Service)

663. Fruin's Level of Service (Queuing) is based on a density of people in a given area. Levels of Service (LoS) are used in pedestrian planning in a similar way to PCLs (i.e. to determine densities of people per square metre and from this, to classify the conditions that pedestrians experience in terms of freedom of movement and comfort). Typically, pedestrian conditions are assessed using Fruin Levels of Service (LoS), which also divide flow conditions into six categories forming a sliding scale from A to F (NB this is a similar (but separate) scoring scale to that implemented per standard PCL assessments). LoS A represents free-flow conditions whilst a LoS F indicates significant congestion associated with a breakdown in flow and crowded conditions (Pedestrian Planning and Design, J J Fruin, 1971).

664. The PCL and Fruin Level of Service scores (A-F) are not directly comparable, but it is noted that the LoS (of C or better) for all crossings, using Fruin Level of Service (walkways) is considered acceptable (and is considered conservative as the full crossing width of the scramble crossing is not considered). The waiting areas at each side, assessed Fruin's Level of Service (Queuing), show acceptable performance (LoS A) with this methodology, which recognises that a higher density is acceptable when queuing, and are therefore considered acceptable.

665. Waiting times at the crossings were discussed during pre-application discussions and it is noted that it is generally the aspiration of the City to limit waiting times at crossings to 60 seconds where possible. A crossing cycle time (essentially wait time) of 96 seconds is proposed in this instance, and this extended cycle time was deemed required in recognition of the need to maintain

vehicular flow at this location (owing to the strategic nature of London Wall and the important movement function this route provides, as set out in the City of London Transport Strategy 2019). Nevertheless, with respect to pedestrian queueing, the modelling also indicates that all waiting areas in front of crossings would operate at satisfactory density at peak times.

Pedestrian Comfort Study Conclusion

666. A thorough assessment of the expected pedestrian environment has been undertaken by the applicant, applying various approaches and modelling techniques.

667. The results of the pedestrian comfort study demonstrate that the net uplift in walking trips expected can be, from a pedestrian comfort perspective, satisfactorily accommodated via the proposed pedestrian network.

668. When considered alongside the more holistic design benefits that would be secured (as highlighted within the Healthy Streets Design Check assessment), on balance, the pedestrian experience is considered to be improved as a result of the proposed changes and is in accordance with Policy AT1 of the Draft City Plan 2040 and Policy 16.2 of the Local Plan 2015.

Cycling

Cycle Parking

669. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

670. The proposals would provide a substantial improvement in facilities and access for cyclists on site, with quantum of cycle parking provided in excess of London Plan standards for both long and short stay cycle parking. The total quantum of long stay cycle parking provided would be 868 spaces, which is 56 more than the London Plan minimum requirements. The total quantum of short stay cycle parking would be 326, which is 116 more than the London Plan minimum standards.

671. Individual cycle store areas are provided in each building for long-stay use by staff. Each building is also provided with end of journey facilities to encourage employees to travel to the site by cycle. As a minimum, these provisions would include changing areas, showers, and lockers. In total, the proposals would provide 57 showers and 654 lockers.

672. The short stay cycle parking is provided across the site, with 76 new short stay spaces provided at ground level within the public realm, which is a significant improvement on existing provisions. The existing Santander docking stations (52) would also be re-provided at ground level within the public realm and an indicative location has been identified; the final location would be subject to detailed design and liaison with TfL. A further 250 short stay spaces would be provided within a dedicated Cycle Hub which would be publicly accessible.

A summary of the overall cycle parking requirements and proposals is provided below.

Cycle Parking Type	Required per London Plan	Proposed
Short Stay	220	326 (+116)
Long Stay	812	868 (+56)

673. Different types of cycle parking are proposed to cater for a range of users and abilities, including enlarged Sheffield stand spaces for larger bikes and cyclists with reduced mobility, lockers for folding bikes (popular with office commuters working in Central London) and two-tier cycle racks.

Cycle Parking Access

674. The long stay cycle parking would be located in three separate locations around the site, serving the proposed Rotunda Building (361 spaces), New North Building (43 spaces), and New Bastion House and London Wall Exhibition Area (464 spaces). The Rotunda Building would be accessed via a cycle lift and gullied stairwell (i.e. with cycle wheeling ramp); New Bastion House long stay cycle parking would be accessed via two separate cycle lifts providing connections from Ground to Lower Ground Floor and Lower Ground Floor to Basement Level 1 (with a short traverse between lifts) as well gullied stairwells; The New North building long stay cycle parking would be accessed via lift only. The proposed lift-only access strategy for the North building is considered appropriate given the relatively modest number of cycle spaces proposed in this location (43).

675. A proportion of the short stay cycle parking (76 spaces) is located at ground level within the public realm and would therefore be easily accessed from street. The remaining proportion (250 spaces) of short stay cycle parking is located within the proposed Cycle Hub, located at Lower Ground Floor.

676. As noted, this hub would be provided at the western end of the existing London Wall car park; the cycle lift located off London Wall (which would also be used to access the long stay cycle parking at the Rotunda Building) would provide access to the Cycle Hub. The gullied stairwell located here would also additionally facilitate access to the Cycle Hub. These access points would be signed via an

appropriate wayfinding strategy to be agreed at the next design development stage.

Car Parking

On Site Car Parking

677. The proposals would be 'car free' with the exception of three Blue Badge bays. This approach to car parking is supported on the basis of encouraging sustainable travel choices and improving access for those with mobility needs and would be in accordance with Policy VT3 of the Draft City Plan 2040.

London Wall Car Park

678. London Wall car park stretches approximately 380 metres under the west end of London Wall Road. The car park is partially included within the proposed development site. The City of London is the sole freehold proprietor of London Wall car park.

679. A portion of the London Wall Car Park will be redeveloped as part of the proposals, with a reallocation of space away from private car parking to provide cycle parking (as part of the proposed short stay Cycle Hub as noted above) and Blue Badge car parking spaces.

680. The western end of London Wall car park would see the removal of 44 car parking spaces and 2 accessible spaces; this area of the car park would be repurposed to provide 250 cycle parking spaces. It is proposed by the applicant that 5 accessible car parking spaces would be provided, resulting in an increase of 3 accessible car parking spaces when compared to the current level of provision. An image of the proposed car park layout is provided below at Figure 5 with the proposed accessible car parking spaces indicated in blue.

Figure 5 – Proposed Cycle Hub and Blue Badge Car Parking



681. The car park has been identified as being currently under-utilised and therefore the proposals to reallocate a small number of spaces to other purposes would represent an optimal use of space. The principle of repurposing the use of a small number of spaces was also previously agreed by members at the Planning and Transportation Committee (15/12/2020) in relation to a former decision made regarding the partial repurposing for last mile logistics hub.

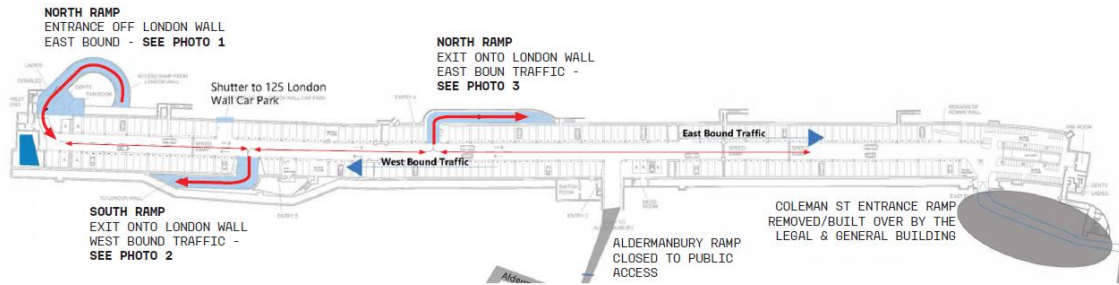
682. Policy DM 16.6 (Public Car Parks) states that “no new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required”. The proposed changes to London Wall Car Park are therefore considered to be policy compliant.

London Wall Car Park Access Proposals

683. To enable delivery of the Cycle Hub, accessible car parking and wider public realm improvements, it is proposed that access to the car park would be reconfigured as part of the proposals. These changes would be the sole responsibility of the applicant to deliver and fund any necessary enabling works and assessments; these responsibilities and commitments are to be secured by condition and would include a Car Park Management Plan as well as any technical / structural works required.

684. The existing access ramp into the car park from London Wall would be repurposed to enable safe pedestrian / cycle access into the site at the western end of the car park. The existing car park access operations are indicated below in Figure 6.

Figure 6 – Existing London Wall Car Park Access Options



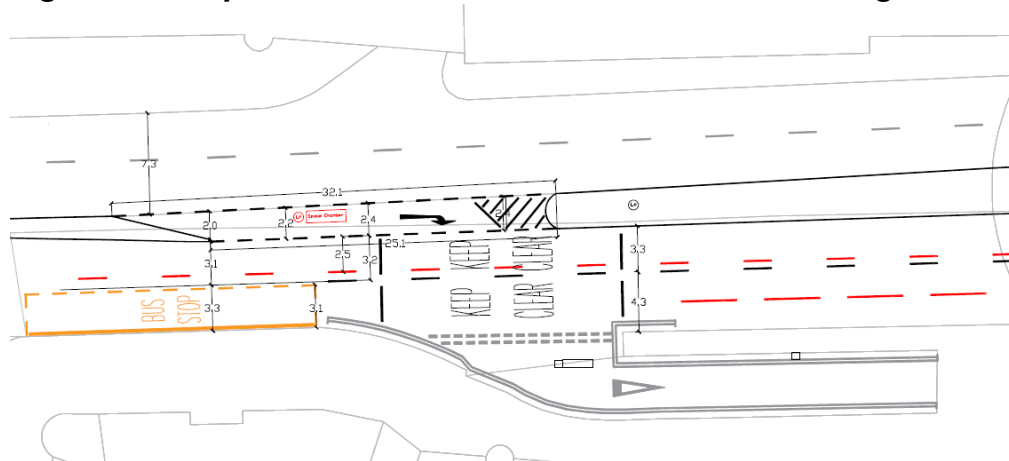
685. It can be seen that there are currently three ramps in use, with two on the north side and one on the southern side of the car park. The most western ramp on the north side of the car park is the one which would be repurposed to provide access for cyclists and pedestrians. Repurposing of the existing access ramp at this location is necessary to enable cycling access to the Cycle Hub and to improve the pedestrian experience more generally at this location from street level.

686. The other two ramps currently both provide an egress function only; an alternative access strategy for the car park has therefore been devised.

687. Three car park access options were considered during the pre-application stage as set out within the TA. It was 'Option 3' that was identified as the preferred option by the applicant; it is agreed by officers that this option is the optimal of those considered at this stage. It is proposed that the ramp to south of London Wall would alternatively provide an ingress function; to enable this vehicle movement, a right turn bay would be provided along London Wall, providing a space for vehicles turning right to wait in.

The proposed access arrangement is shown below in Figure 7.

Figure 7 – Proposed London Wall Car Park Access Arrangement



688. The length of the right turn bay would enable two vehicles to wait for a turning opportunity. The location of the signalised junction at Wood Street / London Wall (which runs on an 88 second cycle and has an all-red stage for pedestrians) would provide frequent opportunities for vehicles to filter during busy periods. A Picady traffic model should be prepared as part of the required Highways Improvement Works design process to inform design requirements in this regard.
689. Swept Path Analysis has been provided which confirms that vehicles can safely access / egress the car park.
690. An independent auditor also undertook a Road Safety Audit (Stage 1) to assess any potential safety implications related to the proposed arrangements. Observations were made with respect to potential risks and suggested mitigation measures (e.g. lighting and signage); none of the items raised within the report are considered undeliverable and would be dealt with at the appropriate technical design stage – for clarity, these design changes can be incorporated into the traffic and highway design as part of the Evaluation and Design process in the Highways Improvement Works if the development is consented. It is noted that a City of London highways officer has separately identified a safety concern that was not included within the independent RSA (Road Safety Audit) report. This concern relates to cyclists and motorcyclists who may pass through the ‘keep clear’ zone across the front of the junction in the event of queuing (thus potentially leading to collisions with right turners who may not be expecting these movements). Mitigation measures to address this safety risk would need to be captured as part of the detailed design works secured by Unilateral Undertaking (and Section 278) in advance of technical approval.
691. The proposed car park access strategy would result in all inbound movements travelling eastbound along London Wall, and all outbound movements also travelling eastbound along London Wall. Relatedly, concerns linked to the consequential impacts on vehicular access resulting from the Rotunda roundabout removal and the proposed car park access strategy have been raised by residents.
692. Naturally, with the proposed removal of the Rotunda roundabout (where vehicles can currently make U-turn movements as required), this would result in some vehicles re-routing around the local road network for some journeys to / from the car park, with southbound exit journeys the ones most affected; this additional journey time impact has been raised as a point of concern for local people that currently use the car park.

693. For vehicles accessing the car park from the east, it would be possible for vehicles to make a 'U-turn' movement of sorts, in the absence of the Rotunda roundabout, via Little Britain; however, it is noted that this road is relatively narrow and does provide access to a number of residential properties.

694. Trips from the south and trips to / from the north would be minimally impacted. When considered as part of longer trips, the time inconvenience for a limited proportion of trips to / from the car park, is not considered significant but would be an inconvenience. These impacts would be off set to a degree by the safety benefits derived from the removal of U-turn movements, which typically result in higher rates of road traffic collisions. Localised re-routing issues might arise in the short term as users of the car park adjust to the changes; however, these impacts are consequently likely to be short-lived and the proposed car park access strategy, and associated impacts thereof, are not considered significant in transport terms.

695. Similar resident concerns linked to the removal of the roundabout have also been raised regarding egress from the shared servicing ramp on Aldersgate with respect to Barbican residents wishing to head northbound along Aldersgate. Access into Wood Street would also be affected in this regard as no right turn is currently permitted from London Wall. For these movements, the Rotunda roundabout currently provides the opportunity to undertake U-turn movements. These specific junctions should be considered at the detailed design stage to assess whether right turn movements can be accommodated (for egress out of the shared access and access into Wood Street via the signalised junction). Incorporating these movements will require an assessment on junction capacities and safety considerations but are at this stage are considered viable in principle and would assuage vehicular access concerns in this regard if delivered.

696. An assessment of the viability of incorporating such movements at the two junctions identified would be secured by condition as part of the Highways Improvement Works.

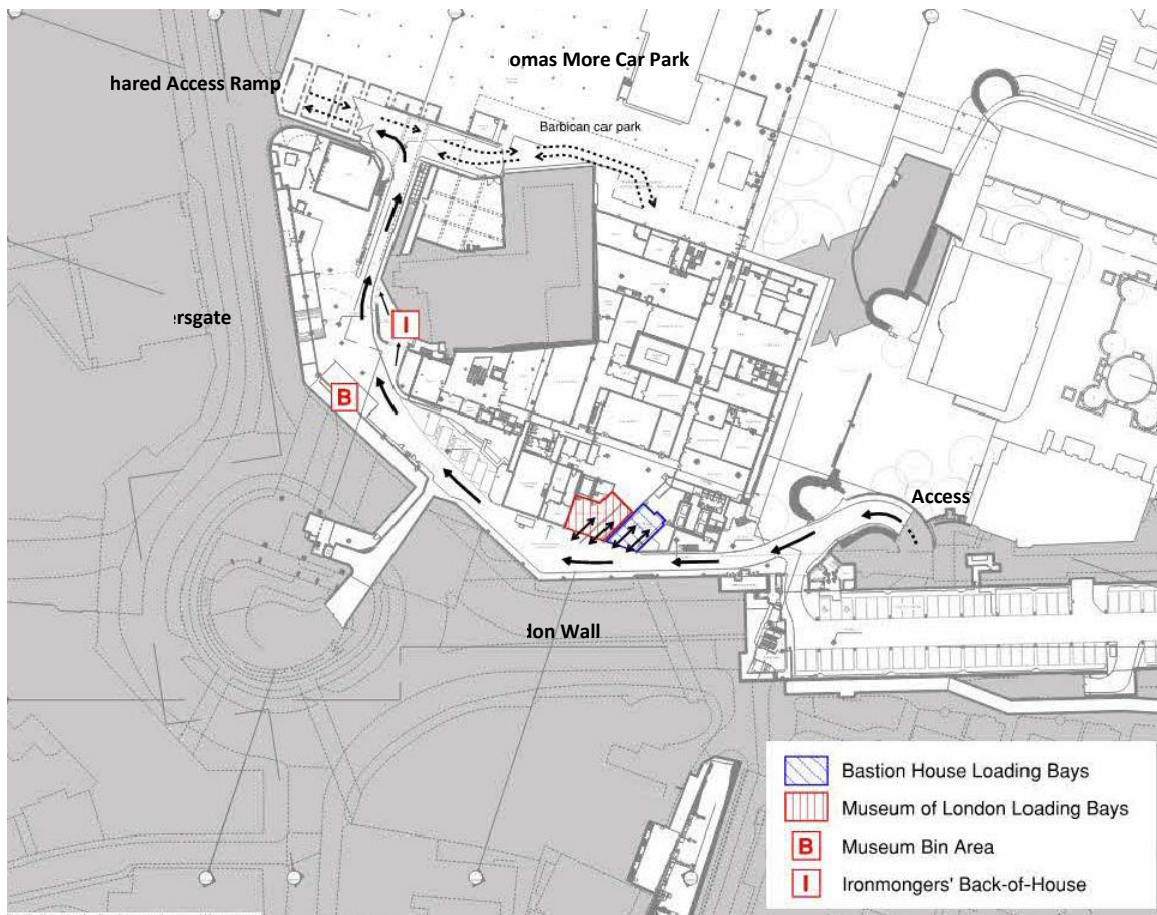
Deliveries and Servicing

Existing Operations

697. The Museum building and Bastion House are currently serviced primarily via the service road running beneath the Site at Lower Ground floor level, accessed via the spiral ramp on London Wall with egress via the shared ramp to Aldersgate Street. There are dedicated loading bays for both buildings along the service road, with a reverse-in, forwards-out configuration, at an angle to the service road and raised loading dock.

698. Further along the existing service road, there is a large open compound which includes the existing Museum cycle store, workshop area and bin storage, with bin collection taking place directly from within the service road (temporarily obstructing traffic on the service road). Deliveries to Ironmongers' Hall are generally made in this area too (also obstructing traffic on the service road), with access to their back-of-house area and service lift from this level, adjacent to the service road.
699. Secondary servicing access is provided via the Barbican car park to the north of the Site, with access to plant areas on the northern elevation. A short section of this access route is shared with the Barbican Estate access to the Thomas More car park, which is also accessed via the shared Aldersgate ramp.
700. Access to Thomas More car park is currently controlled via a lifting arm barrier (with a manned kiosk) at the base of the shared access ramp. The kiosk provides concierge services, sorting and collecting of parcels etc. Servicing vehicles to the Thomas More car park circulate within the car park before exiting via the shared Aldersgate access ramp.
701. The various existing servicing movements around the site are summarised in the image below (Figure 8).

Figure 8 – Summary of Existing Servicing Movements



702. The existing access arrangement from Aldersgate into the site is a left in, left out priority junction, but right turns into the site are possible via a break in the median strip. A site visit with local residents confirmed that a formalised right turn out of the shared access ramp (on to Aldersgate northbound) would be a welcomed introduction for residents, particularly also given removal of the Rotunda roundabout which could be used for U turns, and this would be explored, as previously noted, as part of the associated Highway Improvement Works, secured by condition.

Proposed Operations

703. It is noted that the proposed servicing operations are a key area of contention for residents of the Barbican estate and many objection letters raise this, particularly with regard to the impact on the Thomas More car park and users of the ramp.

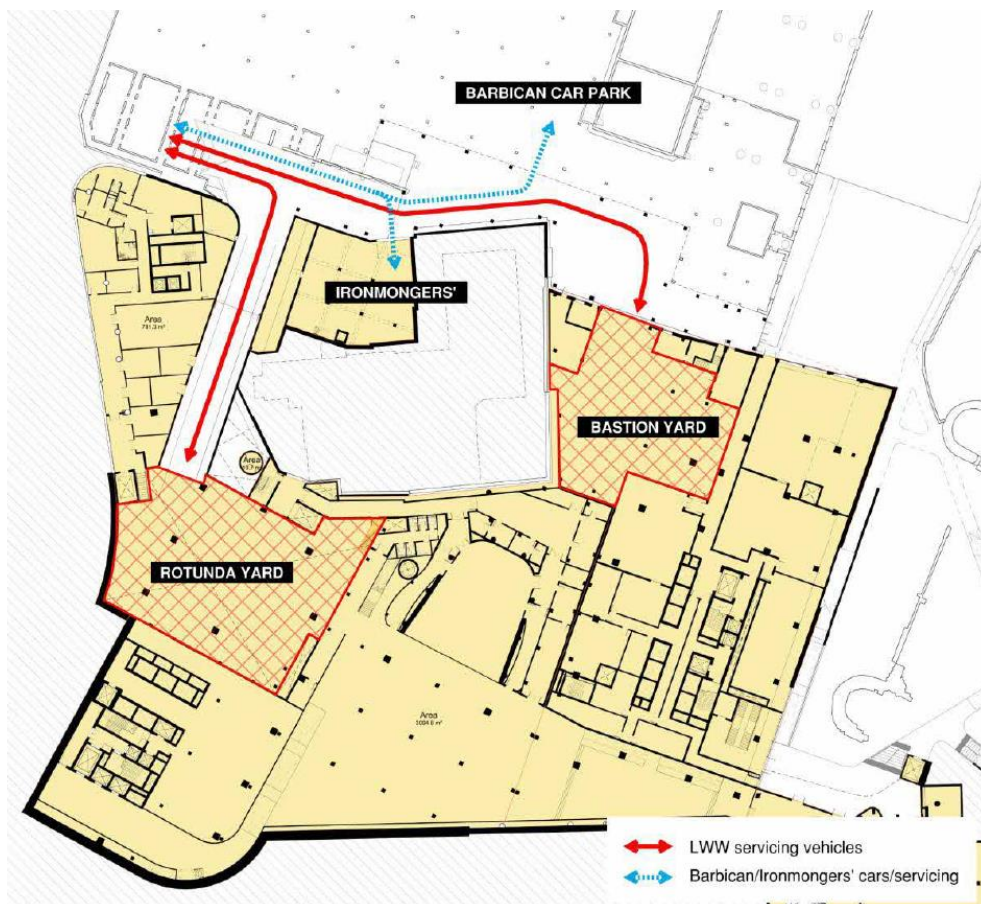
704. The shared ramp naturally creates a point of interaction between the site and Thomas More car park (but also Barbican residents who use this space more widely for other purposes, such as food delivery collections and the parking of vehicles linked to tradespeople). In this respect it is pertinent to note that the existing concierge desk located at the bottom of the shared ramp (and the local

area around this control point) is considered a valuable space asset to Barbican residents. This space is also used as a point of access / egress for some to the wider Barbican estate / Aldersgate. The proposals would change the context of this space (particularly in relation to the proposed Bastion Yard) with consequential impacts to Barbican residents as a result. The proposed Bastion Yard service yard would in effect prevent the (informal) use of this space as a temporary parking / collection point, as outlined below.

Service Yard Layouts

705. The proposals include two separate off-street service yards – one at Lower Ground Floor (LGF) level for the new Bastion House building (and the Roman Wall exhibition area in the London Wall car park) and one at Basement 1 (B1) level shared by the Rotunda and New North Buildings, as set out in Figure 9 below.

Figure 9 – Summary of Proposed Servicing Movements



706. In the image above, it is the space directly to the north of Bastion Yard that is currently used by Barbican residents for activities such as temporary tradespeople vehicle parking and the collection of online food deliveries. It is noted that there

are various other parking opportunities in the vicinity that could alternatively be utilised, but these would be less convenient to residents. An assessment of this particular aspect will be included within the detailed Delivery and Servicing Plan (DSP), to be secured by condition, and mitigation solutions identified for the needs of Barbican residents.

707. Each of the two service yards have adjacent back-of-house facilities, including waste storage areas and a dockmaster's office for management of the yard, along with links to service lifts and storage areas, as summarised in Figure 10 below. All vehicles to the two service yards would enter and exit in forward gear (turning within the yards).

Figure 10 – Service Yard Layouts



708. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with the delivery and servicing functions of the proposals.

709. Off-site consolidation and a cargo bike strategy would be implemented to minimise the number of motorised servicing vehicles visiting the site. A maximum daily vehicle cap would be imposed on the site on account of the proposed consolidation and use of cargo bikes, to be secured by condition.

710. An over-provision of servicing loading bays has been proposed by the applicant to ensure that robustness is built into the servicing strategy for the Site. It is proposed that four loading bays be provided for Bastion House (with just two required per peak demand expected) and six loading bays be provided for The Rotunda Building and New North Building (with two also being required per peak

demand expected). This excess would not encourage additional daily trips but would rather facilitate smoother operations on a day-to-day basis, providing temporary vehicle storage areas which would assist with vehicle access / egress control, and allowing for occasional one-off maintenance requirements.

711. Loading bays of various sizes are provided within each of the service yards to cater for the variety of vehicle sizes that would be expected. The largest vehicles expected to visit the site are an 8m rigid box van (up to 7.5t) for deliveries of larger goods and refuse vehicles for waste collections. Swept Path Analysis of the service yard has been provided and ensures that there is sufficient space for vehicles to manoeuvre efficiently and safely within the service yards.

712. Fire service access (emergency vehicle) provision has also been considered, which is primarily from the main roads surrounding the site and which provide access to the dedicated fire command centres. A dedicated Fire Statement has also been submitted alongside the application in this regard, setting out the proposed requirements and approaches.

713. The applicant has confirmed that bays would be provided to cater for electric vehicle charging, with details to be developed at the next design stage and secured by condition.

714. The applicant has also confirmed that cargo bikes would be utilised and encouraged. Use of these sustainable vehicles would further reduce the number of motorized vehicles expected to service the site and a reduction in the number of daily servicing vehicles permitted to service the site is proposed to ensure the use of such. The additional loading bays provided means that there would be ample space to accommodate these vehicles on-site. Full details would be provided within the detailed Delivery and Servicing Management Plan, which is to be secured by condition.

715. Additional spaces would be provided to cater for the operational needs of the service yard, including a dockmaster office, mail storage, and waste storage rooms. Clear walkways and unloading spaces have been secured to enable efficient dealings with deliveries.

Ironmonger's Hall

716. Due to the reconfiguration of the Site and the removal of the below-ground service road, servicing provision for the Ironmongers' Hall would be adjusted and better formalised as part of the proposed development.

717. The Ironmongers' Company have advised that deliveries are generally limited to up to three Luton vans per day (up to six days per week), primarily driven by

events and catering, plus an increasing amount of filming within the premises. Waste collection generally takes place daily.

718. The existing store area located off the shared access ramp at Lower Ground Floor (LGF) will be designated as a back of house area for the Ironmongers' Hall. The existing double doors, located at the foot of the main ramp from Aldersgate Street, will be enlarged to accommodate vans. Vans will be able to reverse through these doors / gates to unload or load, out of the way of other servicing traffic or Barbican residents accessing the existing car park (which would be an improvement in comparison to the existing situation). The introduction of a reverse manoeuvre is not preferential (as these manoeuvres are often deemed to introduce an element of collision risk); however, these movements would be relatively low frequency. The applicant has noted that the area will be equipped with additional convex mirrors for improved visibility in all directions and the car park attendant kiosk is in close proximity, enabling additional supervision; the Ironmongers are also aware of the access arrangements and limitations and do not have any particular concerns in this regard.

719. Due to restricted headroom in this area, access for a refuse truck is not feasible (as per the current situation). Waste will be stored within the back of house area and collected from directly outside the double doors; due to the very small number of bins, the refuse truck will only be stationary for a very short period and thus any obstruction to other traffic will be minimal.

Interaction with Thomas More Car Park

720. The existing access road is shared and provides access to the Thomas More car park, Ironmongers' Hall, and the proposed development. There is therefore some element of existing interactions between vehicles arriving / departing each of the buildings serviced by the shared access road.

721. However, whilst there is some existing interaction, as a result of the proposed development, it is forecasted that the daily number of vehicles using the shared access road would increase (during permitted hours of operation only). This aspect has been raised as a point of contention for users of the Thomas More car park. The applicant has accordingly devised a servicing strategy which seeks to minimise the impacts of other users, as set out in more detail below.

Proposed Servicing Trip Generation

722. The applicant has identified within the outline Delivery Servicing Plan (DSP) submitted that up to 110 vehicle movements would be expected per day when a 50% consolidation factor is assumed. This total would be in comparison to 83 daily vehicles as estimated for the current site and permitted uses (without consolidation) and would therefore not be a significant uplift.

723. The number of servicing bays proposed are sufficient to cater for the forecasted demand scenario presented in the DSP and, as noted, there is an element of over-supply in this respect, which provides servicing resilience.

724. Whilst the applicant has assessed a scenario which assumes a 50% consolidation rate, it is noted that, owing to the interaction with the adjacent Thomas More car park, the servicing strategy will need to be more ambitious than presented within the DSP to ensure that impacts to residents are minimised. As such, a daily vehicle cap would be imposed on the site, restricting the number of vehicles permitted to visit the site per day. This daily vehicle cap would account for a consolidation rate higher than the 50% assessed and would instead require a consolidation rate of 70%. This is considered to be ambitious yet realistic, based on recent studies and example sites where such consolidation strategies have been implemented.

725. In addition, a further 10% will be deducted from daily motorised vehicle totals permitted to arrive on site, on account of the potential for cargo bikes to service the site. These vehicles are commonly being used by sites across the City, and are particularly suitable for smaller deliveries and perishable goods.

726. Assuming a consolidation rate of 70% for all deliveries would result in a total of 64 daily vehicles. If allowing for 10% of these trips to be made by cargo bike, then this would equate to 58 daily motorised vehicles. To allow for some variation, a daily cap of 60 is considered reasonable by CoL officers and should be secured by condition.

727. A commitment to the monitoring of servicing activity on site would be secured by condition as part of the detailed Delivery Servicing Plan to ensure compliance. The daily vehicle limitations set out above would also form the basis of the assessment that would be required as part of detailed DSP, with supporting information and details to be provided as necessary setting out how these objectives would be achieved in practice (e.g. engagement with consolidation providers, how the strategy would be communicated to future occupants etc.).

Restricted Hours

728. No servicing would be permitted to occur overnight in the interests of resident amenity. Servicing in the daytime period would also be restricted on site to limit interactions with users of the Thomas More car park.

729. The applicant has agreed to limit servicing hours to outside of peak hours to reduce the impact on the public highway and on local residents. It was proposed within the outline DSP that no servicing would take place between 07:00-10:00, 12:00-15:00 and 16:00-20:00, which is actually in excess of policy requirements.

730. Notwithstanding, survey count data was provided by the applicant which identified that 'peak use' of the car park did not align with the 'traditional' network peak periods. Therefore, it is considered that further consideration will be required with respect to the proposed hours of servicing. The applicant will be required to undertake further surveys of the Thomas More car park as part of the detailed DSP to better understand the peak periods of use associated with the car park, so that the optimal hours (i.e. those that present the least interactions with vehicles exiting the car park) for servicing can be identified. During restricted hours, no servicing activity would take place, and during these periods, this would in effect be a benefit to residents when compared to the existing scenario (whereby no time restrictions or consolidation requirements are enforced).

731. The existing survey count data indicates that the period where car park usage is lowest is between 12pm – 6pm. It is noted that this dataset is based on one days' worth of count data. Further surveying will be required as part of the detailed DSP to inform the final agreed hours of servicing. The detailed DSP will be subject to CoL approval.

732. It is considered by officers that the servicing demands of the site can be catered for within a reduced period of operation via commitments to the use of a consolidation centre and cargo bikes. The number of loading bays provides good capacity on site to cater for more intense periods of servicing, which are naturally required if periods of restriction are to be implemented. The applicant will be required as part of the detailed DSP to demonstrate how the vehicle movements will be accommodated across the day, in corroboration with the proposed survey data that will be required. This will include details pertaining to the proposed signal operations, as discussed in further detail below.

Swept Path Analysis

733. Swept Path Analysis has been undertaken by the applicant which demonstrates that the necessary vehicle movements can be made within the service yards to enable vehicles to enter and exit in forward gear.

734. There are however some pinch points on the shared access road which necessitate the implementation of control measures (i.e. signals) to guide traffic movements during periods where servicing activity of the proposed development is permitted. The hours of operation proposed, and the proposed access / control measures are discussed separately hereunder.

Servicing Access and Controls

735. It is proposed that all servicing vehicles associated with the proposed development would access and egress the Site via the existing (shared)

Aldersgate vehicle ramp. It is proposed by the applicant that the proposed access would continue to function per the existing arrangements; however, residents have expressed a desire for a right turn movement out of the site to be facilitated on account of the removal of the Rotunda roundabout. This provision will be considered as part of the Highway Improvement Works to be secured by condition. It is noted that the St Paul's Gyrotory Transformation Project would enable vehicles to make a U-turn movement from Aldersgate (south bound) and back on to Aldersgate (north bound); albeit as part of a slightly longer journey. Nevertheless, the introduction of a right turn movement out of the site would be considered as part of the s278 design stage and subject to technical approval.

736. As noted, the proposals would rely on a single point of access for all servicing activity associated with the proposed development (i.e. all inbound and outbound movements would utilise this access point). The access would also continue to be a shared access with the Thomas More car park and Ironmongers' Hall. As a result, access and management controls are proposed to ensure that operations are managed across the day to mitigate impacts linked to such as far as reasonably possible.

737. To minimise the expected impacts associated with the proposed servicing access strategy, a number of management mitigation measures are proposed by the applicant including:

- The prohibition of overnight servicing between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays would be permitted in the interests of residential amenity;
- The use of an off-site consolidation to minimise the number of servicing vehicle trips to / from the site;
- The use of a Delivery Booking System (DBS) to control the arrival profiles of servicing vehicles;
- The restriction of servicing activity within peak periods (to be agreed following additional surveys and in liaison with CoL officers)
- Communication processes between the consolidation centre, fleet employees, and on-site security employees;
- A central site management/security facility located within the New North Building;
- Additional site management personnel based at 'dockmaster' offices in each of the service yards; and
- The retainment of the Barbican Estate car park kiosk for car park attendant and associated facilities.

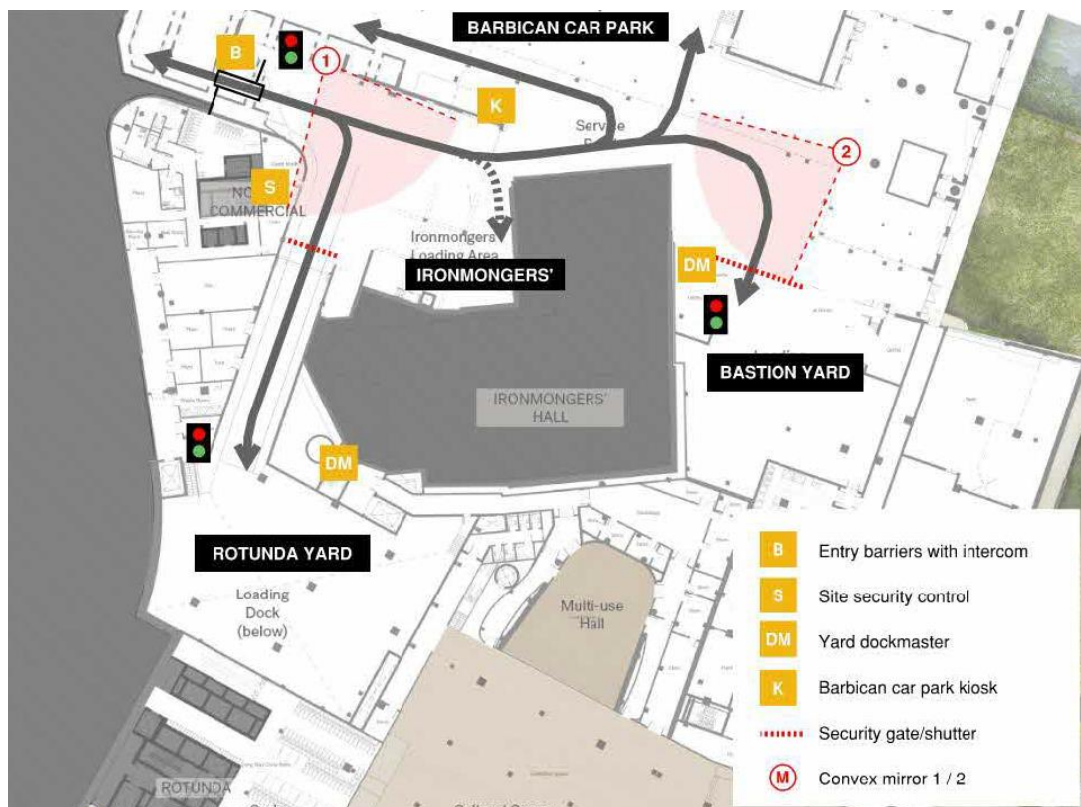
738. In addition to the above 'soft' management measures, numerous 'hard' measures are indicatively proposed to ensure a cohesive operation of activities, including:

- A new island on the main entry ramp with intercom facility linked to the site management personnel;
- Lifting arm barriers to manage the flow of inbound vehicles (and an outbound barrier to prevent inbound traffic attempting to bypass the island);
- Security gates / shutters to keep vehicles / personnel out of controlled areas when required;
- Convex mirrors to assist with restricted visibility and checking for unexpected vehicles; and
- A series of traffic signals to manage traffic flows.

739. The implementation of traffic signals has been deemed required by the applicant as the constraints of the existing Site and Ironmongers Hall result in a layout where two-way circulation is not possible for larger goods vehicles and refuse trucks, such that there are only limited passing opportunities. In addition, there is a need to consider security requirements and access control to the new service yard areas.

740. The proposed traffic signal arrangements are presented in the image below (Figure 12).

Figure 12 – Proposed Signal Control Arrangements



741. The introduction of traffic signals would be a notable change from the existing access operations, which are 'free flowing.' Given the interrelationship between

the Site and the Thomas More car park, the proposed implementation of traffic signals would have some impact on the movement of vehicles to / from the car park (but this would only be during the hours where servicing is permitted, which would be aligned with the 'off-peak' periods of the car park). The proposed control measures have been developed such that impacts on car park users would be avoided as far as is practical.

742. The provision of surplus loading bays on-site provides the ability for the time restrictions (and respective hours) to be adjusted depending on the preferred hours of operation linked to usage of the Thomas More car park. It also provides on-site flexibility to manage vehicle flows in and out of the site in tandem with the proposed Delivery Booking System.

743. The service yard layouts for the Rotunda Yard (left) and Bastion Yard (right) are provided below, which demonstrates how vehicles would wait in their respective bays until they are permitted to exit.

Figure 13– Service Yard Layouts



744. Outbound traffic from the two service yards would be held on a red light until they are permitted to depart, at which point they would be given a green light at a suitable time with inbound traffic held, as necessary. The applicant estimates that outbound vehicles would only be expected to take c.30-40 seconds to transit from the yards to the security island, so any delay to inbound traffic would be kept to a minimum.

745. Priority flow for vehicles travelling to / from the car park has been a key consideration as part of the indicative designs. The applicant states that inbound traffic to the Barbican car park should generally be subject to no more delay than typically experienced in the existing arrangements, which currently include a lifting arm barrier and the need to sometimes wait to allow larger departing vehicles to

clear the entry before they can proceed. In a similar manner, under the proposed operations, some incoming vehicles will have to wait briefly whilst departing vehicles make their way through the narrower areas.

746. It can be seen that no signal controls are proposed to be implemented for vehicles exiting the Thomas More car park. Outbound traffic from the Barbican car park and Ironmongers' Hall back of house would therefore continue to be permitted to depart at all times, albeit taking appropriate caution in relation to other vehicle movements.. As noted, servicing activity would be restricted during peak periods, when activity associated with the Thomas More car park would be expected to be greatest. Outside of peak periods, under the Delivery Booking System proposed, vehicles arrivals would be controlled, with vehicles allocated individual slots where they can arrive on site. .

747. It is noted that specific details relating to equipment, specifications, line markings, signage and systems design would be developed by a traffic systems specialist at the next design stage. Control methods (e.g. sensors and buried loops) have not been confirmed at this stage and such details would need to be included as part of a detailed Delivery and Servicing Management Plan, and additional associated information linked to the control / flow of vehicles once the final hours of servicing restriction have been agreed with CoL officers. which is to be secured by condition. In summary, the proposed servicing arrangements are considered acceptable, for the following reasons:

- The implementation of consolidation would reduce the volume of servicing trips to the site to a degree no greater than existing estimates;
- Cargo bikes would be encouraged for deliveries and a reduction to the daily motorized vehicles permitted to visit the day per day would be enforced to ensure the uptake of cargo bikes;
- The implementation of restricted servicing hours would substantially minimise any impacts expected linked to interactions with users of the Thomas More car park;
- The implementation of a DBS (Delivery Booking System) would restrict the volume of servicing vehicles expected during operational hours;
- The implementation of access controls would assist with the flow of traffic during periods where servicing is permitted (specific details to be developed as part of a detailed Delivery and Servicing Management Plan);
- The provision of loading bays significantly in surplus of requirements would provide additional flexibility for the holding of servicing vehicles, if required on occasions;
- Substantial management processes and personnel would be implemented on site at all times to manage operations; and
- No overnight servicing between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. would be permitted in the interests of residential amenity.

748. The proposals are in accordance with Local Plan Policy DM 16.5 with on-site servicing facilities being provided. As the development will produce significant enough movement of goods and services, a requirement to produce a Delivery and Servicing Management Plan would be secured by condition in order to meet London Plan policy T4 and Local Plan Policy 16.1.

Refuse Management

749. For each of the new buildings, it is proposed to segregate waste into four main waste streams, namely paper/card, organic waste, mixed recycling, and residual waste. Each building has been allocated its own refuse storage area(s).

750. The alterations to Ironmongers' Hall result in the waste storage and collection arrangements being changed, with waste storage re-provided within the LGF back of house zone, within the former Bastion House storage space at lower ground level.

751. Forecasts for the waste generation associated with the development have been estimated using waste generation rates agreed with City of London officers. The total forecast waste generation per week and the storage requirements are outlined below and are acceptable.

Building	Total Waste (litres per week)	Bins for Residual Waste (1,100L)	Bins for Mixed Recyclables (1,100L)	Bins for Organics (240L)	Bins/Cages for Paper/Card (1,100L/m³)
New Bastion House	195,000	4	10	15	20
Rotunda	142,000	3	8	13	12
New North Building	12,000	1	1	1	1
Ironmongers' Hall	13,000	1 (240L)	2	1	-

752. Additional spatial provision has been made for bin washing and for storage of bulky waste, hazardous waste and WEEE (Waste Electrical and Electronic Equipment), which will be collected on an ad hoc basis, as needed.

753. Swept Path Analysis has been provided for both service yards and confirms that the required vehicle movements can be made within the space available. Confirmation has been received from City of London Waste officers that they are satisfied with the assessments and proposed waste strategy.

Dedication of Land

754. The changes to the highway layout at street level, and to the podium and Highwalk network, will require formal changes to highway ‘designations’ following planning approval should permission be granted. There are numerous processes linked to the Highways Act requiring separate approval, including stopping up and the licencing of structures oversailing the highway, etc.

755. An overarching objective for the project is a fundamental transformation of the public realm at street level around the Site, with the removal of the roundabout enabling the generation of new public realm space. In ‘designation’ terms, there would be a net increase in public highway (see below).

756. The plans are intended to represent the design intent as far as practical, but it is noted that further consultation and development will be required before formal processes, such as Stopping Up Orders and licenses for oversailing etc., can be drawn up for technical approval.

Land Designation Changes (Summary)

757. The proposed changes to designations are summarised quantitatively in the table below. It can be seen that the proposals would result in a net positive increase in land designated as public highway, permissive path, and City walkways.

Level	Designation	Existing extent within Site Boundary (m²)	Proposed extent within Site Boundary (m²)
Ground level	Public highway (carriageway + footway)	8,980.5	9,003.0
	Permissive path	685.0	2,205.3
	City walkway	15.5	442.5
	City walkway (restricted height)	0.0	0.0
	Total public realm	9,681.0	11,650.8
Highwalk level	Public highway (carriageway + footway)	0.0	0.0
	Permissive path	271.8	817.7
	City walkway	2,132.8	1,787.6
	City walkway (restricted height)	0.0	166.1
	Total public realm	2,404.6	2,771.4
Ground + Highwalk levels	Public highway (carriageway + footway)	8,980.5	9,003.0
	Permissive path	956.8	3,023.0
	City walkway	2,148.3	2,230.1
	City walkway (restricted height)	0.0	166.1
	Total public realm	12,085.6	14,422.2

758. In order to achieve the benefits outline above, the applicant is proposing various changes to land designations, as discussed in turn below. A series of plans are provided which visually demonstrate the changes proposed, as summarised below. Further details relating to the existing and proposed pedestrian movements across the site and throughout the public realm can be found in the Public Realm section of this report.

Highway Boundary Stopping Up and Adoption

759. The proposed Rotunda junction improvements require areas of land to be 'stopped up' and other areas to be 'adopted.' Stopping up orders are usually made to allow development to take place, or because the public highway is no longer necessary. Public highway can include roads, streets, footpaths, public car parks, grass verges and footways.

760. As the highway authority the City of London has the power to stop up areas designated as highway land by making orders known as a 'stopping up' order. The term 'stopping up' means that once such an order is made, the highway land ceases to be a highway, road, or footpath i.e. the highway rights are extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway if it is satisfied that it is necessary to do so in order to enable development to be carried out. That process would be carried out under separate procedures to considerations of the applications currently before you.

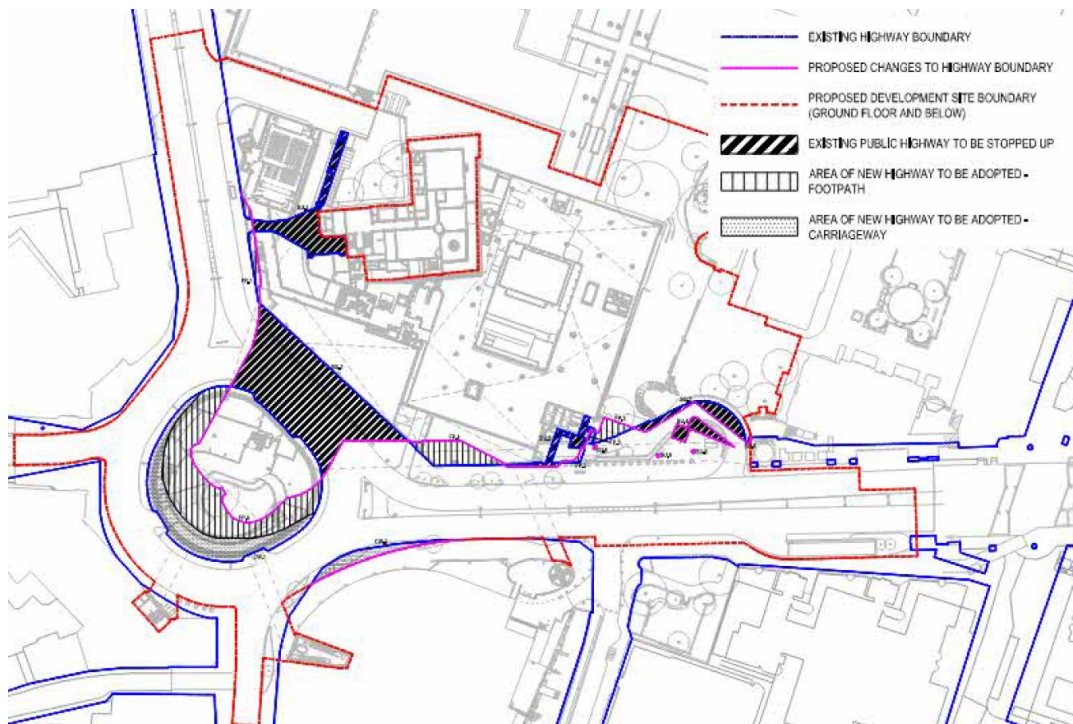
761. Areas of privately owned land can alternatively be 'offered up' for adoption as public highway, for instance for the creation of a new 'estate road' to be adopted and maintained by the local authority.

762. The highways reconfiguration requires that land currently within the footprint of the Rotunda structure at the centre of the roundabout will be required for the formation of the realigned and widened carriageway and associated new footway around the edge of the peninsula. Land that is currently not public highway has therefore been 'offered up' for adoption as highway to enable these changes, thereby expanding the total amount of public highway as a result of the proposed development.

763. The proposed highway reconfiguration will see the 'closure' of the north-east quadrant of the roundabout, with this section of carriageway no longer required for use by vehicles. At the interface with the retained carriageway, part of this area will be used to form new footways along the edge of the realigned carriageway, and a large area will be stopped up to enable the construction of the new Rotunda building as part of the proposed development.

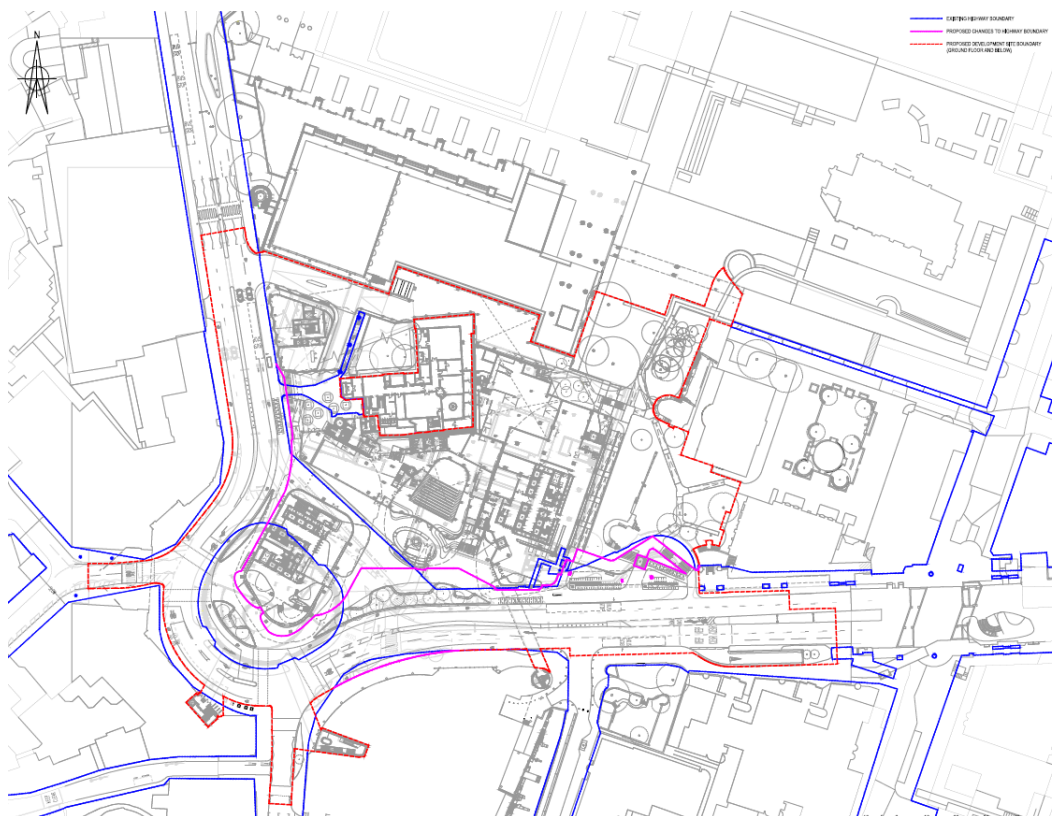
764. Minor areas of stopping up are associated with the closure of the access ramp to the London Wall car park adjacent to Bastion House, including Shaftesbury Place which is currently inaccessible for some users as it is a stepped route; site observations have confirmed that this route is not well used. There is an existing stairwell which is unaffected and provides safer access between car park and street; this will be maintained in the proposed layout. A new Highwalk connection will also be established by the proposals which would provide an additional alternative route for residents wishing to head south / east (accessed via lifts/stairs).
765. There are also some areas of existing public realm that will need to be formally stopped up prior to being 'declared' as a City Walkway, or for a change of designation to permissive path. Notably, this includes the small plaza in front of Ironmongers' Hall.
766. It is noted that Hostile Vehicle Mitigation (HVM) measures are proposed, some of which would sit within the proposed CoL highway boundary. The use of such has been endorsed by City of London Police; the exact placement of bollards would be considered as part of the detailed design stage through discussions with CoL City Operations officers.
767. A draft stopping up / offering up plan has been produced by the applicant, as provided below, which illustrates the proposed changes. It is noted that this plan is preliminary and will be subject to further refinement and consultation with the City following any planning approval. The process to formalise stopping up orders can only be made at the appropriate point, notwithstanding the plans are considered acceptable in principle at this stage.

Figure 14 – Areas to be Stopped Up and / or Adopted



768. The proposed changes to the highway boundary are also presented below in a different format.

Figure 15 – Existing and Proposed Highway Boundaries



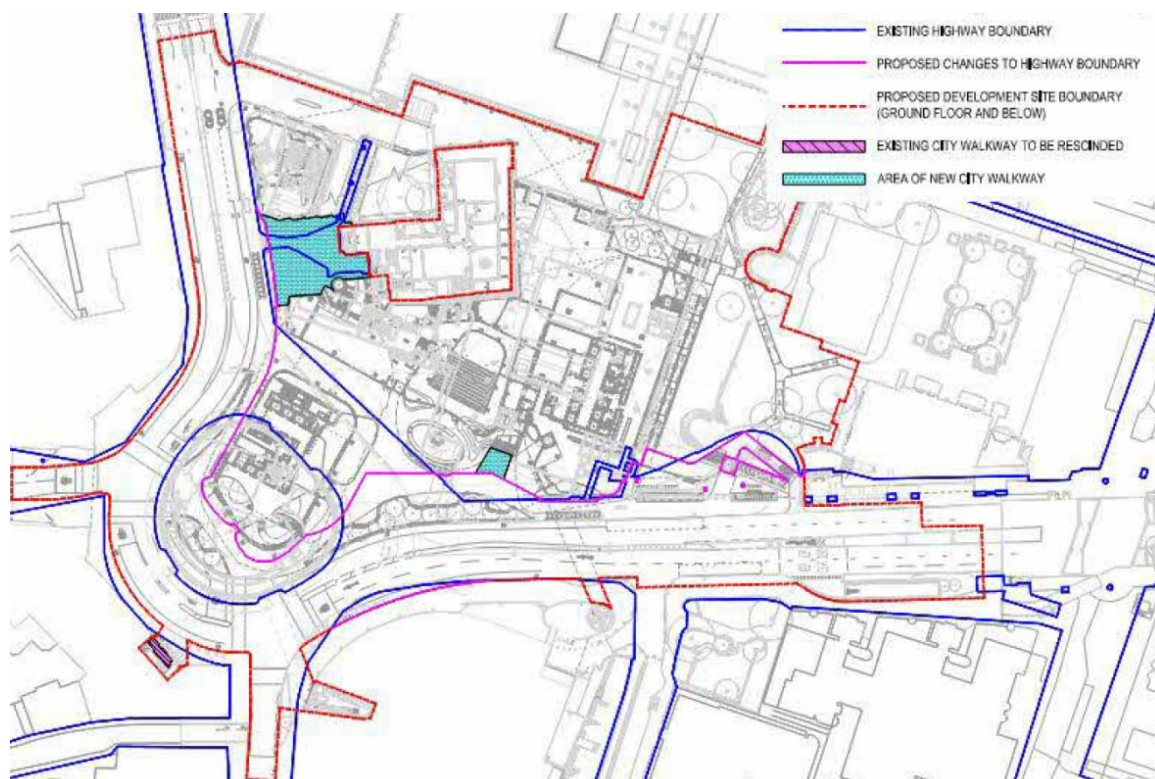
Permissive Paths and City Walkways

769. It is noted that a number of specific criteria apply for a route to be declared as a City Walkway, including minimum width, clear height, and requirements in relation to materials, balustrades, lighting, and drainage. There are no specific requirements in relation to Permissive Paths. Much like stopping up and offering up, there is a formal process for rescinding of existing City Walkways (for removal/demolition, etc) and 'declaration' of new City Walkways.

770. The existing public realm within the Site includes areas of Permissive Path and City Walkway. With public realm provided at street level, at podium level above, and connecting to 'garden level' below the street, it is noted that the land designation proposals are complex and are therefore likely to be subject to further refinement after the planning process should permission be granted. However, the principle of the changes has been demonstrated by the applicant within the TA.

771. At ground, areas of land have been identified by the applicant to form new 'City Walkway'. These areas are identified in the plan below and are identified in the context of the existing and proposed highway boundary plan.

Figure 16 – Existing and Proposed City Walkways (Ground Level)

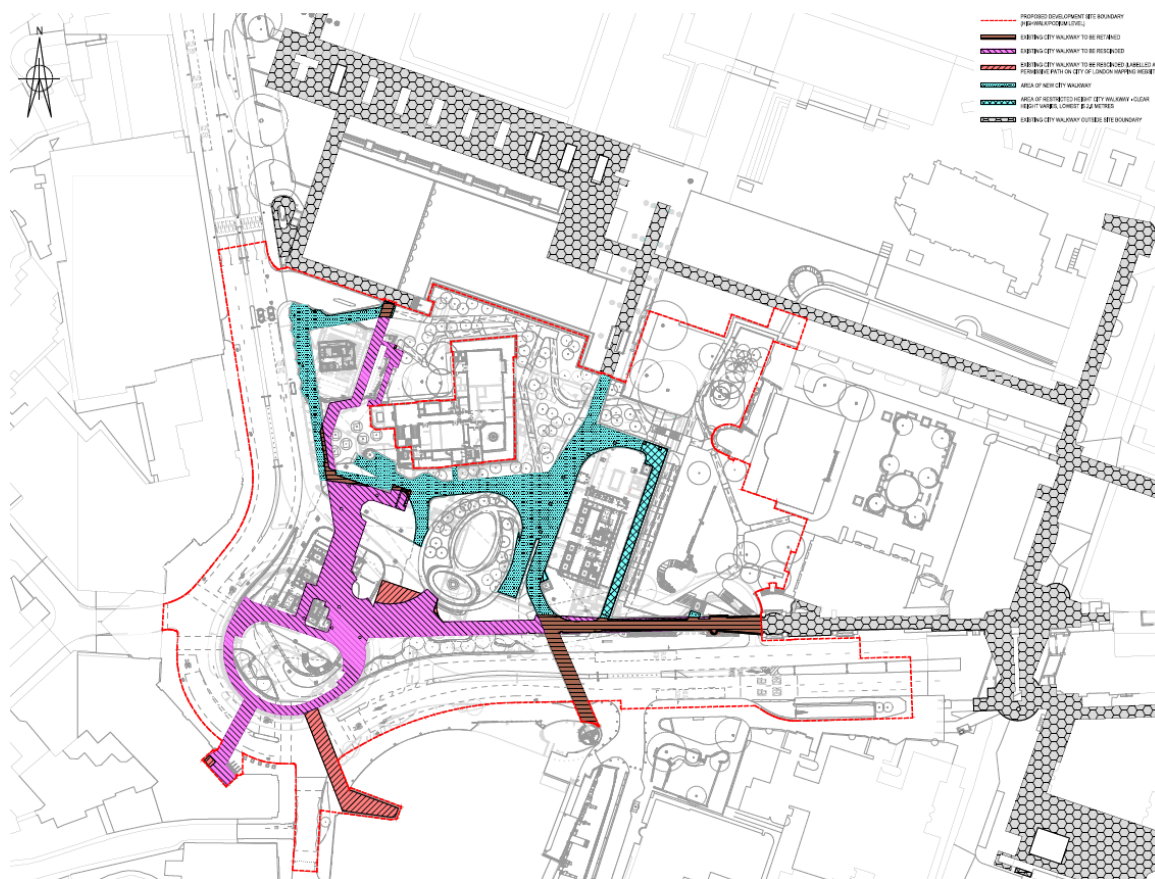


772. At podium level, the proposals seek to maintain walking routes linking the Site to its surroundings, connecting into the existing Highwalk network of paths connecting to the Barbican Estate.

773. There are several existing Highwalk City Walkway routes that need to be rescinded, either due to total removal (i.e. the two bridges across the roundabout which are proposed to be removed) or due to diversion of the Highwalk network onto new routes across the Site, which would then be 'declared' as new City Walkways in accordance with the appropriate procedure(s).

774. The existing and proposed City Walkway routes at podium level are presented in the plan below.

Figure 17 – Existing and Proposed City Walkways (Podium Level)



775. Generally, it can be seen that all primary circulation routes at podium level are proposed as City Walkways.

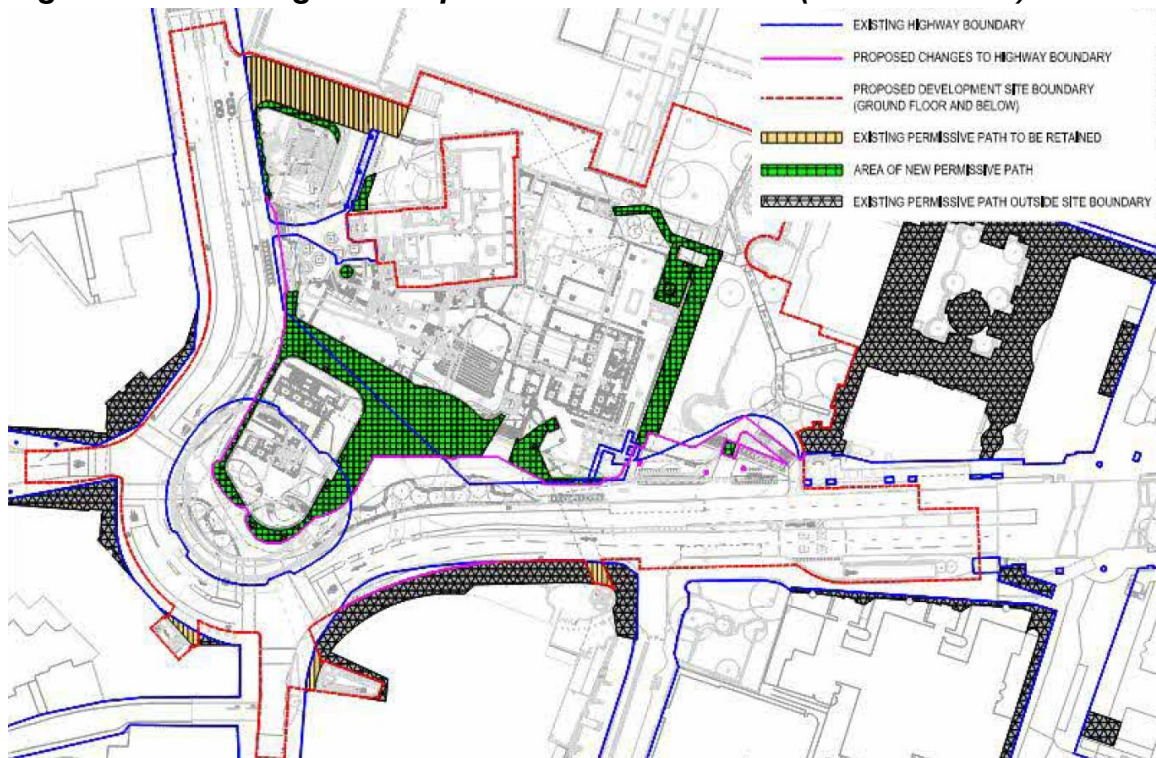
776. One section along the eastern flank of Bastion House (as indicated by the turquoise crosshatch in the plan provided) would not meet the standard headroom requirements to be declared as City Walkway. The proposed walkway would

narrowly miss the clear height requirement (2.75m) for City Walkway designation by c.150mm at the worst location. On this basis, the applicant was advised at pre-application discussions that it made most sense for this to still be proposed as City Walkway, as it would form a logical continuity of route (and avoid overcomplication). It is noted however that the designations illustrated are provisional, to a degree, and this would be subject to further review and revision before final drawings were prepared for stopping up order, declaration of new City Walkways, etc. which would occur post planning approval.

777. Secondary routes through the Northern Gardens are not suited to meeting the requirements for City Walkway status and the paths through the ‘Glade’ are not ‘through routes’; accordingly, these are proposed as Permissive Paths, along with a plaza-type area at podium level that is considered ancillary to circulation and may act more as an external multi-function space that would be managed and maintained by the Applicant.

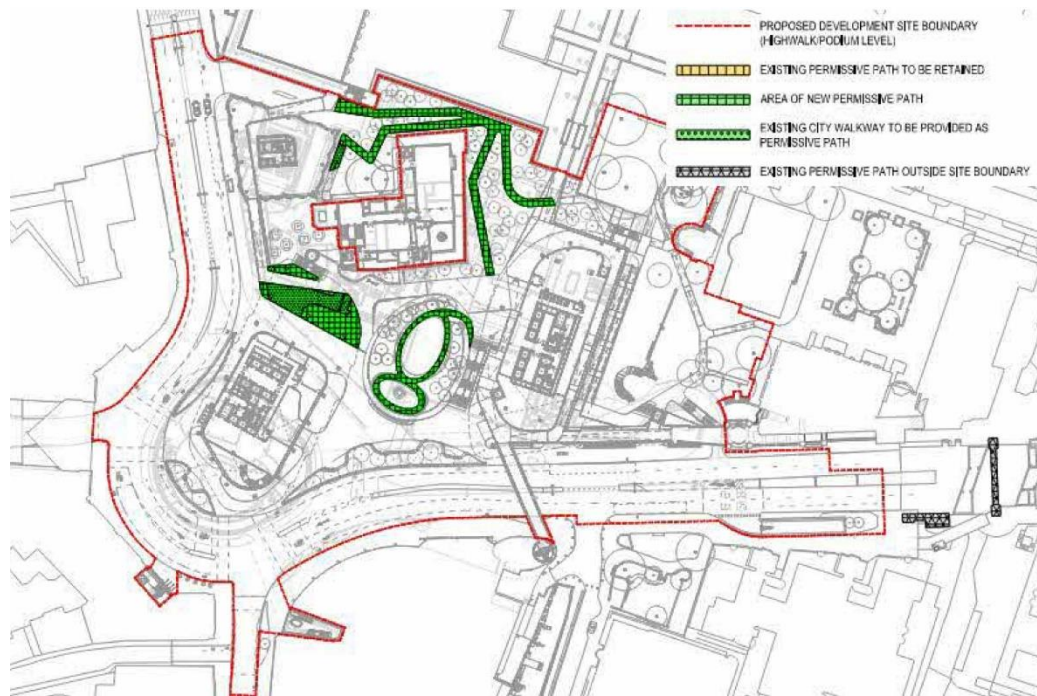
778. A further plan has been prepared by the applicant (as provided below) detailing the current and proposed Permissive Path areas at ground level.

Figure 18 – Existing and Proposed Permissive Path (Ground Level)



779. The current and proposed Permissive Path areas at podium level are presented below.

Figure 19 – Existing and Proposed Permissive Path (Podium Level)



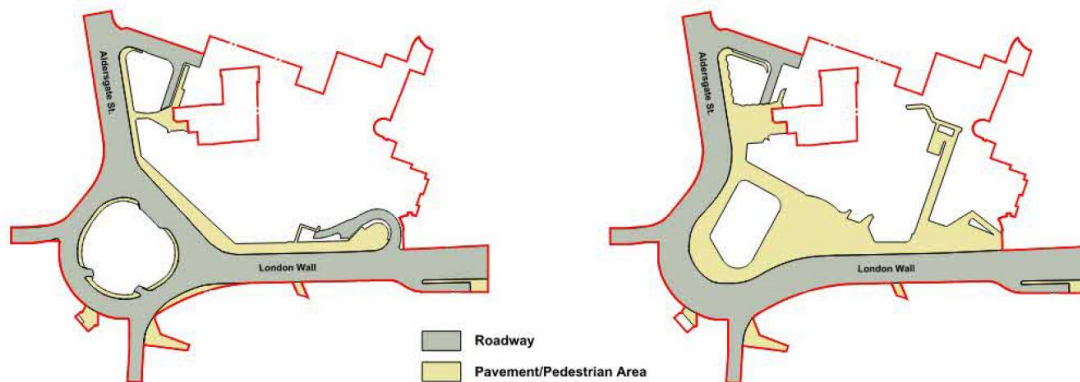
780. In summary, it is considered by officers that the proposals make minimal change to the routing through the site and maintain good levels of permeability. A north-south route would be maintained along the western edge of the site, passing Ironmonger’s Hall and the existing route to the east would be maintained. Further, a new link would be created which would connect the site to Mountjoy House, significantly benefitting residents and providing a direct connection towards London Wall and St Paul’s.

781. Rather than crossing London Wall or the roundabout via footbridge to reach street level, pedestrians will connect to street level via one of the several new stairs and public lifts that would be provided on the north side of the street before crossing via the new signal-controlled crossings.

Summary of Changes to Land Designations

782. As explained above, the proposals would result in a net positive increase in land designated as public highway, permissive path, and City walkways. The applicant has also prepared an overview sketch of the existing and proposed designations which seeks to clarify the proposed changes in simple terms. This sketch is provided below and demonstrates the changes that would be experienced at street level and the overall balance of space allocated as roadway and pedestrian areas.

Figure 20 – Summary Sketch (Existing vs Proposed)



783. The applicant has demonstrated that the following outcomes would be secured by the proposed development:

- Net reduction in roadway for vehicles of c.1,995sqm (c.19% reduction within the assessed boundary);
- Net increase in all public highway (roadway and footway) of c.22sqm (less than 1% change);
- At podium level, there is approximately a 16% reduction in City Walkway designation, but total public realm at podium level increases by c.15%; and
- Net increase in public realm across street level and podium of c2,335sqm (nearly 20% increase within the assessed site boundary).

784. The proposed land designation changes are therefore considered acceptable in principle, subject to the necessary formal / technical processes being followed.

Oversailing

785. Structures that over sail the public highway permanently must be licensed by the local authority, typically in accordance with Section 177 of the Highways Act 1980. There are likely to be additional temporary licensing requirements in relation to cranes, scaffolding etc during construction, but those will be addressed by the appointed contractor, and there may be additional requirements in relation to future maintenance.

786. The proposed development will oversail the street-level public realm in a number of locations. Where the public realm is proposed as adopted highway, the clear height beneath the oversailing area is in excess of the 5.7m requirement with one exception, where the existing 'London Wall Garden Bridge' does not currently achieve this clearance and is being reconstructed to an equivalent clearance (c.5.06m). Street furniture in this area (including proposed cycle hire docking stations) mean that vehicle impact with this structure is extremely unlikely and that a reduced oversailing clearance is considered acceptable. . It is considered that the provision of street furniture (cycle racks and cycle hire docking stations) would adequately mitigate the limited probability of a tall vehicle

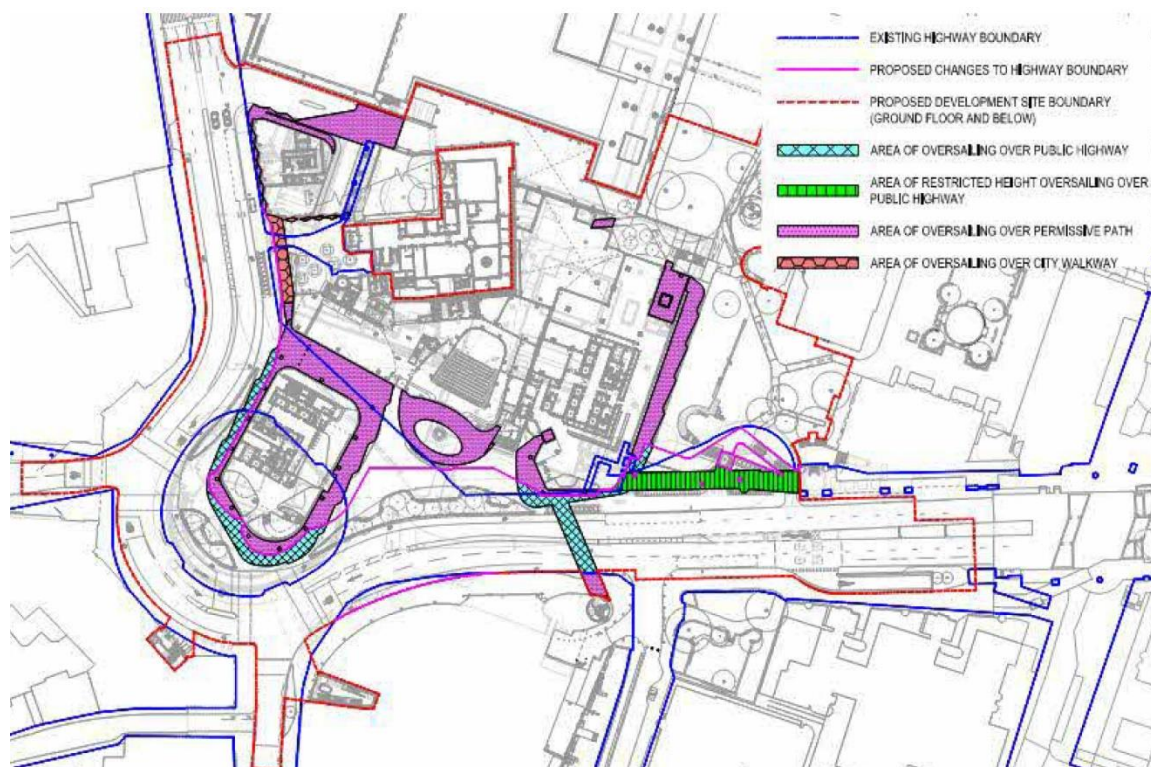
crossing the footway and colliding with the underside of the Highwalk 'bridge' structure in this area and that there was no particular change in surrounding circumstances that warranted the existing clear height to be increased for a replacement structure (unlike the bridge across London Wall, for which clearance has been increased due to removal of the 'tunnel' over the rotunda roundabout).

787. Other public realm areas where the oversailing would be below the 5.7m requirement (e.g. below the new Aldersgate Court Bridge) are proposed as City Walkway or Permissive Path, as considered most appropriate for the specific context, rather than as public highway (whether currently adopted or proposed for adoption)

788. Some areas of the podium level are also oversailed by the structure above; as the podium is not designated as public highway, the requirement here is generally to satisfy the requirement for City Walkways.

789. A drawing has been prepared to illustrate the proposed changes to formal oversailing. The drawing prepared by the applicant is provided below.

Figure 21 – Extents of Oversailing Requirements



790. Should planning permission be granted an Approval In Principle (AIP). The AIP is a construction compliance certificate for all highway structures such as

bridges. This will be required to be set as a condition and on this basis the proposed oversailing is considered acceptable in principle.

Undersailing

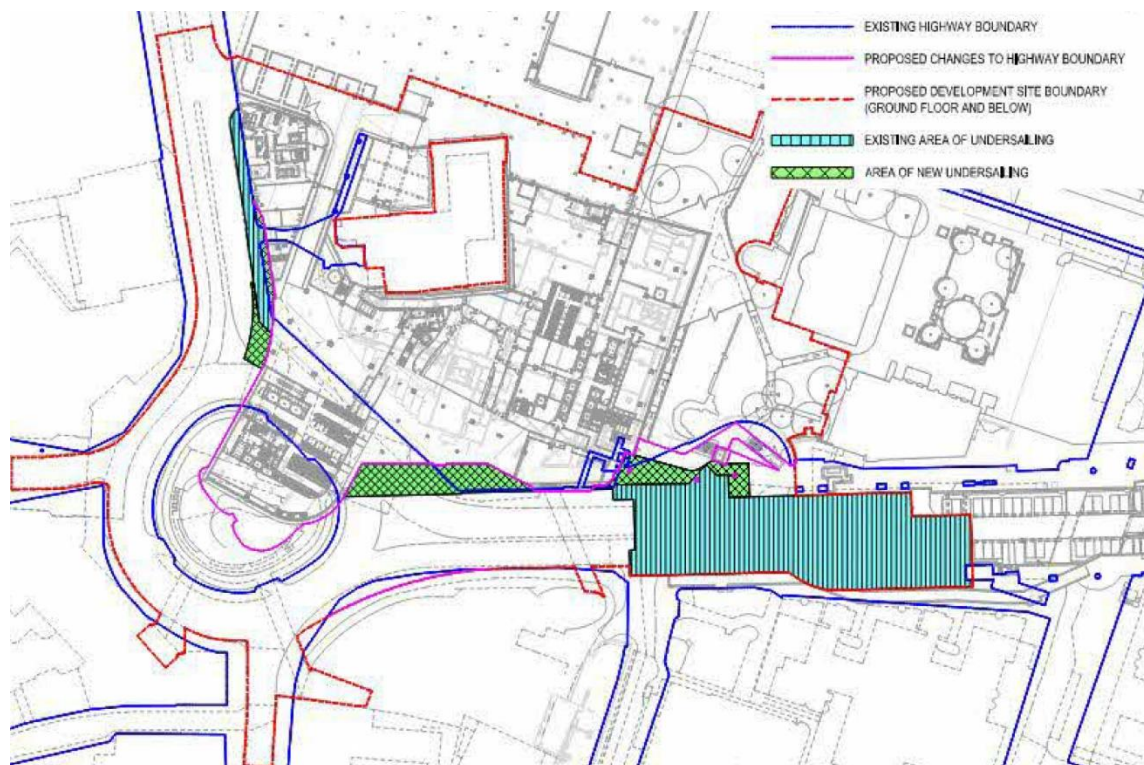
791. Parts of the existing buildings on Site extend beneath the street and the proposed development also includes basement areas over most of the site footprint and extending out beneath the public realm in a number of areas. Most of this public realm will not be adopted public highway, but the basement area will extend out beneath the proposed highway boundary in several locations, requiring undersailing to be approved.

792. As with oversailing, the projection of a building beneath the public highway for basements or similar must be licensed by the local authority; this is typically in accordance with Section 179 of the Highways Act. Undersailing applications typically require submission of appropriate calculations and engineering details to demonstrate that the structure can support the highway and suitable loading.

793. Additionally, a utilities culvert is proposed around the perimeter of the Site, within the realigned highway, but it is provisionally assumed that this will not be subject to an undersailing licence.

794. A drawing has been prepared to illustrate the proposed changes to formal undersailing, indicating areas of existing undersailing (where undersailing would continue) and new areas of undersailing of the public highway. The drawing prepared by the applicant is provided below.

Figure 21 – Extent of Undersailing Requirements



795. Should planning permission be granted an AIP will be required to be set as a condition and on this basis the proposed oversailing is considered acceptable in principle.

Highways and Traffic Modelling

796. In addition to a traffic modelling exercise for the Phase 1 works, in partnership with TfL, preliminary modelling has been undertaken to assess the impact of the proposed highway layouts, the revised vehicle routes on the wider highway network, and on journey times. The modelling for Phase 1 and 2 of the gyratory works has been undertaken by the City's 'framework consultant' Norman Rourke Pryne (NRP).

797. The traffic modelling has been developed in relation to the Gyratory scheme over a number of years and updated as proposals have been refined and new survey data been obtained. The modelling was updated using traffic survey data from March 2022 which is considered a much more dependable set of data in terms of reflecting changes to the operation of the surrounding network in response to changes at Bishopsgate and the All Change at Bank scheme.

798. The LinSig Model Auditing Process (LMAP) approved Future Base model for Region 11 (i.e. a model study area which covers a large are of the City of London), which was developed for the All Change at Bank project, has been used for this assessment with the Rotunda junction added to it. It is noted that the TfL Model Auditing Process (MAP) is separate (and additional) to the London Wall West

planning application process and will ensure that the design meets TfL standards as well as applicable requirements of the City. The modelling will be formally submitted / reviewed as part of the MAP process which is the required process for traffic modelling assessments and runs in parallel with planning applications up to the detailed design stage as schemes develop in detail.

799. Traffic flows in the Future Base model have been derived from the TfL ONE (Operational Network Evaluator) model outputs from the All Change at Bank scheme. Traffic flows from November 2019 and March 2022 were considered as part of the modelling process, with the latter considered to be a better representation of traffic in this area of the City following implementation of the TfL Bishopsgate scheme of 7am-7pm traffic restrictions.

800. Modelling has assessed degrees of saturation (DoS; the percentage of capacity that is used) and mean maximum queue length (MMQ; the average of the maximum queue lengths in each cycle) for the 'Future Base' model and the proposed highways alignment, using both the 2019 and 2022 traffic flows (for robustness); naturally results vary between the 2019 and 2022 scenarios owing to the change in traffic flows recorded; for clarity, the 2022 dataset is considered the most representative following the implementation of traffic restrictions on the surrounding network and the corollary impacts associated with such.

801. It is important to note that the impacts on traffic must be considered in tandem with other modes and wider design / placemaking objectives. The proposals must strike an optimal balance between recognising the movement function of London Wall as a majority transport corridor, and the need to improve safety and the sense of place when compared to the existing scenario.

802. The junction capacity (DoS) results of the traffic modelling undertaken are presented below for the AM and PM Peak Hours.

AM Peak Hour (DoS)

JUNCTION	APPROACH	LINSIG LANE	FUTURE BASE DOS (%)	PROPOSED DOS (%)	MARCH 2022 FLOWS DOS (%)
Aldersgate Street (north)/ Montague Street/ London Wall	Aldersgate Street (north) SB	J3:1/2	93%	89%	75%
	London Wall NB	J3:10/2	N/A	43%	28%
	Montague Street EB	J3:2/1+2	81%	94%	72%
London Wall/ Aldersgate Street (south)	London Wall SB right-turn	J3:11/3	N/A	54%	67%
	London Wall SB left-turn	J3:11/2	N/A	44%	30%
	London Wall WB left-turn	J3:5/2	87%	83%	90%
	London Wall WB ahead	J3:5/3	49%	82%	50%

PM Peak Hour (DoS)

JUNCTION	APPROACH	LINSIG LANE	FUTURE BASE DOS (%)	PROPOSED DOS (%)	MARCH 2022 FLOWS DOS (%)
Aldersgate Street (north)/ Montague Street/ London Wall	Aldersgate Street (north) SB	J3:1/2	83%	86%	70%
	London Wall NB	J3:10/2	N/A	58%	28%
	Montague Street EB	J3:2/1+2	90%	83%	69%
London Wall/ Aldersgate Street (south)	London Wall SB right-turn	J3:11/3	N/A	59%	63%
	London Wall SB left-turn	J3:11/2	N/A	48%	32%
	London Wall WB left-turn	J3:5/2	81%	69%	70%
	London Wall WB ahead	J3:5/3	54%	77%	27%

803. It can be seen that the traffic modelling undertaken to date demonstrates that the proposed Rotunda junction is generally predicted to operate within capacity for the March 2022 Flows scenario, which is considered the most dependable scenario as noted. All arms in the PM Peak Hour are forecasted to operate well within capacity. In the AM Peak Hour, one arm is predicted to operate at 90% capacity, and is therefore likely to result in some level of queuing, but all other arms are expected to operate well within capacity.

804. It is acknowledged that the 2019 scenario generally indicates worse performance owing to the higher traffic flows that existed prior to traffic restriction measures implemented. Despite the higher flows that were assessed, only one arm would be above 90%DoS.

805. The changes to DoS are therefore considered acceptable, especially in the context of the objective to provide improved placemaking and facilities for vulnerable road users including pedestrians and cyclists.

806. The traffic modelling outputs also provide a comparison of the Mean Maximum Queue (MMQ) lengths. This number represents the average value, over each peak hour, of the maximum queues occurring each cycle. The forecasted MMQs are presented below for the AM and PM Peak Hours, again with reference to the two future scenarios assessed.

AM Peak Hour (MMQ)

JUNCTION	APPROACH	LINSIG LANE	FUTURE BASE MMQ (PCUs)	PROPOSED MMQ (PCUs)	MARCH 2022 FLOWS MMQ (PCUs)
Aldersgate Street (north)/ Montague Street/ London Wall	Aldersgate Street (north) SB	J3:1/2	5.1	19.3	12.8
	London Wall NB	J3:10/2	N/A	0.4	5.0
	Montague Street EB	J3:2/1+2	2.1	19.3	4.4
London Wall/ Aldersgate Street (south)	London Wall SB right-turn	J3:11/3	N/A	6.2	9.2
	London Wall SB left-turn	J3:11/2	N/A	2.6	1.9
	London Wall WB left-turn	J3:5/2	3.1	16.7	17.0
	London Wall WB ahead	J3:5/3	0.5	10.1	4.9

PM Peak Hour (MMQ)

JUNCTION	APPROACH	LINSIG LANE	FUTURE BASE MMQ (PCUs)	PROPOSED MMQ (PCUs)	MARCH 2022 FLOWS MMQ (PCUs)
Aldersgate Street (north)/ Montague Street/ London Wall	Aldersgate Street (north) SB	J3:1/2	2.4	15.8	9.5
	London Wall NB	J3:10/2	N/A	0.7	3.8
	Montague Street EB	J3:2/1+2	4.0	13.4	13.1
London Wall/ Aldersgate Street (south)	London Wall SB right-turn	J3:11/3	N/A	6.0	6.8
	London Wall SB left-turn	J3:11/2	N/A	6.4	1.9
	London Wall WB left-turn	J3:5/2	2.0	12.9	12.5
	London Wall WB ahead	J3:5/3	0.6	10.6	0.5

807. The largest queue expected is where the DoS recorded was greatest, as would be expected (London Wall WB left-turn). The forecasted MMQ for the 2022 scenario in the AM Peak Hour is 17 Passenger Car Units (PCUs). This would be an increase to the existing scenario. The introduction of queueing would be expected to a degree as a result of the introduction of traffic signals when compared to the current roundabout arrangement, which are often more efficient junctions for traffic movements.

808. As noted elsewhere within this report, Officers within City Operations have raised concerns relating to the queuing back of vehicles along London Wall. Linked to this, it is considered that there would be a safety issue linked to the proposed 'keep clear' zone where the right turn into the London Wall car park is proposed. This matter will need to be considered as part of the detailed design stage (including further Road Safety Audit) and also the TMAP modelling process, to identify a suitable and safe solution.

809. The MMQs are considered acceptable at this stage in balance, owing to the wider benefits that would be delivered as noted elsewhere within this report and the fact that further refinements of the junction and proposed signal arrangements can be made as part of the required TMAP process.

810. For clarity, it is noted that a formal response from TfL's modelling team is at the time of writing outstanding. However, confirmation has been received from the applicant that TfL have been engaged throughout the model development process and are supportive of the approaches adopted (per pre-application meeting held 16/02/23). As noted, the TfL MAP auditing process is separate (and additional) to the London Wall West planning application process and will ensure that the design meets TfL standards as well as applicable requirements of the City.

811. A Stage 1 Road Safety Audit (RSA) was undertaken for the Rotunda 'junction' by Road Safety Answers. This identified several items to be considered in the development of detailed proposals. No issues were identified within the independent report that could not be reasonably addressed as the design is developed. As noted, City of London officers have raised an additional safety

matter (linked to the right turn movement into the car park) which was not identified within the RSA. This will need to be satisfactorily addressed as part of future design work.

812. The proposed Rotunda junction improvements necessitate numerous amendments to defined structures and boundaries (as noted in the above section of this report), including but not limited to:

- Stopping Up of Highways boundary, to be undertaken prior to the commencement of the works;
- Adoption of Highways;
- Over sailing licenses;
- Under sailing licenses;
- Removal of Highwalks (City Walkway);
- Changes to permissive paths;
- Footways and Carriageway improvement works; and
- New and upgraded Bridges.

Travel Plan

813. The City of London is an extremely busy area, and this development would lead to a large increase in numbers traveling to and from the site with an expected uplift in jobs of over 2,000 people.

814. In this instance we would seek to mitigate the impact of this development by requesting a Workplace Travel Plan be put in place for each of the three buildings proposed. Travel Plans are an effective tool for managing visitors, volunteers, and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

815. If planning permission is granted a Workplace Travel Plan would need to be secured by Condition in order to meet London Plan policy T4 and Local Plan Policy 16.1. The travel plan would need to be approved by the CoL prior to completion of the proposed works. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.

816. Transport for London encourages developers to use the TRICS database for trip generation predictions. Officers will require the applicant to undertake a TRICS after study and provide TfL and the City of London with the results on completion of the development. TfL would then be able to update the TRICS database with the trip generation results for the various use categories associated with this development.

Construction Logistics

817. The proposal would involve a significant amount of demolition and construction works. This will generate a large number of construction vehicle movements during the overall construction period. The proposed works could therefore have a significant impact on the operation of the public highway in the local area if not managed effectively. The primary concern is public safety, but it also needs to be ensured that construction traffic does not unreasonably create (or add to existing) traffic congestion, or impact on the road safety or amenity of other highway users. The proposal is also likely to lead to a variety of amenity issues for local people that would need to be carefully managed (e.g. noise, vibration, air quality). Significant objections have been received with regard to this.
818. An outline Construction Logistic Plan (CLP) has been submitted in support of the planning application. This provides useful information to describe the proposed works and how, at this preliminary stage, they could be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated and to highlight concerns of local stakeholders at an early stage to ensure that these are accounted for within the detailed Construction Logistics Plan; this requirement should be secured by condition and would be prepared once a Principal Contractor has been appointed. This document will need to be in line with Transport for London's Construction Logistics Plan Guidance and said document would be subject to City of London approval before demolition and construction are able to commence.
819. Concerns have been raised thus far in relation to the suggested use of the shared access ramp for construction purposes (and resident car park access restricted via this ramp).
820. It is suggested within the outline CLP that alternative access proposals will be required to enable residents to access the Thomas More car park during construction; specifically, the use of the alternative ramp circa 90m to the north along Aldersgate is referred to by the applicant. However, the alternative access strategy identified has limitations which would impact Barbican residents as follows:
- Limited entry / exit movements (left in / left out only, with a median strip preventing movements to / from other directions);
 - Clear height restrictions (at the access shutter and connecting routes between the Thomas More car park) which may prohibit larger vehicles; and
 - More convoluted walking routes for Barbican residents entering / exiting the estate.
821. The applicant will therefore be required to engage with Barbican residents to establish a suitable access strategy throughout construction. This will be a critical

element to enable discharging of the detailed CLP planning condition (subject to any planning approval) and the maintaining of access to the shared access ramp for Barbican residents should be priority, providing that it can be safely achieved.

822. The detailed CLP document should consider the following points:

- Access concerns for local residents and other users in the vicinity of the site have been raised based on the indicative construction logistics proposals submitted. Access requirements for all nearby residents, workers etc. will need to be considered in detail through consultation processes. This would need to address servicing to Ironmonger's Hall during construction. It is noted that the plans presented are in outline at the moment; however, the applicant has been advised that access to Thomas More should be retained where possible and closure would not be supported / agreed to, save for exceptional circumstances where this was unequivocally unavoidable.
- Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.
- Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.
- Construction vehicle routes to and from the site will need to make the most efficient use of the highway network in the Central London Area. Such routes will require discussion with City of London Highways.
- The proposed works are likely to generate a significant number of workers on the site at any given time. We will expect the Principal Contractor to prepare travel planning guidance to encourage workers to use sustainable transport instead of private motor vehicles.
- Various highways licences would need to be obtained from the City of London prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
- Traffic congestion is already a problem in the City of London, particularly during morning and afternoon/evening peak periods. We will therefore expect construction vehicle movements to be scheduled to avoid 0800 to 0930 and 1500 to 1830 hours on Monday to Friday.
- Details will be required to describe how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.
- Details will be required to describe how vehicular access will be maintained within the locale, including any proposed alternative routes (if necessary).
- Details will be required to describe how access to bus services would be safely maintained throughout the construction period; discussions with TfL will be required in this regard.
- Details will be required with respect to how the contractor will be encouraging the use of cargo bike deliveries throughout the construction process.
- A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.

- The site would be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme:
 - <http://www.clocs.org.uk/standard-for-clocs/>

823. If planning permission is granted, a CLP should be secured separately via condition to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the City of London Local Plan 2015. This would provide a mechanism to manage / mitigate the impacts which the proposed development would have on the local area. The detailed CLP would need to be approved by the City of London prior to works commencing on site should planning permission be granted.

Highway Improvement Works

824. Information has been provided to illustrate the design intent for the 'highways works' and public realm proposals which have been discussed and developed through the pre-application consultation process.

825. The applicant is required to enter into a section 278/s38 agreement, for the following works (but not limited to):

- Proposed highways improvement works for the Rotunda roundabout redesign (which forms part of the proposed development), including a Stage 2 RSA;
- Alterations to highway structures and new/replacement highway structures (including replacement bridge over London Wall);
- Proposed stopping up of public highway and offering up of private land as public highway, design and constructed up to the highways authorities' standards;
- Anticipated permanent oversailing and undersailing licensing requirements;
- Proposed rescinding of existing City Walkways and declaration of new City Walkways, principally associated with Highwalks;
- Alterations to access to the London Wall car park and any associated structural requirements, including a preliminary layout and a Stage 2 RSA; and
- Alterations to bell-mouths to Aldersgate Steet site access ramp and London Wall car park/service road ramp.

826. It is noted that if the City Corporation were to deliver the development itself, it would not be able to enter into a s278/s38 agreement with itself and instead the City Corporation as developer would need to agree a scheme of highway works to be delivered at their expense with the City as Local Highway Authority. Development requiring works to the highway following development will be secured through planning obligation for the developer to repair any construction

damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces as necessary. The works are to be undertaken and included in the design as part of the highways improvement works.

Transportation Conclusion

827. The proposals are considered to be acceptable in transport terms subject to the conditions as set out below.

828. Should planning permission be granted the following conditions, along with the proposed Highways Works, would need to be secured:

- A planning condition requiring the provision of 868 long stay cycle parking spaces, 326 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.
- A planning condition to secure a Delivery and Servicing Management Plan (DSMP) including details as referenced within this report (but not limited to). The condition shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. The DSMP should include for the undertaking of surveys of Thomas More car park (when fully operational i.e. prior to any potential construction impacts) to determine the most appropriate hours of servicing between 7am-8pm, up to a maximum of five hours. The planning condition should ensure a daily cap of vehicles permitted to visit the site (60 vehicles).
- A planning condition to secure a detailed Construction Logistics Plan (CLP). The condition shall state that the detailed CLP shall be required to be approved prior to any works starting on site. Highways licences should not be sought until the CLP has been approved by the planning authority. It should also restrict HGV movement to and from the site to within the hours of 9:30 to 15:00 Monday to Friday, 08:00 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays unless agreed with the CoL in advance.
- A planning condition to secure a Workplace Travel Plan (TP) for the development. The condition shall state that the TP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. The condition shall require the

applicant to undertake a TRICs after survey and to provide TfL and CoL with a copy of the results as part of the travel plan review and monitoring process.

- A planning condition to secure a Car Park Management Plan (CPMP) for the development. The condition shall state how the London Wall Car Park will be managed, subsequent to the proposed access amendments. Details must include matters pertaining to signage, equipment, and measures to control the flow of vehicles within the car park (e.g. occupancy counts on arrival) and adequately mitigate any perceived impacts in this regard. The CPMP should be developed in collaboration with City Operations (CoL) and will be subject to approval. All costs associated with agreed management measures will be borne by the applicant and at no cost to the City of London corporation.
- Technical Approval of all necessary structural elements and associated matters linked to proposed land designation amendments.

829. Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction. It accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2. It also accords with the draft City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

Environmental Impact of Proposals on Surrounding Area

830. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Wind Microclimate

831. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of

London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

832. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

833. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.

834. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.

835. Assessments have been carried out for both the windiest season and the summer season. There are five configurations that have been tested:

- Configuration 1: Existing site and existing surrounds
- Configuration 2: Proposed development and existing surrounds
- Configuration 3: Proposed development with cumulative surrounds
- Configuration 4: Existing site with cumulative surrounds
- Configuration 5: Proposed development with existing surrounds and proposed landscaping.

836. As part of the EIA Scoping Opinion, dated 24th May 2023, Officers requested a sixth configuration, Proposed development with cumulative schemes and wind mitigation measures, be included. The applicant advised that the results from Configuration 1 and Configuration 4 (baseline and future baseline) show that there would be similar wind conditions at and around the site in both (there being no significant influence on the results from cumulative surrounds), and therefore the wind mitigation measures (and landscaping scheme) are expected to provide similar results with the inclusion of cumulative developments.

837. Based on this, the applicants did not consider that Configuration 6 was required, and this was agreed with the LPA and the third-party peer reviewer of the Environmental Statement, and as such has not been provided with the planning application. The assessment below therefore focuses on the above five configurations.

838. Because the proposed buildings are over 50m AOD, both Computational Fluid Dynamics (CFD) and Wind Tunnel Testing have been undertaken by independent experts.

839. The wind tunnel and CFD results broadly give the same assessment results. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

840. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation and architectural features.

841. The City of London Lawson criteria defines the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK, and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.

842. There are four criteria for determining the sensitivity of a receptor:

- High: seating areas, entrances, and terraces
- Moderate: thoroughfares
- Low: high pedestrian traffic thoroughfares
- Negligible: roads and areas of no pedestrian access

843. There are also four criteria for determining the magnitude of change/impact to a receptor:

- Large: Safety exceedance
- Medium: two categories above criteria
- Small: one category above criteria
- Negligible: within suitable criteria.

844. The City of London Lawson Comfort Criteria are as follows:

- Frequent sitting

- Occasional sitting
- Standing
- Walking
- Uncomfortable

Baseline - Configuration 1 and Configuration 4:

845. In configuration 1 (existing site and existing surrounds) in the summer season, the wind conditions are generally suitable for the intended activities, with slightly higher wind speeds in Aldersgate Street and St Martin's Le Grand. In the winter (windier) season, conditions are slightly windier, as can be expected, with a general change to comfort along the highways (Aldersgate Street, St Martin's Le Grand and London Wall) from occasional sitting to standing.

846. In the wind tunnel results, no safety exceedances are shown, however one minor safety exceedance for more than 2 hours (exceedance threshold) is shown in the CFD results on St Martin's Le Grand. It should be noted that CFD results are more onerous than wind tunnel tests. The safety exceedance that would be for more than 2 hours annually is not considered significant, as it is still less than 4 hours annually. There are two more potential safety exceedances identified but they are 1.9 hours annually, under the 2-hour threshold, and are therefore considered negligible.

847. The results for configuration 4 (existing site and cumulative surrounds) show similar results to configuration 1. There is one safety exceedance remaining from that in configuration 1, but overall, the cumulative surrounds remove the main safety exceedance on St Martin's Le Grand, thereby changing the baseline impact from major adverse to negligible. Again, no safety exceedances result from the wind tunnel test.

Demolition and Construction effects

848. The likely effects of nearby receptors from wind during demolition and construction have been assessed qualitatively, taking into account the baseline conditions described above and having regard to the CFD analysis of the completed proposed development. Demolition and construction activities are less sensitive to wind conditions (given their protection from site hoardings, and site access being restricted to site workers) than the completed development with full public access. There would be variety in the effects during demolition and construction given the phased nature of such works, and all effects would be temporary.

Operational effects - Configurations 2, 3 and 5

849. With the proposed development in place (configuration 2) in the summer season, the resultant conditions are suitable mostly for occasional sitting in the 'Events Plaza' and Barber Surgeon's Garden, and mostly frequent sitting in Aldersgate Plaza (outside Ironmonger's Hall).
850. There is a small area of 'standing' to the southern side of the Events Plaza which is due to a funnelling effect coming up from St Martin's Le Grand.
851. Overall, the effects are mostly negligible to minor beneficial over the baseline as they improve up to one category (occasional sitting to frequent sitting in Aldersgate Plaza).
852. In the windier season, conditions are similar to the summer season but the amount of area suitable for occasional sitting is reduced, and there is more of a change to 'standing' in the Events Plaza, which is to be expected during winter. The area of standing within the events plaza would slightly encroach into areas that were intended for outdoor seating associated with café/retail uses. However, there is less of an expectation to be able to be seated outdoors in the windier season (winter) and the results are to be expected. In the summer, these areas see 'frequent sitting' or 'occasional sitting' comfort results.
853. The entrances to the buildings in all seasons are mostly at 'standing', which is considered acceptable.
854. No safety exceedances are identified. The proposed development in configuration 2 also removes the safety exceedance on St Martin's Le Grand found in configuration 1, which is considered a 'major beneficial' effect.
855. The primary difference between the CFD and wind tunnel test results for configuration 2 is that the wind tunnel test found that a larger area in the Events Plaza was suitable for frequent sitting.
856. The results for Configuration 3 (proposed site with cumulative surrounds) show similar results to configuration 2 for ground level including the Events Plaza and Barber Surgeon's Garden.
857. At 'Glade' and Highwalk level, in configuration 2 in the summer, the wind tunnel results mostly show occasional and frequent sitting, with small, isolated instances of standing around the eastern staircase adjacent to the Glade, all of which are suitable for the intended activities. The CFD results accord with this.

858. In winter, less of the central portion of the Glade is suitable for frequent sitting, which is to be expected during the windier season. There are also more areas around the outer edge of the glade and the highwalks that change from occasional sitting to standing.
859. Standing and occasional sitting are acceptable comfort criteria for terraces. This is the case for both the public roof terrace in the Rotunda building and the amenity spaces and roof terrace for tenant use in New Bastion House. This comfort criteria is reached during summer (with some areas suitable for frequent sitting); all balconies within the development achieve occasional or frequent sitting during summer. During winter there is some reduction to standing which is to be expected and in any case is in line with the target comfort criteria for terraces.
860. In configuration 5 (proposed development with existing surrounds and proposed landscaping) at ground level, the results show general improved conditions, with some instances of improving conditions by at least one category compared to configuration 2 (minor to moderate beneficial impact). Frequent and occasional sitting is achieved in most of the outdoor areas, with occasional sitting generally achieved in winter. No safety exceedances are identified, and the CFD results align with the wind tunnel test results.
861. At Glade and Highwalk level, the results for configuration 5 are similar to configuration 2; the highwalks are suitable for occasional and frequent sitting during summer, with some minor areas of standing for Bastion Highwalk during winter. The CFD results for the Glade are mostly in agreement with the configuration 2 results, showing a negligible impact, although the wind tunnel test found the central portion of the Glade during winter is mostly suitable for occasional rather than frequent sitting.
862. At roof terrace level, configuration 5 is similar to configuration 2, with terraces achieving mostly occasional sitting in summer (some frequent sitting achieved), with similar slightly less comfortable conditions during the winter, which is to be expected and is acceptable for the intended activities.
863. The Environmental Statement wind microclimate assessment finds that the Proposed Development in configurations 2 and 5 would result in a mix of Negligible, Moderate/Minor Beneficial and Major Beneficial effects compared to the existing situation (Configurations 1 and 4).
864. There are no mitigation measures required in any of the configurations.

865. During operation of the proposed development, all wind effects are considered negligible with the exception of two:

- Sitting and walking areas on the bridges and Glade – minor to moderate beneficial effect
- Safety exceedance removed from St Martins Le Grand – major beneficial effect.

866. Overall, the wind microclimate impact of the Proposed Development with proposed landscaping is considered to be acceptable.

867. A Wind Audit would be secured in the Unilateral Undertaking which would require, if requested by the Local Planning Authority, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the ES.

868. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan 2040 policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Daylight, Sunlight and Overshadowing

869. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.

870. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

871. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.

872. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may

not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan 2040 states that when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

873. The BRE guidelines “Site layout planning for daylight and sunlight – A guide to good practice” (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

Interpreting results

874. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is *proportionately* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

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

Assessment

876. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE7 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context.

877. An assessment of Daylight Illuminance has also been undertaken. This method provides a more detailed assessment that includes the main factors that affect the daylight appearance of a room including the area of sky visibility, the area of the windows serving the room, the glazing transmittance, the size and shape of the room, reflectance from external surfaces including the proposed development and the internal reflectance of the room, as well as considering climatic data for the site location. The BRE proposes daylight illuminance as a test for new build accommodation where these design factors are commonly available but reasonable estimates can be taken from the BRE guidance and applied to neighbouring residential rooms. BRE recommends at least 150 lux for a living room, 100 lux for a bedroom, and 200 lux for a habitable kitchen; no criteria based on relative change is provided as the criteria is for new build rooms. As the assessment has been applied to the neighbouring properties, the same negligible, minor, moderate, and major categories for relative change have been adopted here.

878. The residential buildings to be considered are those at:

- 2 flats within Ironmongers Hall, Aldersgate Street
- Seddon House, Barbican
- Mountjoy House, Barbican
- Thomas More House, Barbican
- 2-6 Monkwell Square
- Wallside, Barbican

- London House, 172 Aldersgate Street
- 55 Aldersgate Street
- Lauderdale Tower, Barbican
- 1 Little Britain
- 2-3 Little Britain
- 4 Little Britain
- 5 Little Britain
- 6 Little Britain
- Spencer Heights, Bartholomew Close
- 75 Little Britain
- Roman House, Wood Street
- 25 Bartholomew Close
- 60 Aldersgate Street
- Dominion House, 59 Bartholomew Close

879. The religious, educational or community receptors to be considered are those at:

- St Botolph Without Aldersgate
- City of London Girls' School
- St Giles Cripplegate, Fore Street
- Barbican Conservatory, Silk Street

880. An assessment for the following neighbouring commercial properties (including Livery Halls) has also been undertaken:

- Ironmongers Hall, Aldersgate Street
- Monkwell House
- Barber Surgeon's Hall
- Alder Castle House, 10 Noble Street
- 10 Aldersgate Street
- Plaisterer's Hall
- 3 Noble Street
- 88 Wood Street
- Alban Gate, 125 London Wall
- 200 Aldersgate Street
- 1 St Martin's Le Grand
- 5 Aldermanbury Square
- 160 Aldersgate Street
- 20 Little Britain
- 150 Aldersgate Street
- 2 Gresham Street
- Pewterers Hall, Oat Lane (property discounted and analysis not undertaken)

881. When referring to the degree of adverse impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the environmental statement. In forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (draft City Plan policy DE7) it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.

882. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms in adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

Daylight

883. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.
884. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
885. Both the London Plan 2021 and Local Plan 2015 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered when considering any reductions in daylight and sunlight assessed under the BRE methodology.

Existing Baseline results

886. In the baseline condition across all properties tested, 1098 windows out of the 3157 (34.8%) tested would meet BRE's target of 27% VSC. Of the 1146 rooms assessed for NSL, 802 (70%) would receive 80% NSL.
887. For the daylight illuminance test, of the 723 rooms tested, 410 meet the BRE target (56.7%).
888. For Annual Probable Sunlight Hours, a total of 1204 of windows within 90-degrees of due south were tested, and 734 (61%) of them would meet the APSH criteria (i.e. 25% APSH).

Proposed development:

889. Para 13.6.2 of the Environmental Statement Volume 1 outlines that during the design evolution process, the proposed massing on the New Bastion House site was angled away, and set back from the south façade of Mountjoy House to allow increased daylight to 12 bedrooms within Mountjoy House and to allow greater daylight to 2 to 6 Monkwell Square. Similarly, the north elevation of the proposed massing on the Rotunda site was set back and its height reduced to allow greater daylight to flats at 172 Aldersgate Street. The northern commercial site was set back to allow greater daylight to the lower floor flats at 172 Aldersgate Street.

890. The following properties have been assessed as achieving 100% compliance with the BRE guidelines for VSC with the proposed development in place [79.6% (2513 out of 3157 total windows tested)]:

- 55 Aldersgate Street (also meets NSL)
- Lauderdale Tower (also meets NSL)
- 1 Little Britain (also meets NSL)
- 2-3 Little Britain (also meets NSL)
- 4 Little Britain (also meets NSL)
- 5 Little Britain (also meets NSL)
- 6 Little Britain (also meets NSL)
- Spencer Heights, Bartholomew Close
- 75 Little Britain (also meets NSL)
- Alder Castle House
- 10 Aldersgate Street (also meets NSL)
- Wallside, Barbican (also meets NSL)
- Nomura House (also meets NSL)
- St Botolph's Without Aldersgate (also meets NSL)
- Royex House
- Mitre House (also meets NSL)
- 20 Little Britain (also meets NSL)
- Roman House (also meets NSL)
- The Underwood Building (also meets NSL)
- 60 Aldersgate Street (also meets NSL)
- City of London Girls' School (also meets NSL)
- 150 Aldersgate Street (also meets NSL)
- 2 Gresham Street (also meets NSL)
- Dominion House (also meets NSL)
- St Giles Cripplegate (also meets NSL)
- Barbican Conservatory (also meets NSL)

891. The following additional properties are assessed as meeting the BRE criteria for NSL with the proposed development in place in addition to those outlined above [94.1% (1079 out of 1146 total rooms tested)]:

- Seddon House
- Thomas More House
- Barber Surgeon's Hall
- 55 Aldersgate Street
- Lauderdale Tower
- Plaisterer's Hall
- 125 London Wall

892. The assessment below will therefore focus on the buildings with windows/rooms that see a reduction in VSC and/or NSL as a result of the proposed development. For the VSC analysis, a weighted mean has been used and the best-case results have been presented, meaning some variation between the use of windows versus rooms. This is purely a matter of terminology which the BRE Guidelines allow, and the overall methodology for testing VSC is the same for both rooms and windows, and as such Officers are satisfied that the results presented are accurate and in line with guidance.

893. For the daylight illuminance test, 94.7% of the habitable rooms tested meet the BRE criteria target lux levels or retain at least 80% of their baseline levels, a negligible impact.

894. For sunlight, 90.5% of the windows within 90-degrees of due south tested would meet the BRE guidelines for APSH.

Ironmongers' Hall

895. Ironmongers' Hall sits within the site boundary, to the north-west. In the proposed scheme, it is located to the north of the Rotunda Building and the Glade, to the north-west of the New Bastion House, and to the east of the North building.

896. It is an active livery company hall (commercial) with two residential properties within the building on the first and second floors – the Master's Flat (north facing) and the Clerk's Flat (west facing primarily).

897. The non-residential rooms within Ironmongers' Hall would experience minor adverse daylight and/or sunlight impacts, but because they are commercial in nature, the effect to these rooms is not considered to be significant.

898. The Master's Flat contains three rooms served by seven windows. All windows are BRE compliant with regards VSC. All rooms are BRE compliant with regards NSL. All rooms retain a minimum of 80% of their existing daylight illuminance with the proposed development in place. There are no rooms within the Master's Flat that are within 90-degrees of due south. However, the results for these windows still demonstrate that they would meet the target values for APSH were they being considered, as they experience reductions of less than 20% from their existing position.

899. The Clerk's Flat primarily faces west with a small north facing kitchen window and one of the living room windows faces east. This flat is served by five windows

– two of these windows are BRE compliant, whereas the other three see over 40% losses to their existing VSC. However, the existing levels (around 19% VSC) are already below the 27% target, and they would be reduced to around 11%, which is a reasonable result for a dense urban environment, especially where the building is in the middle of the proposed development. Two of these windows also supply bedrooms, which have a lower expectation of natural daylight than living rooms.

900. The Clerk's flat contains four rooms, and three of which are BRE compliant with regards NSL, and the remaining one room would retain 73% of its baseline NSL.

901. None of the four rooms meet the target daylight illuminance levels in the existing situation. In the proposed situation, there is a further reduction of the percentage of area of the room meeting the target lux level of between 8-10%. However, considering the rooms do not meet the target lux levels in the existing situation (achieving between 3% and 31% of the recommended level), the proposed development cannot be seen to reduce the daylight illuminance within the flat to a harmful level when the further reductions are minor.

902. With regards sunlight in the Clerk's Flat, there are three windows within 90-degrees of due south that have been tested for APSH, serving two bedrooms and one living room. The existing annual sunlight for these windows is between 23 and 25%. In the proposed scenario, this drops to between 2 and 6% for annual sunlight, a substantial loss. In winter, the hours drop from 9/10% to zero.

903. Guidance states that a window/room would technically fall below the guidance for sunlight if (a) the room receives less than 25% APSH and experiences more than a 20% change to annual sun, or less than 5% WPSH and more than a 20% change to winter sun; and the same room has a reduction in APSH of 4% or more. Both criteria need to be met for the window/room to fail.

904. In terms of sunlight, the impact to the Clerk's Flat is major adverse. The living room still retains good daylight distribution (the NSL reduction is negligible and BRE compliant) as one of the windows would not be noticeably affected in terms of VSC. It is understood that the Clerk's flat is used Monday-Friday as ancillary accommodation rather than a primary residence. The BRE guidance also states in paragraph 3.2.3 that bedrooms are less important in relation to sunlight, and that "normally loss of sunlight need not be analysed to kitchens and bedrooms..."

905. Therefore, the overall daylight and sunlight impact to the Clerk's flat is considered moderate adverse and the effect is significant.

Seddon House

906. Seddon House is within the Barbican Estate and sits off Aldersgate Street to the north-west of the proposed development, on a roughly southwest-northeast axis. It reaches Lauderdale Tower to the north via Seddon Highwalk, and adjoins Thomas More House and Highwalk to the south. It features deep-set balconies.
907. All windows are BRE complaint with regards VSC and NSL in the proposed scenario. The impact is therefore negligible and the effect is not significant.
908. With regards daylight illuminance, 22 out of 26 rooms meet the target lux level across at least 50% of their floor area, or experience less than a 20% reduction in the area that receives the target lux level. The remaining 4 rooms experience less than a 30% reduction in the area that receives the target lux level. The daylight illuminance impact is considered minor adverse.
909. In sunlight, all windows that face within 90-degrees of due south meet the BRE target for APSH with the proposed development in place. The sunlight impact is therefore considered negligible and the effect is not significant.
910. Overall, the daylight and sunlight impact to Seddon House is negligible and the effect is not significant.

Mountjoy House

911. Mountjoy House is another of the Barbican residential blocks and sits along the same axis as Seddon House, albeit much closer to the proposed development. Its southerly edge directly faces Bastion House. Mountjoy House features deep-set balconies.
912. For daylight, 141 out of 159 windows tested are BRE compliant with regards VSC. 60 out of 67 rooms with windows facing the proposals are BRE compliant with regards NSL. In daylight terms, the conclusion within the ES classified the impact as negligible, and the effect as not significant. Delva Patman Redler, however, acting as a peer reviewer of the Daylight and Sunlight chapter on behalf of the LPA, considers the effect minor adverse.
913. Six of the windows that are not BRE compliant with regards VSC serve circulation spaces and can be disregarded. All seven rooms that do not meet the NSL criteria also serve circulation spaces.

914. The remaining 12 windows that are not BRE compliant with regards VSC serve 12 bedrooms across 12 flats, to the south façade which directly faces the proposed development site. Each bedroom has an additional mitigating window that provides daylight from a different aspect that is unimpacted by the proposed development. This is an acceptable approach. Out of the 12 bedrooms, 9 of them retain 70% or greater of their existing VSC and the remaining 3 would see retention values of 67-69%. The existing VSC in the 'with balcony' scenario is also relatively low, so any percentage reduction appears disproportionate. All other rooms within these flats are BRE compliant for VSC and NSL.

915. The above VSC analysis was undertaken on a 'with balcony' scenario. In the 'without balcony' scenario, which is an acceptable and agreed approach, all rooms would retain a minimum of 80% of their existing VSC. The existing VSC in the 'without balcony' scenario is in the mid-high twenties (percent) and the retained values with the proposed development in place is low to mid-twenties (percent). The retained values are therefore considered good.

916. In daylight illuminance terms, all 60 habitable rooms meet their target lux level across at least 50% of the floor area or experience less than a 20% reduction in the area that receives the target lux level.

917. In sunlight terms, 10 out of 25 windows that face within 90-degrees of due south are BRE compliant for APSH with the proposed development in place. Of the remaining 15 windows, none of them serve main living spaces, and as above, the BRE Guidance states that "normally loss of sunlight need not be analysed to kitchens and bedrooms..."

918. Overall, the daylight and sunlight impact to Mountjoy House is considered negligible to minor adverse and the effect is not significant.

Thomas More House

919. Thomas More House sits between the southern part of Seddon House and the northern part of Mountjoy House. It has deep-set balconies along its southern façade which face the proposed development.

920. For daylight analysis, 205 out of 213 rooms are BRE compliant with regards VSC, and all rooms meet the NSL criteria with the proposed development in place. Of the rooms that do not meet the target values, the percentage losses are all between 20 and 30%, being minor adverse. The overall daylight impact is therefore negligible-minor adverse and the effect is not significant.

921. For daylight illuminance, 206 out of 213 rooms meet their target lux level across at least 50% of the floor area or experience less than a 20% reduction in the area that receives the target level of lux.

922. For sunlight, 322 out of 326 windows that face within 90-degrees of due south meet the target value for APSH. None of the 4 windows that fail serve main living spaces. The impact is therefore negligible and the effect is not significant.

923. Overall, although there are some minor adverse impacts to VSC and daylight illuminance, there is a negligible impact on NSL and the overall daylight and sunlight impact to Thomas More House is minor adverse and the effect is not significant.

2-6 Monkwell Square

924. 2-6 Monkwell Square sits to the east of the application site, to the north of London Wall and faces west across City Walls & Tower and north into Monkwell Square. There are five flats within this property. The applicant obtained layouts for 2 Monkwell Square which were used for the analysis for that flat and formed the basis of the assumptions for the other flats within this building where layouts were not available.

925. The ground floor does not serve habitable space and the first-floor space for 1 Monkwell Square is commercial with central windows serving a stair core not within the residential element of the building. The assessment therefore focuses on windows within the residential properties, where there are 12 habitable rooms. Circulation spaces and commercial space are less sensitive to daylight and sunlight impacts so any reductions are considered negligible.

926. For daylight, all windows in 2-6 Monkwell Square that were assessed are BRE compliant with regards VSC. Five out of 12 rooms are BRE compliant with regards NSL. Three of the remaining seven rooms that are not BRE compliant on NSL retain between 70 and 80% of their existing NSL which is considered minor adverse. Two bedrooms would retain 68% NSL, which is considered moderate adverse. One living room would retain 57% of its existing NSL, a loss of over 40%, and as such is considered major adverse.

927. Daylight illuminance has been undertaken to gain a greater understanding of the daylight impacts to this property in light of the adverse NSL impacts described above. The retained daylight illuminance to 6 out of 12 habitable rooms is 80% or greater of the existing level and therefore considered negligible. Of the remaining

6 rooms, 5 would retain between 70 and 80% of their existing daylight illuminance which is considered minor adverse. The remaining room is a bedroom which would retain 67% of its existing daylight illuminance (moderate adverse impact); however, when looking at the overall daylight quality to this room, it would retain 84% VSC (negligible impact) and 79% NSL (minor adverse impact).

928. With regards sunlight, all living rooms with windows within 90-degrees of due south meet the BRE guidelines target value for APSH. The impact is therefore negligible and the effect is not significant.

929. The BRE Guidelines state that bedrooms are less important when considering NSL and no guidance is provided for reductions in daylight illuminance. As all bedrooms in this property would retain at least 80% of their VSC, daylight impacts are considered negligible or would rise only to minor adverse when taking into account the daylight illuminance reductions.

930. Living rooms have a greater expectation of daylight and sunlight than other room types. Four out of five living rooms in this property would experience negligible impact to all three daylight measures tested. The living room at 2 Monkwell Square shows negligible impact to VSC and daylight illuminance, while NSL shows major adverse. When taking daylight in the round with all three tests, there would only be a small absolute loss in daylight to this room and overall the impact is considered minor adverse.

931. Overall, the impacts to this property are considered minor adverse and the effect is not significant.

172 Aldersgate Street

932. 172 Aldersgate Street, also known as London House, sits to the west of the proposed development. It is commercial on the ground floor with residential properties above. Layouts have been obtained for these properties.

933. In terms of daylight, 95 out of the 138 windows are in accordance with the BRE guidelines. 106 out of 120 rooms with windows facing the proposal meet the NSL target value with the proposed development in place.

934. Of the 43 windows that would experience more than a 20% loss of their existing VSC, 35 would retain between 70 and 80% of their existing VSC which is considered a minor adverse impact, and the effect is not significant. The remaining 9 windows would see between 60 and 70% retention values, which is moderate

adverse. Of these 9, one serves a kitchen which is below habitable size, and 6 are within rooms that are served by additional windows which is a mitigating factor. 2 remaining windows would experience a 31% loss of VSC (i.e. 69% retained value) which is moderate adverse.

935. Out of the 14 rooms which would not meet the BRE Guidelines for NSL, one is a kitchen on the 10th floor which is below 13sqm and is therefore not a habitable room, and seven are bedrooms which are less sensitive to reductions in NSL. Therefore, the impact to these 8 rooms is considered negligible-minor.

936. Of the 6 remaining rooms, two retain at least 70% of their existing NSL which is considered a minor adverse impact. Two living rooms retain 60% of their existing NSL which is considered moderate adverse impact, and two retain 55% and 57% of their NSL which is major adverse impact. However, impacts to these four rooms in terms of VSC are negligible to minor adverse.

937. Where there is different levels of impact and significance shown between the VSC and NSL results, daylight illuminance can provide a useful third test reference to gain an overall picture of daylight to the rooms, which takes into account reflected light. The observed impact to daylight illuminance to these four rooms is considered minor adverse. Overall, therefore the daylight conditions in these four rooms are considered minor adverse and the effect is not significant.

938. In terms of sunlight, 46 out of 47 living rooms with windows that face within 90-degrees of due south would meet the BRE target value for APSH, which is negligible. Room 1 on the 8th floor of this property would experience a major adverse impact to its sunlight, that being a retention value of only 49% of its existing APSH. In absolute terms, the room would retain 22% APSH, just below the 25% target. Although the impact is moderate adverse in relative terms, considering that it is limited to one room within one flat and it is close to the target value of 25%, the overall impact is considered minor adverse.

939. Overall, the impact to this property in terms of daylight and sunlight is considered minor adverse and the effect is not significant.

Spencer Heights, Bartholomew Close

940. Spencer Heights is a residential apartment block to the west of the development site.

941. All windows tested in this building are BRE compliant with regards VSC, and 71 out of 76 rooms tested are BRE compliant with regards NSL. All five rooms that are not BRE compliant would experience no greater than a 30% reduction in NSL, which is considered minor adverse.

942. For daylight illuminance, 74 out of 76 rooms would meet their target Lux levels for at least 50% of the floor area, or experience less than a 20% reduction in the area that receives the target level of lux. One of the rooms that does not meet the target lux levels would experience a 22% reduction, so is considered minor adverse. The other room that fails would go from having 1% of its area meeting the target value (0.08sqm) to 0%, which is a very small absolute change but a disproportionate percentage reduction. This is also considered minor adverse.

943. In terms of sunlight, all windows that face within 90-degrees of due south would meet the target value for APSH with the proposed development in place. The impact is therefore negligible and the effect is not significant.

944. The overall impact on daylight and sunlight to this property is minor adverse and the effect is not significant.

Plasterers' Hall

945. Plasterers' Hall is a livery hall with commercial office space above. It sits directly to the south of the proposed development site. Commercial buildings are of low sensitivity to daylight and sunlight impacts.

946. In terms of daylight, 146 out of 324 windows and 3 out of 13 rooms tested are BRE compliant in regards VSC. All 13 of these rooms would meet the BRE criteria with regards NSL.

947. For VSC, the remaining windows that do not meet the BRE guidelines are from the second floor upwards and would experience reductions of up to 43%, but would retain at least 15% VSC in absolute terms. This is considered a moderate to major impact.

948. The first-floor windows and rooms would experience greater VSC impacts of up to 80% for windows, or 64% for the room), but the windows are recessed into the massing of the host property itself, thereby naturally limiting access to daylight and sunlight as existing. The windows on the first floor would experience small absolute losses in VSC of 3-4%, but these result in disproportionately large relative reductions due to the low existing levels.

949. As Plaisterers' Hall is commercial in nature, it has less of an expectation of good daylight and sunlight levels than residential properties. It is also hampered by its own massing and in particular the second-floor overhang which restricts daylight to the first floor considerably.

950. Overall, the impact is considered moderate adverse, but given the use of the building, the effect is not significant. A query was raised on this point by the peer reviewer of the daylight and sunlight chapter, who could not agree that the effect was not significant. Officers, however, agree with the submitted assessment and as explained above, whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it would not prevent the beneficial use of their intended occupation.

Conclusion on Daylight & Sunlight impact

951. The submitted Daylight and Sunlight chapter of the Environmental Statement shows an overall high level of compliance with the BRE Guidelines 2022 on the majority of properties tested.

952. Seddon House, Mountjoy House, Thomas More House, 2-6 Monkwell House, 172 Aldersgate Street and Spencer Heights would all experience minor adverse impacts with the effect not being significant. An overall good level of daylight and sunlight would continue to be experienced by these properties.

953. Plaisterers' Hall would experience a moderate adverse impact but given its use as commercial and that its results are inherently affected by the design of the building itself, the effect is not significant.

954. Ironmonger's Hall, in the centre of the application site, would experience moderate adverse impact, the effect of which is significant. There would be a major adverse impact with regards sunlight to the Clerk's Flat, although it should be noted that the living room affected would still retain good daylight distribution and windows would not be noticeably affected in terms of VSC. Bedrooms also are less important in relation to sunlight. It should also be noted that it is ancillary accommodation used by the Clerk and is not a permanent dwellinghouse. Overall, it is considered that there is a minor amount of harm to the living conditions within the Clerk's Flat, which is to be expected of the dense urban environment it is within, particularly in the context of the proposed development site bordering it on three sides.

955. Overall, whilst there are some impacts in excess of BRE guidance, due to the context of the individual properties assessed it is not considered that the proposal would result in unacceptable impacts overall and is therefore in compliance with

Local Plan Policy DM10.7, London Plan Policy D6(d), and Draft City Plan 2040 Policy DE7.

Transient Overshadowing

956. The BRE guidelines advise that sunlight amenity is measured on 21st March (spring equinox) and the result is expressed as a percentage of the amenity area that receives at least two hours of sunlight on 21st March. The sunlight amenity and transient overshadowing analysis was undertaken in accordance with the guidelines.

957. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed against the Baseline Scenario.

958. The surrounding amenity areas considered sensitive to overshadowing as well as their baseline results are as follows:

Amenity Area	Percentage of area receiving 2+ hours of sunlight on March 21 st
Space between Aldersgate Street and Seddon House	44%
Barbican Tennis Courts (used by Girls School)	76%
Mountjoy House	90%
Thomas More House	92%
Monkwell Square	59%
City Walls & Tower	45%
Lakeside Terrace, Barbican	100%
Mountjoy Open Air Theatre, Barbican	32%
Speed Garden, Barbican	97%
Thomas More Residents Gardens	67%
Barbican Water Gardens	19%
City Walls & Tower – North	3%

959. The results of the Sunlight Hours on the Ground (SHOG) test for the surrounding amenity areas with the proposed development in place are as follows:

Amenity Area	Percentage of area receiving 2+ hours of sunlight on March 21 st	Percentage ratio between baseline and proposed
Space between Aldersgate Street and Seddon House	44%	100%
Barbican Tennis Courts	72%	96%
Mountjoy House	71%	79%
Thomas More House	90%	98%

Monkwell Square	57%	97%
City Walls & Tower	42%	95%
Lakeside Terrace, Barbican	100%	100%
Mountjoy Open Air Theatre, Barbican	29%	92%
Speed Garden, Barbican	97%	100%
Thomas More Residents Gardens	67%	100%
Barbican Water Gardens	19%	100%
City Walls & Tower – North	0%	0%

960. As shown in the table above, the surrounding amenity areas have been quantitatively assessed against the BRE sun hours on ground criteria. Most amenity areas would see little to no alteration (0-8% change) from the percentage of total area which sees at least two hours of direct sunlight on March 21st, when comparing the baseline scenario with the Proposed Development scenario. The exceptions to this are Mountjoy House (percentage reduction of 21%) and City Walls and Tower North (percentage reduction of 100%).

961. Mountjoy House would see a 79% reduction in the amount of area that receives 2 hours of sun on the 21st March over the existing situation with the proposed development in place. However, 71% of the area analysed would still receive 2 hours or more of direct sunlight on the 21st of March which is considered a positive result, and therefore the impact is negligible-minor adverse and the effect is not significant.

962. The City Walls and Tower (North) is located immediately to the north of 1-16 Wallside and to the south of the lake that separates Wallside from St Giles Cripplegate, and features remnants of the ancient City Wall and Towers. Although it would see a percentage reduction of 100% over the existing scenario with the proposed development in place, it is not well sunlit in the baseline (3% of the area receives more than 2 hours of sun on ground on 21st March). The actual reduction in the 'well sunlit' area is 11.4sq.m. On this basis, the impact is considered minor adverse and the effect is not significant.

76. The proposed development was also assessed for transient shadowing.

Proposed development:

21st March

963. On this day, there would be some additional shadow cast from the proposed development to 200 Aldersgate Street (commercial) between 7am and 10am and

to 125 London Wall (commercial) between 5pm and 8pm. As these are both commercial buildings, the effects are not significant.

964. There is some additional shadow to parts of 172 Aldersgate Street between 9am and 11am. This is a residential property and therefore the effect is minor adverse but the effect is not significant given the minor adverse impact to this property in APSH.

965. All other shadows cast by the proposed development are comparable to the baseline on 21st March.

21st June

966. On this day some additional shadow would be cast from the Proposed Development to 200 Aldersgate Street between 4am and 10am and to 125 London Wall between 5pm and 8pm. Again, these are commercial buildings so the effect is not significant.

967. Some additional shadow would also be cast to 172 Aldersgate Street between 9am and 10am. However, there would be a minor impact to APSH to this residential property, and given the additional shadow is only for one hour, the impact is minor adverse and the effect is not significant.

968. There would also be some additional shadow cast from the proposed development to Barber Surgeon's Hall between 4pm and 5pm. The Hall is already shadowed at this time in the baseline and the increase in shadow is small, so therefore the impact is negligible and the effect is not significant.

969. All other shadows cast by the proposed development are comparable to the baseline on 21st June.

21st December

970. On this day some additional shadow would be cast from the Proposed Development to 172 Aldersgate Street between 10am and 11am. This would affect a small part of this residential façade and is considered minor adverse. There would only be a minor adverse impact to APSH. As such, the effect is not significant.

971. There would also be some additional shadow to a small area of Thomas More House between 11am and 2pm. The shadow is relatively small and passes along the façade of the building as the sun moves so would not linger on any one group of residential properties. Bastion House causes a similar shadow to pass along

the façade in the baseline position. The impact is therefore minor adverse and the effect is not significant.

972. All other shadows cast by the proposed development are comparable to the baseline on 21st December.

973. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area or surrounding properties and therefore the proposal complies with, policy D6 of the London Plan, DM10.7 of the Local Plan and DE7 of the emerging City Plan.

Solar Glare

974. Glare is the discomfort or impairment of vision caused by excessive or large contrasts in luminance within the observer's field of view, and can occur when sunlight is reflected from a glazed façade. There are two categories of glare: distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high luminance source within a low luminance scene which impairs vision).

975. For discomfort glare, the key issue is the total duration of time for which the sun can be reflected to the sensitive location. Durations of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.

976. The assessment assumes a day with no cloud cover and so the maximum potential sunlight is assessed. No change in climate will alter the effect of the analysis.

977. 7 road locations and 4 residential receptors have been identified in the ES as sensitive to solar glare within 1 km of the site. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions and pedestrian crossings at these locations. The locations are as follows (receptor number):

- Junction of Aldersgate Street and Gresham Street (1)
- Approaching junction of Rotunda and Aldersgate Street northbound (2)
- Approaching Rotunda on London Wall westbound (3)
- Approaching junction of Rotunda and London Wall (Noble Street) westbound (4)
- Approaching junction of Rotunda and Montague Street eastbound (5)

- Approaching junction of Rotunda and Aldersgate Street southbound (6)
- Junction of Aldersgate Street, Long Lane and Beech Street southbound (7)
- Mountjoy House (B1/B2, C1/C2)
- Thomas More House (D1/D1, E1/E2)
- Monkwell House (A1/A2)
- 172 Aldersgate Street (F1/F2)

Road receptor 1

978. There is potential for solar glare to occur on the southern façade of the Rotunda Building around midday from October to February, although this would not affect the central field of view. There is also the potential for some minor glare around midday in April to August.

979. The results for road receptor 1 show that the viewpoints would be affected by potential solar glare from the proposed development for approximately 9 hours per year using local climate data, which is significantly below the recommended threshold of 50 hours at which point discomfort glare has greater potential to become harmful. Therefore, the solar glare at this receptor is minor adverse and the effect is not significant.

Road receptor 2

980. There is the potential for solar glare to occur on the southern façade of Rotunda building at midday from February to October. This does not affect the central view.

981. The results show that receptor 2 would be affected by solar glare from the proposed development for approximately 46 hours per year using local climate data, which is slightly less than the recommended threshold of 50 hours. As this receptor is at a junction, where one would expect a motorist to slow down to check traffic, it is considered that this impact is minor adverse and the effect is not significant.

Road receptor 3

982. There is potential for solar glare to occur in this location on the eastern façade of New Bastion House in the early morning from March to September. There is also the potential for solar glare on the southern façade of New Bastion House in the afternoon from May to July, February to March and September to October. There is also potential for solar glare to occur on the eastern façade of New

Bastion House from 9am-10am from January to March and September to November.

983. The results show that receptor 3 would be affected by potential solar glare from the proposed development for 85 hours per year using local climate data, which is significantly above the 50 hours threshold where discomfort glare has the greater potential to become harmful.

984. However, the report notes that none of the glare results reported would affect central field of view. The design of the New Bastion House has also been optimised and glazing would be broken up by less reflective parts of the building structure, so glare would not be continuous.

Road receptor 4

985. There is the potential for solar glare to occur on the eastern façade of New Bastion House in the early morning from March to September. There is also the potential for solar glare from much of the facades of the proposed development in this location from May to September from 8am to 1pm. However, all the potential glare is outside of the central field of vision.

986. The results show receptor 4 would be affected by potential solar glare for approximately 139 hours per year over the 50-hour threshold. The submitted report states that although the amount of glare significantly exceeds the threshold, because the glare is outside of the central field of vision, the glare is considered minor adverse and not significant. Officers, however, consider the potential glare to be minor to moderate adverse, although not significant given the fact it is outside the central field of vision and mitigating measures can be put in place.

Road receptor 5

987. In this location, there is potential for solar glare to occur on the south-western façade of the Rotunda building from April to August, however it is far from the central field of vision.

988. The results show potential for solar glare for approximately 21 hours per year, which is under the 50-hour threshold. As such, potential glare in this location is considered minor adverse and the effect is not significant.

Road receptor 6

989. There is potential for solar glare to occur on the western façade of Rotunda building from approximately 3pm to 4pm from February to October. This is outside the central field of view and as the glazing would be broken up in the design, the glare would not be continuous.

990. The results show the potential for glare at this receptor for 49.9 hours of the year, just below the 50-hour threshold. Although this is close to the threshold, as it is only for one hour, would not be continuous and is outside the central field of view, the impact is considered minor adverse and the effect is not significant.

Road receptor 7

991. There is the potential for solar glare to occur on the western façade of the Rotunda building from 3pm to 4pm from January to March and September to November, with an additional small area of glare at 5am from March to April and August to September. None of this glare would be in the central field of view.

992. The results show the potential for glare at this receptor for 4 hours per year, well below the 50-hour threshold.

993. As such, the potential solar glare in this location is considered minor adverse and the effect is not significant.

Residential receptor A – Monkwell House

994. Views A1 and A2 show a view out of Monkwell House towards the proposed development on the first and top floors.

995. There is potential for solar glare on the eastern façade of New Bastion House from 8am-11am from February to October, as well as a small area of glare at midday from January to February and October to November. The potential for glare is similar on the first and top floors and therefore is likely replicated over the whole of the Monkwell House building.

996. None of the glare would affect the central field of view and as it has been taken from the façade line, may not penetrate deeply into the rooms within Monkwell House.

997. The results show potential for solar glare for 177 hours per year on the first floor and 212 hours per year on the top floor, which is well in excess of the 50-hour threshold.

998. The existing Bastion House presents a large wall facing Monkwell House which has a significant portion of glazing in the same orientation in the baseline position. The east elevation of New Bastion House would include areas of glazing broken up by strips of non-glazed areas, similar to the existing Bastion House. New Bastion House would also feature fins to further temper solar glare. The glare from the proposed new building could be tempered through the use of non-reflective glass coatings or fritting.

999. The potential solar glare arising to this receptor is major adverse and the effect is significant. Mitigation measures through design are recommended and to be secured by planning obligation.

Residential Receptor B – Mountjoy House

1000. Views B1 and B2 show views out of a flat in the south-eastern corner of Mountjoy House facing towards the proposed development on the first and top floors.

1001. Views C1 and C2 show views out of a flat located in the south-western corner of Mountjoy House facing towards the proposed development on the first and top floors.

1002. The results for B1/B2 show the potential for glare as follows:

- From the northern aspect of New Bastion House at 7am-4pm from March to September on lowest floors and between 5am-8am and 6pm-7pm from March to September on the higher floors
- On the lower floors from the eastern aspect of Rotunda building between 9am-12pm from September to March and at 10am from May to July.
- On the upper floors from the eastern aspect of Rotunda building at 10am from October to February and at 8am from May to July.

1003. The results for C1/C2 show the potential for glare as follows: From the northern aspect of New Bastion House at 7am and 6pm from March to September on lower floors and between 6am-7am and 10am-3pm from January to November on the highest floors:

- On the lower floors from the eastern aspect of Rotunda building at 12pm from September to March and from May to July
- On the upper floors from the eastern aspect of Rotunda from 5am-7am March to May and July to September.

1004. The results show the potential for solar glare towards this receptor for between 29 and 42 hours for rooms on the lower floors and between 33 and 53 hours per year for the upper floors. As such the majority of rooms are likely to experience

less solar glare than the recommended threshold of 50-hours, and where rooms exceed the threshold, they are close to the threshold.

1005. Overall, the potential solar glare impacts are minor adverse and the effect is not significant.

Residential Receptor C – Thomas More House

1006. Views D1/D2 show a view out of a flat located to the eastern end of Thomas More House facing towards the proposed development on the first and top floors.

1007. Views E1/E2 show a view out of a flat located to the western end of Thomas More House facing towards the proposed development on the first and top floors.

1008. The results for D1/D2 show the potential for solar glare as follows:

- To lower floors from eastern façade of Rotunda building from 11am to 6pm September to March.
- To upper floors from eastern façade of Rotunda from 5am to 9am from March to May and July to September.

- The results for E1/E2 show the potential for solar glare as follows:
 - To lower floors from western façade of New Bastion House from 4pm to 5pm from March to September with a small area of glare at 10am from January-February and October-November.
 - To lower floors from western façade of Rotunda from 1pm-3pm from January to March and September to November
 - To upper floors from western façade of New Bastion House from 5pm-7pm from March to September, and at 7am from March to September from western façade of Rotunda.

1009. The results show that the potential for solar glare would be between 6 and 15 hours for rooms on the lower floors and between 10 and 14 hours for the upper floors. This is significantly below the 50-hour threshold and as such the potential for solar glare is minor adverse and the effect is not significant.

Residential Receptor D – 172 Aldersgate Street

1010. Views F1/F2 show a view out of a flat located in 172 Aldersgate Street facing towards the proposed development on the first and top floors.

1011. There is the potential for solar glare to occur on the western façade of New Bastion House at 5pm in summer months, but they are small areas and distant from the receptor.

1012. There is also potential for some glare from western façade of Rotunda between 3pm-5pm on the lower floors and 4pm-6pm on the upper floors in the summer months. Much of this glare would occur obliquely to the perpendicular view.

1013. The results show the hours of potential glare would range between 39 and 43 hours per year, under the 50-hour threshold. As such, the potential glare to this receptor is minor adverse and the effect is not significant.

Solar Glare conclusion

1014. Overall, the potential impact of solar glare from the proposed development on neighbouring road and residential receptors is considered minor-moderate adverse but the effects are not considered significant.

1015. Aluminium fins and ceramic fritting on the external glass façades of both the Rotunda and New Bastion House buildings would act to reduce both the incidence of solar glare and the light pollution by restricting the passage of light or reflected light from the façade of the proposal to neighbouring windows. The external lighting scheme has also been designed to minimise light spill beyond the paths and roads around the proposed development and to preserve darker open spaces adjacent the site. Final details of the proposed solar glare mitigation measures are secured through detailed design conditions / Unilateral Undertaking.

1016. Overall, subject to the mitigation measures identified it is considered that the effects on Solar Glare would be acceptable.

1017. If planning permission were to be granted, an obligation within the Unilateral Undertaking would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of any mitigation measures (if considered necessary). The development would comply with policy D9 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Spill

1018. Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3 requires that development should incorporate measures to reduce light spillage particularly

where it would impact adversely on neighbouring occupiers. Draft policy HS3 (Residential Environment) states that light spill from development that could affect residential areas should be minimised in line with policy DE9.

1019. The potential light spillage impacts arising from the Proposed Development upon the surrounding existing residential buildings has been assessed. The following primarily residential properties have been identified as light spill receptors of moderate-high sensitivity:

- Ironmongers Hall
- Mountjoy House
- Thomas More House
- Monkwell House
- 172 Aldersgate Street
- 55 Aldersgate Street

1020. The assessment shows that post-curfew (after 11pm), the levels of light trespass would be below the 5-lux threshold set out within the ILP guidance for five of the buildings assessed and concludes negligible and no significant effects.

1021. At 172 Aldersgate Street, located directly opposite the proposed development to the west, light spillage in the baseline would be 11lux, exceeding the 5-lux threshold set out in ILP Guidance to the site facing windows. An assessment has been undertaken both with and without street lighting with the proposed development in place. The results show there would be no additional light spill from the proposed development in isolation, although there would be some light spill greater than 5-lux with the street lighting in place but this is limited to ground and part of the first floor of this property. There is a requirement for street lighting in this location and the additional light spillage is not caused by the proposed development. Therefore, the impact is negligible from the proposed development and the effect is not significant.

1022. Concern was raised by the third-party reviewer of the Light Spill assessment on behalf of the LPA that the technical assessment for Light Spill had not been conducted correctly. In response to this, the applicant asserts that the analysis of the potential light spill from the proposed development assumes that future occupants of the proposed development would follow the lighting guidance within the CoL Lighting SPD which is why no additional light spillage is shown in the assessment despite considerable amounts of glazing on the proposed buildings. Officers accept that it is the case the proposed development would need to abide by the requirements of the Lighting SPD, to be secured by condition, and that includes future tenants.

1023. A condition has been included which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

1024. Subject to the relevant lighting condition, the development would comply with the Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3 and has been designed as to avoid light spill.

Thermal Comfort Assessment

1025. London Plan Policy D8 and D9 and the emerging City Plan 2040 Policy S8 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

1026. In accordance with the City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared. The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

1027. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location.

1028. Three configurations have been assessed, including; the existing site with existing surrounding buildings at ground level, the proposed development with existing surrounding buildings at ground/podium/terraces and balconies level, and the proposed development with cumulative surroundings at ground/podium/terraces and balconies level.

Usage Category	% of hours with Acceptable UTCI	Description	Colour
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange
Transient	<25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).	Red

Baseline Ground Level

1029. The existing conditions at ground level are largely in the ‘Seasonal’ category around the site. Some areas fall within the ‘All seasons’ comfort category, whilst some areas to the northwest of the site, notably along Aldersgate Street and on the inside edge of Seddon House, are ‘Short-term’. There are isolated instances of ‘short-term seasonal’ conditions to the south, notably in the same regions as those with wind safety exceedances described above.

1030. When looking at the percentage of comfort in different areas of the baseline during summer and winter, in the summer results most of the surrounding area and the Site are comfortable for at least 97% of the time. There are some instances within the Barbican (notably the residents garden and the sports courts) that would drop down to being comfortably 95% of the time, although this is negligible. In the winter season, as can be expected, comfort for most of the site and surrounds drops to around 70% of the time, although along Aldersgate Street and the roundabout to St Martins Le Grand have instances of between 30% and 65%, which roughly corresponds to the areas with higher wind speeds described in the ‘Wind Microclimate’ section above. The spring and autumn percentage comfort levels are very similar, with good comfort percentages of 80% or above.

Proposed development (with existing surrounds) - Ground Level

1031. In the proposed with existing surrounds scenario, the results are very similar to the baseline. The 'short term seasonal' condition to the inside edge of Seddon House is removed, but there are more instances of 'short term seasonal' along Aldersgate Street, outside the North building and Aldersgate Plaza but in the centre of the highway. This is mostly attributed to increased wind speeds, but as above the wind microclimate would be suitable for the intended activities, and in thermal comfort terms, increased wind speed may cause positive results through improved air quality.
1032. The sports courts between the site and Thomas More House would see a slight improvement from 'Seasonal' to 'all season' for the majority of the space. The Events Plaza within the development itself would see mostly 'seasonal' comfort.
1033. In the summer season, comfort across the site and surrounds would be mostly between 97% and 100% of the time, with similar instances to the baseline of 95% within the Barbican complex itself. In the winter season, there are regions in the north-west of the site that would experience comfort levels around 50% of the time; these again correspond with the higher wind speeds and are apparent in the baseline. The spring and autumn seasons would be similar again; in spring a majority of the site would be above 80%, and in autumn the results are similar but there would be a wider spectrum of comfort percentages (as to be expected), but overall in a positive way, particularly along Aldersgate Street.

Proposed development (cumulative) – Ground level

1034. The results for the proposed development with cumulative scenario are similar to the proposed development with existing baseline scenario, meaning there are no nearby cumulative developments that would impact the thermal comfort around the site with the proposed development in situ.
1035. In summer, the percentage levels of comfort across the site and surroundings would be high (above 95%). In winter, however, the increased wind speed in the roads decreases the percentage of comfort quite considerably along Aldersgate Street and St Martins Le Grand, and would also cause a slight worsening around the proposed buildings edges, although they would still achieve suitable comfort levels between 65% and 100%, suitable for their intended activities.
1036. In spring and autumn, comfort level percentages exceed 80% although there is a slight drop in comfort to the southern buildings along London Wall/St Martins Le Grand junction. However, there would still be a good level of comfort.

Proposed development (with existing surrounds) – Podium level

1037. At Podium level with the proposed development (existing surrounds), the majority of the space would achieve 'seasonal' or 'all season' comfort. There are some very minor, isolated instances of 'short term' comfort, and once again this accords with the higher wind speeds around the Glade, described above.

1038. Looking at the summer and winter comfort percentages, it is evident that there would be a decline in comfort in the central part of the site, around the Glade, in winter. Again, this is attributed to the increased wind speeds there, and particularly around the stairs to the east of the Glade, which is a transitory space. Parts of the upper bowl of the Glade itself would also see reductions, but this is mostly in locations where the dedicated landscaping would be, rather than public access. The spring and autumn comfort levels are similar to each other again, with percentages sitting between those experienced in summer and winter with the main declines again being around the Glade.

Proposed development (cumulative) – Podium level

1039. The results in the cumulative scenario at Podium level are very similar to the existing surrounds although slightly less of the North Garden would achieve 'all season' comfort, instead moving to 'seasonal'.

1040. The seasonal results are similar to the proposed development with existing surrounds scenario, and the podium level of the proposed development would experience and maintain a high degree of comfort.

Proposed development (with existing surrounds) – Terrace level

1041. The terrace levels, being the public roof terrace to the Rotunda Building, the private amenity roof terrace at New Bastion House, and the private amenity roof terrace on the North Building, would all achieve either 'all season' or 'seasonal' comfort with the proposed development in situ in the existing surrounds. Notably, the public roof terrace to the Rotunda building to the west of the site would achieve greater 'all season' comfort than the private roof terraces.

1042. In summer, all terraces maintain a high level of comfort, above 95%. In winter, there is a broader spectrum of comfort percentages, between 30 and 100%, with the 'worst' conditions to the private terrace to New Bastion House. The public terrace to the Rotunda would maintain a very high level of comfort in the winter. In spring and autumn there are similar results split across the private versus public terrace on the two main buildings, but all terraces would maintain a good level of comfort of above 70%.

Proposed development (cumulative) – Terrace level

1043. The results in the cumulative scenario at roof terrace level are very similar to the existing surrounds with the proposed development, with all achieving either 'seasonal' or 'all season' comfort bar some isolated instances of 'short term' comfort to the roof terrace on new Bastion House.

1044. In the seasonal percentage analysis, the results in the cumulative scenario are very similar to the proposed development in baseline.

Proposed development (with existing surrounds and cumulative) – Balconies level

1045. The proposed Rotunda Building and New Bastion House feature balconies all across their 'inward' facing facades (east façade of Rotunda and west façade of Bastion). The majority of the balconies in the existing surrounds scenario would achieve 'all season' comfort with some achieving 'seasonal' comfort, which is mostly replicated in the cumulative scenario.

1046. In the seasonal comfort percentages results, the balconies to the western elevation of New Bastion House would experience slightly more varied results than those on the eastern elevation of Rotunda, but would still experience good comfort of at least 95% in summer, at least 80% in winter, spring and autumn. This is true in both the existing and cumulative surrounds with the proposed development scenarios.

Thermal Comfort Conclusion

1047. It is considered that the thermal comfort in and around the site would be acceptable and in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Noise and Vibration

1048. Noise from the development is a concern for those raising objection to the scheme. A summary of the main noise related objections are set out below:

- Increased traffic on the servicing ramp would result in noise for residents.
- There would be potential noise from the roof garden on the North building and event and entertainment space (given that the event space would end at activities at 11 pm, this implies that residents would have no quiet during waking hours).

- The noise impact of the activity/use of new buildings and thoroughfares has not been considered..
- The new visible and easily accessible highwalk is a potential site of noise and disturbance from antisocial behaviour.
- Noise from plant has potential to cause nuisance.
- Noise from construction. Flats would be uninhabitable during the day, particularly Mountjoy with single glazing and windows would not be able to open. There is significant risk that levels of noise could exceed the Unacceptable Adverse Effect Level which national policy in the Noise Policy Statement for England (NPSE) and the Noise PPG state should be avoided to prevent significant medically definable harm. Construction noise would also impact on the operation of Ironmongers' Hall.
- The impact of construction noise on the school playing grounds.

1049. The development plan sets out a series of noise policies that need to be taken into consideration in the assessment of the case. This includes policy DM15.7 of the Local Plan, which relates to noise and light pollution. A summary of the main noise related points from policy DM15.7 are set out below:

- Developers will be required to consider the impact of their development on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as housing and quite open spaces.
- Any potential noise conflict between existing activities and new development should be minimised.
- Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
- Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

1050. Policy DM21.3 of the Local Plan further seeks to protect the amenity of existing residents by resisting uses that would cause undue noise disturbance and seeks to ensure that noise generating uses are sited away from residential uses where possible.

1051. Policy DM3.5 of the Local Plan states that proposals for new night time entertainment related uses will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on the

amenity of residents and other noise sensitive uses and environmental amenity, taking account of the potential noise, disturbance and odours arising for the operation of the premises, customers arriving at and leaving and the servicing of the premises. Applicants would be required to submit Management Statements detailing how these issues would be addressed during the operation of the premises.

1052. The draft City Plan 2040 has policies relating to the prevention of noise pollution (policy HL3) and preventing noise disturbance from terraces and viewing galleries (policy DE4). Policy SA2 of the Plan sets out a requirement for major commercial development to provide a management plan setting out proposals for the dispersal of patrons and workers from premises to reduce instances of noise nuisance.

1053. Policies D13 and D14 of the London Plan 2021 further seek to ensure that harmful noise impacts are mitigated.

1054. The City of London Noise Strategy identifies the strategic approach to noise in the City in line with the Noise Policy Statement for England and the City's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise impacts of development.

1055. Chapter 7 of the Environmental Statement assesses the likely significant environmental effects of the proposed development with respect to noise and vibration. The chapter is supported by Appendices 7A-F and the cumulative effects of noise and vibration are assessed in Chapter 17 of the Environmental Statement.

1056. The statement identifies that the proposal would have potential to generate noise and vibration from the following sources:

- The demolition of the existing structures and the construction of the proposed development
- The change in road traffic flows on the road network during the operational phase of the development;
- Building services and fixed plant noise emissions during operation of the proposed development;
- Delivery and servicing vehicle activities associated with operation of the proposed development; and
- Entertainment noise emission from the use of internal and external spaces in the proposed development.

1057. The ES identifies the following as receptors that would be sensitive to noise and vibration from the proposal (the sensitive receptors):

- Local residents
- Churches – St Giles Cripplegate and St Botolph without Aldersgate
- City of London School for Girls
- Livery Halls – Ironmonger’s Hall and Barber Surgeons’ Hall
- Local offices

1058. An assessment has been made as to the impact of the potential noise sources on the sensitive receptors.

Demolition of the existing structures and construction of the proposed development:

1059. The Environmental Statement has assessed the potential effects of demolition and construction noise and vibration associated with the development on the identified sensitive receptors. The assessment has been carried out by comparing the predicted noise levels at the receptors for the different construction phases. It identifies that the noise from the piling and building phases could have a temporary significant effect on nearby sensitive receptors. The assessment predicts that no significant noise effects would arise from construction traffic.

1060. The ES acknowledges that the presented noise levels are a worst-case scenario, without any mitigation measures being applied. In practice, the development would be required to comply with the City’s Code of Practice for Deconstruction and Construction Sites (9th Edition, January 2019), which sets out standards for how construction sites are to be maintained and operated with a view to limiting disturbance and disruption to neighbours and users of the surrounding area. A scheme of protective works for each phase of the development would be required by condition prior to any works commencing setting out how noise, dust and environmental effects of the works would be minimised.

1061. The Environmental Statement sets out the mitigation measures that could be applied to limit the noise impact of demolition and construction associated with the development:

- A perimeter hoarding to reduce noise at street level.
- Selection of appropriate equipment and construction methods, for example use of hydraulic plant in preference of pneumatic plant.
- Plant equipment that would be maintained in good working order and fitted with silencers where appropriate.
- Plant equipment would be located as far as practicable from noise sensitive receptors and would be switched off when not in use.

- Acoustic enclosures and temporary hoardings/screens where required. During construction of the proposed buildings acoustic wrapping/sheeting would be installed on scaffolding around the new structures to reduce noise breakout.
- Work during agreed hours and appropriate management of working hours for noisier tasks.
- Liaison with residents in advance of works commencing and on an ongoing basis to provide information regarding the programme.

1062. In respect of vibration, the potential significance of construction vibration associated with the piling phase of the proposed development has been assessed. The ES concludes that construction vibration could have an effect on Ironmongers' Hall given its proximity to construction activity. The impact of the vibration would be controlled through the scheme of protective works which would be required by condition.

Operational Road Traffic Noise

1063. The ES has assessed the significance of road traffic noise from completed and operational development. The assessment is based on the change in traffic noise between the existing and proposed site conditions.

1064. In the majority of instances, no significant effects would be expected this is given that noise levels would be within or only marginally above noise levels that are considered acceptable, to the degree that impact would be negligible.

1065. The ES acknowledges that the traffic noise would have some impact on Ironmongers' Hall. This impact would occur as the existing buildings on the site provide more screening of road traffic noise than the proposed buildings, as opposed to any material increases in road traffic flows. There is an ancillary residential unit within Ironmongers' Hall. Mitigation may be required to the unit in the form of noise insulation or alternative ventilation/cooling, given that opening windows at night may now be undesirable, details of which would be required by condition.

Operational Fixed Plant Noise

1066. Information is not yet available regarding the type, number or exact location of the mechanical plant which could be installed in the completed development. Such information would be expected at detailed design stage. As a result, should planning permission be granted details of the type of plant, location of the plant, noise levels from the plant and details of plant mounting would be required by condition. The plant would need to comply with the City's

standard of 10dba below background noise level. As such it is not considered that operational plant noise would give rise to any adverse or significant adverse effects.

Delivery and Servicing Noise

1067. The ES considers the effects of noise from delivery and servicing activities associated with the operation of the proposed development. The service yards for the new buildings would be enclosed spaces that are located beneath buildings at basement/lower ground floor level. Access to the yards would be via a ramp that is covered by buildings in the case of the Rotunda Yard or by the deck supporting the new Northern Garden in the case of the Bastion Yard. Details of the deck would be required by condition to ensure that it would prevent noise breakout from the servicing area. Subject to conditions, it is therefore anticipated that there would be no significant noise from delivering and servicing activities at the sensitive receptors due to the screening from built structure. As such negligible impacts are expected from delivery and servicing noise and no significant effects would be anticipated.

Operational Noise

1068. Consideration has been given to minimising the impact of operation noise in the site layout. Conceptually the intention is that the ground floor plaza fronting London Wall is the vibrant busy location, surrounded by active frontages from the cultural and retail uses. It was intended that the more tranquil green areas would be provided at podium level and to the north of the site to minimise impact on surrounding residents.

1069. Technical consideration has been given to potential noise from the proposed entertainment/cultural spaces the ES. The ES assesses the impact, whilst acknowledging that the assessment has been prepared in the absence of having operators and tenants for such spaces and therefore it is not known how they would operate in practice. Reference is made to the licensing regime as a means to place conditions on the operators when such information is known, to minimise impacts on surrounding sensitive uses. The ES also recommends that an Events Noise Management Plan be prepared for external events and internal events greater than 50 people.

1070. The City's Environmental Health Officer has discussed the approach to the assessment of entertainment noise with the applicant. Given that the occupiers of the flexible entertainment spaces are not known at this stage and given that the site is in close proximity to a number of sensitive receptors, in order to ensure compliance with policy DM15.7 of the Local Plan, the Environmental Health Officer has requested a condition requiring details of a scheme of sound

insulation for the entertainment spaces to the submitted and approved by the Local Planning Authority demonstrating that sound from amplified and non-amplified music and speech shall not exceed set noise levels. This would be a stringent approach that seeks to ensure that no noise is audible in the flats of sensitive receptors.

1071. The following additional conditions are recommended by the City's Environmental Health team to prevent undue operational noise from the site, noting that the Licensing Act 2003 should not be relied on to control noise:

- Ensure that no live or recorded music is heard outside the office buildings within any residential or other premises in the relevant buildings, this includes use of the external terrace areas.
- That the class E/Sui Generis premises/uses shall not be open to customers between the hours of 11 pm on one day and 7 am the following day.
- That the office roof terraces are not used or accessed between the hours of 6 pm on one day until 8 am the following day and at no time on Saturdays, Sundays or Bank Holidays other than in the case of an emergency.
- Look at no promoted events condition that is being recommended and whether this is reasonable.

1072. Policy 3.5 of the Local Plan and policy CV4 of the Draft City Plan 2040 refer to the provision of management plans for evening and nighttime uses. It would also be conditioned that Management Plans are provided for the proposed flexible entertainment spaces, setting out information such as:

- Hours of operation.
- Noise mitigation plans both internal and external noise, including measures to reduce sound transfer, such a soundproofing, noise controls and double entry lobbies.
- The dispersal of patrons.
- Arrangements for the storage, handling and disposal of waste.
- Information on deliveries and servicing.
- Measures to deal with odours and the location of ducts and plant.

Noise Conclusion

1073. The submitted ES considers the impact of the development on the noise environment. Subject to conditions controlling noise levels from entertainment uses, hours of operation and the management of such premises it is not considered that operational noise would adversely affect neighbours. Noise from construction and deconstruction has been identified as potentially having temporary significant effects on sensitive receptors. The developer would be required to mitigate the impact of the works and would need to provide a scheme

of protective works to demonstrate compliance with the City of London's Code of Practice for Deconstruction and Construction sites. A condition is recommended to ensure that any new plant would be 10dba below background noise level. Subject to conditions it is considered the proposals would comply with London Plan Policies D13 and D14, Local Plan 2015 Policies DM15.7, DM21.3 and DM3.5 and draft City Plan 2040 policies HL3, SA2 and DE5.

Air quality

1074. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.

1075. The Environmental Statement includes an assessment of the likely impact of the proposed development on air quality as a result of the demolition, construction, and operational phases of the development. The Air Quality Positive approach as recommended by policy HL2 of the emerging City Plan 2040 has been undertaken throughout the design of the proposed development in line with the GLA Air Quality Positive Guidance 2023, and an Air Quality Positive Statement has been submitted with the application as an appendix to the main Air Quality chapter of the ES.

1076. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.

1077. The proposed development would be car free save for the disabled parking bays, and heating would be through air source heat pumps which is welcomed. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. There are substantial impacts upon NO₂ concentrations predicted during the construction phase, but not during the operational phase.

1078. Measures that were considered during the design phase to have a positive impact on air quality include separating sensitive uses from pollution hotspots and

a robust ventilation strategy, use of green infrastructure, minimising traffic generated, and utilising a low or zero emission energy strategy. The development is also targeting WELL credits for indoor air quality which would have positive health and wellbeing benefits for building occupants.

1079. The City's Air Quality Officer has no objections following some clarifications on the ES Chapter, including as part of the peer review of the ES by Trium. Conditions are recommended in relation to Non- Road Mobile Machinery Register details, a compliance condition in relation to flues terminating at least 1m above the highest roof in the development, and the requirement for a Local NO2 Monitoring Strategy as part of the Construction Environmental Management Plan.

1080. Subject to conditions, the proposed development would have minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2040, and policy SI of London Plan which all seek to improve air quality.

Contaminated Land

1081. Local Plan policy DM15.8 and draft policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

1082. Policy S1 of the emerging Draft City Plan expects developers to address land contamination.

1083. The applicant has identified that the site has a long history of occupation and has identified a number of small scale potentially contaminative uses within the site redline boundary including warehouses, garages, printers, typewriter works etc. The desk study has also flagged that the site suffered heavy bomb damage during WWII with associated potential for made ground to be present and risks from possible unexploded ordnance that may be present on site.

1084. The reports confirm that intrusive investigations will be required to provide information to support design of the scheme, with investigations required to confirm both geotechnical and geoenvironmental ground conditions. For the purposes of discharging contaminated land conditions the investigation will need to include shallow and deep boreholes with chemical testing of soils and

groundwater as well as screening of samples for the presence of asbestos. As part of any future investigation the work should also include groundwater and gas monitoring. Overall, the proposals are in accordance with policy DM15.8 of the Local Plan and policies S1 and HL4 of the emerging City Plan.

Health Impact Assessment

1085. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

1086. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The HIA sets out an overall positive impact on health arising from the proposed development and advises on the benefit of adopting strategies that will ensure health impacts are positive, such as a Construction Environmental Management Plan and Cycling Promotion Plan.

1087. There are a large number of residential properties surrounding the development site. The HIA addresses potential disturbance from construction noise for the neighbouring sensitive receptors and states that the Construction Environmental Management Plan and Demolition and Construction Logistics Plans will enable mitigation of disturbance.

1088. The HIA has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment.
- Excellent cycle facilities which will encourage and support active transport by building users.
- Servicing and logistics strategy has been designed to minimise delivery vehicle trips to the Site.
- The Site is well located with good pedestrian and cycle routes, promoting users to choose active modes of travel coming to and from the Proposed Development. New and extended cycle lanes as part of works to change the Rotunda roundabout along with the St Paul's Gyrotory works.

- The Proposed Development provides extensive greening across the site including retention and enhancement of existing open space, new public gardens, and publicly accessible roof terrace on the Rotunda building.
- Provision of high-quality, flexible public realm at ground floor and highwalk levels, improving the physical environment and contributing to social cohesion.
- A car-free (except the disabled bays) development minimising vehicles travelling to the Site and reducing emissions.
- Building design considering the context of the Site and maximising benefits including employing systems to reduce energy usage. The Proposed Development targets a BREEAM Outstanding rating.
- Consideration to sustainability and inclusive design.

1089. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:

- Preparation and agreement of Construction Environmental Management Plan (CEMP) to address any adverse amenity impacts arising from demolition and construction; and
- Potential to provide affordable workspace within the commercial floorspace and be made available to a range of occupiers, including local businesses – to be agreed through planning conditions.

1090. Potential negative impacts identified in the Assessment would be mitigated so far as possible by the requirements of relevant conditions and obligations contained within the Unilateral Undertaking. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy GG3 and draft City Plan 2040 policy S1.

Impact on residential amenity

1091. Local Plan policy DM21.3 and draft City Plan 2040 policy HS3 seeks to protect the amenity of existing residents by resisting uses that would have an undue impact on amenity through noise disturbance, fumes and smells and vehicular and pedestrian movements likely to cause disturbance. Proposals should be designed to avoid overlooking and protect privacy, day light and sun lighting levels to adjacent residential accommodation. Policies CS5 of the Local Plan and S23 of the draft City Plan 2040 seek to protect the amenity of residents in the north of the City. This section of the report draws together an assessment of the impacts of the scheme on residential amenity.

1092. A detailed assessment of the impact of the scheme in terms of noise and disturbance is set out in the Noise and Vibration section of this report. The

Environmental Statement identifies that noise from the piling and building phase could have a temporary significant effect on nearby residents as sensitive receptors. To minimise the impact of noise and disturbance on residents conditions are recommended to cover:

- Noise levels from operational plant
- A Scheme of Protective Works to manage noise from the construction and demolition phases of development
- Details of the deck to the northern garden in order to prevent noise breakout from the servicing area
- An Events Management Plan to limit the impact of any internal/external events
- Control of noise levels from entertainment uses
- Hours of operation of the entertainment spaces

1093. The scheme has been assessed with regard to daylight, sunlight, overshadowing, solar glare and light spillage as is set out in the relevant section of this report. There would be some minor adverse impact on daylight to residential properties in Seddon House, Mountjoy House, Thomas More House, 2 – 6 Monkwell House, 172 Aldersgate Street and Spencer Heights. Notwithstanding, it is considered that a good level of daylight and sunlight would continue to be experienced by these properties. There would be a more significant impact on the residential unit in Ironmongers' Hall with regard to sunlight, notwithstanding the impacted room would still maintain good levels of daylight. Subject to further details in respect of the design of the building facades and a lighting strategy being secured by condition, it is not considered that the proposal would have any undue impact in respect of solar glare or light spillage. Residential amenity has been assessed in the Lighting Strategy and Concept Report by Speirs Major. Proposed mitigation measures, including designing the interior lighting in line with the requirements of the City Environmental Zones as outlined in the Lighting SPD would be secured through the condition.

1094. The proposed New Bastion House and Rotunda buildings feature a large number of terraces to their 'inward' (Site) facing facades. As such, the terraces of each building mostly face each other and look across the Site itself, but given the angle of New Bastion House at its northern end, there is the potential for overlooking from the terraces to the residential properties in the Barbican, specifically the bedrooms to the south elevation of Mountjoy House. The applicant has confirmed however, that these terraces would not be accessible. There is also a terrace proposed to the roof of the North Building, although that would be screened by the façade system of the building itself. It is located to the southwest of the building roof and as such Officers consider there would be no materially harmful additional overlooking from this terrace to the playing fields, which are already significantly overlooked in the existing situation.

1095. Subject to conditions it is considered that the proposal would comply with residential amenity related policies: Local Plan policy DM21.3 and CS5 and draft City Plan 2040 policy HS3 and S23.

Sustainability

Circular Economy

1096. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 set out the City's support for circular economy principles.

1097. The application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site.

1098. The existing site was developed between 1968 and 1976. The construction of the 14 storey Bastion House began in 1972 with an exposed concrete structure and a dark bronze coloured curtain walling system still in place today. Limitations of the existing building relate to low floor to floor heights limiting natural lighting (typical office floors slab to soffit heights between 3.060 - 3.075 m) and the quality of office floorspace, and the current space provision for core and lifts is significantly below modern level of service.

1099. The low-rise Museum of London (MoL) building was completed in 1976 with a concrete structure and clad in white wall tiling. The limitations of the existing building relate to the size, arrangement and quality of internal spaces designed to suit a museum use, in particular the clear heights of the typical exhibition spaces - slab to soffit heights are 4.895 m and 5.205 m - that would be difficult to transform for other uses such as offices, and the typical intermediate floors slab to soffit heights are very low, varying between 2.175 – 2,190 m. The northern wing of the MoL is used for education, and the majority of the floorspace is designed to accommodate a theatre with sloping concrete slab forming the underside of the space. Above the theatre are 2 levels of classrooms and offices.

1100. Both buildings share the podium structure that is constructed using an exposed concrete frame.

Structural survey:

1101. The structural survey included a visual inspection and concrete testing of columns beams, slab tops and soffits and the detailed scanning of 600x600mm

areas to confirm reinforcement distribution and depth of cover. Further investigation of the reinforcement exposure and overlapping has been carried out.

1102. The findings for **Bastion House and the Museum of London building** show carbonation (this is the process of penetration of the concrete by carbon dioxide in the atmosphere, reacting with calcium hydroxide present in the concrete to produce calcium carbonate. Calcium carbonate causes embedded steel reinforcements in concrete to corrode, leading to expansion and cracking of the concrete that weakens the structure) to a depth within the expected range for average quality concrete of around 50 years of age, not having reached the reinforcement yet. However, in some locations, such as internal areas above the 3rd floor in Bastion House, the concrete cover of the reinforcement are below 20mm that are normally considered adequate for fire protection and durability. The reinforcement in the tested locations was found to be either in a visually good condition or with very slight surface corrosion.

1103. A retention of the buildings is likely to require:

- anti-carbonation coating applied every 15-20 years
- for lettability and risk/insurance reasons intumescent paint or fire boarding of the structure to comply with fire safety regulations which would further reduce floor-to-ceiling heights
- significant alterations to the Level 3 transfer structure in the form of jacketing to beams and associated columns at Bastion House required to comply with present-day disproportionate collapse requirements.

1104. The construction of Bastion House began in the early part of 1972 but disproportionate collapse requirements only first appeared in the structural design code for concrete (CP110) in November that year. Given that structural designs are normally completed prior to the start of construction, on the balance of probability it is considered more likely that Bastion House did not incorporate the requirements of CP110. This does not mean that the building is at risk in its present condition. The requirements of future changes to design codes are generally not retrospectively applied to an existing building, except in the case of significant alterations/modifications to that building. Investigations for Bastion House undertaken to date have indicated that, generally, compliance with modern-day requirements can be demonstrated. The applicants have allowed for a carbon contingency in the WLC assessments to cover any structural works that might be needed to demonstrate compliance with current structural requirements.

1105. A pre-demolition audit was undertaken in line with the GLA requirements. The audit outlines potential routes for reuse of materials on site which in the case of full demolition are estimated at 73,853 tonnes, of which concrete is with 89.36% the largest proportion and metal with 6.65% the second largest proportion. Given

that concrete elements, in particular concrete constructed in situ, are difficult to reclaim, due to non-standard dimensions, reinforcement and costs of handling and storing, the focus would be on recycling rather than reuse. From a circularity perspective, concrete would need to be crushed to separate out the rebar and for use as recycled concrete aggregate (RAC) which, if the quality is sufficiently high, should be used in the construction process of the new development after being stored on site. The audit sets out opportunities for the use of all demolition materials along with potential waste management contractors. A condition is attached requiring a strategy to recycle the various concrete elements from deconstruction on site following in depth surveys of the structure and quality prior to demolition.

Optioneering

1106. At the start of the pre-application process in late 2021, the CoL Carbon Options Guidance (COG) Planning Advice Note was not in place, however, planning officers had started during 2021 to request from applicants to consider and demonstrate options as part of the pre-application discussions to inform the application proposal. 2 distinctive development options for the London Wall West site have been assessed and published in spring 2022 to address this request. The methodology as set out in the COG was only available in draft form from July 2022, and the COG in its final version was adopted in March 2023. To address the requirements of the adopted COG, the applicants in collaboration with planning officers and the 3rd party reviewer of the options assessment have developed further options in 2023 to reflect the opportunities of the site in more detail, and these options are set out in the following paragraphs.

1107. A pre-redevelopment audit has been undertaken for the application submitted in late 2023 that includes details of the optioneering process to address circular economy in this section, and whole life-cycle carbon considerations in the Whole life-cycle carbon emissions section of this report. This exercise is designed to establish the potential of retention, reuse of materials and carbon impacts of the options, in this case with particular focus on the retention opportunities for Bastion House and the Museum of London building within a wider masterplan for the site to improve the public realm and integration into the wider context of the City of London. The options are also evaluated with regard to their opportunities for wider environmental benefits and other planning benefits in order to address the economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2023, chapter 2, paragraph 8.

1108. The optioneering exercise updated in 2023 initially included 10 development options that reflected a wide range of reuse and land use scenarios which were qualitatively assessed. Of those, the following 5 options were discounted in

agreement with planning officers (none of which were discounted on the basis of disproportionate collapse concerns):

- Scenario 0: Do nothing – considered not feasible as the buildings currently have a low energy efficiency performance and substantial repair and upgrade works would be required to attract occupiers.
- Scenario 2: Major refurbishment – required works for this scenario were integrated into scenario 1 (minor refurbishment) as a second phase to the minor refurbishment, to achieve a future lifetime beyond 15 years.
- Scenario 4: Major refurbishment with extension, replacement of the Museum of London building, including rotunda with parts of the podium – despite significant investment to divert the road, this option significantly limits the extent of major public realm improvements due to the retained podium below Bastion House and North building.
- Scenario 7: Major refurbishment with extension – replacement of Museum of London building and Bastion House – despite significant investment to divert the road, this option significantly limits major public realm improvements due to retained podium below Bastion House and North building.
- Scenario 8: Redevelopment – retention of foundations only - this option limits the size and design of the new buildings and the major public realm improvements.

1109. The remaining 5 options were assessed quantitatively for carbon impacts as part of the optioneering exercise both for the pre-redevelopment audit and the whole life-cycle carbon considerations. Scenario 3 has been split into 3a and 3b to assess the use of Bastion House with hotel and residential use respectively including retention of the podium and rotunda. The remaining options therefore are:

Scenario 1: minor refurbishment with interventions mostly relating to repairing MEP systems and installing insulation to extend the life and use of the existing buildings; major refurbishment after 15 years to include new cladding and new building services. Retained sub and superstructure: 100%.

Scenario 3a: major refurbishment of podium, retention of Museum of London and Bastion House, change of use of Bastion House to hotel, extensions to existing buildings and a new office building on the Rotunda site. Retained sub and superstructure: 100%.

Scenario 3b: major refurbishment of podium, retention of Museum of London and Bastion House, change of use of Bastion House to residential, extensions to existing buildings and a new office building on the Rotunda site. Balconies would be added, however, dual aspect to all apartments as required by the new London Plan Guidance - Housing Design Standards would not be possible due to existing site constraints. Retained sub and superstructure: 100%.

The works for scenarios 3a and 3b would include new cladding to Bastion House and the Museum of London as well as new building services.

Scenario 5: major redevelopment with retention of Bastion House and change of use to hotel, redevelopment of the remainder of site including new public realm. Includes new cladding for Bastion House. Retained substructure: 20% and superstructure: 30%.

Scenario 6: replacement of Bastion House and retention/extension of the Museum of London building with new cladding, retention of podium and new development of North building and Rotunda building. Restricted column grids due to retention of the substructure. Retained substructure: 100% and superstructure: 40%.

Scenario 9: full redevelopment of the site including 2 new office buildings, one commercial building (North building) and a cultural podium. Retained sub and superstructure: 0%.

1110. The options study concludes that it is technically feasible to retain parts of the existing building. This would require concrete repairs to fix visible defects, carbonation inhibiting treatments to extend the life of the buildings, reinforcement cover and fire resistance strategies for structural elements as well as the need to meet modern standards for structural robustness which would result in carbon impacts that are considered in the carbon analysis of the options.

1111. The analysis of the options with regard to circular economy demonstrates that the retention of higher percentages of existing fabric would result in lower quality office accommodation on the retained floors, including limited future flexibility and adaptability. In particular, the Museum of London building has been designed for the specific needs of a museum and has limited scope for adaptation to other uses. The options to change the use of Bastion House to hotel or residential would address some of the internal space constraints of the building, however there would still be limitations for the internal distribution of services such as MEP, lifts and firefighting access in particular for a highly serviced hotel building. The retention of substructure and the podium would limit the structural design of any new build elements above in terms of floorspace provision and arrangement as well as flexibility of the column grids, as presented in option 6.

1112. Overall, the explored refurbishment, extension, and part retention options including assessing different uses are considered to comply with the GLA's Circular Economy Statement guidance requiring a robust exploration of options as part of a redevelopment audit. The assessed options retain varying degrees of existing buildings and elements which mostly consist of concrete. However, the evaluation of the options against the overarching objectives for the site as set out in other sections of this report concludes that any refurbished buildings would lack

social, economic and environmental quality due to inherent space and efficiency limitations that in particular affect the internal office space quality, adaptability, flexibility and longevity as well as the incorporation of health and wellbeing in form of generous amenity and urban greening into the buildings, even if that would affect residential and hotel uses in Bastion House less so. However, all part refurbishment/part redevelopment options that retain parts of the podium do not address the need to rearrange and improve the public realm at street and podium level to an extent that would offer significant public benefits for sustainable movement and integration of the site into the wider context of the City.

1113. Although the redevelopment option would result in the highest quantity of demolition waste and the highest absolute carbon emissions of the assessed options due to its largest size, it would offer substantial benefits of connectivity, high quality public realm and sustainable design quality for the whole site that are required to future proof the City as a highly sustainable location. This option therefore has been further developed for the application scheme.

1114. The evaluation of the carbon intensity of the options is discussed in the Whole life-cycle carbon emissions section of this report.

The application proposal:

1115. The submitted Circular Economy Statement for the planning application scheme describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.

1116. The strategy includes measures to support reuse and recycling of existing materials within the new built elements as well as durable materials and construction and sustainable procurement, to include the following principles that will be further developed in the detailed design:

- lightweight sub and superstructure: adopting S460 grade (high strength structural) steel for all steel columns to minimise overall tonnage of material and reducing steel tonnages
- use and recycling of components from the existing buildings, e.g. use of excavation waste for soft landscaping and backfilling of pile caps, and by crushing concrete for use as recycled aggregate and piling platforms
- Retention of 2 stretches of existing basement retaining wall for the new scheme (south of the existing Bastion House and west of the Rotunda)
- Reuse of the existing drainage connection points
- Incorporating high-performance insulation materials and glazing systems to minimise heat transfer and improve energy efficiency and daylighting

- Exploring the use of recycled aggregate from the existing building envelope for the proposed façade systems
- Aiming for 20% use of reused or recycled content overall, to include 75-100% recycled content in aluminium sheet elements in spandrels and fins in Husk façade and 75% recycled content in steel façade elements
- Adopting modularisation and pre-fabrication where possible
- Ensuring that the need for maintenance, repair and replacement of elements such as the structure, facades and MEP is minimised and made easily possible to reduce waste during the use of the development
- Ensuring the ability of disassembly and reuse of materials as part of the end of life strategy, to including material passports
- Designing for adaptable floor plans that would enable a future change of use to a hotel (New Bastion House and Rotunda Building), or to higher education facilities (New Bastion House, Rotunda Building and New North Building).

1117. An update to the Circular Economy Statement including results from the detailed design phase and a post-completion update in line with the GLA guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

Operational energy strategy and carbon emissions

1118. The energy strategy demonstrates that the whole development on site has been designed to achieve an overall 1.3% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building. For a commercial development, this figure is relatively low, due to the proposed heating and cooling connection to the local heat network Citigen that cannot yet provide details of its future decarbonisation.

1119. The City Corporation, through its longstanding Cooperation Agreement with Citigen, are supporting the development of long-term decarbonisation proposals for the network in support of the City Corporation's 2040 Net Zero Square Mile Climate Action Strategy target. The aim is to achieve a highly decarbonised network utilising large scale local waste/ambient heat sources via electrically driven heat pumps and multiple energy centres hosted within local sites and buildings. The decarbonisation proposals will need to be compliant with the pending Heat Network Zoning regulations which are due to come into force in 2025 and set minimum carbon limits where new network connections are made to buildings.

1120. The application scheme is based on the local heat network hosting a local energy centre within the development, consisting of Air Source Heat Pumps (ASHPs) and electric chillers. These will be designed to meet all the low carbon heating and cooling needs of the development. The development would also be

connected to the network to allow its cooling systems to supply waste heat to the network and thus providing a source of low carbon heat to other buildings connected to the network. When the network decarbonises further this will provide an increasing opportunity for the London Wall West site to be supplied by lower carbon heating/cooling than can otherwise be generated by the on-site ASHPs and electric chillers.

1121. Based on Citigen's current carbon factor, the calculations for the energy hierarchy including the network connection were carried out as follows:

- For the Be lean stage, an all-electric baseline was modelled to demonstrate compliance with the GLA target of 15% improvement of carbon emission reduction over the Part L 2021 baseline. This shows that the buildings on site would achieve a 16.1% carbon emission reduction, due to design measures such as optimised façade performance, mixed mode ventilation, demand control ventilation, high efficiency lighting and external solar shading.
- For the Be Clean and the Be Green stages a parallel baseline was created that includes the Be lean savings from energy demand reduction and takes into account the current carbon factor received from Citigen which significantly inflates the carbon baseline. The carbon factor is based on SAP 2012 (the Government's Standard Assessment Procedure for energy rating), reflecting the Combined Heat and Power system with boilers used by the network which significantly reduces savings of carbon emissions in the Be Clean and Be Green stages.
- The addition of renewable technologies in form of high efficiency PV arrays on the roof tops of the two proposed larger buildings (with panel areas of 260 sqm and 185 sqm), would add 3.3% carbon emissions savings beyond Part L 2021.

1122. To demonstrate the overall potential of the proposal to reduce carbon emissions, the analysis of carbon emissions reduction has also been carried out under the previous Building Regulations Part L 2013 which uses a baseline with higher carbon factors based on a much lower decarbonisation rate of the National grid. This results in an overall reduction of 35% beyond Part L 2013 which demonstrates that the development is of highly energy efficient design to meet the GLA requirement of 35% carbon reductions despite a heat network connection that is still partially based on gas boilers and therefore reducing the positive results.

1123. Despite the reduced level of carbon emissions savings that can be demonstrated at planning stage, the proposed heat network connection is considered to contribute to the aims of the City of London's Local Area Energy Plan by providing a location for a network extension with air source heat pumps and dry-air coolers (625 sqm at basement level and 224 sqm at roof level). This

will enhance the capacity and efficiency of the local energy network, contribute to its decarbonisation plans and ultimately futureproof the proposed development.

1124. When separating the site into the various proposed buildings, the results are as follows:

	Savings against Part L 2021	Savings against Part L 2013
New Bastion House	6.1 %	37.9 %
Be Lean	21.9 %	39.6 %
Be Clean	3.3 %	35.5 %
Be Green	2.8 %	2.4 %
Rotunda Building (incl cultural uses)	-2.3 %	33.0%
Be Lean	11.5 %	33.1 %
Be Clean	-6.6 %	29.3 %
Be Green	4.3 %	3.7 %
North Building	-29.7 %	22.4 %
Be Lean	6.1 %	27.6 %
Be Clean	-29.7 %	22.4%
Be Green	0 %	0 %

1125. These results confirm that compliance with the GLA's 35% carbon emission saving target is not currently achievable without confirmation of the future carbon factor for the local heat network. The comparison with the carbon savings against Part L 2013 indicates that the buildings are designed to be highly energy efficient, in line with best practice for new commercial buildings. This is with the exception of the North Building due to the constraints of the site leading to a complex architectural form and design, although with low impact on the overall site operational carbon emissions due to its small size. However, the heat network connection still represents a negative impact on the operational carbon savings.

1126. Detailed energy statements at RIBA stage 4 are required by condition separately for each building before construction begins to ensure satisfactory energy strategy results.

Energy Use Intensity (EUI)

1127. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m²(GIA)/year and a space heating demand of 15 kWh/m²(GIA)/year. The estimated EUI from all uses of the proposed development is 119.46 kWh/m²/year and for the space heating demand 28.16 kWh/m²/year.

These are conservative estimates at this stage, and the energy consumption is anticipated to decrease with further design and, at in use stage, in collaboration with tenants, monitoring and optimisation. In addition, the decarbonisation of Citigen will enable the utilization of more efficient heat pumps for cooling as well as reduction on heating flow and return temperature which would have positive impacts on the overall efficiency of the systems including reducing losses.

Energy strategy conclusion

1128. The site-wide energy strategy would not meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme (London Plan policy S1 2C). This is mostly due to the planned connection into the local heat network that results in reduced carbon savings at this stage. However, as set out at the beginning of the Operational Energy section, in the long term the heat network connection would offer the opportunity to supply lower carbon heating and cooling than can be generated by on-site ASHPs and chillers, as set out in the City Corporation's Local Area Energy Plan.

1129. In addition, the GLA acknowledges in a note released in 2022 that "Initially, non-residential developments may find it more challenging to achieve significant onsite carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35% improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments."

1130. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

1131. The office, retail and cultural uses have been pre-assessed under BREEAM New Construction 2018 Office – Shell and Core, Retail – Shell only, and Other: Assembly and Leisure- Shell only. The office use across the whole site targets an "outstanding" rating (80.80%) while the retail and other uses target "excellent" ratings (72% and 74% respectively). The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution, Materials and Waste.

1132. The BREEAM pre-assessment results comply with Local Plan policy CS15 and draft City Plan 2040 policy DE1. Post construction BREEAM assessments are required by condition.

NABERS UK

1133. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The applicants are signing up to this scheme, targeting a 5 star rating (out of 6 stars possible) which will contribute to reducing common performance gaps between modelled and actual energy use intensity.

WELL

1134. The WELL Standard is a comprehensive scheme that requires intervention at the design, fit-out and operational stages. All preconditions and design-inherent strategies that would require early design stage intervention have been assessed.

1135. The proposed development was assessed under the WELL v2 scheme and targets a WELL Platinum certification. Stage 2 minimum requirements are being included in the design to secure preconditions compliance. A WELL core approach is under review and will be further investigated during the next design stage.

Whole life-cycle carbon emissions

1136. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

Carbon options:

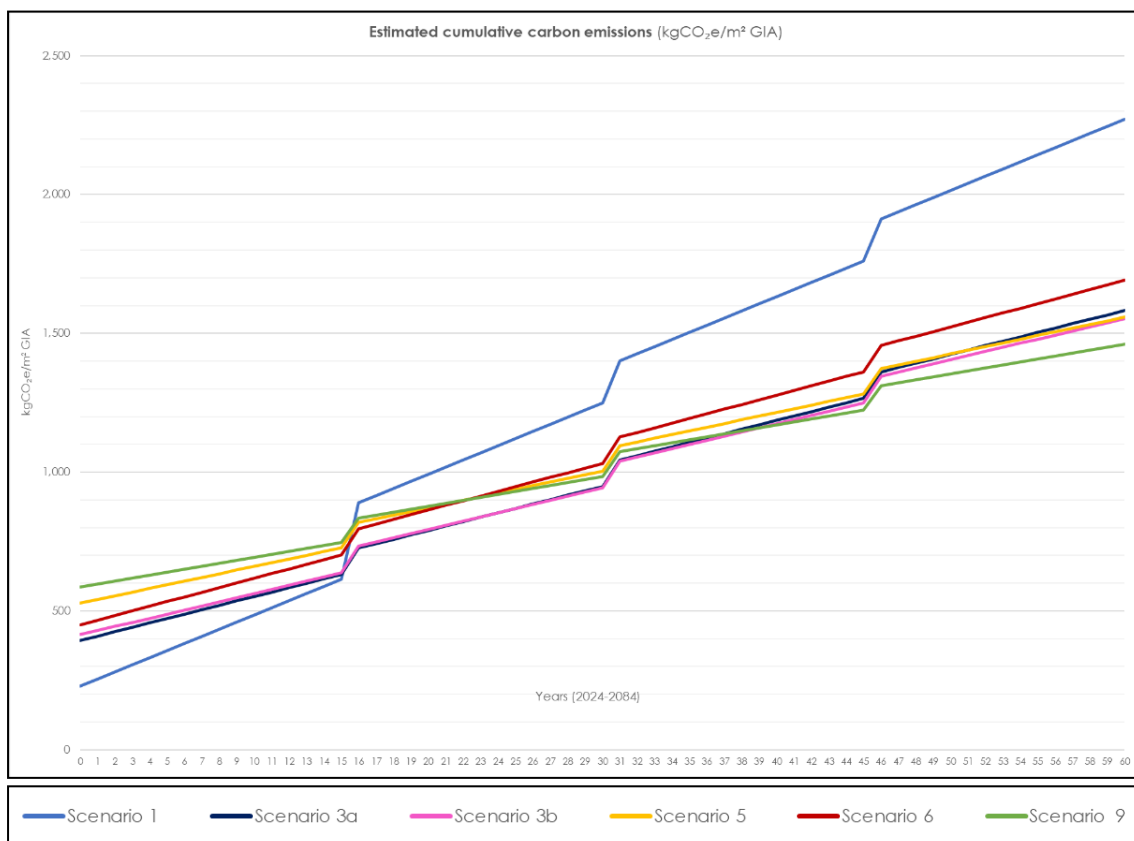
1137. Following the public consultation on the first optioneering assessment in 2022, and further pre-application discussions throughout 2023, the number and types of options were extended in preparation of the submission of the planning

application. The final carbon options appraisal has been undertaken in line with the City of London’s Carbon Options Guidance planning advice note (2023), as confirmed by the completed 3rd party review of the optioneering study.

1138. 6 options have been assessed as set out in more detail in the Circular Economy section of this report:

- Scenario 1: minor refurbishment - retained sub and superstructure: 100%.
- Scenario 3a: major refurbishment, extensions, change of use to hotel, and new office building - retained sub and superstructure: 100%.
- Scenario 3b: major refurbishment, extensions, change of use to residential, and new office building - retained sub and superstructure: 100%.
- Scenario 5: major redevelopment, retention of Bastion House and change of use to hotel - retained substructure: 20% and superstructure: 30%.
- Scenario 6: major redevelopment, retention of foundations and Museum of London with extension - retained substructure: 100% and superstructure: 40%.
- Scenario 9: full redevelopment of the site including 2 new office buildings, one commercial building (North building) and a cultural podium. Retained sub and superstructure: 0%.

1139. The following graph and table present the whole life-cycle carbon results from the 6 options.












		 Carbon Options Assessment							
		GLA Aspirational Benchmarks	GLA Benchmarks	Scenario 1	Scenario 3a	Scenario 3b	Scenario 5	Scenario 6	Scenario 9
Substructure A-C exc. B6-B7		100	144		40	41	129	57	113
Superstructure A-C exc. B6-B7		350	505		114	130	154	126	259
Façade A-C exc. B6-B7		170	245		268	279	263	281	240
Finishes/FF&E A-C exc. B6-B7		130	188		36	35	35	35	37
MEP A-C exc. B6-B7		220	318		154	155	145	175	142
Total A-C exc. B6-B7		<970	<1400	360 +275 Benchmark +Major refurb	613	641	726	674	790
A1-A5 totals		<600	<950	230 Benchmark	391	411	509	434	560
Operational energy B6 (kgCO ₂ e/m ²)				1,185	951	894	797	1,007	589
Estimated existing building demolition (kgCO ₂ e/m ² GIA)				0	3	4	20	16	25
Total WLCA (incl. B6 & pre-demolition) (kgCO ₂ e/m ² GIA)				1,545	1,566	1,539	1,543	1,697	1,404
Total existing building demolition (tCO ₂ e)				0	144	169	1,043	831	1,712
UPFRONT EMBODIED CARBON (A1-A5) (tCO ₂ e)				7,880	19,918	21,066	26,487	22,542	37,678
In-use embodied carbon (B-C) (tCO ₂ e)				4,454	12,124	12,588	12,201	13,401	16,686
Operational Carbon for building life time (B6) (tCO ₂ e)				52,688	48,429	45,842	41,542	52,307	43,187
Total WLCA (incl. B6 and pre-demolition) (tCO ₂ e) Module B7 is not considered				65,021	80,614	79,635	81,272	89,082	99,264
GIA (m²)				34,259	50,940	51,256	52,139	51,941	67,283

Table: Whole life-cycle carbon results for the options

1140. The options can be analysed in terms of their carbon emissions throughout the GLA's reference period of a 60 year life-cycle as follows:

1141. Scenario 1 would have the lowest whole life-cycle carbon emissions per square meter for a period of approx. 15 years after completion, until a major refurbishment becomes necessary. This would include new facades and building services, such as lifts, plant equipment and lighting and, due to the steeper rise of the operational carbon emissions up to the major refurbishment event, lift the whole life-cycle carbon emissions per square meter to a level above the other options where it would remain throughout the life-cycle. The exact gradient of the line, either parallel to the other options or steeper, would depend on the MEP and façade systems available at the time, however, it is anticipated that a major refurbishment of the whole site would not be expected to achieve the same energy efficiency levels as other part refurbishment and redevelopment options. In absolute terms, this scenario would have the lowest whole life-cycle carbon emissions (approx. two thirds of scenario 9), however it would most likely have the highest operational carbon impact per square meter and therefore it would be unattractive for future tenants and occupiers over the whole life-cycle.

1142. Scenarios 3a and 3b show significantly higher upfront carbon emissions compared to scenario 1, due to the works to repair, improve and adapt the existing structure, however, these scenarios have the lowest upfront carbon emissions out of the major refurbishment with extensions options due to a high level of retention, and the carbon impact of both scenarios remains on a very similar level throughout their life-cycles. Out of the two higher upfront carbon scenarios 5 and 9, only scenario 9 crosses over scenarios 3a and 3b to a lower carbon intensity more than halfway through the 60 year life-cycle, while scenario 5 reaches a similar whole life-cycle carbon intensity compared to scenarios 3a and 3b after 60 years, both per square meter and absolute. The relative improvements of scenarios 5 and 9 compared to scenarios 3a and 3b are due to energy efficiency improvements in the larger Rotunda development.

1143. Scenario 5 has a lower upfront carbon level compared to the redevelopment scenario 9, due to the retention of Bastion House, but it has a higher whole life-cycle carbon impact per square meter as its operational carbon impact as a hotel in a retained building with inherent inefficiencies in the floorplan and building services strategy would be higher. However, in absolute terms it would be considerably lower in whole life-cycle carbon emissions as the redeveloped Bastion House in scenario 9 would have a larger footprint.

1144. Scenario 6 would have an upfront carbon impact per square meter that would only be slightly higher than that of scenarios 3a and 3b due to the retention of

substructure and part retention of superstructure, however, it would result in a significantly higher whole life-cycle carbon impacts due to higher operational carbon emissions, in particular for cooling, linked to office use.

1145. Lastly, scenario 9 combines the higher upfront carbon intensity with the lowest whole life-cycle carbon intensity per square meter of all options, due to the highly energy efficient design of the whole site. However, as this scenario is the largest of all the options, the absolute whole life-cycle carbon emissions would be higher (99,264 tCO_{2e}) than those of the major refurbishment scenarios 3a, 3b, 5 and 6 (79,635 – 89,082 tCO_{2e}). In contrast, despite the largest size of this scenario, the operational carbon emissions over the whole life-cycle would be one of the lowest (43,187 tO_{2e}) out of all scenarios, except for those of scenario 5 (41,542 tCO_{2e}).

Separate optioneering results for building elements

1146. For this exercise, the site has been split into the individual site elements to provide whole life-cycle carbon results for each element in each option. These individual elements are Bastion House; Museum of London (MoL) and new podium (option 5); Rotunda Building; Northern Wing of MoL/North Building; Auxiliary Spaces (car park, Aldersgate/One London Wall and Ferroners' House); and External Areas. The allocation of external spaces and below podium floorspace varies in accordance with the details and uses of the options. This section focusses on the two largest structures on site which are the Museum of London and Bastion House.

1147. The MoL building has the largest existing floorspace on site but would be considerably more challenging to reuse due to its specific design as a museum. The MoL floorspace is largest in scenario 1 with the largest total whole life-cycle carbon emissions mostly due to high operational carbon impacts. As the MoL parts of the site are integrated with new development in the other scenarios, its floorspace reduces along with its whole life-cycle carbon emissions. In scenario 9, the MoL site is fully integrated with the Bastion House site, and associated carbon emissions are reported in the Bastion House figures. The more of the MoL is retained, the less the public realm improvements including the revised roadway configuration can be implemented.

1148. Bastion House is considered to be the largest, individual structure on site that could be repurposed for a variety of uses alongside the implementation of a part of the envisaged public realm improvements if the remaining or some of the structures on site would be demolished. The carbon results reflect those for the whole site optioneering in proportion. Scenario 9 has the largest floorspace out of the options and therefore the highest whole life-cycle carbon emissions in total, but the lowest per square meter. A smaller "like for like" replacement of Bastion

House tower with an additional proportion of lower floors (that is currently occupied by MoL) in scenario 6 would be lower in whole life-cycle carbon emissions compared to scenario 9 but with higher operational carbon emissions due to operational inefficiencies of the base levels. In the other scenarios, Bastion House is retained, with the highest whole life-cycle carbon emissions in scenario 1 due to high operational carbon impacts despite the lowest upfront carbon emissions. Scenarios 3a, 3b, and 5 include more substantial works to adapt Bastion House to residential or hotel uses, resulting in higher upfront carbon emissions compared to scenario 1, however, whole life-cycle carbon emissions, both total and per square meter would be lower in those 3 scenarios compared to scenario 1, 6 and 9.

1149. The assessment of whole life-cycle carbon emissions of the various buildings on site demonstrates the high impact of operational carbon emissions in the retained and refurbished/retrofitted buildings. A notable carbon impact also results from the works to remove the podium and reconfigure the public realm in scenarios 5 and 9. This would transform and better integrate the site into its context by creating better connectivity and public accessibility that can only be achieved to its highest potential with the demolition of all of the buildings and structures on site, and to a lesser degree with the retention of Bastion House and its podium structure.

Qualitative optioneering conclusion

1150. Scenario 1 would not be able to facilitate the transformation of the buildings on site into a high quality, energy efficient, commercial and cultural development with significant public realm benefits that are considered to be essential to improve the integration of the various buildings and their connectivity with its context.

1151. Scenarios 3a and 3b include the refurbishment of Bastion House for hotel/residential use respectively which would be a feasible use in the context of the floorspace limitations of Bastion House. However, these limitations would still affect the operational efficiency of a hotel and the retained Museum of London building. For a residential use of Bastion House, the requirement of 50% affordable housing would make the scheme unviable. These scenarios would limit the urban greening and public realm improvement opportunities to modest alterations to the street level facades and external podium level design.

1152. Scenario 5 includes the refurbishment of Bastion House for hotel use which is considered a feasible use, with some limitations to operational efficiency of the floorspace and to the opportunities to convert the Bastion House levels below the transfer structure to provide MEP systems for a hotel use. The redevelopment of the remainder of the site would allow for significant improvements of the public realm including a revised roadway configuration.

1153. The retention of the foundations, podium levels of the whole site and part of the Museum of London buildings in scenario 6 would limit the quality of and opportunities for uses of those retained structures, restrict the design of the new buildings above the podium and restrict the public realm improvements for the wider site to modest alterations to the street level facades and external podium level design.

1154. Scenario 9 would allow for the whole site to be repositioned, both maximising the environmental quality of the new buildings and the quality and accessibility of the public realm including roadway configuration to integrate the site into the wider City context. While none of the scenarios have been discounted for reasons of structural stability, the whole redevelopment scenario in this case would have the lowest whole life-cycle carbon emissions per square meter of all scenarios, and, while resulting in the highest absolute whole life-cycle carbon emissions due to its larger size, it would unlock the greatest amount of strategic and public benefits from the site that would contribute significantly to futureproofing the development and benefit the sustainability of the City as a whole, and therefore has been further developed for the application scheme.

1155. The optioneering approach set out in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on circular economy and whole life-cycle carbon emissions, and with the more detailed methodology set out in the City of London's Carbon Options Guidance to establish and evaluate the carbon impact of development options.

1156. Although the draft City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2023 stating in paragraph 157 that the planning system should support the transition to a low carbon future and that it should help to, amongst others, encourage the reuse of existing resources, including the conversion of existing buildings. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme.

The application proposal:

1157. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. The results show that the embodied carbon emissions can be reduced beyond the GLA's Aspirational Benchmark when

1158. The main carbon reduction measures that have been incorporated into the proposal to achieve this exemplar performance are:

- the use of 75% recycled content in aluminium façade elements
- the use of 50% ground granulated blast furnace slag to replace cement in concrete
- the connection to the local heat network which would improve efficiencies in installations, allowing the exclusion of back-up systems on site and reducing refrigerants in systems installed specifically for the development
- avoiding the use of suspended ceilings
- 100% recycled raised access floors
- structural and facade optimisation.

1159. These measures reflect the high ambitions for the development to become an exemplar in low carbon design. Further, potential alternative measures will be explored during the detailed design development to ensure that the targets set out in the table below can be achieved. Confirmation that the proposed low carbon design of the whole site development can achieve at least the GLA's Aspirational Benchmark (current at the time of conditions discharge) is required as part of the detailed whole life-cycle carbon assessment at RIBA stage 5.

1160. The table below shows whole life-cycle carbon emissions per square meter for the whole site and for the various buildings in relation to the GLA benchmarks for offices at planning application stage (including cultural uses – the GLA guidance advises to select the most relevant building use in providing data):

Scope	Proposed Redevelopment					Benchmark	GLA Benchmark
RICS components	kgCO2/m2					kgCO2/m2	
	Site	Bastion House	Rotunda Building	North Building	Auxiliary Spaces		
A1-A5	560	460	645	713	625	< 950	GLA Standard
						< 600	GLA Aspirational
A-C (excluding B6-B7)	795	708	890	1,068	905	< 1400	GLA Standard
						< 970	GLA Aspirational
B6-B7	671	642	642	642	642		
A-C (including B6-B7)	1,466	1,375	1,503	1,710	1,547		

1161. The proposed site development has been designed to exceed the GLA's Aspirational Benchmark overall. When considering the individual new building elements, New Bastion House would significantly improve on the Aspirational

Benchmark while the Rotunda's and the Auxiliary Spaces' performances would either come close below or above this benchmark. The North Building would not meet the Aspirational Benchmark due to the site complexity resulting in inefficiencies of the architectural form but it would reach close.

1162. The proposed whole site development would result in overall whole life-cycle carbon emissions of 98,674,620 kgCO₂ being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 45,172,893 kgCO₂ (46% of the building's whole life-cycle carbon), and the embodied carbon emissions for 53,501,727 kgCO₂, (54% of the building's whole life-cycle carbon).

1163. A detailed whole life-cycle carbon assessment and a confirmation of the post-construction results are required by conditions.

1164. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the independent 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions significantly and therefore comply with the London Plan policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic policy CS15 Sustainable Development and Climate Change. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to a low carbon future in accordance with NPPF (2023) paragraph 157 and 159.

Urban Greening

1165. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan (2040) Policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.

1166. In accordance with policy the proposed development would incorporate significant public realm areas and landscaping at street level, podium level, lower ground level and higher up the building in the form of new terraced areas. The glasshouse office reception and lobby space will also be extensively greened, albeit as internal space this does not contribute to the Urban Greening Factor (UGF) score achieved for the application site.

1167. The application documentation states that the Urban Greening Factor for the proposed development would be 0.41. It must be noted that this scoring is not

based on the total site area as required by guidance, the UGF calculation has omitted the carriageway. The proposed UGF based on total site area including carriageway would be 0.28. Officers accept the approach that has been set out in the application documentation is logical given that it would not be feasible to provide greening on the carriageway.

1168. The proposal would involve the loss of 5 category A trees, 12 category B trees, 22 category C trees and 3 category C trees. Category A trees are defined as “Trees of high quality with an estimated remaining life expectancy of at least 40 years”. Category B is defined as “Trees of moderate quality with an estimated remaining life expectancy of at least 20 years”. Category C is defined as “Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm.” The trees that would be removed are located within the Rotunda garden, along London Wall and outside Ironmongers’ Hall.

1169. Policy CS19 of the Local Plan 2015 seeks to protect the amenity value of trees retaining and planting more trees wherever practicable and policy DM19.2 states that developments should promote biodiversity and contribute to urban greening. Local Plan paragraph 3.19.17 states that “Where existing green infrastructure is disturbed, removed or damaged as a result of development, it must be replaced with good quality urban greening. There should be no net loss of green infrastructure. Existing trees should be replaced with trees of an equivalent size and quality.” Policy OS5 of the emerging City Plan 2040 seeks to increase the number of trees and their overall canopy cover through a number of measures including “Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed requiring their replacement with trees that can attain an equivalent value.”

1170. In considering the loss of the trees in relation to policy, policy CS19 requires the amenity value of trees to be protected and the retaining and planting of more trees wherever practicable. It is not considered that it would be practicable to facilitate the proposed development and retain the existing trees on the site in this instance. In line with policy CS19 and DM19.2 of the Local Plan a greater level of tree planting is proposed across the extensive public realm that is proposed as part of the scheme. Conditions are recommended to require further details of the proposed trees in order to ensure that they would be of an equivalent quality and size to the existing trees and to require details of potential re-use of the wood from the existing trees. Policy OS5 states that other than in exceptional circumstances only permitting the removal of trees which are dead, dying or dangerous. The proposed circumstances are considered exceptional with regard to the loss of the tree in that a development is being secured that would revitalise this part of the

City and deliver significant public realm benefits. Taking into consideration the quality of the existing trees, the circumstances of the development and that a greater level of tree planting would be delivered it is considered that the policy tests of CS19 and DM19.3 of the Local Plan and policy OS5 of the emerging City Plan 2040 have been complied with regarding the loss of the trees.

Climate Resilience

Overheating and the urban heat island effect

1171. Overheating mitigation has been considered for the development, with a façade design with reduced glass façade to minimise solar shading (61% Solid, 39% glass). The applicant has also included measures for passive solar shading, and natural and mechanical ventilation.

1172. Roof space is optimised for overheating mitigation through PV roofs and green roofs. 18 street level trees are planned for the public realm; however, no planting or sheet shading is considered for the carriageway areas within the development site boundary.

1173. No consideration to the reduction in urban heat island effect is mentioned in sustainability report submitted.

Flooding

1174. The proposed development is in Flood Zone 1 and is at Low risk from all other sources of flooding. A Flood Risk Assessment and Drainage Strategy has been produced by Buro Happold.

1175. The flow rate of surface water discharge for the development would be limiting discharge of 9.9l/s proposed, which is equivalent to the greenfield runoff rate. SuDs, drainage network designs, and rainwater attenuation system have been designed for 1 in 100 year + 40% climate change allowance.

Water stress

1176. The proposed development includes measures to adapt to water stress risks, including smart controlled irrigation measures, drought resilient planting and rainwater harvesting.

Biodiversity and pests and diseases

1177. A Biodiversity Net Gain Assessment report was completed by Buro Happold, which details the changes to biodiversity on the development. An Urban Greening Factors score of 0.41 is targeted which is higher than the required standard (for further details on the urban greening factor refer to the greening section of the report). The Biodiversity Net Gain scores are 24% for habitats and 38% for

hedgerow units. 14 existing trees including mature trees will be removed. 100 new trees are proposed across the site (further assessment of the removal of the trees is set out in the greening section of this report). Other biodiversity measure included were bat and bird boxes. Conditions are recommended to ensure that these are delivered.

Species Included:

1178. Modified grassland habitat proposals in the Barber Surgeon's Garden, Northern Garden and The Glade species proposed are primarily grasses, which do not produce nectar as these are wind pollinated. Four of the six proposed species provide opportunity for two species of butterfly that could be expected within greenspaces in central London, providing they are managed appropriately. It is suggested that areas within these gardens are allocated to be managed as species rich grassland. This would see an increase in native species that can provide flowers that produce nectar and pollen for pollinators as well as food and host sources for invertebrate lifecycles. These areas would retain some tall swards throughout the year with cyclical mowing patterns. The proportion of additional greenspace that this scheme is provided does allow for an adapted management protocol which could support 'species-rich grassland, a Mayor of London target habitat, by planting and establishing a diverse sward aiming to contain at least 25 species.

Comments on native trees to be planted:

1179. *Betula pubescens* (Downy Birch) has been identified by Forest Research as marginal under the current baseline, and unsuitable in the South East by 2050 in a high emissions rate scenario. Whilst *Betula pendula* (Silver Birch) has been identified as marginal by 2050 under a high emissions scenario, it is recommended that the number of downy birch be reconsidered in favour of similar yet more resilient species, and silver birch.

Native species suggested as options to diversify birch planting include:

1180. *Sorbus aria/aucuparia/torminalis* (whitebeam/rowan/ wild service tree) moderately dense crown and can reach between 15 – 22m in height. High value to pollinators and other wildlife.

Small to medium native species suggested for planting through-out the scheme include:

1181. *Acer campestre* (field maple), good for wildlife, can be utilised as hedging.

1182. *Crataegus laevigata/monogyna* (Hawthorn) high ecological value, has a denser crown, could be utilised as hedging. It can be grown as a multi-stem, and can host some diseases.

General comments on tree planting approach:

1183. Good practice for planting for future resilience is to utilise the 10:20:30 approach; no more than 10% of all trees planted should be the same species, no more than 20% of all trees planted should be the same genus, and no more than 30% of all trees planted should be of the same family.

1184. Subject to conditions the proposal would be compliant with Local Plan policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2. As part of the recommended conditions, the applicant should consider and provide information on the development's impact on the Urban Heat Island, as per Policy CR1: Overheating and Urban Heat Island Effect, for example by maximising street level shading as part of the landscaping strategy.

1185. Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. They have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that a pre-commencement condition that no development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. In addition, the development is located within 15m of a strategic water main and further conditions relating to piling are recommended to protect the local underground water utility infrastructure.

Conclusion on Sustainability

1186. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of

development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

1187. The proposed development would deliver a low carbon and energy efficient development of the highest sustainability quality that commits to a high 5* NABERS UK rating and is on track to achieve an “outstanding” BREEAM assessment rating for the proposed main use (offices), in overall compliance with London Plan policy SI 2, Local Plan policy CS15 as well as Draft City Plan 2040 policy DE1. The proposals initially cannot meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme due to the proposed connection to the local heat network, however, the demonstrated high energy efficiency and the anticipated decarbonisation of the heat network and increasing heat network efficiency would reduce the carbon emissions associated with energy use as heat networks develop to supply heat and coolth in the most efficient way. In addition, the development would contribute to the expansion of heat networks on site for the City of London to help deliver the Local Area Energy Plan of the City of London.

1188. The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that the redevelopment scenario would – due to the complexity of the existing site - result in the lowest whole life-cycle carbon emissions per square meter GIA out of the 6 options that considered a variation of retention and use scenarios while providing the best long term solution for the successful integration of the site into the City, through connectivity, urban design and ultimately future proofing with high levels of urban greening, climate resilience, flexibility and diversity of uses. Despite its highest level of overall whole life-cycle carbon emissions due to its largest size, the redevelopment option has been further developed for the application scheme to achieve these benefits along with a commitment for a whole life-cycle carbon performance exceeding the GLA’s Aspirational Benchmark. These targets are coupled with a strategy to achieve maximum flexibility, adaptability and material optimisation to satisfy the GLA’s circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Security

1189. London Plan Policy D11 (‘Safety, security and resilience to emergency’) states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the

design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

1190. Local Plan Policy CS3 ('Security and Safety') seeks to ensure that the City is secure from crime, disorder, and terrorism. Local Plan Policy DM3.2 ('Security measures in new developments and around existing buildings') seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 ('Crowded places') requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.

1191. Security proposals to protect the building and the new areas of public realm have been developed. During the construction phase, as detailed within the Construction and Environment Management Plan (CEMP) the contractor is to ensure that the Site is secure at all times to prevent unauthorised entry (Multiplex, 2023). In addition, a security firm with experience of large construction projects will be engaged to manage site security, in addition to CCTV and a 24-hour security personnel presence. During the operational phase, areas within the public realm will be well-lit, with active frontages providing passive surveillance, in addition to the presence of building management personnel.

1192. Security proposals to protect the building, its users, and new areas of public realm have been developed in consultation with the City of London Police. An HVM Protection Strategy has been developed which covers Hostile Vehicle Mitigation (HVM) to protect the public spaces and structures. This proposes a mix of planters, landscaping and bollards. It is noted that some of which would sit within the proposed CoL highway boundary.

1193. In addition, the potential impact of any vehicle impact upon the structure has also been considered. It is noted that the installation of a HVM protected measures to protect the public plaza removes the threat of vehicle impact from many of the elevations and structures, leaving just the perimeter columns 'exposed' in a few locations to vehicle impact and that the majority of the columns that land on the pavement are surrounded by low level planters. A robustness strategy considers measures to ensure that the columns are designed to withstand vehicle impact.

1194. Details of the overall security strategy, including further details of HVM measures, and a Public Areas Management Plan will be required by condition

which will detail more specifically the measures to protect the building and its different user groups. The proposal, subject to conditions would be in accordance with policy DM3.2.

Suicide Prevention

1195. Policy DM 3.2 of the adopted Local Plan 2015 ('Security measures in new developments and around existing buildings') aims to ensure that appropriate security measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm. Policy DE5 of the draft submission City Plan 2040 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling. The City Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrent capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

1196. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:

K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, and
(B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.

1197. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge

protection need to be appropriately designed and should take into consideration British Standard BS 6180: Barriers in and around buildings.

1198. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advises a barrier height of at least 2.5 metres high, no toe or foot holds, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with Building Regulation standards and, where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to adverse weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.

1199. The proposal includes elevated outside areas and details of barriers and other mitigation measures have been submitted. This has been assessed against the guidance and with the assistance of the relevant Senior Public House Practitioner. In most instances the height of the proposed barriers and other measures are adequate but where further measures are necessary, this is indicated in the table below.

Space	Approximate height	Barrier height/mitigations as currently proposed	Further mitigations required (by Condition)
Glade pathway around oculus at highwalk level.	6.6m above ground floor performance space level below.	1.1m (details to be provided)	
Glade -highest point at outer edge of the structure	9.7m to street level at highest point	Multiple obstructions to reaching the highest drop from the outer edge of the structure including in sequence climbing a high-backed bench, through dense ground cover and shrub planting, and over a 1.5m tall guardrail to reach this location.	Suggest thorny plants and whether potential to use bench as step
Highwalks-highest level changes	6.8m to the northern edge of the highwalk	A 1.1m high guardrail is provided at this location. Final details and height will be secured by planning condition	Suggest thorny plants

	<p>alongside the east of New Bastion House.</p> <p>10.0m drop at highest point for a short segment of Highwalk along London Wall connecting to the East.</p>	<p>At this location a 1.1m high planter box acts as a guardrail which creates an additional obstacle at the small area with the highest drop.</p>	
Pedestrian Bridge over London Wall	<p>6.5m height of walking surface above street level.</p> <p>➤</p>	<p>The balustrade/upstand edge protection height gradually changes along the length of the proposed bridge from a minimum of 1.1m at the connecting ends of the bridge, to a maximum of 1.8m high at the centre point of the crossing above the road.</p>	<p>Consider use of glass for balustrade</p>
Rotunda Rooftop Public Terrace	<p>Distance to ground from the terrace level is approx. 55m</p>	<p>Planters of approx. 0.5m high form an obstruction to reaching the edge of the building. At the edge of the building a glazed balustrade of 1.8m high is sited above the planter. Total edge protection height of 2.3m.</p>	<p>Height of barrier adequate but the planter could be used as a step so either raise the glass/remove the planter/make sure it is a thorny plant in there and add soft measures e.g.: cctv that is monitored/ smart cctv and motion activated light.</p>
New Bastion House Rooftop Terrace (private)	<p>Distance to ground from the terrace level is approx. 64m.</p>	<p>Planters of approx. 0.5m high form an obstruction to reaching the edge of the building. At the edge of the building a glazed balustrade of 2.2m high is sited above the planter. Total edge protection height of 2.7m.</p>	<p>Height of barrier acceptable, but would still advise to put thorny plants in the planter and have some soft measures as above.</p>
North Building Rooftop Terrace (private)	<p>Distance to ground from the terrace level is approx. 17m.</p>	<p>Planters of approx. 0.5m high form an obstruction to reaching the edge of the building. At the edge of the building a glazed balustrade of 1.2m high is sited above the planter. Total edge protection height of 1.7m.</p>	<p>Height of barrier a bit low especially with the planter beneath that can be used as a step, either raise the height of the glass or take the planter away, if planter kept, need thorny plant and add soft measures e.g.: cctv that is monitored/ smart cctv and motion activated light.</p>
Balconies		<p>They are inaccessible except for maintenance access. They are planted with hardy grasses, and</p>	<p>Noted, inaccessible.</p>

Balconies run up the inner facades of the proposed new commercial buildings (New Bastion House and Rotunda Building).		evergreen climbers and creeping plants.	Where accessible, increase height of barriers.
Rooftop and roof terrace maintenance		<ul style="list-style-type: none"> • Access prevented for regular building occupants / visitors to typical rooftop service, plant areas and planted roof areas. • Requisite fall protection for safe maintenance of the roof / roof garden areas. 	

1200. A full risk assessment would be required by condition along with further details of the height of the safety screens to the viewing platform and further management controls such as the training of staff in suicide awareness. Subject to the recommended Condition, the proposal would comply with the relevant development plan policies notably DM3.2.

Fire Statement

1201. A Fire statement has been submitted outlining the fire safety strategy for all buildings. The City District Surveyor's office has reviewed the submitted fire statement and has confirmed that this is in accordance with policies D5 and D12 of the London Plan. The Fire Statement is therefore adequate for the planning stage and is secured by condition.

Assessment of Public Benefits and the NPPF Paragraph 208 balancing exercise

1202. Under s16 and s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard must be had to the desirability of preserving the settings of the aforementioned listed buildings, and under s72 of the same Act, special attention paid to the desirability of preserving or enhancing the character or appearance of the Barbican and Golden Lane Conservation Area.

1203. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paras 205 and 206).

1204. The proposal would result in less than substantial harm via indirect setting impacts to the significance of three listed buildings and a conservation area, as follows:

- St Bride's Church (grade I) – low level of less than substantial harm through the proposal's slight erosion of its sky silhouette in the view from Hungerford Bridge
- St Botolph Aldersgate (grade I) – low level of less than substantial harm through the proposal's background presence in views from Postman's Park
- Postman's Park Conservation Area – slight level of less than substantial harm through the proposal's background presence in views from Postman's Park

1205. Given the proposal would result in harm to the significance of a conservation area and of listed buildings, including Grade I listed buildings, there is a strong presumption against the grant of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits.

1206. The proposal would trigger paragraph 208 of the NPPF, which states 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

1207. Public benefits could be anything that delivers economic, social or environmental objectives as described in the NPPF (para 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public to be genuine public benefits.

1208. The key economic, environmental, and social public benefits which flow from the proposal are considered to be:

1209. Economic:

- The provision of 56,211 sqm of grade A office floorspace, will contribute to office floorspace requirements for the City delivering an estimated net increase of 3091 FTE employees. This uplift will contribute significantly to inward investment in the Square Mile and supports the strategic objective to maintaining a world class city which is competitive and promotes opportunity.

- The provision of 7,186.4 sqm of accessible cultural uses across multiple levels of the site including a rooftop viewing gallery and the revealing of archaeological remains would drive footfall and therefore increase spend in the City as well as provide leisure and educational opportunities for the wellbeing of workers, residents, and visitors.
- The provision of 13,032sqm of new or improved external public realm across the site combined with improvements to the road layout would transform the appearance, image and function of the locale by making the area more enticing for people to visit and stop and dwell which would drive footfall and increase spend across the City.
- The enhanced public realm combined with the cultural offer would drive footfall through the site during the day, evenings and weekends. It would become a significant destination on the cultural spine from Tate Modern to the Barbican Arts Centre. Occupiers on site and in the locale would benefit from the increase in footfall and the high-quality amenities provided by the proposed development.
- The proposal would transform and regenerate the western end of London Wall making it an attractive environment for wider investment.

1210. Collectively these benefits are attributed **substantial** weight.

1211. Environmental:

- It would deliver growth in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- At a local level the proposal would result in significant enhancement of the public realm at ground and at first floor level. The public realm proposals are considered to exceed policy compliance by delivering several new and/or improved public spaces and routes totalling 13,032sqm. The proposals would deliver enhanced permeable public space, active and cultural uses which will enhance urban greening, and the quality, appearance and distinctiveness of the site and the Barbican as a cultural destination, including new views and heritage appreciation, all of which aligns with the aspirations of Destination City.
- The significant increase and extent of urban greening on the buildings and in the new public spaces would provide a healthy, sustainable and biodiverse environment for all to access; including the incorporation of historic monuments and other uses which would benefit the wider area. The urban greening is exemplary and the UGF 0.41 would exceed emerging City Plan Policy targets.
- The local area would be transformed through improvements to the public realm for pedestrians and cyclists, pavement widening, road layout and streetscape enhancements, new high walks and wayfinding would

encourage active travel and support the wellbeing of users and improve highway safety constituting a key social and environmental benefit in a congested and polluted area. The details of the highway land are to be secured through conditions with the highway improvement works to be delivered through a s278 agreement (or through the agreement of a scheme of highway works if the City Corporation was to bring forward the development itself)

- The direct impacts to Ironmongers Hall include improvements to immediate and wider setting, with an overall beneficial heritage impact upon the ability to appreciate the hall's significance;
- The direct impacts to the Barbican Estate through the extension of Mountjoy Highwalk would fulfil the design intentions and would be an overall beneficial heritage benefit to the southern part of the Estate;
- Extension of the Citigen plant.

1212. Collectively these benefits are attributed a **Substantial** level of weight.

1213. Social:

- The proposals will reimagine this part of the city by delivering a more pleasant and easily accessible, inclusive and well-connected place for all through the provision or improvement of several pedestrian routes and high quality public spaces, exceeding policy compliance, totalling 13,032sqm of new or improved external public realm;
- A range of connected flexible cultural spaces at lower ground, ground, top floor and roof level have been designed to accommodate new audiences; workers, visitors and residents and provide opportunities for relaxation and leisure, these could be operated by a single anchor or multiple operators;
- The cultural proposals would attract new audiences, alongside the enhanced public realm, a new destination in the City would be created. The quality and extent of the public realm would support the social vibrancy of the area through encouraging activity on evenings and weekends. The site would attract visitors, increase tourism, support and enhance the image of the area;
- Learning and educational opportunities associated with the maker spaces and significant scope for apprenticeships through the commercial floor space uplift.
- Enhance the setting, public access and understanding of Bastion 14. Create free public access to a dedicated exhibition revealing the hidden Roman Fort gate;
- The unique combination of enhanced existing and new cultural experiences, food and beverage and new/ revitalised landscaped public spaces will promote socialisation, wellbeing and support vibrancy

- The proposal will include the provision for Cultural Events to bring a new dynamic to the City and facilitate a 7/7 Destination City.
- The proposal would secure a S.106 obligation of £1,635,119.00 towards affordable housing provision.

1214. Collectively these are attributed a **Substantial** level of weight.

1215. In relation to the indirect impacts on the grade I buildings, these are designated heritage assets of the highest order. When carrying out the balancing exercise, considerable importance and weight has been given to the desirability of preserving their settings and great weight given to their conservation. When considering the balancing exercise relating to the less than substantial harm caused to the Postman's Park Conservation Area, great weight has been given to its conservation.

1216. When carrying out the para 208 balancing exercise in a case where there is harm to the significance of designated heritage assets, considerable importance and weight should be given to the desirability of preserving the building or its setting. In this case it is the view of officers that the collective package of the public benefits secured, and which flow from the development proposals, would outweigh the heritage harms identified to the designated heritage assets some of which are of the highest calibre, thus complying with para 208 of the NPPF.

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

1217. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1218. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

1219. The Applicants have held a range of meetings with resident associations and other stakeholders and the following stakeholders are considered to be particularly relevant in the context of the Equalities Act:

- Iain Borden Bartlet School Meeting
- City of London Access Group update
- Age UK
- Aldgate School Briefing
- Prior Western School
- Newpark Childcare Barbican/London Wall West
- Partnership for Young London Meeting
- Age UK/Barbican Communities in Residence Meeting
- St Paul's Cathedral
- City of London Primary Academy Islington I
- Canon Barnett Primary School
- Great St Bartholomew Church Wardens
- Healthwatch
- Preservation of Jewish Cemeteries in Europe briefing
- City of London Education Strategy Unit

1220. As set out in the submitted Statement of Community Involvement (SCI), the consultation process meetings and consultation with stakeholders from resident groups, cultural institutions, and community organisations which in particular sought to develop the London Wall West Culture Plan. This feedback formed principles to underpin the development's cultural offer, which will carry forward the commitment to genuine involvement with local stakeholders through co-curation and shared programming with community and cultural partners.

1221. It is the view of officers that a decision to grant permission would remove or minimise disadvantages suffered by persons who suffer from a disability including mobility impairment. In particular, the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability, whether you are pregnant, race, sex, sexual orientation and gender reassignment and marital status. This would be achieved through measures such as the creation of step-free access to all parts of the site, the provision of resting/seating areas in the external landscape and public space. Where feasible this has been located at intervals no greater than 50m and disabled parking bays have been provided. Final details would be secured by condition in order to ensure equality of access. For example, furniture provisions such as cycle stands, bollards and seating areas are indicative and subject to future design detail and development.

1222. It is recognised that noise and disturbance during construction may have a disproportionate impact on certain groups. This has been raised in objections

received some of which comment that the proposed construction works would be harmful to resident's health including children during construction and to health of girls using sports area next to building site. They note that construction noise and disturbance will have a disproportionate impact upon the ill, elderly and housebound. In addition, concern has been raised that some residents including the elderly and those using wheelchairs rely on transport accessing their flat via the ramp into the Thomas More car park. Other concerns raised relate to the closing of bus stops and routes during construction. These points have been considered in the Transport and Accessibility sections of the report and conditions are recommended to mitigate the impacts so far as possible.

1223. In addition, the representations received and the potential impact upon the Jewish Cemetery is of particular relevance with regard to the Equality Act. This has been considered in depth as explained in the Archaeology section to minimise the impact. Continued dialogue would also be necessary with the occupiers of Ironmongers Hall to ensure that the proposed development does not have a disproportionate impact upon protected groups.

1224. It is noted that the Equality Act carries ongoing responsibilities which will continue once the development is complete. As part of considering the design of the building and the physical environment, property management teams for each buildings and public spaces will need to have suitable management policies and procedures to ensure the obligations of the Act are met once the buildings are in operation. This would include the proposed cultural spaces which currently do not have any end user finalised. In formulating the cultural offer, the landowner should continue to engage with a full range of local stakeholders so that its offer is relevant and accessible to all.

Human Rights Act 1998

1225. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).

1226. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result

in an unacceptable impact on the existing use of nearby residential properties including by reason of loss of light or privacy. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City’s primary business and professional services function, outweighs the Minor Adverse impacts on nearby residential properties and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

1227. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining properties and loss of access to the Thomas More car park, it is the view of officers that such interference is in the public interest and proportionate.

CIL and Planning Obligations

1228. It is recommended that a condition be imposed which limits the development which can take place until a planning obligation is entered into. The heads of terms for that planning obligation would mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City’s environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

1229. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

1230. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London’s CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

1231. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance	Contribution	Forwarded to the Mayor	City’s charge for
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with the Mayor of London's policies	(excl. indexation)		administration and monitoring
MCIL2 payable	£5,800,261.53	£5,568,251.07	£232,010.46

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£2,477,452.50	£2,353,579.88	£123,872.63
City Planning Obligations			
Affordable Housing	£1,651,635.00	£1,635,119.00	£16,516.00
Local, Training, Skills and Job Brokerage	£990,981.00	£981,071.00	£9,910.00
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£916,000.00	£916,000.00	£0
Evaluation and Design Fee <i>Not indexed</i>	£250,000 (there will also be an obligation for the developer to pay any excess evaluation and design fees)	£250,000	£0
S106 Monitoring Charge	£3,750	£0	£3,750
Total liability in accordance with the City of London's policies	£6,289,819	£6,135,770	£154,049

City's Planning Obligations

1232. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and

reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
- Construction Monitoring Cost (£53,820 for First Year of development and £46,460 for subsequent years)
- Carbon Offsetting
- Wind Audit
- Solar Glare
- Television Interference Survey
- Public Lift (*Delivery, maintenance and specification*)
- Public Route (*Delivery and Public Access*)
- Cycle hire docking station
- Public Viewing Gallery and The Culture Cap (*Delivery and Public Access*)
 - *The public viewing gallery shall be free to access to all members of the public everyday between the hours of 10:00 and 19:00 or nautical dusk whichever is the later (except Christmas Day, Boxing Day, New Year's Day). The public viewing gallery shall not be closed for private events or hire during the public access hours.*
- Public Realm Space (*Delivery and Public Access*)
- Scheduled Monument (*Public Access*)
- Cultural Hub (*Delivery and Public Access*)
- Highway Improvement Works necessary to make the development acceptable in planning terms - the scope of works may include, but is not limited to:
 - Proposed highways improvement works for the Rotunda roundabout redesign (which forms part of the proposed development)
 - Alterations to highway structures and new/replacement highway structures (including replacement bridge over London Wall);
 - Proposed stopping up of public highway and offering up of private land as public highway, design and constructed up to the highways authorities' standards;
 - Alterations to access to the London Wall car park and any associated structural requirements,
 - Alterations to bell-mouths and associated works to Aldersgate Steet site access ramp and London Wall car park/service road ramp.
 - The highways improvement works will be subject to feasibility studies, Road Safety Audits and Model Auditing Process (MAP)
- Rescission of existing City Walkways and declaration of new City Walkways (*inter alia including details of any temporary routes (if necessary), specifications, management and maintenance of the proposed city walkway and city walkway bridge, covenants relating the requirement to enter into any further legal agreements and obtain all necessary*

consents/licences to remove or construct any city walkway bridges and for the developer to provide any indemnities/collateral warranties/bonds deemed necessary. It is noted that the consent of the Planning and Transportation Committee may be required outside of the planning process if any works to city walkway bridges are to be carried out by another party as the City Corporation's agent).

1233. The appropriate mechanism for securing the planning obligations, and enabling your Committee to give weight to them, requires particular consideration in this case because the applicant (and owner) is the City Corporation. Ordinarily a third-party owner is involved in a development who can enter into a Section 106 Agreement with the City Corporation and give covenants to secure planning obligations. In this case, there is no other interested party involved in the development, so all undertakings and commitments fall to be given by the City Corporation itself.

1234. The fact that the City Corporation would be giving covenants under S.106 of the Town and Country Planning Act 1990 gives rise to a technical enforceability issue because the City Corporation could not take legal action against itself. In order to give weight to the planning obligations, the City Corporation as local planning authority needs to be satisfied that the required planning obligations would be complied with, notwithstanding the lack of ultimate enforcement powers through the courts.

1235. In line with the City Corporation's previous practice, it is considered that the appropriate way of addressing this enforceability issue is for the City Corporation as landowner to resolve to comply with the planning obligations in the event that the City itself implements the planning permission (and that it will ensure that the obligations are binding on any future purchaser or development partner). Additionally, a unilateral undertaking under S.106 should be signed by the City Corporation as landowner, and this will be placed on the Local Land Charges and Planning Registers to provide a public record of the covenants, as is the practice with all S.106 Deeds. It is considered that the recommended pre-commencement condition, along with the dual assurance of a unilateral undertaking and express commitment regarding compliance, would give your Committee reasonable grounds to give weight to the planning obligations in evaluating this application.

1236. Your approval is therefore sought for a unilateral undertaking to be accepted to cover the obligations set out above, together with the payment of the local planning authority's legal and planning administration fees associated with the undertaking. As negotiations on the form of the undertaking will continue after any resolution to grant planning permission, I request that I be given delegated authority to continue to negotiate and agree the terms of the obligations and to make minor changes in the event that changes are needed to vary or add conditions or informatives to those proposed, or to move conditions into

obligations or vice versa, provided always that officers do not exceed the substantive nature of the Committees decision.

Monitoring and Administrative Costs

1237. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

1238. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Conclusions and Overall Planning Balance

Conclusion 23/01304/FULEIA

1239. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

1240. 965 objections to the scheme have been received raising concern over the demolition of Bastion House and the Museum of London and the carbon implications that this would have, the design of the proposal, loss of amenity to residents, harm to heritage assets, the lack of consultation on the proposals prior to submission, the impact of the demolition and construction phase of the development and the impact of the proposed delivery and servicing arrangements on local residents. The Barbican and Golden Lane Neighbourhood Forum, Ironmongers' Company, Barbican Quarter Action and the Barbican Association Planning Sub Committee are some of those that raise objections to the scheme. Historic England consider that the proposal would result in less than substantial harm to the Grade I listed St Bride's Church, Grade I listed St Botolph's Church, Grade II listed Barbican Estate and its Grade II* Registered Garden, the Monuments of London Wall and the Postman's Park Conservation area. The Twentieth Century Society similarly consider that the scheme would result in less than substantial harm and strongly object to the demolition of the Museum of London and Bastion House stating that they should be considered Non-Designated Heritage Assets. The Surveyor to the Fabric of St Paul's Cathedral identify minor less than substantial harm to the Cathedral.

1241. It is proposed that the existing Museum building and Bastion House would be demolished, and the Rotunda roundabout would be removed. An office-led development would be provided with, cultural use and retail space on its lower

levels in addition to a viewing gallery in the Rotunda building at roof level. Three office buildings are proposed alongside a newly configured highway arrangement and an extensive network of public realm improvements.

1242. The proposals would deliver 56,211 sqm (GIA) of high-quality flexible office space that would contribute towards maintaining the City's position as the world's leading international financial and business centre.

1243. The proposed New Bastion House and Rotunda buildings would be classed as tall buildings under policy and thin sliver of the New Bastion Tower would be within the Barbican and Golden Lane Conservation Area designation. This would result in conflict with policy CS14(2) of the Local Plan 2015 and therefore London Plan policy D9 B (3). Officers have thoroughly assessed the qualitative impact of the proposals, in line with the criteria of D9 C and D, and conclude that these parts of the policy are complied with.

1244. The western end of London Wall, which is currently a hostile, traffic dominated environment would be regenerated by the proposals. The proposed development would optimise the use of the land delivering a high-quality, mixed-use space, with exemplary architecture surrounded by an extensive network of new public realm that reconciles complex level changes across the site to create a cohesive and legible new environment. Cultural opportunities would be created on the site through the provision of 8,150.9 sqm (GIA) sqm of cultural space. The cultural offer would better reveal the site's history by opening up and positively representing the remains of the Roman Wall and West Gate of Cripplegate Fort which are currently in a locked room in the London Wall car park.

1245. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of permission.

1246. In transportation terms the proposal would radically transform a brutal road junction in line with aspirations set out in the City's Transport Strategy. Policy compliant levels of cycle parking are proposed which would encourage active travel to the site. On analysis of the pedestrian environment, it is concluded that the net uplift in walking trips around the site can be satisfactorily accommodated

via the proposed pedestrian network. Local residents have raised concerns about the proposed delivery and servicing arrangements and the indicative arrangements that have been proposed for demolition and construction traffic. In respect of demolition and construction traffic, de construction and construction logistics plans would be required by condition. Subject to stringent controls details of which would need to be set out in a delivery and servicing management plan, it is considered that the proposed servicing arrangement would be acceptable.

1247. The lack of retention of buildings on site and the high embodied carbon impacts from the proposed new build scheme for a much larger development have attracted heavy criticism and formed one of the main grounds of objection to the scheme. It is considered that the proposal would deliver a low carbon and energy efficient development of the highest sustainability quality that commits to a high 5* NABERS UK rating and is on track to achieve an “outstanding” BREEAM assessment rating for the office use in accordance with Local Plan and London Plan requirements. The development would contribute to the expansion of the heat network through accommodating the location of plant in the basement of the Rotunda building, this would help deliver the City of London Local Area Energy Plan.

1248. The assessment of options for the existing buildings on the site has been carried out in accordance with the Carbon Options Guidance 2023. It confirmed that a redevelopment scenario would – due to the complexity of the existing site – result in the lowest whole life-cycle carbon emissions per square meter GIA out of the options that were considered. Despite its highest level of overall whole life-cycle carbon emissions due to its largest size, the redevelopment option has been developed to provide a long term solution for the site through successful integration into the City through connectivity, urban design and ultimately future proofing with high levels of urban greening, climate resilience, flexibility and diversity of uses alongside a commitment for a whole life-cycle carbon performance exceeding the GLA’s aspirational benchmark. This is coupled with a strategy to achieve maximum flexibility, adaptability and material optimisation to satisfy the GLA’s circular economy principles.

1249. The proposal would fail to preserve the significance/special interest or setting of the following designated heritage assets and would result in low to slight levels of less than substantial harm to St Brides Church (I), Church of St Botolph (I) and Postman’s Park Conservation Area. There would also be some conflict with Local Plan policies CS14(2), CS12 (1), DM12.1 (1), CS13 (1 and 2) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. The proposals comply with Local Plan CS14 (1,3 and 4), CS 12 (2-5) DM12.1 (2-5) DM 12.2, DM12.4 and DM12.5 and Draft City Plan S11 (2-5) S 13 (3) , Policies HE1 and HE2 and the objective set

out in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1250. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design, culture, environmental and public realm related policies.

1251. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

1252. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with as well as policies relating to office floor space delivery, environmental impacts, provision of a cultural offer and public realm delivery would be complied with, and as the relevant design policies, and the criteria in London Plan policy D9C and D are satisfied, the proposals would comply with the development plan when considered as a whole.

1253. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

1254. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the Unilateral Undertaking.

1255. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

1256. As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be).

1257. In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 208 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth, also indicate that planning permission should be granted.

1258. National Planning Guidance advises that conflict between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs as guided by the NPPF.

1259. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Conclusion on 23/01277/LBC

1260. The special architectural and historic interest of the Barbican Estate would be fully preserved. The new highwalk connections would not result in the loss of any historic fabric. The extension of Mountjoy Highwalk would fulfil the original design intentions plans for a link in this location and would be a heritage benefit. Elsewhere the amendments to John Welsey Highwalk would improve the permeability and pedestrian experience in the southern part of the Estate. The other direct impacts to the car park, and CLGS boundary are to areas of low heritage significance. The increased landscaping would soften the boundary and there would be no harm to historic fabric. The final details and samples of materials of all these elements would be conditioned to maintain quality and workmanship and Historic England and City Gardens would be consulted.

1261. The heritage significance of the Barbican Estate, and its appreciation, would be preserved and slightly enhanced and the proposals would comply with Local Plan Policies CS12, DM12.3 draft City Plan policies S11 and HE1 and London Plan Policy HC1, and with the objective set out in Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.

Conclusion on 23/01276/LBC

1262. Ferroner's House which is attached and linked to Ironmongers Hall dates from the 1970s and is specifically excluded from the listed building designation. This is of no heritage value and would be demolished and replaced with a single storey brick extension in its place which would be lower in height than the projecting

porch to Ironmongers' Hall. This demolition would reveal more of the existing stair/lift tower attached to Ironmongers Hall also excluded from the listing designation. Alterations are proposed to the stair/lift tower to improve its relationship with the listed building. These elements do not technically require listed building consent but have been included in the application for the sake of completeness and due to the interfaces with the listed building which would need to be detailed via conditions. Internally at lower-ground level a small storage room which forms part of the modern fit out within the existing circulation space and simple historic nibs would be demolished. A new doorway would be created in the external north elevation within the lower-ground floor lobby to provide access to a new service area for the Ironmongers' Hall. The proposed new door is located within a structure comprising simple and functional brickwork. These internal alterations are considered to have neutral impacts and are in areas of limited heritage significance.

1263. In addition, proposals include demolition and reconstruction of part of the perimeter wall to the south and east of the Ironmongers' Hall which again does not form part of the listed building but adjoins its boundary.

1264. Overall, the listed building consent proposals are minor and affect areas of no or low interest and the heritage significance of the Ironmongers Livery Hall and its appreciation, would be preserved. The proposals would comply with Local Plan Policies CS12, DM12.3 draft City Plan policies S11 and HE1 and London Plan Policy HC1, and with the objective set out in Section 16 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.

Background Papers

Consultation Responses:

13/12/23 - 06:53	Mr Matthew Rees	Objection	23/01304/FULEIA
17/12/23 - 17:22	Graham Webb	Objection	23/01304/FULEIA
18/12/23 - 16:07	Mr Fred Rodgers	Objection	23/01304/FULEIA
21/12/23 - 16:08	Matthew Doidge	Neutral	23/01304/FULEIA
23/12/23 - 11:49	Joellen Secondo	Objection	All three
23/12/23 - 13:00	Mr Mark Bogod	Support	23/01304/FULEIA
23/12/23 - 15:02	Dr Dimitri Varsamis	Objection	23/01304/FULEIA
25/12/23 - 07:39	Ms Clare Fielding	Support	23/01304/FULEIA
27/12/23 - 11:23	Mr Mark Simpson	Objection	23/01304/FULEIA
27/12/23 - 12:35	James Curtis	Objection	23/01304/FULEIA
27/12/23 - 15:51	Mr Tom Matthews	Objection	23/01304/FULEIA
27/12/23 - 16:13	Mr Adlai De Moura Stewart	Objection	23/01304/FULEIA
27/12/23 - 19:21	Mr Stephan Solomonidis	Objection	23/01304/FULEIA
27/12/23 - 19:31	Mr S PRESS	Objection	23/01304/FULEIA
27/12/23 - 19:34	Kurt Bredenbeck	Objection	23/01304/FULEIA
27/12/23 - 20:08	Miss Katie Hill	Objection	23/01304/FULEIA
27/12/23 - 20:10	Ms Tian Lan	Objection	23/01304/FULEIA
27/12/23 - 23:13	Miss Yvonne Trew	Objection	23/01304/FULEIA
28/12/23 - 03:08	Mr Arthur Savile	Objection	23/01304/FULEIA
28/12/23 - 07:07	Mr Simon Martner	Objection	23/01304/FULEIA
28/12/23 - 08:03	Dr Eric Guibert	Objection	23/01304/FULEIA
28/12/23 - 12:25	Mr Alberto Garciga	Objection	23/01304/FULEIA
28/12/23 - 12:29	Dr Leslie Joffe	Objection	23/01304/FULEIA
28/12/23 - 12:43	Mr Nick England	Objection	23/01304/FULEIA
28/12/23 - 14:13	Ms Alex Thiele	Objection	23/01304/FULEIA
28/12/23 - 17:00	Nikita Poplavski	Objection	23/01304/FULEIA
30/12/23 - 12:12	Dr Lucy Pollard	Objection	23/01304/FULEIA
30/12/23 - 18:14	Ms Margaret King	Objection	23/01304/FULEIA
30/12/23 - 20:39	Mr Julian Burgess	Objection	23/01304/FULEIA
31/12/23 - 15:15	Mr Philip Wheatley	Objection	23/01304/FULEIA
01/01/24 - 14:35	Ms Helen Suddards	Objection	23/01304/FULEIA
01/01/24 - 17:07	Ms Ellie Roy	Objection	23/01304/FULEIA
01/01/24 - 20:48	Dr christiane ten hoopen	Objection	23/01304/FULEIA
02/01/24 - 09:49	Dr SELINA ROBERTSON	Objection	23/01304/FULEIA
02/01/24 - 13:26	Alex Young	Objection	All three
02/01/24 - 19:20	Mr Peter Savage	Objection	23/01304/FULEIA
02/01/24 - 19:44	Fred Rodgers	Neutral	23/01304/FULEIA
02/01/24 - 20:59	Mr Fabien Avis	Objection	23/01304/FULEIA
03/01/24 - 08:27	Graham Webb	Objection	23/01304/FULEIA
03/01/24 - 15:29	Mr Graham Wallace	Objection	23/01304/FULEIA
04/01/24 - 21:43	Dr Diana Tyson	Objection	23/01304/FULEIA
05/01/24 - 14:49	Dr Jacqueline Glomski	Objection	23/01304/FULEIA
05/01/24 - 18:07	Ms Emma West	Objection	23/01304/FULEIA

05/01/24 - 18:15	Mr MARK MALLINDINE	Objection	23/01304/FULEIA
06/01/24 - 14:47	Mr Nils Fischer	Objection	23/01304/FULEIA
07/01/24 - 02:16	Sarah Benjamin	Objection	All three
08/01/24 - 09:59	Mr Gareth Owen	Objection	23/01304/FULEIA
08/01/24 - 15:06	Mr Martin Seiffarth	Support	23/01304/FULEIA
09/01/24 - 22:01	Mr Barry Reynolds	Support	23/01304/FULEIA
10/01/24 - 08:53	Miss Lara Phasey	Objection	23/01304/FULEIA
10/01/24 - 11:05	Caroline Bennett	Objection	All three
10/01/24 - 13:15	Elizabeth Simpson	Objection	All three
10/01/24 - 17:03	A Byrne	Objection	23/01304/FULEIA
10/01/24 - 21:16	Mr Peter Duckworth	Objection	23/01304/FULEIA
10/01/24 - 21:21	Miss Fiona Savory	Objection	23/01304/FULEIA
10/01/24 - 21:23	Peter Duckworth	Objection	All three
10/01/24 - 22:23	Judith Duckworth	Objection	All three
11/01/24 - 08:50	Mr Joel Livesey	Objection	23/01304/FULEIA
11/01/24 - 10:16	Mr Simon Houghton	Objection	23/01304/FULEIA
11/01/24 - 11:39	James Y Watson	Objection	All three
11/01/24 - 12:30	Dr Stephen Lubell	Objection	23/01304/FULEIA
11/01/24 - 12:51	Mr Konstantin M	Objection	23/01304/FULEIA
11/01/24 - 13:47	Miss Karen Gilleberg	Objection	23/01304/FULEIA
11/01/24 - 15:01	Mr Vincent Scully	Objection	23/01304/FULEIA
11/01/24 - 15:05	Sheila McIntosh	Objection	All three
11/01/24 - 22:07	Janet Porter	Objection	All three
11/01/24 - 22:59	Guillaume Faucompre	Objection	23/01304/FULEIA
12/01/24 - 10:44	Paul Swain	Objection	All three
12/01/24 - 10:59	Ms Lila Rawlings	Objection	23/01304/FULEIA
12/01/24 - 12:21	Mr Anthony Swanson	Objection	23/01304/FULEIA
12/01/24 - 12:39	Mr Peter Bennett	Support	23/01304/FULEIA
12/01/24 - 15:07	Dr Jane Isley	Objection	23/01304/FULEIA
12/01/24 - 16:08	Miss Sally Bradforth	Objection	23/01304/FULEIA
12/01/24 - 16:27	Hilary Belchak	Objection	All three
12/01/24 - 16:33	Peter Poore	Objection	All three
12/01/24 - 18:53	Ian Collins	Objection	All three
13/01/24 - 09:45	Oliver Stone	Support	All three
13/01/24 - 11:40	Jill Meager	Objection	All three
13/01/24 - 12:10	Gill Thomas	Objection	23/01304/FULEIA
13/01/24 - 12:54	Terence Bennett	Objection	All three
13/01/24 - 15:56	Mrs Sheila McIntosh	Objection	23/01304/FULEIA
13/01/24 - 16:16	Ms Alex Thiele	Objection	23/01304/FULEIA
13/01/24 - 17:23	Dr Jane Bickerton	Objection	23/01304/FULEIA
13/01/24 - 19:49	Ms Patricia McGettigan	Objection	23/01304/FULEIA
13/01/24 - 21:14	Ms Margaret Berer	Objection	23/01304/FULEIA
13/01/24 - 22:07	Mrs Larissa Begault	Objection	23/01304/FULEIA
13/01/24 - 22:15	Mr Julian Pickard-Garcia	Objection	23/01304/FULEIA
14/01/24 - 05:23	Sarah Weston	Objection	23/01304/FULEIA
14/01/24 - 13:03	Kevin Geary and Lisa Hesling	Objection	All three
14/01/24 - 13:53	Steve Smithson	Objection	All three
14/01/24 - 14:07	John Ramsey	Objection	All three

14/01/24 - 14:48	Dr Clare Wood	Objection	23/01304/FULEIA
14/01/24 - 14:59	David Andrews	Objection	All three
14/01/24 - 16:07	Victoria Raffé	Objection	All three
15/01/24 - 11:21	Fred Rodgers	Objection	All three
15/01/24 - 12:31	Oliver Shaw	Objection	23/01304/FULEIA
15/01/24 - 12:45	Dr Duncan Greig	Objection	23/01304/FULEIA
15/01/24 - 13:00	Mr David Reeves	Objection	23/01304/FULEIA
15/01/24 - 14:16	Mr Tim Parker	Objection	23/01304/FULEIA
15/01/24 - 14:16	Kathleen Bailey	Objection	All three
15/01/24 - 15:18	Mr Ian Martin	Objection	23/01304/FULEIA
15/01/24 - 16:26	Linda Brown	Objection	All three
15/01/24 - 16:41	Reed Landberg	Objection	All three
15/01/24 - 17:21	Tessa Montgomery	Objection	All three
15/01/24 - 19:26	Mr James McKay	Objection	23/01304/FULEIA
15/01/24 - 19:31	Jenny Watson	Objection	All three
15/01/24 - 19:41	Miss Ruth King	Objection	23/01304/FULEIA
15/01/24 - 21:19	Dr Linda Partridge	Objection	23/01304/FULEIA
15/01/24 - 08:34	Mr David Coleman	Objection	23/01304/FULEIA
16/01/24 - 09:34	Dr James Backhouse	Objection	23/01304/FULEIA
16/01/24 - 10:14	Claire Pike	Objection	All three
16/01/24 - 13:27	Tony Lee	Objection	All three
16/01/24 - 14:29	Dr Cathy Ross	Objection	23/01304/FULEIA
16/01/24 - 14:31	Julia Robinson	Objection	All three
16/01/24 - 16:00	Mr Chris Price	Objection	23/01304/FULEIA
16/01/24 - 16:04	Mrs Brenda Szlesinger	Objection	23/01304/FULEIA
16/01/24 - 16:16	Ms Sian Emmison	Objection	23/01304/FULEIA
16/01/24 - 18:03	Michael Friel	Objection	All three
16/01/24 - 20:34	Simon Cooper	Objection	23/01304/FULEIA
16/01/24 - 21:02	Mr Jonathan Reid-Edwards	Objection	23/01304/FULEIA
16/01/24 - 22:18	Gonzalo Casco Sanchez	Objection	All three
17/01/24 - 10:31	Mr Richard Collins	Objection	23/01304/FULEIA
17/01/24 - 12:15	Ms Samantha Logan	Objection	23/01304/FULEIA
17/01/24 - 12:18	Mr Patrick Gibbons	Objection	23/01304/FULEIA
17/01/24 - 12:26	Janet Porter	Objection	All three
17/01/24 - 13:30	Tory Young	Objection	All three
17/01/24 - 14:51	Tony Lee	Objection	All three
17/01/24 - 15:57	Ms Pauline Ashall	Objection	23/01304/FULEIA
17/01/24 - 17:25	Ms Janet Porter	Objection	23/01304/FULEIA
17/01/24 - 20:44	Mr Paul Lincoln	Objection	23/01304/FULEIA
17/01/24 - 22:14	Mr Angus Henry McNeill Peel	Objection	23/01304/FULEIA
18/01/24 - 07:12	Mrs karen young	Objection	23/01304/FULEIA
18/01/24 - 12:24	Mrs Anne Page	Objection	23/01304/FULEIA
18/01/24 - 12:32	Darrell Corner	Objection	All three
18/01/24 - 17:16	Tony Lee	Objection	All three
18/01/24 - 22:03	Barnaby Spurrier	Objection	All three
19/01/24 - 09:52	Mr Richard Tomblin	Objection	23/01304/FULEIA
19/01/24 - 12:56	Tony Lee	Objection	All three
19/01/24 - 15:38	Mr Jonathan Mendelow	Objection	23/01304/FULEIA

19/01/24 - 15:50	Mr David Mackie	Objection	23/01304/FULEIA
20/01/24 - 11:15	Mr Roy Sully	Objection	23/01304/FULEIA
20/01/24 - 16:03	Miss Alison Gowman	Objection	23/01304/FULEIA
20/01/24 - 16:59	Dr Michael Pike	Objection	23/01304/FULEIA
21/01/24 - 14:39	Mrs Monique Long	Objection	23/01304/FULEIA
21/01/24 - 16:15	Sarah Stobbs	Objection	All three
21/01/24 - 17:03	Vivien Fowle	Objection	All three
21/01/24 - 17:38	Mr David Nesbit	Objection	23/01304/FULEIA
21/01/24 - 19:34	Matthew Rees	Objection	23/01304/FULEIA
21/01/24 - 19:44	Matthew Rees	Objection	23/01304/FULEIA
21/01/24 - 20:59	Miss Jane Northcote	Objection	23/01304/FULEIA
21/01/24 - 22:53	Chairman of the Rabbinical Board	Neutral	All three
21/01/24 - 23:05	Mr Konstantinos Karampelas	Objection	23/01304/FULEIA
21/01/24 - 23:21	Simon Martner	Objection	All three
22/01/24 - 09:05	Brenda Szlesinger (Thom M HG)	Objection	All three
22/01/24 - 11:07	Mr John Hall	Objection	23/01304/FULEIA
22/01/24 - 11:30	Ms Ruth Cooke-Yarborough	Objection	23/01304/FULEIA
22/01/24 - 11:51	Richard Dykes	Objection	All three
22/01/24 - 13:25	Tony Lee	Objection	All three
22/01/24 - 14:45	Ms Candace Gillies-Wright	Objection	23/01304/FULEIA
22/01/24 - 16:00	Barnaby Spurrier	Objection	All three
22/01/24 - 17:15	Mr Matthew Bell	Objection	23/01304/FULEIA
22/01/24 - 18:06	Mrs Pauline Pearson	Objection	23/01304/FULEIA
22/01/24 - 20:38	Mr Jean Nicolai	Objection	23/01304/FULEIA
22/01/24 - 20:42	Ms Vony Drouant	Objection	23/01304/FULEIA
22/01/24 - 20:48	Miss Olivia Nicolai	Objection	23/01304/FULEIA
22/02/24 - 20:50	Al Nicolai	Objection	23/01304/FULEIA
23/01/24 - 10:52	Mr Robert Morgan	Objection	23/01304/FULEIA
23/01/24 - 11:05	Peter Poore	Objection	23/01304/FULEIA
23/01/24 - 11:44	Valerie Faiers	Objection	All three
23/01/24 - 12:19	Ms Brenda Szlesinger	Objection	23/01277/LBC
23/01/24 - 12:21	Ms Brenda Szlesinger	Objection	23/01276/LBC
23/01/24 - 12:31	Hilary Belchak	Objection	23/01304/FULEIA
23/01/24 - 12:33	Ms Hilary Belchak	Objection	23/01276/LBC
23/01/24 - 12:36	Ms Hilary Belchak	Objection	23/01277/LBC
23/01/24 - 14:24	Ms Jane Dickson	Objection	23/01304/FULEIA
23/01/24 - 14:39	Ms Sylvia Lucas	Objection	23/01304/FULEIA
23/01/24 - 14:42	Ms Sylvia Lucas	Objection	23/01277/LBC
23/01/24 - 14:43	Ms Sylvia Lucas	Objection	23/01276/LBC
23/01/24 - 15:00	Mr Jan Demytri Szczesny	Objection	23/01304/FULEIA
23/01/24 - 15:35	Mrs Jane Wainwright	Objection	23/01304/FULEIA
23/01/24 - 18:07	Mr Paul Tilley	Objection	23/01304/FULEIA
23/01/24 - 18:45	Mrs Jane Wainwright	Objection	23/01304/FULEIA
23/01/24 - 18:54	Mr Roger Tynan	Objection	23/01304/FULEIA
23/01/24 - 19:12	Mr Bert Rozeman	Neutral	23/01304/FULEIA
24/01/24 - 04:07	Barnaby Spurrier	Objection	All three

24/01/24 - 09:03	Ms Sylvia Evans	Objection	23/01304/FULEIA
24/01/24 - 10:47	Hilary Sunman	Objection	23/01304/FULEIA
24/01/24 - 10:53	Hilary Sunman	Objection	23/01304/FULEIA
24/01/24 - 14:30	Mr Jonathan Palmer-Hoffman	Objection	23/01304/FULEIA
24/01/24 - 14:38	J. E. Dix	Objection	All three
24/01/24 - 16:55	Ms Wendy-Jane Catherwood	Objection	23/01304/FULEIA
24/01/24 - 17:09	Mr Stuart MacKenzie	Objection	23/01304/FULEIA
24/01/24 - 17:27	Dr Bob Harris	Objection	23/01304/FULEIA
24/01/24 - 17:45	Dr Bob Harris	Objection	23/01304/FULEIA
24/01/24 - 22:35	Mr Henry Morgan	Objection	23/01304/FULEIA
25/01/24 - 09:03	Ms Joanna Rogers	Objection	23/01304/FULEIA
25/01/24 - 10:41	Mrs Jennifer Harris	Objection	23/01304/FULEIA
25/01/24 - 11:17	Mr Clive Bannister	Support	23/01304/FULEIA
25/01/24 - 12:00	Colin Slaughter	Objection	23/01304/FULEIA
25/01/24 - 13:32	Mr David Hawkins	Objection	23/01304/FULEIA
25/01/24 - 17:57	Charles Thomson	Objection	23/01304/FULEIA
25/01/24 - 18:04	Justin Rogers	Objection	23/01304/FULEIA
25/01/24 - 19:09	Alma Tischlerwood	Support	23/01304/FULEIA
25/01/24 - 20:24	Al Nicolai	Objection	23/01276/LBC
25/01/24 - 20:27	Al Nicolai	Objection	23/01277/LBC
25/01/24 - 20:28	Vony Drouant	Objection	23/01277/LBC
25/01/24 - 20:29	vony drouant	Objection	23/01276/LBC
25/01/24 - 20:49	Olivia Nicolai	Objection	23/01277/LBC
25/01/24 - 20:52	Olivia Nicolai	Objection	23/01276/LBC
25/01/24 - 21:50	Ms Imogen Malpas	Objection	23/01304/FULEIA
25/01/24 - 22:12	Mr Jonathan Dow	Objection	23/01304/FULEIA
26/01/24 - 03:21	Mr John Holland	Objection	23/01304/FULEIA
26/01/24 - 06:33	Brendan Barnes	Objection	23/01304/FULEIA
26/01/24 - 07:00	Brendan Barnes	Objection	23/01304/FULEIA
26/01/24 - 07:23	Mr Brendan Barnes	Objection	23/01304/FULEIA
26/01/24 - 09:44	Mrs Emma Leaper	Objection	23/01304/FULEIA
26/01/24 - 10:51	Avril Ormsby	Objection	All three
26/01/24 - 12:58	Mr Jonathan Vaughan	Support	23/01304/FULEIA
26/01/24 - 15:44	Mr James Soane	Objection	23/01304/FULEIA
26/01/24 - 16:00	Barnaby Spurrier	Objection	All three
26/01/24 - 17:17	C Sun	Objection	23/01304/FULEIA
26/01/24 - 17:51	E. C. Price	Objection	All three
26/01/24 - 20:19	Mr Thomas Hulls	Objection	23/01304/FULEIA
26/01/24 - 23:38	Dr Joy Townsend	Objection	23/01304/FULEIA
27/01/24 - 05:34	Mr Paul Farmer	Objection	23/01304/FULEIA
27/01/24 - 08:38	Dr Jane Insley	Objection	23/01304/FULEIA
27/01/24 - 09:24	Mrs Christine Clifford	Objection	23/01304/FULEIA
27/01/24 - 10:27	Dr peter poore	Objection	23/01277/LBC
27/01/24 - 10:30	Dr peter poore	Objection	23/01276/LBC
27/01/24 - 10:51	Miss Zoe McMillan	Objection	23/01304/FULEIA
27/01/24 - 11:05	Mr Paul Eardley	Objection	23/01304/FULEIA
27/01/24 - 11:12	Ms Shirley Day	Objection	23/01304/FULEIA
27/01/24 - 12:01	Mr Guy Howes	Objection	23/01304/FULEIA

27/01/24 - 12:22	Dr Audrey Brown	Objection	23/01304/FULEIA
27/01/24 - 12:37	Mr Martin Luff	Objection	23/01304/FULEIA
27/01/24 - 12:39	Martin Luff	Objection	23/01304/FULEIA
27/01/24 - 13:11	Ms Feona Hamilton	Objection	23/01304/FULEIA
27/01/24 - 13:44	Ms Evangelia Balanou	Objection	23/01304/FULEIA
27/01/24 - 13:53	Ms Katherine Jacomb	Objection	23/01304/FULEIA
27/01/24 - 14:07	Ms Katherina Tschawow RIBA	Objection	23/01304/FULEIA
27/01/24 - 14:36	Mr Markus Smith	Objection	23/01304/FULEIA
27/01/24 - 15:03	Anita Bulusu	Objection	All three
27/01/24 - 15:21	Mr Fidel Madeira Godoy	Objection	23/01304/FULEIA
27/01/24 - 15:17	Abdul Bhanji	Objection	All three
27/01/24 - 15:34	Martin Ross	Objection	All three
27/01/24 - 16:17	Kay Lee	Objection	All three
27/01/24 - 16:35	Mr Frank Forster	Objection	23/01304/FULEIA
27/01/24 - 16:38	Mrs Juliana Lottmann	Objection	23/01304/FULEIA
27/01/24 - 18:28	Dr Jeremy Tambling	Objection	23/01304/FULEIA
27/01/24 - 18:36	Ms Polly Staple	Objection	23/01304/FULEIA
27/01/24 - 18:41	Ms Polly Staple	Objection	23/01276/LBC
27/01/24 - 18:43	Ms Polly Staple	Objection	23/01277/LBC
27/01/24 - 19:03	Dr Dan Kidner	Objection	23/01304/FULEIA
27/01/24 - 19:06	Dr Dan Kidner	Objection	23/01276/LBC
27/01/24 - 19:09	Dr Dan Kidner	Objection	23/01277/LBC
27/01/24 - 19:25	Mr Jake Brandford	Objection	23/01304/FULEIA
27/01/24 - 19:40	Mr Gordon Wise	Objection	23/01304/FULEIA
27/01/24 - 19:42	Mr Gordon Wise	Objection	23/01277/LBC
27/01/24 - 21:07	Mr Brad Rose	Objection	23/01304/FULEIA
27/01/24 - 21:36	Mr Paul Drinkwater	Objection	23/01304/FULEIA
27/01/24 - 22:08	Ms Antonina Szlesinger	Objection	23/01304/FULEIA
27/01/24 - 22:23	Mr Mahendra Pabari	Objection	23/01304/FULEIA
27/01/24 - 22:42	Ms Joanna Lyall	Objection	23/01304/FULEIA
28/01/24 - 01:02	Miss Jennifer Dyne	Objection	23/01304/FULEIA
28/01/24 - 08:07	Faye Clements	Objection	All three
28/01/24 - 08:59	Mr Jon Blanthorn	Objection	23/01304/FULEIA
28/01/24 - 09:06	Catherine Harris	Objection	All three
28/01/24 - 09:45	Ms Rebecca Wells	Objection	23/01304/FULEIA
28/01/24 - 09:55	Mr Xavier Fenouil	Support	23/01304/FULEIA
28/01/24 - 10:07	Miss Ceri Wilkins	Objection	23/01304/FULEIA
28/01/24 - 10:12	Mr Leigh Bowen	Objection	23/01304/FULEIA
28/01/24 - 10:22	Mr leo burley	Objection	23/01304/FULEIA
28/01/24 - 10:25	Dr Ian Patterson	Objection	All three
28/01/24 - 10:33	Michael McCoy	Objection	23/01304/FULEIA
28/01/24 - 10:36	Miss Ruth Campbell	Objection	23/01304/FULEIA
28/01/24 - 11:12	Mr Brendan Ball	Objection	23/01304/FULEIA
28/01/24 - 11:27	Mr Harvey Brown	Objection	23/01304/FULEIA
28/01/24 - 11:46	Mr Hector Lee	Objection	23/01304/FULEIA
28/01/24 - 11:55	Mr Russell Harris	Objection	23/01304/FULEIA
28/01/24 - 12:01	Mrs Catherine Harris	Objection	23/01304/FULEIA
28/01/24 - 12:05	Ms Olivia Laing	Objection	23/01304/FULEIA

28/01/24 - 12:22	Dr Pam Morris	Objection	23/01304/FULEIA
28/01/24 - 13:02	John Macfarlane	Objection	23/01304/FULEIA
28/01/24 - 13:06	Ms Dragana Vukovic	Objection	23/01304/FULEIA
28/01/24 - 13:31	Tara Basi	Objection	All three
28/01/24 - 13:41	Dr Catherine Souch	Objection	23/01304/FULEIA
28/01/24 - 13:45	Mr Luke Smallman	Objection	23/01304/FULEIA
28/01/24 - 13:53	Mr Steve Trent	Objection	23/01304/FULEIA
28/01/24 - 14:23	Mr Peter Davis	Objection	23/01304/FULEIA
28/01/24 - 15:09	Dr S Press	Objection	23/01304/FULEIA
28/01/24 - 15:35	Mr Laurence Quinn	Objection	23/01304/FULEIA
28/01/24 - 15:59	Dr Nicolas Bacon	Objection	23/01304/FULEIA
28/01/24 - 16:53	Dr Clare Carolin	Objection	23/01304/FULEIA
28/01/24 - 17:05	Mrs Janet Wells	Objection	23/01304/FULEIA
28/01/24 - 17:21	Mr Bart Smallman	Objection	23/01304/FULEIA
28/01/24 - 19:17	Mary Gilchrist	Objection	All three
28/01/24 - 19:40	Mr Mark Szlesinger	Objection	23/01304/FULEIA
28/01/24 - 19:45	Mr Mark Szlesinger	Objection	23/01277/LBC
28/01/24 - 19:47	Mark Szlesinger	Objection	23/01276/LBC
28/01/24 - 19:49	Melissa Green	Objection	23/01304/FULEIA
28/01/24 - 20:18	Mr Andrew Hope	Objection	23/01304/FULEIA
28/01/24 - 20:20	Mrs Alison Hope	Objection	23/01304/FULEIA
28/01/24 - 20:28	Mr Christopher Makin	Objection	23/01304/FULEIA
28/01/24 - 21:01	Philippa Andrews	Objection	All three
28/01/24 - 21:02	Professor David Andrews	Objection	All three
28/01/24 - 21:06	Mrs Pamela King	Objection	23/01304/FULEIA
28/01/24 - 21:10	Mrs Joanne Littlefair	Objection	23/01304/FULEIA
28/01/24 - 21:32	Mrs Emily Borg	Objection	23/01304/FULEIA
28/01/24 - 21:43	Emily Borg	Objection	23/01304/FULEIA
28/01/24 - 21:44	Ms Nadine Forster	Objection	23/01304/FULEIA
28/01/24 - 21:48	Mr Callum Borg	Objection	23/01304/FULEIA
28/01/24 - 21:50	Callum Borg	Objection	23/01304/FULEIA
28/01/24 - 21:58	Dr Rebecca Nicholas	Objection	23/01304/FULEIA
28/01/24 - 22:07	Matthew Rees	Objection	23/01304/FULEIA
28/01/24 - 22:28	Mrs Alan Black	Objection	23/01304/FULEIA
28/01/24 - 23:16	Mr Stuart Lynas	Objection	23/01304/FULEIA
29/01/24 - 08:09	Ms Mary Gilchrist	Objection	23/01304/FULEIA
29/01/24 - 08:25	Mrs Suzy Waite	Objection	23/01304/FULEIA
29/01/24 - 08:29	Jean Nicolai	Objection	23/01276/LBC
29/01/24 - 08:30	Jean Nicolai	Objection	23/01277/LBC
29/01/24 - 08:31	Mrs Suzy Suzy	Objection	23/01304/FULEIA
29/01/24 - 08:48	Ms Myrto Kritikou	Objection	23/01304/FULEIA
29/01/24 - 09:27	Dr Michael Morgan	Objection	23/01304/FULEIA
29/01/24 - 10:01	Faye Clements	Objection	All three
29/01/24 - 10:10	Mr Paul Clifford	Objection	23/01304/FULEIA
29/01/24 - 10:12	Ms Anna Holmgren	Objection	23/01304/FULEIA
29/01/24 - 10:22	Mr Jeff Hennessey	Objection	23/01304/FULEIA
29/01/24 - 10:37	Mr Tom Morris	Objection	23/01304/FULEIA
29/01/24 - 10:42	Mr Thomas Morris	Objection	23/01304/FULEIA

29/01/24 - 11:11	Miss Anita Strymowicz	Objection	23/01304/FULEIA
29/01/24 - 11:17	Mrs Fiona Auty	Objection	23/01304/FULEIA
29/01/24 - 11:26	Dr peter poore	Objection	23/01304/FULEIA
29/01/24 - 11:33	Mrs Eva Guerra	Objection	23/01304/FULEIA
29/01/24 - 11:40	Dr peter poore	Objection	23/01276/LBC
29/01/24 - 11:41	Dr peter poore	Objection	23/01277/LBC
29/01/24 - 12:02	Mr JOSEPH REEVES	Objection	23/01304/FULEIA
29/01/24 - 12:08	Dr Paul Simmons	Objection	23/01304/FULEIA
29/01/24 - 13:10	Mrs martha cossey	Objection	23/01304/FULEIA
29/01/24 - 14:14	Ms Helen Fairfoul	Objection	23/01304/FULEIA
29/01/24 - 14:32	Mr George Jeffrey	Objection	23/01304/FULEIA
29/01/24 - 14:35	Ms Avril Ormsby	Objection	23/01304/FULEIA
29/01/24 - 14:36	Mrs Emma Mckay	Objection	23/01304/FULEIA
29/01/24 - 14:48	Ms Sara-Anne Bird	Objection	23/01304/FULEIA
29/01/24 - 14:55	Ms Ellie Duffy	Objection	23/01304/FULEIA
29/01/24 - 15:02	Miss Alison Meade	Objection	23/01304/FULEIA
29/01/24 - 15:21	Sally Spensley	Objection	23/01304/FULEIA
29/01/24 - 15:31	Dr Colin Spensley	Objection	23/01304/FULEIA
29/01/24 - 15:36	Mr Bernard Hughes	Objection	23/01304/FULEIA
29/01/24 - 15:38	Dr Timothy Geach	Objection	23/01304/FULEIA
29/01/24 - 16:23	Ms Margareta Kern	Objection	23/01304/FULEIA
29/01/24 - 16:24	Mr Terry Trickett	Objection	23/01304/FULEIA
29/01/24 - 16:27	Miss Alison Meade	Objection	23/01277/LBC
29/01/24 - 16:29	Miss Alison Meade	Objection	23/01276/LBC
29/01/24 - 16:36	Mr Terry Trickett	Objection	23/01277/LBC
29/01/24 - 16:40	Mr Robert Letham	Objection	23/01304/FULEIA
29/01/24 - 16:53	Miss Suzanne Hinton	Objection	23/01304/FULEIA 23/01304/FULEIA and 23/01277/LBC
29/01/24 - 16:59	Martin Farebrother	Objection	23/01304/FULEIA
29/01/24 - 17:02	Miss Suzanne Hinton	Objection	23/01304/FULEIA
29/01/24 - 17:14	Mr Brian Johnson	Objection	23/01304/FULEIA
29/01/24 - 17:16	Andrew Faiers	Objection	All three
29/01/24 - 17:48	Mrs Linda Kiernan	Objection	23/01304/FULEIA
29/01/24 - 17:51	Mrs Christine Doublet-Stewart	Objection	23/01304/FULEIA
29/01/24 - 18:08	Dr Ruth Holt	Objection	23/01304/FULEIA
29/01/24 - 18:19	Mr Peter Rimmer	Objection	23/01304/FULEIA
29/01/24 - 18:47	Mrs Joan Farebrother	Objection	23/01304/FULEIA
29/01/24 - 18:57	Mr Liam Gillick	Objection	23/01304/FULEIA
29/01/24 - 18:58	Mrs Ann Mosseri	Objection	23/01304/FULEIA
29/01/24 - 19:14	Mr Roger Cheveley	Objection	23/01304/FULEIA
29/01/24 - 20:01	Dr Diana Tyson	Objection	23/01304/FULEIA
29/01/24 - 20:27	Mr Iain Connor	Objection	23/01304/FULEIA
29/01/24 - 20:54	Joe Thomas	Objection	23/01304/FULEIA
29/01/24 - 21:37	Ms Helena Twist	Objection	23/01304/FULEIA
29/01/24 - 21:42	Miss Anne Toovey	Objection	23/01304/FULEIA
29/01/24 - 22:08	Ms Deborah Lambkin	Objection	23/01304/FULEIA
29/01/24 - 22:11	Mrs Lesley Connor	Objection	23/01304/FULEIA
29/01/24 - 22:12	Mrs Helen Hulson	Objection	23/01304/FULEIA

30/01/24 - 00:06	Dr Peter Delves	Objection	23/01304/FULEIA
30/01/24 - 07:05	Mr Stephen Griffin	Objection	23/01304/FULEIA
30/01/24 - 07:33	Mr Benjamin Auty	Objection	23/01304/FULEIA
30/01/24 - 07:51	Mr Richard Garey	Objection	23/01304/FULEIA
30/01/24 - 08:13	Mr Nicholas STONE	Objection	23/01304/FULEIA
30/01/24 - 08:27	Dr Katrina Spensley	Objection	23/01304/FULEIA
30/01/24 - 08:28	Mr Nicholas STONE	Objection	23/01304/FULEIA
30/01/24 - 09:34	Mrs Lorraine Stone	Objection	23/01304/FULEIA
30/01/24 - 09:59	Mr Michael Stone	Objection	23/01304/FULEIA
30/01/24 - 10:01	Dr Sara Tanatova	Objection	23/01304/FULEIA
30/01/24 - 10:11	Miss Gemma Moody	Objection	23/01304/FULEIA
30/01/24 - 10:32	Mr Nick Caistor	Objection	23/01304/FULEIA
30/01/24 - 10:41	Susan C McDonald	Objection	23/01304/FULEIA
30/01/24 - 10:55	Mr Robert Elms	Objection	23/01304/FULEIA
30/01/24 - 11:08	Ms Hilary Belchak	Objection	23/01304/FULEIA
30/01/24 - 11:09	Ariella Yedgar	Objection	23/01304/FULEIA
30/01/24 - 11:10	Ms Hilary Belchak	Objection	23/01276/LBC
30/01/24 - 11:11	Ms Hilary Belchak	Objection	23/01277/LBC
30/01/24 - 11:13	David Rees	Objection	23/01304/FULEIA
30/01/24 - 11:17	Ms Janine Smith	Objection	23/01304/FULEIA
30/01/24 - 11:49	Mr Desmond Day	Objection	23/01304/FULEIA
30/01/24 - 11:53	Niall Conlon	Objection	All three
30/01/24 - 12:28	Helen Barnes	Objection	23/01304/FULEIA
30/01/24 - 12:40	Mr Guy Atkins	Objection	23/01304/FULEIA
30/01/24 - 12:42	Mrs Janey King	Objection	23/01304/FULEIA
30/01/24 - 13:09	Miss Fernanda Vilar	Support	23/01304/FULEIA
30/01/24 - 13:13	Tony Lee	Objection	All three
30/01/24 - 13:17	Averil Baldwin	Objection	23/01304/FULEIA
30/01/24 - 13:47	Mr Paul Morgan	Objection	23/01304/FULEIA
30/01/24 - 13:53	David Rees	Objection	23/01304/FULEIA
30/01/24 - 14:14	Miss Jennifer Reeves	Objection	23/01304/FULEIA
30/01/24 - 14:17	Ms Anett Rideg	Objection	23/01304/FULEIA
30/01/24 - 14:42	Mrs Jenny Smart	Objection	23/01304/FULEIA
30/01/24 - 14:59	Miss Aimee Rathle	Objection	23/01304/FULEIA
30/01/24 - 15:05	Mrs Ann George	Objection	23/01304/FULEIA
30/01/24 - 15:06	Mr Nicholas Manderson	Objection	23/01304/FULEIA
30/01/24 - 15:37	Helen Fentimen	Objection	All three
30/01/24 - 15:39	Mrs Jamie Luff	Objection	23/01304/FULEIA
30/01/24 - 15:48	Mrs Miranda McArthur	Objection	23/01304/FULEIA
30/01/24 - 16:11	Mr DANTE VANOLI	Objection	23/01304/FULEIA
30/01/24 - 16:23	Fred Rodgers	Objection	All three
30/01/24 - 16:47	Mary Bonar	Objection	All three
30/01/24 - 16:52	Ms Lucy Sisman	Objection	23/01304/FULEIA
30/01/24 - 16:55	Mr George Theodosiou	Objection	23/01304/FULEIA
30/01/24 - 16:56	Jennifer White	Objection	23/01304/FULEIA
30/01/24 - 16:59	Andre Sirangelo	Objection	23/01304/FULEIA
30/01/24 - 17:00	Sarah Mann	Objection	23/01276/LBC
30/01/24 - 17:27	Miss Frances Northall	Objection	23/01304/FULEIA

30/01/24 - 17:32	Dr Jane Bickerton	Objection	23/01304/FULEIA
30/01/24 - 17:35	Ms Liz Hasell	Objection	23/01304/FULEIA
30/01/24 - 17:42	Miss Charlotte Day	Objection	23/01304/FULEIA
30/01/24 - 17:44	Miss Frances Northall	Objection	23/01304/FULEIA 23/01304/FULEIA and 23/01277/LBC
30/01/24 - 17:44	John Taysum	Objection	23/01304/FULEIA
30/01/24 - 17:44	Terry Trickett	Objection	All three
30/01/24 - 17:54	Mr Richard Barrett	Objection	23/01304/FULEIA
30/01/24 - 17:56	Mr Daniel Gerring	Objection	23/01304/FULEIA 23/01276/LBC and 23/01277/LBC
30/01/24 - 17:57	David Rees	Objection	23/01277/LBC
30/01/24 - 18:17	Mr Christopher Makin	Objection	23/01277/LBC
30/01/24 - 18:25	Philip Crawford	Objection	23/01304/FULEIA
30/01/24 - 18:50	Ms Christina Wilson	Objection	23/01304/FULEIA
30/01/24 - 18:51	Miss Dom Flewitt	Objection	23/01304/FULEIA
30/01/24 - 18:56	Professor Richard Lynch	Objection	23/01304/FULEIA
30/01/24 - 19:01	Mr Richard Lynch	Objection	23/01304/FULEIA
30/01/24 - 19:22	Mr Daniel James	Objection	23/01304/FULEIA
30/01/24 - 19:37	Mr Graham Bulpitt	Objection	23/01304/FULEIA
30/01/24 - 19:38	Alison Rees	Objection	All three
30/01/24 - 19:44	Ms Kathryn Greaves	Objection	23/01304/FULEIA
30/01/24 - 19:55	Mr John Norbury	Objection	23/01304/FULEIA
30/01/24 - 20:22	Dr Christina Strym	Objection	23/01304/FULEIA
30/01/24 - 20:41	Mr Francois-Xavier Villemin	Objection	23/01304/FULEIA
30/01/24 - 20:48	Mr Daniel Stone	Objection	23/01304/FULEIA
30/01/24 - 21:01	Mr Alexander Roa Perez	Objection	23/01304/FULEIA
30/01/24 - 21:02	Mr Robert Dufton	Objection	23/01304/FULEIA
30/01/24 - 21:06	Ted Reilly	Objection	23/01304/FULEIA
30/01/24 - 21:22	Judith Silveston	Objection	23/01304/FULEIA
30/01/24 - 21:24	Mr Jack Mama	Objection	23/01304/FULEIA
30/01/24 - 21:40	Silvia Crawford	Objection	23/01304/FULEIA
30/01/24 - 21:58	Ronald P Silveston	Objection	23/01304/FULEIA
30/01/24 - 22:05	Mr Olivier Nicolai	Objection	23/01304/FULEIA
30/01/24 - 22:06	Mrs Patricia Borg	Objection	23/01304/FULEIA
30/01/24 - 22:22	Mr Jonathan Dow	Objection	23/01304/FULEIA
30/01/24 - 22:23	Dr Markman Ellis	Objection	23/01304/FULEIA
30/01/24 - 22:27	LISA SHAW	Objection	23/01304/FULEIA
30/01/24 - 22:56	Mr Ian Callaghan	Objection	23/01304/FULEIA
30/01/24 - 23:03	Mr Miguel Picciochi	Objection	23/01304/FULEIA
30/01/24 - 23:03	Mr Alan Budgen	Objection	23/01304/FULEIA
30/01/24 - 23:03	Jeremy Tambling	Objection	23/01304/FULEIA
30/01/24 - 23:41	Mr Howard Hoveman	Objection	23/01304/FULEIA
30/01/24 - 23:44	Mrs Alicia pivaro	Objection	23/01304/FULEIA
30/01/24 - 23:54	Dr Nicholas Deakin	Objection	23/01304/FULEIA
31/01/24 - 00:44	Sarah Hayden	Objection	23/01304/FULEIA
31/01/24 - 01:59	Ms Karen Munroe	Objection	23/01304/FULEIA
31/01/24 - 02:19	Ms Hannah BB	Objection	23/01304/FULEIA
31/01/24 - 07:49	Mar Maestre	Objection	23/01304/FULEIA

31/01/24 - 07:52	Mr Kevin Kiernan	Objection	23/01304/FULEIA
31/01/24 - 08:09	Mrs Silvia Braga	Objection	23/01304/FULEIA
31/01/24 - 08:14	Mrs Zoe Griffin	Objection	23/01304/FULEIA
31/01/24 - 08:21	Mrs Ava Griffin	Objection	23/01304/FULEIA
31/01/24 - 08:34	Mrs Jessica Duffy	Objection	23/01304/FULEIA
31/01/24 - 08:34	C O'Riordan	Objection	All three
31/01/24 - 08:40	Mr Jonathan Mendelow	Objection	23/01304/FULEIA
31/01/24 - 09:03	Sarah McCracken	Objection	23/01304/FULEIA
31/01/24 - 09:18	Dr Sophia Nicolov	Objection	23/01304/FULEIA
31/01/24 - 09:41	Mrs Jessica Duffy	Objection	23/01304/FULEIA
31/01/24 - 09:54	Mr Jeremie Mathot	Objection	23/01304/FULEIA
31/01/24 - 09:55	Derek Adams	Objection	23/01304/FULEIA
31/01/24 - 09:57	Mr Darran Jaques	Objection	23/01304/FULEIA
31/01/24 - 09:57	Gelly Balanou	Objection	23/01304/FULEIA
31/01/24 - 10:10	Fran Cliffe	Objection	23/01304/FULEIA
31/01/24 - 10:13	Dr Barnabas Calder	Objection	23/01304/FULEIA
31/01/24 - 10:14	Mr Robert Taylor	Objection	23/01304/FULEIA
31/01/24 - 10:25	Mr Rodney Jagelman	Objection	23/01304/FULEIA
31/01/24 - 10:30	Mr Zhining Xu	Objection	23/01304/FULEIA
31/01/24 - 10:32	Ms Emma Matthews	Objection	23/01304/FULEIA
31/01/24 - 10:37	Mr Joshua Bean	Objection	23/01304/FULEIA
31/01/24 - 10:38	Mr Phil Eaton	Objection	23/01304/FULEIA
31/01/24 - 10:41	John & Hilary Mesher	Objection	All three
31/01/24 - 10:43	Dr Holly Smith	Objection	23/01304/FULEIA
31/01/24 - 10:44	Ms Abigail Gorton	Objection	23/01304/FULEIA
31/01/24 - 10:47	Mr Mark Amies	Objection	23/01304/FULEIA
31/01/24 - 10:48	Madeline Gantley	Objection	All three
31/01/24 - 10:54	Dr Matthew Walker	Objection	23/01304/FULEIA
31/01/24 - 10:55	Mr michael jackson	Objection	23/01304/FULEIA
31/01/24 - 10:55	Ms Suwei Jiang	Objection	23/01304/FULEIA
31/01/24 - 10:55	Mr Robert Connolly	Objection	23/01304/FULEIA
31/01/24 - 11:04	Toby Riding	Objection	23/01304/FULEIA
31/01/24 - 11:05	Ms Yvonne Taylor	Objection	23/01304/FULEIA
31/01/24 - 11:06	Ms Yvonne Taylor	Objection	23/01304/FULEIA
31/01/24 - 11:08	Mr Richard Jinman	Objection	23/01304/FULEIA
31/01/24 - 11:10	Mr Brendan Brendan Barnes	Objection	23/01304/FULEIA
31/01/24 - 11:16	Mr Aaron Tilley	Objection	23/01304/FULEIA
31/01/24 - 11:29	Suzy Kenly Waite	Objection	23/01304/FULEIA
31/01/24 - 11:31	Mr Chris Kettle-Frisby	Objection	23/01304/FULEIA
31/01/24 - 11:31	Dr Peter Starie	Objection	23/01304/FULEIA
31/01/24 - 11:31	Mr Chris Kettle-Frisby	Objection	23/01304/FULEIA
31/01/24 - 11:31	Mr Jon Bennett	Objection	23/01304/FULEIA
31/01/24 - 11:31	Mr Derek Penney	Objection	23/01304/FULEIA
31/01/24 - 11:31	Mr Chris Kettle-Frisby	Objection	23/01304/FULEIA
31/01/24 - 11:31	Mr Derek Penney	Objection	23/01304/FULEIA
31/01/24 - 11:31	Mr Chris Kettle-Frisby	Objection	23/01304/FULEIA
31/01/24 - 11:31	Mr Jon Bennett	Objection	23/01304/FULEIA
31/01/24 - 11:31	Ms Ann Brew	Objection	23/01304/FULEIA

31/01/24 - 11:37	Jon Bennett	Objection	23/01304/FULEIA
31/01/24 - 11:42	Owen Hill	Objection	23/01304/FULEIA
31/01/24 - 11:59	Mr Andrea De Vitis	Objection	23/01304/FULEIA
31/01/24 - 12:03	Mr Michael Craig-Martin	Objection	23/01304/FULEIA
31/01/24 - 12:18	Mrs Penelope Gillinson	Objection	23/01304/FULEIA
31/01/24 - 12:20	Mr Herbert Alexander	Objection	23/01304/FULEIA
31/01/24 - 12:20	Mr MATTHEW KNIGHT	Objection	23/01304/FULEIA
31/01/24 - 12:25	Mr Giles Smart	Objection	23/01304/FULEIA
31/01/24 - 12:26	Ms Sally Atkin	Objection	23/01304/FULEIA
31/01/24 - 12:27	Ms Emma Georgiou	Objection	23/01304/FULEIA
31/01/24 - 12:28	Dr Cristina Cerulli	Objection	23/01304/FULEIA
31/01/24 - 12:29	Nick Mott	Objection	All three
31/01/24 - 12:36	Elizabeth Crowther	Objection	All three
31/01/24 - 12:37	Dinah Godfree	Objection	23/01304/FULEIA
31/01/24 - 12:45	Mr Nick Mott	Objection	23/01304/FULEIA
31/01/24 - 12:47	Mr Charles Creffield	Objection	23/01304/FULEIA
31/01/24 - 12:49	Mr Alan Budgen	Objection	23/01304/FULEIA
31/01/24 - 12:51	Peter Inskip	Objection	All three
31/01/24 - 12:54	Mr Nick Heard	Objection	23/01304/FULEIA
31/01/24 - 12:57	Mrs Jane Ernstzen	Objection	23/01304/FULEIA
31/01/24 - 12:58	E. Hirst	Objection	All three
31/01/24 - 12:59	Ms Adriana Medina Lalinde	Objection	23/01304/FULEIA
31/01/24 - 13:00	Miss Fiona Sonola	Objection	23/01304/FULEIA
31/01/24 - 13:02	Mr Gareth Gardner	Objection	23/01304/FULEIA
31/01/24 - 13:08	Dr Andrew Ormsby	Objection	23/01304/FULEIA
31/01/24 - 13:11	Dr Andrew Ormsby	Objection	23/01304/FULEIA
31/01/24 - 13:14	Andrew Ormsby	Objection	23/01304/FULEIA
31/01/24 - 13:15	Dr Andrew Ormsby	Objection	23/01304/FULEIA
31/01/24 - 13:16	Dr Andrew Ormsby	Objection	23/01304/FULEIA
31/01/24 - 13:16	Mr Nicholas England	Objection	23/01304/FULEIA
31/01/24 - 13:16	Dr Andrew Ormsby	Objection	23/01304/FULEIA
31/01/24 - 13:23	Ms Liliana Ferreira	Objection	23/01304/FULEIA
31/01/24 - 13:31	Martin Young	Objection	23/01304/FULEIA
31/01/24 - 13:32	Ms Eva Wilson	Objection	23/01304/FULEIA
31/01/24 - 13:33	Joe Kerr	Objection	23/01304/FULEIA
31/01/24 - 13:37	Miss Rebecca Bubb Fionnuala Hogan (Will House G)	Objection	23/01304/FULEIA
31/01/24 - 13:45	Mr Ally Lee	Objection	All three
31/01/24 - 14:06	Mr Ally Lee	Objection	23/01304/FULEIA
31/01/24 - 14:10	John Fowle	Objection	All three
31/01/24 - 14:13	Mr Maxim Tooker	Objection	23/01304/FULEIA
31/01/24 - 14:16	Mr Kevin Barnes	Objection	23/01304/FULEIA
31/01/24 - 14:19	Mrs Yasuko Morley	Objection	23/01304/FULEIA
31/01/24 - 14:24	Ms Sarah Gaventia	Objection	23/01304/FULEIA
31/01/24 - 14:25	Mr Richard Price	Objection	23/01304/FULEIA
31/01/24 - 14:25	Mr David Phillips	Objection	23/01304/FULEIA
31/01/24 - 14:26	Carolyn Larkin	Objection	All three
31/01/24 - 14:28	Mr Peter Smart	Objection	23/01304/FULEIA

31/01/24 - 14:29	Samantha Barber	Objection	23/01304/FULEIA
31/01/24 - 14:34	Miss Sally Chorley	Objection	23/01304/FULEIA
31/01/24 - 14:38	Yen-Yen The	Objection	23/01304/FULEIA
31/01/24 - 14:41	Keith Woodward	Objection	23/01304/FULEIA
31/01/24 - 14:42	Richard Stanley	Objection	All three
31/01/24 - 14:53	Keith Woodward	Objection	23/01277/LBC
31/01/24 - 14:54	Mr Michael Jardine	Objection	23/01304/FULEIA
31/01/24 - 14:54	Mr Orlando Figes	Objection	23/01304/FULEIA
31/01/24 - 14:57	Keith Woodward	Objection	23/01276/LBC
31/01/24 - 14:59	Terry Trickett	Objection	23/01277/LBC
31/01/24 - 15:04	Mr Istvan Polay	Objection	23/01304/FULEIA
31/01/24 - 15:06	Terry Trickett	Objection	23/01304/FULEIA
31/01/24 - 15:18	Mrs Helen Clifford	Objection	23/01277/LBC
31/01/24 - 15:19	Mr Costanzo Capece	Objection	23/01304/FULEIA
31/01/24 - 15:22	Mr Nicholas Oakes	Objection	23/01304/FULEIA
31/01/24 - 15:23	Sally Woodward	Objection	All three
31/01/24 - 15:24	Dr Angeles de Cara	Objection	23/01304/FULEIA
31/01/24 - 15:26	Mrs Helen Hudson	Objection	23/01277/LBC
31/01/24 - 15:39	Ms Lara Haworth	Objection	23/01304/FULEIA
31/01/24 - 15:41	Dr Jonny Smith	Objection	23/01304/FULEIA
31/01/24 - 15:44	Mr Aron Adamski	Objection	23/01304/FULEIA
31/01/24 - 15:44	Mr kevin almond	Objection	23/01304/FULEIA
31/01/24 - 15:45	Mr Theo Budgen	Objection	23/01304/FULEIA
31/01/24 - 15:45	Mr Aron Adamski	Objection	23/01276/LBC
31/01/24 - 15:46	Mr Aron Adamski	Objection	23/01277/LBC
31/01/24 - 15:48	Mr Adam Hogg	Objection	23/01304/FULEIA
31/01/24 - 15:58	Ms Katya Duffy	Objection	23/01304/FULEIA
31/01/24 - 16:09	Mr Michael Holms Coats	Objection	23/01304/FULEIA
31/01/24 - 16:13	Dr Carolyn Thomas	Objection	23/01304/FULEIA
31/01/24 - 16:17	Mrs Jo Burch	Objection	23/01304/FULEIA
31/01/24 - 16:21	Mr Peter Burrows	Objection	23/01304/FULEIA
31/01/24 - 16:32	Mina Lad	Objection	23/01304/FULEIA
31/01/24 - 16:38	Mr David Bradshaw	Objection	23/01304/FULEIA
31/01/24 - 16:43	Miss Susie Barrass	Objection	23/01304/FULEIA
31/01/24 - 16:48	Mina Lad	Objection	23/01304/FULEIA
31/01/24 - 16:53	Mr Bernard Hughes	Objection	23/01304/FULEIA
31/01/24 - 16:57	Mina Lad	Objection	23/01304/FULEIA
31/01/24 - 17:00	Gerard Moore	Objection	23/01304/FULEIA 23/01304/FULEIA and
31/01/24 - 17:01	Drs A R & Y A Burne	Objection	23/01277/LBC
31/01/24 - 17:02	Mr Charles Thomson	Objection	23/01304/FULEIA
31/01/24 - 17:02	Ms Megumi Yamashita	Objection	23/01304/FULEIA
31/01/24 - 17:02	Julie Mapstone	Objection	All three
31/01/24 - 17:05	Mr Nathan Morse	Objection	23/01304/FULEIA
31/01/24 - 17:07	Mrs Diana Gray	Objection	23/01304/FULEIA
31/01/24 - 17:09	Ms Katy Hackney	Objection	23/01304/FULEIA
31/01/24 - 17:11	Mrs Miranda Griffin	Objection	23/01304/FULEIA
31/01/24 - 17:12	Mr Ian Martin	Objection	23/01304/FULEIA

31/01/24 - 17:13	Melanie Beckham	Objection	All three
31/01/24 - 17:14	Mr Stuart Dixon	Objection	23/01304/FULEIA
31/01/24 - 17:19	Mr Nathan Morse	Objection	23/01304/FULEIA
31/01/24 - 17:21	Anne Huang	Objection	All three
31/01/24 - 17:22	Jan-Marc Petroschka (BJHG)	Objection	All three
31/01/24 - 17:24	Mr Joel Morris	Objection	23/01304/FULEIA
31/01/24 - 17:26	Ms Anastasiia Manokhina	Objection	23/01304/FULEIA
31/01/24 - 17:33	Alan Newman	Objection	All three
31/01/24 - 17:49	Steve Sinclair	Objection	23/01304/FULEIA
31/01/24 - 17:56	Mr Stephen Sinclair	Objection	23/01304/FULEIA
31/01/24 - 17:57	Mr Alex Brogan	Objection	23/01304/FULEIA
31/01/24 - 18:06	Mr Guy Strelitz	Support	23/01304/FULEIA
31/01/24 - 18:17	Mr Unmesh Desai	Objection	23/01304/FULEIA
31/01/24 - 18:25	Mr Oliver Lazarus	Objection	23/01304/FULEIA
31/01/24 - 18:36	Ms Jane Arthur	Objection	23/01276/LBC
31/01/24 - 18:42	Ms Jane Arthur	Objection	23/01277/LBC
31/01/24 - 18:45	Ms Jane Arthur	Objection	23/01304/FULEIA
31/01/24 - 18:51	Mr Aaron Todd	Objection	23/01304/FULEIA
31/01/24 - 18:52	Mr Ashley Brown	Objection	23/01304/FULEIA
31/01/24 - 18:53	Mr Lawrence Staden	Objection	23/01304/FULEIA
31/01/24 - 18:56	Miss Sian Leong	Objection	23/01304/FULEIA
31/01/24 - 18:58	david bonnett	Objection	23/01304/FULEIA
31/01/24 - 18:59	Heather Griffiths	Objection	23/01304/FULEIA
31/01/24 - 19:00	Heather Griffiths	Objection	23/01304/FULEIA
31/01/24 - 19:03	Jane Arthur	Objection	All three
31/01/24 - 19:04	Hitesh Chhaya	Objection	All three
31/01/24 - 19:05	Shelagh Wright	Objection	All three
31/01/24 - 19:21	Mr Yanqi Huang	Objection	23/01304/FULEIA
31/01/24 - 19:31	Mr Craig Aspey	Objection	23/01304/FULEIA
31/01/24 - 19:36	Jude Stuchfield	Objection	23/01304/FULEIA
31/01/24 - 19:40	Mrs Denise Rawls	Objection	23/01304/FULEIA
31/01/24 - 19:42	Ms silvia kolbowski	Objection	23/01304/FULEIA
31/01/24 - 19:59	Mrs Grace Scanlan	Objection	23/01304/FULEIA
31/01/24 - 20:02	Mr Peter Morton	Objection	23/01304/FULEIA
31/01/24 - 20:05	Mr Kevin Fellingham	Objection	23/01304/FULEIA
31/01/24 - 20:14	Mr Colin Griffiths	Objection	23/01304/FULEIA
31/01/24 - 20:16	Ms Elena Pascolo	Objection	23/01304/FULEIA
31/01/24 - 20:25	Ms Jane Ellison	Objection	23/01304/FULEIA
31/01/24 - 20:25	Dr Elizabeth Simpson	Objection	23/01304/FULEIA
31/01/24 - 20:30	Dr Peter Rowe	Objection	23/01304/FULEIA
31/01/24 - 20:35	Nina Barber	Objection	All three
31/01/24 - 20:39	Sean Bashforth	Objection	All three
31/01/24 - 20:43	Dr Gail E Evans	Objection	23/01304/FULEIA
31/01/24 - 20:46	Ms CATHERINE SLESSOR	Objection	23/01304/FULEIA
31/01/24 - 20:51	Jonathan Mackenzie	Objection	23/01304/FULEIA
31/01/24 - 21:01	Mr Rupert Cook	Objection	23/01304/FULEIA
31/01/24 - 21:06	Marina Snee	Objection	23/01304/FULEIA
31/01/24 - 21:08	Peter Jenkinson	Objection	All three

31/01/24 - 21:10	Ms Sara Marley	Objection	23/01304/FULEIA
31/01/24 - 21:15	Miss Maja Jadachowska	Objection	23/01304/FULEIA
31/01/24 - 21:16	Mrs Silvia Crawford	Objection	23/01276/LBC
31/01/24 - 21:19	Mr Julien Waite	Objection	23/01304/FULEIA
31/01/24 - 21:19	Rebecca Smithers	Objection	All three
31/01/24 - 21:21	Ms Jacqueline Ashurst	Objection	23/01304/FULEIA
31/01/24 - 21:21	Ms Jacqueline Ashurst	Objection	23/01276/LBC
31/01/24 - 21:22	Ms Fiona Jackson	Objection	23/01304/FULEIA
31/01/24 - 21:24	Ms Harriet Bateman	Objection	23/01304/FULEIA
31/01/24 - 21:25	Mr Julien Waite	Objection	23/01304/FULEIA
31/01/24 - 21:30	Mr Berwyn Kinsey	Objection	23/01304/FULEIA
31/01/24 - 21:31	Mr Jose Sanchez	Objection	23/01304/FULEIA
31/01/24 - 21:37	Ms Fiona Jackson	Objection	23/01304/FULEIA
31/01/24 - 21:37	Mr J Fernández Garrido	Objection	23/01304/FULEIA
31/01/24 - 21:38	Mr Phil Calverley	Objection	23/01304/FULEIA
31/01/24 - 21:40	Mrs Joan Crighton	Objection	23/01304/FULEIA
31/01/24 - 21:44	Mrs Melissa Price	Objection	23/01304/FULEIA
31/01/24 - 21:44	Mrs Silvia Crawford	Objection	23/01277/LBC
31/01/24 - 21:51	Mr Rafy Kouyoumjian	Objection	23/01304/FULEIA
31/01/24 - 21:58	Mr Bruce Badger	Objection	23/01304/FULEIA
31/01/24 - 21:58	Mr Jonathan Riley	Objection	23/01304/FULEIA
31/01/24 - 21:59	Mr Alex Philpott	Objection	23/01304/FULEIA
31/01/24 - 22:01	Elizabeth Fotheringham	Objection	23/01304/FULEIA
31/01/24 - 22:01	Ms Caroline Rae	Objection	23/01304/FULEIA
31/01/24 - 22:06	Miss Clare Malden	Neutral	23/01304/FULEIA
31/01/24 - 22:10	Mr Gareth Randell	Objection	23/01304/FULEIA
31/01/24 - 22:19	Mrs Sally Jeffrey	Objection	23/01304/FULEIA
31/01/24 - 22:23	Mr Kevin Bond	Objection	23/01304/FULEIA
31/01/24 - 22:26	Alpesh Lad	Objection	23/01304/FULEIA
31/01/24 - 22:29	Dr Christina Townsend	Objection	23/01304/FULEIA
31/01/24 - 22:29	Mr Adam Mee	Objection	23/01304/FULEIA
31/01/24 - 22:29	E King	Objection	All three
31/01/24 - 22:34	Ms Wah Fong Dart	Objection	23/01304/FULEIA
31/01/24 - 22:53	James Ball	Objection	All three
31/01/24 - 22:53	Annabel Gillings	Objection	23/01304/FULEIA
31/01/24 - 22:56	Ms P Stary	Objection	23/01304/FULEIA
31/01/24 - 23:00	Hilary Allbrook	Objection	23/01304/FULEIA
31/01/24 - 23:10	Mr Gerard Mcatamney	Objection	23/01304/FULEIA
31/01/24 - 23:12	Mr Chris Johnson	Objection	23/01304/FULEIA
31/01/24 - 23:20	Dr Inge Daniels	Objection	23/01304/FULEIA
31/01/24 - 23:30	Mr Isaac Auers	Objection	23/01304/FULEIA
31/01/24 - 23:34	Mr Michael Priaulx	Neutral	23/01304/FULEIA
31/01/24 - 23:41	John Vercoutre	Objection	23/01304/FULEIA
31/01/24 - 23:45	Kunal Kishore	Objection	23/01277/LBC
31/01/24 - 23:52	Mrs Caroline Winter	Objection	23/01304/FULEIA
31/01/24 - 23:53	Kunal Kishore	Objection	23/01304/FULEIA
31/01/24 - 23:54	Mr Dermot O'Brien	Objection	23/01304/FULEIA
31/01/24 - 23:55	Alison Parry	Objection	All three

31/01/24 - 23:59	Mr Norman Rea	Objection	23/01304/FULEIA
01/02/24 - 00:01	Ms Lisa Hughes	Objection	23/01304/FULEIA
01/02/24 - 00:45	Fionnuala Hogan	Objection	All three
01/02/24 - 00:57	The Ironmongers' Company	Neutral	All three
01/02/24 - 01:37	Mrs Victoria Pop-Arad	Objection	23/01304/FULEIA
01/02/24 - 04:00	Ms Marion Friedmann	Objection	23/01304/FULEIA
01/02/24 - 06:04	Mr Andy Costa	Objection	23/01304/FULEIA
01/02/24 - 06:08	Kunal Kishore	Objection	23/01304/FULEIA
01/02/24 - 06:48	Mr Andrew Spear	Objection	23/01304/FULEIA
01/02/24 - 07:29	Mr Jim Denchfield	Objection	23/01304/FULEIA
01/02/24 - 07:39	Mr Andrew Norris	Objection	23/01304/FULEIA
01/02/24 - 08:53	Catherine Ashton Copestake	Objection	23/01304/FULEIA
01/02/24 - 09:05	Mr Emanuele Alberto Cirello	Objection	23/01304/FULEIA
01/02/24 - 09:54	Francesca Berry	Objection	23/01304/FULEIA
01/02/24 - 10:24	Mr Michael Twomey	Objection	23/01304/FULEIA
01/02/24 - 10:48	Ms Niamh Lynch	Objection	23/01304/FULEIA
01/02/24 - 12:04	Mr Scott Morgan	Objection	23/01304/FULEIA
01/02/24 - 12:05	Mr David Nicholls	Objection	23/01304/FULEIA
01/02/24 - 13:08	Mr Josh Salisbury	Objection	23/01304/FULEIA
01/02/24 - 16:02	Mr Stephen Palfrey	Objection	23/01304/FULEIA
01/02/24 - 16:30	Zack Polanski	Objection	23/01304/FULEIA
01/02/24 - 16:33	Ms Celia Scott	Objection	23/01304/FULEIA
01/02/24 - 17:00	Petra Einwiller	Objection	23/01304/FULEIA
01/02/24 - 17:17	Rachel Blake	Objection	23/01304/FULEIA
01/02/24 - 18:20	Ms Jo Bole	Objection	23/01304/FULEIA
01/02/24 - 19:01	Miss Sian Hodgson	Objection	23/01304/FULEIA
01/02/24 - 20:23	Peter Cox	Objection	All three
01/02/24 - 20:45	Ms Cary Ash	Objection	23/01304/FULEIA
01/02/24 - 21:29	Miss Tara Reeves	Objection	23/01304/FULEIA
01/02/24 - 21:40	Miss Jessica Hodgson	Objection	23/01304/FULEIA
01/02/24 - 22:13	Mr Marcus Chambers	Objection	23/01304/FULEIA
01/02/24 - 22:17	Kenneth Frampton	Objection	All three
01/02/24 - 22:20	Mr Kenneth Frampton	Objection	23/01304/FULEIA
01/02/24 - 22:32	Nicola Baker	Objection	All three
02/02/24 - 00:43	Rob Small	Objection	23/01304/FULEIA
02/02/24 - 08:43	Mr Kevin Carter	Objection	23/01304/FULEIA
02/02/24 - 10:12	Edward Lucas	Objection	All three
02/02/24 - 13:59	Ms Julie Mapstone	Objection	23/01304/FULEIA
03/02/24 - 00:59	Ms A Gillespie	Objection	23/01304/FULEIA
03/02/24 - 07:33	Peter Wrench	Objection	23/01304/FULEIA
03/02/24 - 08:37	Margarita Murillo Benítez	Objection	23/01304/FULEIA
03/02/24 - 10:09	Mr Dominik Arni	Objection	23/01304/FULEIA
03/02/24 - 12:21	Stephen Rigg	Objection	All three
03/02/24 - 12:52	Mr Rupert Martin	Objection	23/01304/FULEIA
03/02/24 - 19:59	Fred Rodgers	Objection	All three
04/02/24 - 19:07	Mr Minesh Shah	Objection	23/01304/FULEIA
04/02/24 - 19:21	Miss Deborah Tompkinson	Objection	23/01304/FULEIA
04/02/24 - 19:37	Mr Adrian Gale	Objection	23/01304/FULEIA

05/02/24 - 13:07	Gienetta Corley	Objection	23/01304/FULEIA
06/02/24 - 08:31	Mr Bert Rozeman	Objection	23/01304/FULEIA
06/02/24 - 10:27	Dilys Cowan	Objection	All three
06/02/24 - 16:39	Neil Constable	Objection	23/01304/FULEIA
07/02/24 - 01:15	Mr Anonymous Anonymous	Objection	23/01304/FULEIA
07/02/24 - 06:19	Ms Jane Arthur	Objection	23/01304/FULEIA
07/02/24 - 06:20	Ms Jane Arthur	Objection	23/01277/LBC
07/02/24 - 06:21	Ms Jane Arthur	Objection	23/01276/LBC
07/02/24 - 12:02	John Miller + Su Rogers	Objection	23/01304/FULEIA
07/02/24 - 17:46	Mr Philip Ellaway	Objection	23/01304/FULEIA
07/02/24 - 19:13	Miss Anne-Lucie Norton	Objection	23/01304/FULEIA
07/02/24 - 22:54	Mr Jethro Au-Yeung	Objection	23/01304/FULEIA
08/02/24 - 07:58	Dr Kris Scheerlinck	Objection	23/01304/FULEIA
09/02/24 - 19:06	Mr Roland Jeffery	Objection	23/01304/FULEIA
13/02/24 - 10:03	Fred Rodgers	Objection	All three
14/02/24 - 15:25	Martin Luff	Objection	23/01304/FULEIA
16/02/24 - 07:42	Mr Cennydd John	Objection	23/01276/LBC
16/02/24 - 07:44	Mr Cennydd John	Objection	23/01304/FULEIA
16/02/24 - 07:45	Mr Cennydd John	Objection	23/01277/LBC
16/02/24 - 12:56	Ms Krishna Kakad	Objection	23/01304/FULEIA
17/02/24 - 22:25	Caroline Pardy	Objection	23/01304/FULEIA
19/02/24 - 00:20	Mr Abdul Bhanji	Objection	23/01304/FULEIA
19/02/24 - 15:37	Fred Rodgers	Objection	All three
21/02/24 - 12:14	Miss Elizabeth Rose	Objection	23/01304/FULEIA
22/02/24 - 18:53	Mr Aaron Shardey	Objection	23/01304/FULEIA
22/02/24 - 21:11	Zoey Chang	Objection	23/01304/FULEIA
22/02/24 - 21:18	Mr Sam Weston	Objection	23/01304/FULEIA
22/02/24 - 22:48	Miss andrea edwards	Objection	23/01304/FULEIA
22/02/24 - 21:50	Mr Alejandro Madero	Objection	23/01304/FULEIA
22/02/24 - 22:14	Mrs Elizabeth Parry	Objection	23/01304/FULEIA
22/02/24 - 22:17	Miss Ellie Stocks	Objection	23/01304/FULEIA
22/02/24 - 22:38	Mr Adam roche	Objection	23/01304/FULEIA
22/02/24 - 23:01	Mr Joseph Benjamin	Objection	23/01304/FULEIA
22/02/24 - 23:12	Miss Lucie Dewar	Objection	23/01304/FULEIA
22/02/24 - 23:18	Mrs Wan Ru Lin	Objection	23/01304/FULEIA
23/02/24 - 00:26	Ms Elizabeth Shale	Objection	23/01304/FULEIA
23/02/24 - 08:40	B Walden	Objection	23/01304/FULEIA
23/02/24 - 08:44	Mr Paul Allen	Objection	23/01304/FULEIA
23/02/24 - 11:16	Miss Gemma Cawley	Objection	23/01304/FULEIA
23/02/24 - 11:38	Mr Andrew Cameron	Support	23/01304/FULEIA
23/02/24 - 15:55	Ms Daria Stishova	Objection	23/01304/FULEIA
24/02/24 - 06:41	Mrs Montserrat Garcia	Objection	23/01304/FULEIA
24/02/24 - 14:29	Mr Ashley Kollakowski	Objection	23/01304/FULEIA
24/02/24 - 22:37	Ms Fran Geer	Objection	23/01304/FULEIA
28/02/24 - 13:37	Brenda Szlesinger	Objection	23/01304/FULEIA
28/02/24 - 13:53	Ms Sophy Twohig	Objection	23/01304/FULEIA
28/02/24 - 14:22	Shelagh Wright	Objection	23/01304/FULEIA
28/02/24 - 17:32	Oliver Shaw	Objection	All three

28/02/24 - 18:27	Dasha Stish	Objection	All three
28/02/24 - 23:32	Name not stated	Objection	All three
29/02/24 - 13:52	Fred Rodgers	Objection	All three
29/02/24 - 19:13	Margaret Berer	Objection	23/01304/FULEIA
01/03/24 - 01:14	Dr Nicholas Deakin	Objection	23/01277/LBC
01/03/24 - 12:20	Mr Michael Collins	Objection	23/01304/FULEIA
02/03/24 - 23:03	Mr Dmitry Pantyushin	Objection	23/01304/FULEIA
05/03/24 - 15:24	Mr Nigel Pilkington	Objection	23/01304/FULEIA
08/03/24 - 16:35	Ms Eilidh Ho	Objection	23/01304/FULEIA
09/03/24 - 20:25	Fred Rodgers	Objection	All three
11/03/24 - 11:32	Peggy Jones	Objection	23/01304/FULEIA
11/03/24 - 12:12	Mr Alexander Brogan	Objection	23/01304/FULEIA
11/03/24 - 14:01	Dr Juliet Jacques	Objection	23/01304/FULEIA
11/03/24 - 15:58	Mr Aaron Law	Objection	23/01304/FULEIA
11/03/24 - 17:06	Ms Alison Allighan	Neutral	23/01304/FULEIA
11/03/24 - 17:10	Ms Alison Allighan	Neutral	23/01277/LBC
11/03/24 - 17:13	Ms Alison Allighan	Neutral	23/01276/LBC
13/03/24 - 08:30	Ms Sharon Bowles	Objection	23/01304/FULEIA
13/03/24 - 17:17	Mr Malcolm Garrett	Objection	23/01304/FULEIA
13/03/24 - 19:48	Ms Montserrat Sala Colls	Objection	23/01304/FULEIA
13/03/24 - 23:13	Mr Joseph Asghar	Objection	23/01304/FULEIA
14/03/24 - 09:39	Mr Alan King	Objection	23/01304/FULEIA
14/03/24 - 16:11	Reed Landberg	Objection	All three
14/03/24 - 16:19	Tim Parker	Objection	All three
14/03/24 - 16:24	Ms Deborah Nagan	Objection	23/01304/FULEIA
15/03/24 - 10:50	Margaret Berer	Objection	All three
15/03/24 - 11:06	Mrs Miranda Griffin	Objection	23/01304/FULEIA
15/03/24 - 23:54	Ms Oxana Korsun	Objection	23/01304/FULEIA
16/03/24 - 13:47	Nargis Christopher	Objection	23/01304/FULEIA
16/03/24 - 15:13	Dimitri Varsamis	Objection	All three
16/03/24 - 17:36	Fred Rodgers	Objection	All three
18/03/24 - 09:54	Ms maria luisa cicognani	Objection	23/01304/FULEIA
18/03/24 - 12:33	Feona J. Hamilton	Objection	All three
18/03/24 - 18:34	Dr Dimitri Varsamis	Objection	23/01304/FULEIA
19/03/24 - 13:06	Ms Sofia Anna Dolina	Objection	23/01304/FULEIA
19/03/24 - 13:10	Mr Ken Mackay	Objection	23/01304/FULEIA
19/03/24 - 17:12	Anne Page Chairman of the Rabbinical	Objection	All three
20/03/24 - 00:50	Board	Neutral	All three
20/03/24 - 11:12	Mr Simon Martner	Objection	23/01304/FULEIA
20/03/24 - 14:11	Cennydd John	Objection	All three
20/03/24 - 14:37	Mr Richard Fryer	Objection	23/01304/FULEIA
21/03/24 - 10:03	Mr Guy Orton	Support	23/01304/FULEIA
22/03/24 - 07:09	Ms Sandra Jener	Objection	23/01304/FULEIA
22/03/24 - 09:33	Dr Michael Morgan	Objection	23/01304/FULEIA
22/03/24 - 10:06	Mrs Sheila McIntosh	Objection	23/01304/FULEIA
22/03/24 - 12:16	Dr Lucy Pollard	Objection	23/01304/FULEIA

22/03/24 - 13:51	Mr Alberto Garciga	Objection	23/01304/FULEIA
22/03/24 - 14:13	Mrs Lesley Connor	Objection	23/01304/FULEIA
22/03/24 - 15:07	Ms Jan Eileen Smith	Objection	23/01304/FULEIA
22/03/24 - 15:14	Mrs Vivien Fowle	Objection	23/01304/FULEIA
22/03/24 - 15:47	Dr Jane Bickerton	Objection	23/01304/FULEIA
22/03/24 - 19:30	Adrian Samuel	Objection	23/01304/FULEIA
23/03/24 - 09:07	Ian Posner	Neutral	All three
23/03/24 - 09:25	Dr Emma Phillips	Objection	23/01304/FULEIA
23/03/24 - 11:55	Dr Linda Partridge	Objection	23/01304/FULEIA
23/03/24 - 19:55	Dr David Candy	Objection	23/01304/FULEIA
23/03/24 - 23:13	Mr Konstantinos Karampelas	Objection	23/01304/FULEIA
24/03/24 - 18:35	Natasha Curran	Objection	23/01304/FULEIA
25/03/24 - 16:18	Mr Jan Demytri Szczesny	Objection	23/01304/FULEIA
25/03/24 - 16:55	Sarah Mann	Objection	23/01304/FULEIA
26/03/24 - 18:38	Dr Jane Bickerton	Objection	23/01304/FULEIA
27/03/24 - 09:18	Mary Bonar	Objection	All three
27/03/24 - 16:31	Ms Brenda Szlesinger	Objection	23/01304/FULEIA
28/03/24 - 16:36	tony peel	Objection	23/01304/FULEIA
28/03/24 - 18:22	Ms Fiona Jackson	Objection	23/01304/FULEIA
28/03/24 - 21:54	Mr Matthew Rees	Objection	23/01304/FULEIA
29/03/24 - 11:49	Mr Christopher Dixon	Objection	23/01304/FULEIA
29/03/24 - 11:53	Ms Katie Milton	Objection	23/01304/FULEIA
29/03/24 - 12:09	Mr michael jackson	Objection	23/01304/FULEIA
29/03/24 - 13:16	Dr Carlo Resta	Objection	23/01304/FULEIA
29/03/24 - 14:17	Mr Scott Hammond	Objection	23/01304/FULEIA
29/03/24 - 14:51	Mrs Sylvia Usher	Objection	23/01304/FULEIA
29/03/24 - 20:22	Mrs Larissa Begault	Objection	23/01304/FULEIA
29/03/24 - 20:53	Ms Janet Porter	Objection	23/01304/FULEIA
30/03/24 - 10:21	Ms Daria Stishova	Objection	23/01304/FULEIA
30/03/24 - 11:11	Mr Jack Hornsey	Objection	23/01304/FULEIA
30/03/24 - 11:12	Ms Rebecca Jeffs	Objection	23/01304/FULEIA
30/03/24 - 13:00	Mr Anton Biriukov	Objection	23/01304/FULEIA
30/03/24 - 16:42	Dr Jill Jeffs	Objection	23/01304/FULEIA
30/03/24 - 22:22	Miss Lola Wilson	Objection	23/01304/FULEIA
30/03/24 - 22:25	Miss Lesley Wilson	Objection	23/01304/FULEIA
01/04/24 - 08:00	Barnaby Spurrier	Objection	All three
01/04/24 - 10:31	Elizabeth Crowther	Objection	All three
01/04/24 - 11:25	Mr Julian Pickard-Garcia	Objection	23/01304/FULEIA
01/04/24 - 12:38	Darrell Corner	Objection	All three
01/04/24 - 13:21	Tony Lee	Objection	All three
01/04/24 - 14:52	Mr Patrick Gibbons	Objection	23/01304/FULEIA
01/04/24 - 16:02	Mr tom Sparks	Objection	23/01304/FULEIA
01/04/24 - 18:10	Mr Dominic Silcott	Objection	23/01304/FULEIA
01/04/24 - 19:47	Dr Nick Astbury	Objection	23/01304/FULEIA
02/04/24 - 07:13	Mr Percy Preston	Objection	23/01304/FULEIA
02/04/24 - 08:00	Barnaby Spurrier	Objection	All three
02/04/24 - 09:08	Mrs Jill Jones	Objection	23/01304/FULEIA
02/04/24 - 10:18	Mr Scott Palmer	Neutral	23/01304/FULEIA

02/04/24 - 10:26	Mr Robert Dufton	Objection	23/01304/FULEIA
02/04/24 - 11:19	Dr Cathy Ross	Objection	23/01304/FULEIA
02/02/24 - 11:22	Mrs Brenda Szlesinger	Objection	23/01304/FULEIA
02/04/24 - 12:59	Ms Lila Rawlings	Objection	23/01304/FULEIA
02/04/24 - 13:39	Mr Luke O'Doherty	Objection	23/01304/FULEIA
02/04/24 - 14:20	Miss Samantha Logan	Objection	23/01304/FULEIA
02/04/24 - 16:11	Mr Ali-Murtazah Vindhani	Objection	23/01304/FULEIA
02/04/24 - 17:13	Mr Gareth Owen	Objection	23/01304/FULEIA
02/04/24 - 20:38	Mr Richard Stonehewer-Smith	Objection	23/01304/FULEIA
02/04/24 - 21:11	Mr Martin Luff	Objection	23/01304/FULEIA
02/04/24 - 21:40	Dr Valerie Fraser	Objection	23/01304/FULEIA
03/04/24 - 08:00	Barnaby Spurrier	Objection	All three
03/04/24 - 09:56	Mr Roger Mavity	Objection	23/01304/FULEIA
03/04/24 - 11:00	Barnaby Spurrier	Objection	All three
03/04/24 - 13:08	Mrs Claire Pike	Objection	23/01304/FULEIA
03/04/24 - 13:41	Mr Graeme Gordon	Objection	23/01304/FULEIA
03/04/24 - 17:37	Naresh Sonpar	Objection	All three
03/04/24 - 18:04	Dr Bob Harris	Objection	23/01304/FULEIA
04/04/24 - 06:39	Mr Philip Katz	Objection	23/01304/FULEIA
04/04/24 - 08:00	Barnaby Spurrier	Objection	All three
04/04/24 - 10:43	Felicity Guinness	Objection	23/01304/FULEIA
04/04/24 - 11:00	Barnaby Spurrier	Objection	All three
04/04/24 - 12:39	Nicholas Stone	Objection	All three
04/04/24 - 12:42	Mr Keith Davies	Objection	23/01304/FULEIA
04/04/24 - 12:50	Brendan Barnes	Objection	All three
04/04/24 - 13:03	Dr Michael Pike	Objection	23/01304/FULEIA
04/04/24 - 14:19	William H Cresswell	Objection	All three
04/04/24 - 15:34	Penelope Gillinson	Objection	All three
04/04/24 - 16:12	Mr Greg Grant	Objection	23/01304/FULEIA
04/04/24 - 17:41	Mr Phillip Wheatley	Objection	23/01304/FULEIA
04/04/24 - 18:45	Ms Rosemary Simmonds	Objection	23/01304/FULEIA
05/04/24 - 08:00	Barnaby Spurrier	Objection	All three
05/04/24 - 09:21	Mr John Spicer	Objection	23/01304/FULEIA
05/04/24 - 09:50	Dr Bob Harris	Objection	23/01304/FULEIA
05/04/24 - 09:55	Terry Trickett	Objection	23/01304/FULL and 23/01277/LBC
05/04/24 - 12:09	Mr Alan Newman	Objection	23/01304/FULEIA
05/04/24 - 13:20	Ms Paola Murguia	Objection	23/01304/FULEIA
05/04/24 - 13:26	Dr Neil Sanders	Objection	23/01304/FULEIA
05/04/24 - 14:39	Ms Corinne Estermann	Objection	23/01304/FULEIA
05/04/24 - 15:24	Mary Gilchrist	Objection	All three
05/04/24 - 16:11	Ms Kathrin Speidel	Objection	23/01304/FULEIA
05/04/24 - 16:16	David Rees	Objection	All three
05/04/24 - 16:56	E Hirst	Objection	All three
05/04/24 - 17:01	JOHN HOLLAND	Objection	23/01304/FULEIA
05/04/24 - 17:20	Ms Sinead Hanley	Objection	23/01304/FULEIA
05/04/24 - 17:22	Dr Benjamin Mohamed	Objection	23/01304/FULEIA
05/04/24 - 17:43	Dr Mary Chard	Objection	23/01304/FULEIA

05/04/24 - 17:55	Nina Barber	Objection	23/01304/FULEIA
05/04/24 - 18:18	Sean Bashforth	Objection	All three
05/04/24 - 19:19	Guillaume Faucompre	Objection	All three
05/04/24 - 19:20	Anne Huang	Objection	All three
05/04/24 - 20:49	Jan-Marc Petroschka	Objection	All three
05/04/24 - 21:06	Joanna Turvey	Objection	All three
05/04/24 - 22:30	Simon Ricketts	Objection	All three
05/04/24 - 22:57	Fiona Seres	Objection	All three
06/04/24 - 08:08	Mr Scott Lebon	Support	23/01304/FULEIA
06/04/24 - 09:09	Mr Simon Aldridge	Objection	23/01304/FULEIA
06/04/24 - 10:04	Franzisca Moeller	Objection	23/01304/FULEIA
06/04/24 - 10:27	Ms Sibylla Duffy	Objection	23/01304/FULEIA
06/04/24 - 11:36	Louise Ketley	Objection	23/01304/FULEIA
06/04/24 - 11:42	Melissa Collett	Objection	All three
06/04/24 - 12:48	Iona Adair	Objection	23/01304/FULEIA
06/04/24 - 13:01	Mr Matthew Jones	Objection	23/01304/FULEIA
06/04/24 - 13:23	Ms Hannah Cousins	Objection	23/01304/FULEIA
06/04/24 - 13:52	Averil Baldwin	Objection	All three
06/04/24 - 14:03	Ms Janie Price	Objection	23/01304/FULEIA
06/04/24 - 15:33	Brenda Szlesinger	Objection	All three
06/04/24 - 16:11	Mr Joseph Duckworth	Objection	23/01304/FULEIA
06/04/24 - 16:22	Mr Gary Brown	Objection	23/01304/FULEIA
06/04/24 - 16:23	Mr Roger Hall	Objection	23/01304/FULEIA
06/04/24 - 16:24	Erin Summers	Objection	23/01304/FULEIA
06/04/24 - 16:28	Mrs Alison Hope	Objection	23/01304/FULEIA
06/04/24 - 16:36	Mr Andrew Hope	Objection	23/01304/FULEIA
06/04/24 - 16:38	Dr John Bredican	Objection	23/01304/FULEIA
06/04/24 - 16:41	Dr VEENA RAVAL	Objection	23/01304/FULEIA
06/04/24 - 16:44	Ms Tanja Goudarzi Pour	Objection	23/01304/FULEIA
06/04/24 - 16:49	Lukas Dengl	Objection	23/01304/FULEIA
06/04/24 - 16:55	Mrs Fiona Meyringer	Objection	23/01304/FULEIA
06/04/24 - 16:57	Mr Robin Caley OBE	Objection	All three
06/04/24 - 17:38	Ms Olivia Romeni	Objection	23/01304/FULEIA
06/04/24 - 17:39	Ms Silvia Kolbowski	Objection	23/01304/FULEIA
06/04/24 - 17:59	Shelagh Wright	Objection	23/01304/FULEIA
06/04/24 - 18:02	Peter Jenkinson	Objection	23/01304/FULEIA
06/04/24 - 18:54	Miss Carolyn Larkin	Objection	23/01304/FULEIA
06/04/24 - 19:10	Kay Lee	Objection	All three
06/04/24 - 19:10	Victoria Raffe	Objection	23/01304/FULEIA
06/04/24 - 20:30	Mr Philip Crawford	Objection	23/01304/FULEIA
06/04/24 - 20:32	Mrs Silvia Crawford	Objection	23/01304/FULEIA
06/04/24 - 20:43	Mrs Sally Woodward	Objection	23/01304/FULEIA
06/04/24 - 21:15	Mr Keith Woodward	Objection	23/01304/FULEIA
06/04/24 - 23:47	Nick Mott	Objection	All three
06/04/24 - 23:52	Naresh Sonpar	Objection	All three
07/04/24 - 05:54	Mr Jonathan Wolf	Objection	23/01304/FULEIA
07/04/24 - 08:22	Mr Tom Matthews	Objection	23/01304/FULEIA
07/04/24 - 14:45	Miss Hazel Brothers	Objection	23/01304/FULEIA

Consultee Responses:

To be completed.

Application Documents:*Main Application: LWW (Ref: 23/01304/FULEIA):*

- Completed Planning Application Form, prepared by Gerald Eve LLP;
- CIL Form, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by DS+R and Sheppard Robson;
- Covering Letter, prepared by Gerald Eve LLP;
- Site Plan, prepared by DS+R and Sheppard Robson;
- Drawing Schedule, prepared by DS+R and Sheppard Robson;
- Existing, Demolition & Proposed Plans, Sections and Elevations, prepared by DS+R and Sheppard Robson;
- Landscaping & Public Realm Plans, prepared by DS+R, Sheppard Robson and Gross Max;
- Town Planning Statement, including Draft Heads of Terms for Legal Agreement, prepared by Gerald Eve LLP;
- Carbon Options Re-Use Study, prepared by Buro Happold;
- Circular Economy Statement (including GLA Pro-Formas), prepared by Buro Happold;
- Culture Plan (+ Culture Needs Assessment), prepared by CASC;
- Delivery Servicing Management Plan, prepared by Buro Happold;
- Design and Access Statement, prepared by DS+R and Sheppard Robson (with access prepared by Buro Happold and Gross Max);
- Draft Construction Environmental Management Plan, prepared by Multiplex;
- Energy Statement, prepared by Buro Happold;
- Equalities Impact Assessment, prepared by Buro Happold;
- Fire Statement, prepared by Buro Happold;
- Health Impact Assessment, prepared by Buro Happold;
- Learning and Skills Report, prepared by Dr. Jessica Mordsley;
- Internal Daylighting Report, prepared by Waldrams;
- Internal Thermal Comfort Assessment, prepared by Buro Happold;
- Office Needs Report, prepared by JLL;
- Operational Management Plan, prepared by Buro Happold;
- Preliminary Ecological Assessment. prepared by Buro Happold;
- Security Statement, prepared by JGA;
- Site Waste Management Plan, prepared by Burpo Happold;

- Social Value Strategy, prepared by Buro Happold;
- Statement of Community Involvement, prepared by LCA;
- Sustainability Statement (including BREEAM), prepared by Buro Happold;
- Tree Survey and Arboricultural Assessment, prepared by Thomson Arboriculture;
- Whole Life Carbon Assessment (including GLA Pro-Formas), prepared by Buro Happold;
- Environmental Statement, prepared by Buro Happold; including:
 - Volume 1 – Main Assessment
 - Volume 2 – Townscape, Heritage and Visual Impact Assessment
 - Volume 3 – Technical Appendices
 - Volume 4 – Non Technical Summary
- Amended Title Plan (to capture minor adjustment to blue line), prepared by Diller Scofidio + Renfro Sheppard Robson;
- Energy and Carbon Addendum: Summary Report of Building Separation and Appendices, prepared by Buro Happold;
- Clarifications on Reception Areas, prepared by Diller Scofidio + Renfro and Sheppard Robson;
- Clarifications on Proposed Public WC Provision, prepared by Diller Scofidio + Renfro and Sheppard Robson;
- Study of Guardrail Alternatives, prepared by Diller Scofidio + Renfro and Sheppard Robson;
- Citigen Report, prepared by Buro Happold;
- Responses to Access Comments, prepared by Buro Happold;
- Responses to Historic England comments, prepared by the Tavernor Consultancy;
- Jewish Cemetery Note, prepared by Diller Scofidio + Renfro and Sheppard Robson;
- The Jewish Cemetery Report, prepared by MOLA
- Risk Evaluation: Potential Suicide Note, prepared by Sheppard Robson;
- Environmental Statement: Further Information, prepared by Buro Happold;
- LVMF Panoramas: Further Information, prepared by Millerhare;
- Social Value Strategy Report, prepared by Buro Happold;
- Operational Waste Management Strategy, prepared by Buro Happold;
- Urban Green Factor: Design Note, prepared by Gross Max Landscape Architects;
- Response to Transport/Highways Comments (Will Salt), prepared by Buro Happold;
- Response to Access Advisor (Harriet Bell), prepared by Applicant Team.

Listed Building Consent - Alterations to Existing Highwalks (ref. 23/01277/LBC):

- Completed Listed Building Consent Application Form, prepared by Gerald Eve LLP;
- Site Location Plan (ref. 6594-DSRSR-ZZ-ZZ-DR-A-001020 Rev P01), prepared by DS+R and Sheppard Robson;
- Covering Letter, prepared by Gerald Eve LLP;
- Site Plan, prepared by DS+R and Sheppard Robson;
- Drawing Schedule, prepared by DS+R and Sheppard Robson;
- Existing, Demolition & Proposed Plans, Sections and Elevations, prepared by DS+R and Sheppard Robson;
- Landscaping & Public Realm Plans, prepared by DS+R, Sheppard Robson and Gross Max;
- Town Planning Statement, prepared by Gerald Eve LLP;
- Design and Access Statement, prepared by Diller, Scofidio + Renfro and Sheppard Robson;
- Townscape, Visual and Built Heritage Impact Assessment, prepared by Tavernor Consultancy;
- Risk Evaluation: Potential Suicide Note, prepared by Sheppard Robson;
- Environmental Statement: Further Information, prepared by Buro Happold;
- LVMF Panoramas: Further Information, prepared by Millerhare.

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- Risk Evaluation: Potential Suicide Note, prepared by Sheppard Robson;
- Environmental Statement: Further Information, prepared by Buro Happold;
- LVMF Panoramas: Further Information, prepared by Millerhare.

Appendix A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of the report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Scheme of Protective Works, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan. These as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the conditions and the Unilateral Undertaking. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend on the particular provision in the relevant legal agreement or conditions.

Appendix B

London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall Buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public Toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and Woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling

- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning Guidance (SPG):

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

Draft City Plan 2040

- Draft Strategic Policy S1: Health and Inclusive City
- Draft Policy HL1: Inclusive buildings and spaces
- Draft Policy HL2: Air quality
- Draft Policy HL3: Noise
- Draft Policy HL4 Contaminated land and water quality
- Draft Policy HL5: Location and protection of social and community facilities
- Draft Policy HL6: Public Toilets
- Draft Policy HL7 Sport and Recreation
- Draft Policy HL8 Play areas and facilities
- Draft Policy HL9: Health Impact Assessment (HIA)
- Draft Strategic Policy S2: Safe and Secure City
- Draft Policy SA1: Publicly accessible locations
- Draft Policy SA2 Dispersal Routes
- Draft Policy SA3: Designing in Security
- Draft Strategic Policy S4: Offices
- Draft Policy OF1: Office Development
- Draft Policy OF2: Protection of Existing Office Floorspace
- Draft Policy OF3 Temporary 'Meanwhile' Uses
- Draft Strategic Policy S5 Retail and Active Frontages
- Draft Policy RE2 Active Frontages
- Draft Policy RE3 Specialist Retail Uses and Clusters

- Draft Strategic Policy S6: Culture and Visitors

- Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Draft Policy CV3: Provision of Visitor Facilities
- Draft Policy CV5 Evening and Night-Time Economy
- Draft Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Draft Policy N1 Infrastructure Provision and Connection
- Draft Policy IN1: Infrastructure Capacity
- Draft Strategic Policy S8: Design
- Draft Policy DE1: Sustainable Design
- Draft Policy DE2: Design Quality
- Draft Policy DE3: Public Realm
- Draft Policy DE4: Terraces and Elevated Public Spaces
- Draft Policy DE5 Shopfronts
- Draft Policy DE6 Advertisements
- Draft Policy DE7: Daylight and Sunlight
- Draft Policy DE8: Lighting
- Draft Strategic Policy S9: Transport and Servicing
- Draft Policy VT1: The impacts of development on transport
- Draft Policy VT2 Freight and Servicing
- Draft Policy VT3: Vehicle Parking
- Draft Strategic Policy S10: Active Travel and Healthy Streets
- Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Draft Policy AT2: Active Travel including Cycling
- Draft Policy AT3: Cycle Parking
- Draft Strategic Policy S11: Historic Environment
- Draft Policy HE1: Managing Change to Historic Environment Development
- Draft Policy HE2: Ancient Monuments and Archaeology
- Draft Strategic Policy S12: Tall Buildings
- Draft Strategic Policy S13: Protected Views
- Draft Strategic Policy S14: Open Spaces and Green Infrastructure
- Draft Policy OS2: City Urban Greening
- Draft Policy OS3: Biodiversity
- Draft Policy OS4: Biodiversity Net Gain
- Draft Policy OS5 Trees
- Draft Strategic Policy S15: Climate Resilience and Flood Risk
- Draft Policy CR1: Overheating and Urban Heat Island Effect
- Draft Policy CR3 Sustainable Drainage Systems (SuDs)
- Draft Policy CR4 Flood Protection and Flood Defences
- Draft Strategic Policy S16: Circular Economy and Waste
- Draft Strategic Policy S23: Smithfield and Barbican Key Area of Change
- Draft Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- Barbican and Golden Lane Conservation Area SPD, February 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD,
- Barbican Listed Building Management Guidelines SPD, Volumes I, II and IV (2012-2015)
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014);

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Utilities infrastructure

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

CS3 Security and Safety

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

CS4 Planning contributions

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

CS5 The North of the City

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and “eco design” to complement the sustainable transport infrastructure, by:

1. Ensuring that disruption to the City is minimised during construction of Crossrail and requiring the restoration of worksites to deliver enhancement of biodiversity, heritage assets and the public realm, open space provision and integration with other transport modes.
2. Implementing proposals for the rejuvenation of Farringdon, Moorgate and Holborn jointly with neighbouring boroughs in the Farringdon / Smithfield Area for Intensification, taking account of urban design studies, conservation area management strategies and area enhancement strategies.
3. Requiring improvements to pedestrian and cycle routes to maintain safe, effective and efficient pedestrian and cycle flows, including for disabled people, within and through the north of the City.
4. Ensuring the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as Smithfield Market, Barbican, Golden Lane and Broadgate, whilst preserving privacy, security and noise abatement for residents and businesses.
5. Identifying and meeting residents' needs in the north of the City, including protection of residential amenity, community facilities and open space.

6. Safeguarding the Citigen combined cooling heating and power (CCHP) network and ensuring that, where feasible, all new development is designed to enable connection to the CCHP network.
7. Requiring the incorporation of sustainable drainage solutions (SuDS), such as green roofs, into development.
8. Requiring developers to make use of innovative design solutions to mitigate and adapt to the impacts of climate change, particularly addressing the challenges posed by heritage assets whilst respecting their architectural and historic significance.
9. Further enhancing the distinctive character of the Smithfield area by retaining a range of buildings suitable for accommodating a mix of uses, whilst recognising the particular challenges arising from the 24 hour character of the area.
10. Recognising and supporting the continued presence of both Smithfield Market and St Bartholomew's Hospital.
11. Promoting the further improvement of the Barbican area as a cultural quarter of London-wide, national and international significance.

CS10 Design

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

CS11 Visitor, arts and culture

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

CS12 Historic environment

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

CS13 Protected views

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

CS14 Tall Buildings

To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by:

1. Permitting tall buildings on suitable sites within the City's Eastern Cluster.

2. Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
3. Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.
4. Ensuring that tall building proposals do not adversely affect the operation of London's airports

CS15 Sustainable development and climate change

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

CS16 Public transport, streets and walkways

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

CS17 Waste

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

CS18 Flood risk

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

CS19 Open spaces and recreation

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

CS20 Retailing

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

CS21 Housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to

meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Social infrastructure and opportunity

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

Policy DM 1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

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

DM1.2 Assembly and protection of large office development sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a. assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b. invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c. ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d. resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

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

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

Policy DM 1.4 Temporary alternative use of vacant office buildings and sites

1. To permit the temporary use of vacant office buildings and sites by other uses where such uses would not produce unacceptable amenity conflicts nor prejudice the eventual return of the site to office use.
2. To refuse the temporary replacement of vacant offices with housing where it would adversely affect the existing beneficial mix of commercial uses

DM1.5 Mixed uses in commercial areas

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

DM2.1 Infrastructure provision

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

programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

Policy DM 3.1 Self-containment in mixed use developments

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

DM3.2 Security measures

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

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

DM3.3 Crowded places

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

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

DM3.4 Traffic management

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

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

DM3.5 Night-time entertainment

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

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

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

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;

- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

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

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;

- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

Policy DM 10.5 Shopfronts

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

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

Policy DM 10.6 Advertisements

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

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

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

Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities

1. To resist the loss of existing visitor, arts and cultural facilities unless:
 - replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
 - they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
 - it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
2. Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

DM11.2 Public Art

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

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

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

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

DM12.4 Archaeology

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

Policy DM 12.5 Historic parks and gardens

1. To resist development which would adversely affect gardens of special historic interest included on the Historic England register.
2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

DM15.1 Sustainability requirements

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

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
 - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
 - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
 - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
 - d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

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

DM15.4 Offsetting carbon emissions

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

DM15.5 Climate change resilience

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

DM15.6 Air quality

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

DM15.7 Noise and light pollution

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

DM15.8 Contaminated land and water quality

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

DM16.1 Transport impacts of development

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

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
 - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should

be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of

at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

Policy DM 16.6 Public car parks

No new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

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

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
 - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
 - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

Policy DM 18.3 Flood protection and climate change resilience

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
 - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
 - b) provide a high quality environment;
 - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
 - d) have regard to biodiversity and the creation of green corridors;
 - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

Policy DM19.4 Play areas and facilities

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas identified as deficient, by:
 - protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
 - where the creation of new play facilities is not feasible, requiring developers to work with the City Corporation to deliver enhanced provision nearby;

- requiring external play space and facilities as part of new residential developments which include 20 or more family units (those with 3 or more bedrooms) or 10 or more affordable units of 2 or more bedrooms;
 - promoting opportunities for informal play and play within open spaces where it is not possible to secure formal play areas.
2. Play areas and facilities should not be located where they would cause undue disturbance to neighbouring occupiers.

Policy DM 20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000m²) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

Policy DM 22.1 Location and protection of social and community facilities

1. To resist the loss of social and community facilities unless:

- replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
- necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
- it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace. 3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

- where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- in locations which are convenient to the communities they serve;
- in or near identified residential areas, providing their amenity is safeguarded;
- as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Policy DM 22.2 Provision of public toilets

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

APPENDIX C

Methodologies for Assessing Daylight, Sunlight and Overshadowing New Development

The BRE guidelines (2022) present the following methodologies and standards for measuring light levels within new developments.

Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). If the VSC is:

- At least 27%, a conventional window design would usually allow for reasonable amounts of daylight;
- Between 15% and 27%, special measures (larger windows, changes to room layout) are usually needed to provide adequate daylight;
- Between 5% and 15%, it is very difficult to provide adequate daylight unless very large windows are used;
- Less than 5%, it is often impossible to achieve reasonable daylight, even if the whole window wall is glazed.

Sunlight to windows: In general, a dwelling, or non-domestic building, that has a particular requirement for sunlight, will appear reasonably sunlit provided:

- at least one main window wall faces with 90 degrees of due south; and
- a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March. This is assessed at the inside of the window; sunlight received by different windows can be added provided they occur at different times and sunlight hours are not double counted.

Interior Daylighting Recommendations

The British Standard “Daylight in buildings” (BS EN 17037) contains advice and guidance on interior daylighting. A UK National Annex sets out specific minimum recommendations for habitable rooms in dwellings in the United Kingdom.

Illuminance Method: This method uses climatic data to calculate daylight illuminance at each point on an assessment grid within a room (usually 0.85m from the floor level), using sun and sky conditions, derived from standard meteorological data. This analytical method allows the calculation of absolute daylight illuminance taking account of a building’s location and orientation. The UK National Annex recommends the following minimum illuminance levels that should be exceeded over at least 50% of the assessment grid within a room for the following habitable room types, with vertical and / or inclined windows, for at least half of the daylight hours:

- 100 lux for bedrooms
- 150 lux for living rooms
- 200 lux for kitchens

Where a room has a shared use, the highest target should apply, such as living/kitchen/dining rooms and studios. In a bed sitting room/studio in student accommodation, the value for a living room should be used if students are considered likely to often spend time in their rooms during the day.

Daylight Factor Method: This method involves the calculation of the daylight factors at each calculation point on an assessment grid within a room or space. The daylight factor is the illuminance at a point on the assessment grid in a space, divided by the illuminance on an unobstructed horizontal surface outdoors. This method of assessment uses an overcast sky model, which means that the orientation and location of the building assessed is not relevant. The UK National Annex recommends the following minimum target daylight factors that should be achieved over at least 50% of the assessment grid within a room for the following habitable room types for at least half of the daylight hours in a year: 0.7% for bedrooms; 1.1% for living rooms; and 1.4% for kitchens.

Both the illuminance method and daylight factor method require assessment via detailed computer software to simulate the illuminance or daylight factor at calculation points on the assessment grid within a proposed space. The inputs for these methods of assessment would normally include internal and external surfaces and their reflectance values (which should reflect real or specified conditions, or default values recommended by the BRE guidelines), window types and glazing transmission.

Existing Buildings

Daylight to Existing Buildings

The BRE guidelines (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

- 1. Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
- 2. Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the

proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

The BRE guidelines recommends compliance with both the VSC and daylight distribution (NSL) assessment criteria.

Sunlight to Existing Buildings

Sunlight to windows: Annual Probable Sunlight Hours (APSH): Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

Interpreting Assessment Data

In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is *proportionately* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment, which

are referenced in Appendix H of the BRE guidelines and have become part of an industry standard utilised by Daylight and Sunlight consultants. It is for the Local Planning Authority to decide whether any losses would result in a reduction in amenity which is or is not acceptable.

It should be noted that where there are existing low levels of daylight in the baseline figures, any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

- Proportionate Percentage change (10% reduced to 8% = 20% reduction); and
- Actual / Absolute change (10% reduced to 8% = 2% change).

Setting Alternative Target Values (including Mirror Massing)

Appendix F of the BRE guidelines provides advice on setting alternative target values for daylight and sunlight. This notes that the numerical target values are purely advisory and different targets may be used based on the characteristics of the proposed development and/or its location.

Alternative targets may be generated from the scale/layout of existing development within the surrounding context or be based on an extant planning permission. The BRE guide provides an example of a narrow mews in an historic city centre where the VSC values derived from the obstruction angle could be used as a target value for development in that street if new development is to match the existing layout.

The guidance notes that a similar approach may be adopted in cases where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light. In that case, to ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for the relevant windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.

Opens Spaces

Overshadowing

Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21 March.

For existing open spaces, if as a result of a proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun

is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Assessing the Cumulative Impact of Development Proposals

Paragraph 3.10.41 of the Local Plan and paragraph 6.1.59 of the draft City Plan state that “when considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals”. The impact of a proposed development on the daylight and sunlight received by neighbouring properties and open spaces is assessed against the light levels in the existing scenario. When assessing the cumulative impact of development proposals, the impact of the proposed development would be assessed alongside any other nearby developments with either full planning permission, a resolution to grant consent, those development proposals that have been submitted but not yet determined and / or potential future applications that due to be submitted (none of which have been completed). In undertaking an assessment of the cumulative impact of such development proposals it can be determined the extent to which the impact of each development proposals can be attributed. It should be noted that previous completed developments are considered to form part of the existing baseline against which the development proposals would be assessed.

Supplementary Methods of Assessment

Radiance Based Daylight Factor Assessment

A radiance-based daylight factor assessment is a lighting simulation tool that measures the individual ‘daylight factors’ at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room’s internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance-based daylight factor method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

Whilst there is currently no established guidance regarding what constitutes a ‘noticeable’ or ‘significant’ change in daylight when using the radiance methodology, radiance-based assessments can draw upon the BRE’s Average Daylight Factor (ADF) target values (2011), which recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The 2011 BRE guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. These minimum target values are comparable with the minimum standards set out in the UK National Annex of BS EN 17037.

Radiance-based assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. In addition, the average value of the individual daylight factors within a room can be expressed as a 'radiance based' ADF percentage for the room as a whole.

It should be noted that the radiance-based daylight factor assessment is not meant to replace a submitted BRE based daylight and sunlight assessment, but to provide an additional assessment to illustrate the daylight levels within habitable rooms, including within neighbouring properties.

SCHEDULE

APPLICATION: 23/01304/FULEIA

London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway.

CONDITIONS

1. Time limit (C)

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

2. Approved Drawings (C)

The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:

Site plans:

- 6594-DSRSR-ZZ-ZZ-DR-A-001000 Site Location Plan;
- 6594-DSRSR-ZZ-ZZ-DR-A-001001 Proposed Site Location Plan;
- 6594-DSRSR-ZZ-ZZ-DR-A-001002 Existing Site Plan;
- 6594-DSRSR-ZZ-ZZ-DR-A-001003 Proposed Site Plan;
- 6594-DSRSR-ZZ-ZZ-DR-A-001004 Phase 1 Demolition Plan;
- 6594-DSRSR-ZZ-ZZ-DR-A-001004 Enabling Phasing Plan – Ground Level;
- 6594-DSRSR-ZZ-ZZ-DR-A-001005 Phase 2 Construction Plan;
- 6594-DSRSR-ZZ-ZZ-DR-A-001006 Proposed Sitewide Ground Floor Plan;

Demolition plans:

- 6594-DSRSR-ZZ-B1-DR-A-010995 Demolition – Basement;

6594-DSRSR-ZZ-00L-DR-A-010996 Demolition – Lower Ground Floor Plan;
6594-DSRSR-ZZ-00-DR-A-010997 Demolition – Upper Ground/Ground Floor Plan;
6594-DSRSR-ZZ-00M-DR-A-010998 Demolition – Upper Ground Mezzanine Floor Plan;
6594-DSRSR-ZZ-01P-DR-A-010999 Demolition – Podium Floor Plan;
6594-DSRSR-ZZ-01M-DR-A-011000 Demolition – Podium Mezzanine Floor Plan;
6594-DSRSR-ZZ-02-DR-A-011001 Demolition – Second Floor Plan;
6594-DSRSR-ZZ-R1-DR-A-011002 Demolition – Roof Plan (Museum of London);
6594-DSRSR-ZZ-ZZ-DR-A-011003 Demolition – Third-Fifteenth Floor Plan;
6594-DSRSR-ZZ-16-DR-A-011016 Demolition – Sixteenth Floor Plan;
6594-DSRSR-ZZ-R2-DR-A-011017 Demolition – Roof Plan (Bastion House);
6594-DSRSR-ZZ-XX-DR-A-012000- Demolition – Sitewide Elevation A;
6594-DSRSR-ZZ-XX-DR-A-012001 Demolition – Sitewide Elevation B;
6594-DSRSR-ZZ-XX-DR-A-012002 Demolition – Sitewide Elevation C;
6594-DSRSR-ZZ-XX-DR-A-012003 Demolition – Sitewide Elevation D;

Proposed Plans:

6594-DSRSR-ZZ-XX-DR-A-022100 Proposed Sitewide Elevation A;
6594-DSRSR-ZZ-XX-DR-A-022101 Proposed Sitewide Elevation B;
6594-DSRSR-ZZ-XX-DR-A-022102 Proposed Sitewide Elevation C;
6594-DSRSR-ZZ-XX-DR-A-022103 Proposed Sitewide Elevation D;
6594-DSRSR-ZZ-XX-DR-A-022104 Proposed Sitewide Elevation E;
6594-DSRSR-ZZ-B2-DR-A-021126 Proposed Sitewide – Basement 2 Plan;
6594-DSRSR-ZZ-B1-DR-A-021127 Proposed Sitewide – Basement 1 Plan;
6594-DSRSR-ZZ-00L-DR-A-021128 Proposed Sitewide – Lower Ground Floor Plan;
6594-DSRSR-ZZ-00-DR-A-021129 Proposed Sitewide – Ground Floor Plan;
6594-DSRSR-ZZ-00H-DR-A-021130 Proposed Sitewide – Highwalk Floor Plan;
6594-DSRSR-ZZ-01-DR-A-021131 Proposed Sitewide – First Floor Plan;
6594-DSRSR-ZZ-02-DR-A-021132 Proposed Sitewide – Second Floor Plan;
6594-DSRSR-ZZ-03-DR-A-021133 Proposed Sitewide – Third Floor Plan;
6594-DSRSR-ZZ-04-DR-A-021134 Proposed Sitewide – Fourth Floor Plan;
6594-DSRSR-ZZ-05-DR-A-021135 Proposed Sitewide – Fifth Floor Plan;
6594-DSRSR-ZZ-06-DR-A-021136 Proposed Sitewide – Sixth Floor Plan;
6594-DSRSR-ZZ-07-DR-A-021137 Proposed Sitewide – Seventh Floor Plan;
6594-DSRSR-ZZ-08-DR-A-021138 Proposed Sitewide – Eighth Floor Plan;
6594-DSRSR-ZZ-09-DR-A-021139 Proposed Sitewide – Ninth Floor Plan;
6594-DSRSR-ZZ-10-DR-A-021140 Proposed Sitewide – Tenth Floor Plan;
6594-DSRSR-ZZ-11-DR-A-021141 Proposed Sitewide – Eleventh Floor Plan;
6594-DSRSR-ZZ-12-DR-A-021142 Proposed Sitewide – Twelfth Floor Plan;
6594-DSRSR-ZZ-13-DR-A-021143 Proposed Sitewide – Thirteenth Floor Plan (RS Roof);
6594-DSRSR-ZZ-14-DR-A-021144 Proposed Sitewide – Fourteenth Floor Plan;
6594-DSRSR-ZZ-15-DR-A-021145 Proposed Sitewide – Fifteenth Floor Plan;
6594-DSRSR-ZZ-R1-DR-A-021146 Proposed Sitewide – Roof Plan (BH & RS Roofs);

6594-DSRSR-ZZ-XX-DR-A-023110 Proposed Sitewide Section A;
6594-DSRSR-ZZ-XX-DR-A-023111 Proposed Sitewide Section B;
6594-DSRSR-ZZ-XX-DR-A-023112 Proposed Sitewide Section C;
6594-DSRSR-BH-XX-DR-A-022000 New Bastion House – North Elevation;
6594-DSRSR-BH-XX-DR-A-022001 New Bastion House – South Elevation;
6594-DSRSR-BH-XX-DR-A-022002 New Bastion House – East Elevation;
6594-DSRSR-BH-XX-DR-A-022003 New Bastion House – West Elevation;
6594-DSRSR-BH-XX-DR-A-023010 New Bastion House – Short Section A-A;
6594-DSRSR-BH-XX-DR-A-023011 New Bastion House – Long Section B-B;
6594-DSRSR-BH-XX-DR-A-024000 New Bastion House Bay Study West;
6594-DSRSR-BH-XX-DR-A-024001 New Bastion House Bay Study East;
6594-DSRSR-BH-XX-DR-A-024002 New Bastion House Bay Study South;
6594-DSRSR-RS-XX-DR-A-022000 Rotunda – North Elevation;
6594-DSRSR-RS-XX-DR-A-022001 Rotunda – South Elevation;
6594-DSRSR-RS-XX-DR-A-022002 Rotunda – East Elevation;
6594-DSRSR-RS-XX-DR-A-022003 Rotunda – West Elevation;
6594-DSRSR-RS-XX-DR-A-022004 Rotunda – Cultural Hub – Elevations;
6594-DSRSR-RS-XX-DR-A-023010 Rotunda – Short Section A-A;
6594-DSRSR-RS-XX-DR-A-023011 Rotunda – Long Section B-B;
6594-DSRSR-RS-XX-DR-A-023012 Rotunda – Cultural Hub – Sections;
6594-DSRSR-RS-XX-DR-A-024000 Rotunda Bay Study East;
6594-DSRSR-RS-XX-DR-A-024001 Rotunda Bay Study South;
6594-DSRSR-RS-XX-DR-A-024002 Rotunda Bay Study West;
6594-DSRSR-RS-XX-DR-A-024003 Rotunda Bay Study Husk Planter;
6594-DSRSR-NC-XX-DR-A-022000 North Building – North & South Elevations;
6594-DSRSR-NC-XX-DR-A-022001 North Building – West & East Elevations;
6594-DSRSR-NC-XX-DR-A-023010 North Building – Sections;
6594-DSRSR-NC-XX-DR-A-024000 North Building Bay Study West;
6594-DSRSR-CP-XX-DR-A-022110 London Wall Car Park – Proposed
Plan/Elevation & Section;
6594-DSRSR-2A-XX-DR-A-022120 200 Aldersgate (2A) – Proposed Plan/Elevation
& Section;
6594-DSRSR-OLW-XX-DR-A-022130 One London Wall (OLW) – Proposed
Plan/Elevation & Section;

Landscape Plans:

981151-GMX-ZZ-00-DR-L-10001 Ground Floor Landscape GA;
981151-GMX-ZZ-00-DR-L-10002 Podium Level Landscape GA;
981151-GMX-ZZ-00-DR-L-10003 Roof Terraces Landscape GA.

REASON: To ensure that the development of the site is in compliance with details and particulars which have been approved by the Local Planning Authority.

3. Use Classes (C)

The areas shown on the approved drawings as Offices and as set out in Condition 5 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

4. Retail use (C)

The areas shown on the approved drawings as Retail, and as set out in Condition 5 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

5. Floor Areas (C)

The development shall provide (all figures GIA and excluding plant):

- 56,211 sq.m Office Use (Class E(g)(i));
- 1112.4 sq.m Retail/Restaurant Use (Class E(b));
- 8182.9 sq.m Cultural Use (Sui Generis);
- 480 sq.m Livery Hall Use (Sui Generis);
- 594.2 sq.m Public Car Park (Sui Generis);
- 703 sq.m Cycle Hub (Sui Generis);

REASON: To ensure the development is carried out in accordance with the approved plans.

6. Fire Safety (C)

The development shall be carried out in accordance with the approved details within the Fire Strategy Document by Buro Happold dated 6 March revision P02.

REASON To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan D5 and D12.

7. Doors over the highway (C)

No doors, gates or windows at ground floor level shall open over the public highway.

REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 1980.

8. No telecoms (C)

Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plan or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

9. BMU Cradle (C)

At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1

10. Circular Economy (PC)

(a) Prior to demolition of the development: full details of the **pre-demolition audit** in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. In addition, the audit shall include a strategy to recycle the various concrete elements from deconstruction on site following in depth surveys of the structure and quality. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

(b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved **detailed Circular Economy Statement** to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 -; S16, CEW 1. These details are required prior to construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

11. Post Construction Circular Economy (APC)

No later than 3 months after completion of the building, a **post-construction Circular Economy Statement** and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the

proposed targets stated in the approved Circular Economy Statement for the development. The statement shall also be submitted to the GLA at: circulareconomystatements@london.gov.uk.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

12. Whole Life-Cycle carbon emissions (PC)

Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions of the development are on track to achieve at least the GLA's Aspirational Benchmark (as current at the time of submission) set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2'. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

13. Post construction WLC (RIBA6)

Once the as-built design has been completed (upon commencement of RIBA Stage 6 the **post-construction Whole Life-Cycle Carbon (WLC) Assessment** (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk

REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

14. Façade system (PCED)

Prior to the commencement of the development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings.

REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the e Local Plan policies: CS15, DM15.1, DM15.2 and Draft City Plan 2040 policies DE1 and CE1.

15. District Heating Network connection (C)

The development shall provide an energy centre for the local district heating network to host low carbon plant with the capacity to meet all the heating and cooling needs for all buildings on site. The energy centre shall include connections to the local district heating network to allow in future for other lower carbon sources to supply the heating and cooling needs of the site. Any waste heat generated by the plant at the energy centre will be transferred to the local district heating network where it can be utilised.

REASON: To minimise carbon emissions by enabling the site to be connected to a district heating and cooling network in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

16. Climate Resilience (PCED)

Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, overheating, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. In The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

17. Post completion CCRSS (APC)

Within 6 months of completion details of **climate change resilience measures** must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

18. Operational carbon emissions (PCED)

Prior to the commencement of development, excluding demolition, updated Energy Assessments separate for each building on site, confirming the detailed design stage (RIBA stage 4) opportunities for operational carbon reduction from the buildings to future proof the development for low carbon operation, are required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved Energy Assessments, and the carbon reduction measures contained with the approved Energy Assessments shall remain in place for the lifetime of the development.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

19. BREEAM (POC)

A **post construction BREEAM assessment** for each building and each for the office uses, cultural uses, retail uses and demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

20. Preliminary Roost Assessment (PRA)

Prior to commencement of development, an updated Preliminary Roost Assessment (PRA) shall be submitted and approved by the Local Planning Authority to determine

whether any additional roosting opportunities have emerged since the previous PRA in May 2023.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS3 Biodiversity. This is required to be pre-commencement to ensure that roosting sites are not disturbed by development.

21. Updated Biodiversity Net Gain score (PCED)

Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment should be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.

22. Ecological Management Plan (PCED)

Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following

- details of ecological landscaping, along with associated management and monitoring.
- detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided.
- details of habitat created for solitary bees
- details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided.
- Build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible)

The measures as set out in the plan shall be carried out and so maintained.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.

23. Demolition and Construction Environmental Management Plan (PC)

There shall be no demolition or construction on the site until measures for protecting adjacent Sites of Nature Conservation, Bats and Breeding birds and as set out within the Ecology ES Chapter has been submitted to and approved in writing by the Local Planning Authority. The demolition and construction shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS3 Biodiversity. This is required to be

prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.

24. Post construction UGF and BNG (APC)

Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening.

25. Thames Water (Waste) (NP)

No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-ourpipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C3db5f12ea8fa4ba7093908dc00aa17b0%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638385977749608189%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=0o02cUHnE3lnT8z%2BBWsUcLfj7AULQ6wKzOgJQRSAd1M%3D&reserved=0>

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB.

26. Thames Water (water) (NP)

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be

carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-ourpipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C3db5f12ea8fa4ba7093908dc00aa17b0%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638385977749608189%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=0o02cUHnE3InT8z%2BBWsUcLfj7AULQ6wKzOgJQRSA1M%3D&reserved=0> Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk

27. Thames Water (water capacity) (PTO)

No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development

28. Thames Water (water mains) (NC)

No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local

underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-ourpipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C3db5f12ea8fa4ba7093908dc00aa17b0%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638385977749608189%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=0o02cUHnE3lnT8z%2BBWsUcLfj7AULQ6wKzOgJQRSA1M%3D&reserved=0> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

29. SUDS (BC)

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices (hydrobrake), design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.94 l/s from, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 240m³;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works; and
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2040.

30. SUDS (BSC)

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2040.

31. Rainwater Harvesting (BC)

Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

32.Sewer Vents (BP)

Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DMI0.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

33. Tree protection (PC)

An arboricultural method statement to include details of fencing for the protection of any retained tree including the roots shall be installed in accordance with plans and particulars to be submitted to and approved in writing by the Local Planning Authority and shall be erected before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the Local Planning Authority.

REASON: In order to protect the trees on the site during building operations in accordance with the following policies of the Local Plan: DM10.4, DM19.2. These details are required prior to construction work commencing in order to ensure that the trees are sufficiently protected from the time that construction starts.

34. Method statement for felling trees (PCRW)

Prior to any works to the trees, a method statement shall be submitted to and approved in writing by the local planning authority setting out the methodology for felling the trees and the evaluation process for assessing how the timber may be reused within the development. Within 1 year from the approval of such details, a statement shall be submitted to and approved by the local planning authority in writing setting out the findings of the timber analysis and the details of how the timber will be reused within the development. The development shall be carried out in accordance with the approved details.

REASON: In order to minimise waste and secure recycling in accordance with the following policy of the Local Plan: DM 17.2.

35. Sound insulation for music and speech (PTO)

Prior to the commencement of use, a scheme of sound insulation shall be submitted to the local planning authority to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90,5min 1m from the facade of the nearby residential premises at all third octave bands between 31.5Hz and 8kHz. The scheme shall be installed and constructed in accordance with any such approval given and shall be permanently maintained thereafter and the development shall not be carried out otherwise than in accordance with any such approval given.

36. No music (C)

No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

37. Hours of use (C)

The Class E/Sui Generis (use/premises) hereby permitted shall not be open to customers between the hours of (23:00) on one day and (07:00) on the following day.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

38. Doors/windows kept closed (C)

Unless otherwise approved by the Local Planning Authority the doors and windows to any bar or restaurant on the shall be kept closed. The doors may be used only for access or egress and in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

39. To require 'self-closing' doors (C)

Self-closing mechanisms must be fitted on doors before the restaurant/bar/takeaway use commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

40. Additional doors (C)

A further set of doors must be fitted between [INSERT] and [INSERT] and this extra set of doors shall be retained for the life of the premises. These doors must not be left open except in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

41. Hours of use (roof terraces) (C)

The roof terraces hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

42. No music on roof terraces (C)

No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

43. Promoted Events (C)

There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

44. Plant noise (PCRW)

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

45. Sound insulation (PC)

Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

47. Sound insulation office/non office (APC)

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

48. Flues (PCRW)

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the restaurant use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

49. Anti vibration (APC)

Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

50. Contamination site investigation (PC)

Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

51. Contamination investigation and risk assessment (DBSL)

A. No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

B. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

C. Following completion of measures identified in the approved remediation scheme and prior to occupation, a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

52. Unexpected contamination

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

53. Details of extracts

No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

54. Extract maintenance (C)

All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

55. Public Access and Events Management Plan (PTO)

Prior to first occupation, a public access and events management plan shall be submitted and approved by the Local Planning Authority. This shall include detailed proposals for the dispersal of patrons and workers from premises to ensure the safe

egress of all people, to minimise the potential for over-crowding and reduce the instances of noise nuisance and anti-social behaviour.

Such measures as approved shall be implemented and the use shall be carried out in accordance with the plan.

REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies SA2, DM 10.1, DM 15.7 and DM 21.3

56. Demolition Management Plan (PC)

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

57. Construction Management Plan (PCED)

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

58. Flue termination

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

59. NRMM (PC)

Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

60. NO₂ Impact Quantification (PC)

Prior to development commencing and as part of the Construction Environmental Management Plan a local NO₂ monitoring strategy shall be submitted and approved in writing by the Local Planning Authority. This should define a baseline and quantify the impact of the construction phase of the proposed development. Both long-term and short-term NO₂ objectives should be taken into account when designing the monitoring strategy, with due attention provided to nearby receptors and the diurnal nature of construction vehicle emissions.

REASON: In accordance with the following policy of the Local Plan: DM15.6 to maintain local air quality and ensure that NO₂ concentrations remain within relevant UK objectives during the construction phase in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D. These details are required prior to construction work commencing in order to establish the NO₂ levels from the time that construction start.

61. Landscape tree barriers (PC)

Prior to development commencing, details of landscape tree barriers as set out in Air Quality Positive Statement shall be submitted and approved in writing by the Local Planning Authority.

REASON: In accordance with the following policy of the Local Plan: DM15.6 to maintain local air quality and ensure that NO₂ concentrations remain within

relevant UK objectives during the construction phase in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

62. Demolition and Construction Logistics Plan (PC)

Demolition and construction works shall not begin until a Deconstruction and Construction Logistics Plan (DCLP) to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. A Principal Contractor should be appointed to enable preparation of the required DCLP. The Deconstruction and Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work-Related Road Risk is to be managed. The plan should address the following:

- Access concerns for local residents and other users in the vicinity of the site have been raised based on the indicative construction logistics proposals submitted. Access requirements for all nearby residents, workers etc. will need to be considered in detail through consultation processes. This would need to address servicing to Ironmonger's Hall during construction. Access to Thomas More car park should be retained where possible and closure would not be supported / agreed to, save for exceptional circumstances where this was unequivocally unavoidable.
- Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.
- Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.
- Construction vehicle routes to and from the site will need to make the most efficient use of the highway network in the Central London Area. Such routes will require discussion with CoL Highways.
- The proposed works are likely to generate a significant number of workers on the site at any given time. We will expect the Principal Contractor to prepare travel planning guidance to encourage workers to use sustainable transport instead of private motor vehicles.
- Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
- Reconsideration should be given in particular to the location of the welfare space.
- Traffic congestion is already a problem in The CoL, particularly during morning and afternoon/evening peak periods. We will therefore expect construction vehicle movements to be scheduled to avoid 0800 to 0930 and 1500 to 1830 hours on Monday to Friday.

- Details will be required to describe how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.
- Details will be required to describe how vehicular access will be maintained within the locale, including any proposed alternative routes (if necessary).
- Details will be required with respect to how the contractor will be encouraging the use of cargo bike deliveries throughout the construction process.
- A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.
- The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme:
 - <http://www.clocs.org.uk/standard-for-clocs/>

The demolition and construction shall not be carried out otherwise than in accordance with the approved Deconstruction and Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

63. Site Condition Survey (PC)

Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority. Proposed threshold levels at finished floor levels (highways boundary) and levels at basement in relation to existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

64. Interim Travel Plan (PFO)

Six months before the first occupation of each building, an Interim Travel Plan shall be submitted and approved in writing by the Local Planning Authority for each of the following buildings-

- a) New Bastion House
- b) Rotunda building
- c) North building

Each Interim Travel Plan shall include details of the following-

- i. Trips and choices - details of the estimated number of new trips resulting from the development and the development and the predicted share across different transport modes;
- ii. Site Assessment - overview of the existing transport links serving the development, identifying realistic alternatives to car use and any barriers to non-car use, identify possible improvements to the area that would encourage the use of environmentally friendly travel options;
- iii. Provide details of facilities provided on site by the development which will encourage the use of sustainable means of transport, cycling and walking;
- iv. Identify indicative baseline mode share targets and future targeted mode shares;

A travel plan co-coordinator shall be appointed to oversee the development and implementation of the travel plan no less than 3 months before occupation of the first building.

REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.

65. Full Travel Plan (APC)

Within six months of first occupation, a full Travel Plan in respect of each of the following buildings shall be submitted to and approved in writing by the Local Planning Authority ("LPA").

- a) New Bastion House
- b) Rotunda building
- c) North building

Each of the buildings shall thereafter be operated in accordance with the approved Travel Plan (or any amended Travel Plan that may be approved from time to time by the LPA) for a minimum period of 5 years from first occupation of that building. The travel plans should focus on promoting sustainable travel to and from the development site, encouraging cycling and targets should be set to reflect achieving full occupancy of the cycle parking provided. The full Travel Plan shall:

- i. Provide a site assessment;
- ii. Provide for the creation of steering group to oversee the development of the travel plan and provide guidance and support;

- iii. Provide a survey of staff travel to work patterns and attitudes to identify how staff travel, where staff travel from, why staff travel the way they do and whether staff are able or willing to change and what measures might encourage them to do so;
- iv. Provide a travel audit of all travel generated to include business travel, visitors, deliveries/suppliers and fleet vehicles where applicable;
- v. Identify the high-level objectives of the travel plan including emissions/vehicle reduction initiatives, public transport initiatives, walking and cycling initiatives, measures and goals and indicators to assess progress against objectives;
- vi. Establish a reporting mechanism to the LPA;
- vii. Provide details of measures and incentives for the encouragement of travel by cycle;
- viii. Identify the level of funding required for initiatives committed to within the Travel Plan;
- ix. Set out practical measures through which targets are to be met and objectives may be achieved based upon the results of the survey and audit;
- x. Provide for regular promotion of measures to facilitate the development sites accessibility by means other than private motor vehicles including as appropriate information to be incorporated into publicity material and by making copies of the travel plan available to staff, visitors and customers to the development;
- xi. Provide arrangements for the review and monitoring of the travel plan on an annual basis.

B. Annual monitoring reports shall be submitted to the LPA for 5 years from the first occupation of the relevant building.

REASON: To ensure that the LPA may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.

66. Delivery and Servicing Management Plan (PFO)

Details of a Delivery and Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the first of the buildings hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Delivery and Servicing Management Plan (or any amended Delivery and Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the development.

1. The Delivery and Servicing Management Plan shall make provision for:

- A. No overnight servicing- No delivery or servicing by motorised vehicles to the site overnight shall take place between the hours of 2300 and 0700 the next day;
- B. A maximum of five hours of daytime servicing by motorised vehicles between 0700 to 2300 hours. Surveys shall be undertaken of Thomas More car park

(when fully operational i.e. prior to any potential construction impacts) to determine the most appropriate hours of servicing between 7am-11pm, up to a maximum of five hours;

- C. All servicing must take place within the dedicated off-street servicing areas;
- D. No motorised vehicles larger than 7.5 ton and 8 metres in length shall be used for the service and delivery of the Site;
- E. All vehicles (aside from cargo bikes) associated with the office elements of the scheme arriving at the site must have travelled from an off-site consolidation centre. A consolidation provider must be identified prior to the preparation of the detailed DSP;
- F. Details pertaining to specific uses / trips where travelling via an off-site consolidation centre is not viable, or does not represent the most efficient method of logistics, must be clarified / confirmed;
- G. Measures specifically relating to how cargo bikes will access the site and be encouraged should be included (noting a target for at least 10% of deliveries by this mode);
- H. All vehicles arriving at the site must have first been allocated Pre-Booked Delivery Slots for the time of their arrival;
- I. There shall be no more than 60 delivery and servicing motorized vehicles to all of the proposed buildings in total over any 24-hour period (accounting for a consolidation rate of at least 70% and 10% of trips via cargo bike);
- J. Electric Vehicle charging points should be provided for all dedicated loading bays;
- K. Details and analysis pertaining to the proposed signal operations must be provided;
- L. Additional site management personnel based at 'dockmaster' offices in each of the service yards; and
- M. The retention of the Barbican Estate car park kiosk for car park attendant and associated facilities and replacement of any electrical charging points affected.

The above provisions shall not apply to facilities management vehicles accessing any of the proposed buildings in the event of an emergency. Annual monitoring reports shall be submitted to the Local Planning Authority from the date of first occupation and the format of the data recorded should be agreed with CoL officers in advance.

2. The developer shall undertake a review of the Delivery and Servicing Management Plan, specifically including survey count data of the site, following the first occupation of the second and third building annually for the first five years. This document is to be submitted to the Local Planning Authority no later than the anniversary of the date of approval of the initial Delivery and Servicing Management Plan, and then as requested by the LPA and notified in writing to the developer as necessary. The review shall set out any amendments considered necessary to the Delivery and Servicing Management Plan, subject to the results of the survey data,

for approval, but no amendments shall come into force until they have been approved by the LPA.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3

67. Cycle Parking Facilities (PFO)

Details of the cycle parking facilities shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. These shall comprise long stay cycle parking of 868 spaces and short stay cycle parking of 326 spaces.

The cyclist facilities shall thereafter be retained and operated in accordance with the approved details for the life of the building. The cycle parking provided within the buildings must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.

REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.

68. Changing Facilities and Showers (PFO)

Changing facilities, showers (a site total minimum of 57) and lockers (a site total minimum of 654) shall be provided in conjunction with the individual bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans. These facilities should be provided within each respective building as presented in the approved plans.

REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.5

69. Waste Storage (PFO)

Notwithstanding Condition 2 (approved plans), details of the waste storage facilities demonstrating the arrangements for the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. Waste stores should be compliant with BS5906 specifications. The building facilities shall thereafter be operated in accordance with the approved details for the life of the building and the refuse collection and storage facilities thereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1.

70. Blue Badge Car Parking Spaces (C)

A minimum of three blue badge off-street parking spaces shall be provided and maintained for the life of the development. Electric Vehicle charging facilities should be provided for these spaces.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM16.5.

71. Cycle Parking (C)

A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8 and London Plan policy TS cycling.

72. Car Management Plan (PCRW)

A Car Park Management Plan (CPMP) shall be submitted and approved in writing by the Local Planning Authority prior to the commencement on any works to the London Wall Car Park or associated access. This shall include details of how the London Wall Car Park will be managed after the works including signage, equipment, and measures to control the flow of vehicles within the car park (e.g. occupancy counts on arrival) and adequately mitigate any perceived impacts in this regard. The CPMP should be developed in collaboration with City Operations (CoL). All costs associated with agreed management measures will be borne by the applicant and at no cost to the City of London corporation.

Specific details should include:

- A Health & Safety audit and risk assessment for the car park's new configuration.
- A review of on-street wayfinding, directional and entrance signage.
- An assessment of the necessary changes required to facilitate the new entrance including barrier & control equipment, CCTV, sensor loops and intercoms.
- Undertaking the detailed design (including road safety audit) for the new entrance configuration at street level.
- A review of the operational management implications within the car park including revised traffic flows, new cycle hub and bay configuration, revised signage, bay sensors and real time public information.
- A review of the implications to the car park as a highway structure, particularly the removal of the central reservation at street level.

REASON: To ensure that the Local Planning Authority may be satisfied that the operation of the car park would not be adversely affected in accordance with Local Plan: DM16.1 and DM16.5.

73. Hostile Vehicle Mitigation (PC)

The development shall incorporate measures as deemed necessary by City of London Police within the site to resist structural damage arising from an attack with a road vehicle, or road vehicle borne explosive device, provided such measures are necessary to protect the areas around the building entrances and public spaces where crowding is expected. Details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

REASON: To ensure that the premises and its surrounds are protected from road vehicle borne damage in accordance with the following policy of the Local Plan: DM3.2 and DM3.3. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

74. AOD Height of Buildings (C)

The maximum heights of the approved buildings shall be as follows:

1. Rotunda 75.27m AOD to top of main roof level; 76.27m AOD to top of flue
2. New Bastion House 86.65m AOD to top of main roof level; 87.13m AOD to top of BMU rail
3. North Building 37.45m AOD to top of main roof level and 39.6m AOD to top of lift overrun

REASON: In the interests of visual amenity and heritage protection in accordance with the following policies of the Local Plan: DM10.1, CS12 and CS14

75. Detailed Design (PCRW)

Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- a. Rotunda Building
 - i. particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces;
 - ii. before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details;
 - iii. details of the proposed new external and semi- external facades including details of typical and unique bay details for the development for each façade including fins, balconies, soffits and jointing where appropriate;
 - iv. mock up sample of the glazing system to test solar glare and colouration;

- v.details of the rooftop including any plant enclosure, equipment and the roofscape and fifth elevation;
- vi.details of lower ground elevations including all entrances, cycle entrance, service and escapes, public lifts, façade materials;
- vii.details of columns, “petal” detail, soffit, and fins including jointing and expansion joints where relevant with samples of materials and a mock up as required;
- viii.full details of the ground floor, roof top and terrace public spaces, including flooring, entrances, fenestration, planters, seating, lighting, soffits, drainage, irrigation and any infrastructure required to deliver programmed and varied uses;
- ix.details of soffits, hand rails and balustrades;
- x.details of any relevant party wall treatments;
- xi.details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room
- xii.details of interfaces with the Highwalk and public realm;
- xiii.details of any canopies;
- xiv.Notwithstanding the annotated materials for the fins to the external “husk” these shall match the texture and materiality of the columns, petals and soffit.

b. *Details of Rotunda roof top terrace*

- i. full details of the fit out for public ground floor to roof top cultural spaces and the external public roof terrace, including flooring, entrances, fenestration, balustrades, planters, seating, lighting, soffits, drainage, irrigation, wayfinding, security, lifts and any infrastructure required to deliver programmed and varied uses;

c. *New Bastion House Building*

- i.particulars and sample of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces;
- ii.before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details;
- iii.details of the proposed new external and semi- external facades including details of typical and unique bay details for the development for each façade including fins, balconies, soffits and jointing where appropriate;
- iv.mock up sample of the glazing system to test solar glare and colouration;
- v.details of the rooftop including any plant enclosure, equipment and the roofscape and fifth elevation;
- vi.details of lower ground elevations including all entrances, cycle entrance, service and escapes, public lifts, façade materials;

- vii.details of columns, “petal” detail, soffit, and fins including jointing and expansion joints where relevant with samples of materials and a mock up as required;
- viii.full details of the ground floor, roof top and terrace public spaces, including flooring, entrances, fenestration, planters, seating, lighting, soffits, drainage, irrigation and any infrastructure required to deliver programmed and varied uses;
- ix.details of soffits, hand rails and balustrades;
- x.details of any relevant party wall treatments;
- xi.details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room
- xii.details of interfaces with the Highwalk and public realm;
- xiii.details of any canopies;
- xiv.details of the public accessible lift including entrance
- xv.details of the entrances from Barber Surgeons Gardens
- xvi.elevations of the cycle entrance below London Wall
- xvii.Notwithstanding the annotated materials for the fins to the external “husk” these shall match the texture and materiality of the columns, petals and soffit.

d. North Building

- i.particulars and sample of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces;
- ii.before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details;
- iii.details of the proposed new external details of typical bay details for the development for each façade
- iv.details of the rooftop including any plant enclosure, equipment and the roofscape and fifth elevation;
- v.details of lower ground elevations including all entrances, cycle entrance, service and escapes, façade materials;
- vi.details of soffits, hand rails and balustrades;
- vii.details of any relevant party wall treatments;
- viii.details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room
- ix.details of interfaces with the Highwalk and public realm;
- x.details of any canopies;

e. Ironmongers Hall

Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all

works pursuant to this permission shall be carried out in accordance with the approved details:

- i.. particulars and samples of the materials to be used on all external faces of the building and surface treatments in areas where the public would have access, including external ground;
- ii. before the works thereby affected are begun, sample panels of brickwork shall be built, agreed on-site
- iii. details of dismantling existing boundary wall and extent and method of reuse of materials
- iv.. details of the proposed single storey extension and public access lift
- v. details of all new external windows and doors
- vi details of the interface between listed building and proposed new extensions and public realm
- vii. details of any plant enclosure, louvers, equipment and the roofscape and fifth elevation;
- e. Details of handrails and balustrades and decorative ironwork
- f. details of the boundary enclosure to Ironmongers including sample panel of the brickwork
- i..details of any lighting or signage
- j. details of any urban greening or planting fixed to building including infrastructure and maintenance
- l. detailed schedule with specifications for any repairs and replacement works to the historic building.

f. Cultural hub building and arcade

- i. particulars and sample of the materials to be used on all external faces of the building and surface treatments in areas where the public would have access, including external ground;
- ii. before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details;
- iii.details of the proposed new external details of typical bays including glazing, entrances and doors for the development for each façade;
- iv.details of the cultural fit out and external visual experience of the spaces;
- v.details of the soffit and including interface junctions and samples
- vi.details of any plant enclosure or louvers;
- vii.details of hand rails and balustrades;
- viii.details of any relevant party wall treatments;
- ix.details of the integration of window cleaning equipment

- x.details of interfaces with the public realm, Highwalk/accessible lift, staircase and public realm;
- xi.details of any lighting or signage
- xii.details of any urban greening or planting fixed to building including infrastructure and maintenance

g. 200 Aldersgate

- i. detailed drawings of the repurposing of this space, façade repairs, remodelling and samples of materials following removal of the Highwalk

h. 1 London Wall

- i. detailed drawings of the repurposing of this space, façade repairs, remodelling and samples of materials following removal of the Highwalk

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.5, DM12.2

76. Landscaping (PCRW)

All unbuilt surfaces, including the ground floor, podium and roof level and landscaping, shall be treated in accordance with a landscaping scheme, including details of:

- a. Irrigation;
- b. Provision for harvesting rainwater run-off from road to supplement irrigation;
- c. Spot heights for ground levels around planting pit;
- d. Soil;
- e. Planting pit size and construction;
- f. Tree guards; and
- g. Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.

To be submitted to and approved in writing by the Local Planning Authority in consultation with Historic England before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

77. Urban greening (PWTA)

Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for

- a. the green walls, facade planting, green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;
- b. the incorporation of blue roofs into roof surfaces; and
- c. the landscaping including samples of the public realm

Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

78. Wayfinding (PCED)

Prior to commencement excluding demolition, a signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, cultural uses and any other relevant uses or historic sites shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.

79. Public Realm details (BWTA)

Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

a. Central Plaza

- i. full details of the of the public spaces, including flooring, entrances, planters, steps, seating, lighting, soffits, drainage, irrigation, bollards, cycle storage, and any infrastructure required to deliver programmed and varied uses;
- ii. particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access, including external ground and upper level surfaces;

- iii. details of hand rails and balustrades and staircases and steps;
- vi. details of the drinking fountain;
- v. details of all drainage, irrigation and rainwater harvesting;
- vi. details of the supporting columns including the interface at ground level
- vii. details of all proposed entrances including accessible public lifts

b. The Glade

- i. full details of the of the public spaces, including flooring, entrances, planters, seating, lighting, soffits, drainage, walls, railings, irrigation, handrails, balustrades, the oculus and any infrastructure required to deliver programmed and varied uses;
- li. particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access, including external ground and upper level surfaces;
- iii. details of lifts, ramps and columns
- vi. details of all drainage, irrigation and rainwater harvesting;
- v. details of the supporting columns including the interface at surface level
- vi. full details of the boundary treatments with Ironmongers Plaza at podium level
- vii. details of the interface with Ironmongers Hall boundary

c. Aldersgate Plaza and Aldersgate Street

- i. full details of the of the public spaces, including flooring, entrances, planters, steps, seating, lighting, soffits, drainage, walls, railings, irrigation, hand rails, balustrades, and any infrastructure
- ii. particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access, including external ground and upper level surfaces;
- iii details of lifts, ramps and columns
- iv. details of all drainage, irrigation and rainwater harvesting;

d. Northern Garden & Barber Surgeon's Garden

- i. full details of the of the public spaces, including flooring, entrances, planters, seating, lighting, soffits, drainage, walls, railings, irrigation, hand rails, balustrades, the water feature, heritage plaques/heritage interpretation, and any infrastructure required;
- ii. particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access, including external ground and upper level surfaces;
- iii details of lifts, ramps and columns
- iv. details of all drainage, irrigation and rainwater harvesting;
- Vi. details of gates, entry points and boundary treatments, planting and structure and perimeter treatment with adjoining premises particularly the City of London Girls School and the Barbican Estate

vii.details of the supporting structure for the Northern Garden decking over the car park area below.

e.Highwalks

The Highwalks, including, the connection with Mountjoy House, Jon Wesley Highwalk, Plaisterer’s Highwalk, Bastion Highwalk, Falcon Highwalk, Nettleton Court and Mountjoy Close

i.full details of the of the external appearance of the new highwalks: including flooring/surface materials, entrances, materials, soffits, planters, seating, lighting, soffits, drainage, walls, railings, irrigation, hand rails and balustrades

ii details of the interface junction including soffit, balustrade, expansion joint and materials and surrounding structure to extend Mountjoy Close Highwalk and Hohn Wesley Highwalk

iii. heritage plaques/heritage interpretation

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2, CS10, DM10.1, DM10.4 and DM12.2

80. Public realm areas suicide prevention (BWTA)

Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external viewing platform area, ‘the glade’, the raised highwalk areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan:, CS3, DM3.2 DM10.1 and DM12.2

81. Public Realm Management Plan (PCRW)

Prior to implementation, a Public Realm Management Plan shall be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. The management and operation of the public realm shall be carried out in accordance with the Public Realm Management Plan for the lifetime of the development, alterations may be agreed in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied with the management and operation of publicly accessible areas in accordance with the Public London Charter LPG and London Plan (2021) Policy D8

82. Sculptures, Markers and Plaques (PC)

All sculpture, parish markers, commemorative plaques on the existing building and in the existing public spaces shall be carefully removed prior to demolition commencing, stored for the duration of building works, repaired, reinstated in agree location and retained for the life of the building on the new building in accordance with detailed specifications including mounting, framing and fixing details and long term maintenance programme which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby. In each case there should be relevant stakeholder engagement and evidence of necessary permissions.

These include but not exclusively:

- Wesley Memorial (Aldersgate Flame)
- Bronze Plaque Commemorating John Wesley
- Bull and Mouth carving
- Metropolitan Drinking Fountain
- Crest and decorative projecting bracket sign of the Ironmongers' Company (at entrance to Shaftesbury Place)
- Blue Plaque – Site of Thanet House
- Metropolitan Drinking Fountain and Cattle Trough Association cattle trough
- City of London Wall Walk Plaques
- Bull and Mouth Sculpture

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM11.2 and DM12.1. This is required to be prior to commencement in order to ensure that the memorials are safely removed and retained.

83. Public Art Strategy (BSC)

Details of a public art strategy for existing and proposed temporary installations within the public realm or on buildings, demonstrating: commissioning process; artistic merit; appropriateness to siting; deliverability; maintenance; management and engagement with BID and CAI and wider community; implementation programme; and environmental impact; shall be submitted to and approved in writing by the Local Planning Authority. The public art strategy shall be carried out as approved and so maintained.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: CS12 and DM 11.2. This is required to be prior to commencement in order to ensure that the memorials are safely removed and retained.

84. Jewish cemetery marker (BSC)

Before shell and core of the first building is complete, details (including design, appearance and location) of a commemorative marker relating to the Jewish

Cemetery shall be submitted and approved in writing by the Local Planning Authority. There should be relevant stakeholder engagement. The marker as approved shall be implemented prior to the occupation and maintained thereafter.
REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM11.2 and DM12.1.

85. Scheduled Monuments (protection) (PC)

There shall be no demolition on the site until a scheme for protection of the scheduled monuments within the development site from construction, noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority in consultation with Historic England. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

REASON: In the interests of safeguarding the designated heritage asset in accordance with the following policies of the Local Plan: CS12 and DM12.4 These details are required prior to demolition in order that the impact on relevant scheduled monuments is minimised from the time that development starts.

86. Scheduled Monuments (details heritage/exhibition spaces) (PCRW)

Prior to commencement of the relevant works, details of the site wide archaeology and scheduled monument heritage interpretation and exhibition spaces for West Gate of Cripplegate Fort and Bastion 14 - London Wall West and North of Monkwell Square shall be submitted and approved in writing by the Local Planning Authority and Historic England including but not exclusively:

1. Fort Gate exhibition space external and internal curtain, fit out and elevations
2. details of related lifts, steps, ramps from London Wall and Highwalk to Barber Surgeons Gardens
3. details of heritage viewing platform from London Wall and Highwalk overlooking Barber Surgeons Gardens
- 4, details of London Wall interpretation through the site within the public realm
5. details of public access
6. Lighting and signage

REASON: In the interests of safeguarding the designated heritage assets are safeguarded and presented to the public in a suitable manner in accordance with the following policy of the Local Plan: CS12 and DM12.4.

87. Archaeology and Fieldwork (PC)

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning

authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- B. Where appropriate, details of a programme for delivering related positive public benefits.
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

88. Preservation and Protection (PC)

No development shall commence until details of fencing, signage and other control measures to protect the part of the Jewish Cemetery that may extend onto the site have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of operational works.

REASON: In order to protect the remains of the Jewish cemetery from disturbance by the development in accordance with the following policy of the Local Plan: DM12.4.

89. Jewish Cemetery Condition (PC)

Notwithstanding Condition 2 (approved drawings), no development shall take place until detailed drawings of a revised design of the northern part of New Bastion House and highwalk to prevent impact to the part of the Jewish Cemetery that may extend onto the site have been submitted to the Local Planning Authority and approved. The development shall be carried out in accordance with the approved details.

REASON: In order to protect the remains of the Jewish cemetery from disturbance by the development in accordance with the following policy of the Local Plan: DM12.4.

90. Foundation Design (PC)

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. This submission will be informed by the Stage 1 evaluation. The development shall be carried out in accordance with the approved details.

REASON: In order to ensure archaeological remains of significance are preserved in situ exist in accordance with the following policy of the Local Plan: DM12.4.

91. Public Engagement (PC)

No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.

REASON: In order to ensure the archaeology of the site is presented to the public in a suitable manner in accordance with the following policy of the Local Plan: DM12.4. This is required to be prior to development commencing to ensure that the timetable is sufficient for appropriate public engagement.

92. Lighting including lighting of buildings, scheduled monuments and public spaces gardens and highwalks (PCRW)

Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:

- lighting layout/s;
- details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
- a lighting control methodology;
- proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;
- all external, semi-external and public-facing parts of the building and of any internal lighting in relation spaces, gardens, terraces, scheduled monuments and highwalks so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;
- details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental

impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 , CS15.

93. Securing heritage and public benefits: Unilateral Undertaking

The approved scheme shall be implemented in full accordance with the Unilateral Undertaking entered into between the Corporation and the applicants or their successors in title.

REASON: To ensure that the public benefits, including the heritage benefits, of the approved scheme are secured and in accordance with Section 17 (3) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and National Planning Policy Framework, December 2023, Paragraphs 195 to 214; The London Plan 2021 Policy HC1 Heritage conservation and growth.

94. Inclusive Public Realm Strategy (PCRW)

Before the relevant parts are commenced, an Inclusive Public Realm Strategy shall be submitted to and approved in writing by the Local Planning Authority. This should include details of gradients, crossfalls, planting, details of security measures (for example bollards), seating, surface materials, boundary edges, lighting, hazard protection and appropriate resting points throughout the public realm. The management and operation of the public realm shall be carried out in accordance with the Inclusive Public Realm Strategy for the lifetime of the development, alterations may be agreed in writing by the Local Planning Authority.

REASON: To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments open spaces and streets, and in accordance with Local Plan DM10. 8.

95. Changing place facilities (PCRW)

Before the shell and core of the first building are complete, details of accessible toilets and Changing Place facilities shall be submitted to and approved in writing by the Local Planning Authority. These shall be carried out in accordance with the details so approved, alterations may be agreed in writing by the Local Planning Authority and so maintained for the lifetime of the buildings.

REASON: To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments and in accordance with Local Plan DM10. 8.

96. Safety in the Public Realm (PCRW)

Before the relevant parts are commenced, a safety audit of the Public Realm Strategy shall be submitted to and approved in writing by the Local Planning Authority. The management and operation of the public realm shall be carried out in accordance with the Strategy for the lifetime of the development, alterations may be agreed in writing by the Local Planning Authority.

REASON: To achieve an environment that meets the highest standards of safety and security in all developments open spaces and streets, and in accordance with Local Plan DM3.2 and London Plan D11.

97. Local Procurement Strategy Demolition (PC)

In this condition “Local Procurement Code & Guidance” means documents entitled Code for Local Employment and Procurement (2021) and Employment and Skills Plan Guidance (2021) together with any amendments or revisions thereto.

A. A Local Procurement Strategy (Demolition) shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any works including any demolition. The submitted strategy shall include:

- i. details of initiatives to identify local procurement opportunities relating to the demolition of the development and how the tender process will be used to achieve the targets below;
- ii. details of initiatives to reach a 10% target for local procurement from Local SME's and how the tender process will be used to achieve the targets;
- iii. the timings and arrangements for the implementation of such initiatives; and
- iv. suitable mechanisms for the monitoring of the effectiveness of such initiatives to maximise opportunities for local SMEs to access contracts for goods and services pursuant to the Local Procurement Code & Guidance at least bi-annually.

B. Monitoring reports shall be submitted to the Local Planning Authority at least biannually to assess:

- i. The performance by all contractors and subcontractors in achieving the 10% Local SME procurement spend target identified in the Local Procurement Code & Guidance and benchmark that performance against the approved Local Procurement Strategy (Demolition) and the overall estimated demolition procurement spend on all goods and services.
- ii. all Local SMEs which are sent a tender enquiry or a tender invitation, and all contractors and sub-contractors detailing: the date, the goods and services tendered for and the outcome and value of the tender;
- iii. all Local SME suppliers of goods and services which are used by the Owner and all contractors and sub-contractors together with: the value and type of the goods and services procured (irrespective of whether or not these goods and services were procured pursuant to a tender).

- C. In the event that the monitoring reports submitted pursuant to Part B above demonstrate that targets are not being achieved a revised Local Procurement Strategy (Demolition) incorporating revisions requested by the Local Planning Authority shall be submitted to and approved by the Local Planning Authority.
- D. A final report shall be submitted to the Local Planning Authority no later than one month after occupation of the development:
- i. Assessing the overall performance in achieving the 10% Local SME procurement spend target identified in the Local Procurement Charter and benchmarking that performance against the approved Local Procurement Strategy (Demolition) and the actual total demolition procurement spend on all goods and services;
 - ii. Providing details of all Local SMEs which were used to procure goods and services together with the total spend on goods and services procured from Local SMEs, such details to include the name and contact details of the appropriate person(s) within the Local SME.
- E. The Development shall be carried out in accordance with the approved Local Procurement Strategy (Demolition) and the Local Procurement Code & Guidance as may be revised under Part C above until the development is occupied.

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

98. Local Procurement Strategy Construction (PC)

In this condition "Local Procurement Code & Guidance" means documents entitled Code for Local Employment and Procurement (2021) and Employment and Skills Plan Guidance (2021) together with any amendments or revisions thereto.

- A. A Local Procurement Strategy (Construction) shall be submitted to and approved in writing by the Local Planning Authority prior to implementation of the development. The submitted strategy shall include:
- i. details of initiatives to identify local procurement opportunities relating to the construction of the development and how the tender process will be used to achieve the targets below;
 - ii. details of initiatives to reach a 10% target for local procurement from Local SME's and how the tender process will be used to achieve the targets;
 - iii. the timings and arrangements for the implementation of such initiatives; and
 - iv. suitable mechanisms for the monitoring of the effectiveness of such initiatives to maximise opportunities for local SMEs to access contracts for goods and services pursuant to the Local Procurement Code & Guidance at least bi annually.

- B. Monitoring reports shall be submitted to the Local Planning Authority at least biannually to assess:
- i. The performance by all contractors and subcontractors in achieving the 10% Local SME procurement spend target identified in the Local Procurement Code & Guidance and benchmark that performance against the approved Local Procurement Strategy (Construction) and the overall estimated construction procurement spend on all goods and services.
 - ii. all Local SMEs which are sent a tender enquiry or a tender invitation, and all contractors and sub-contractors detailing: the date, the goods and services tendered for and the outcome and value of the tender;
 - iii. all Local SME suppliers of goods and services which are used by the Owner and all contractors and sub-contractors together with: the value and type of the goods and services procured (irrespective of whether or not these goods and services were procured pursuant to a tender).
- C. In the event that the Monitoring Reports submitted pursuant to Part B above demonstrate that targets are not being achieved a revised Local Procurement Strategy (Construction) incorporating revisions requested by the Local Planning Authority shall be submitted to and approved by the Local Planning Authority.
- D. A final report shall be submitted to the Local Planning Authority no later than one month after occupation of the development:
- i. Assessing the overall performance in achieving the 10% Local SME procurement spend target identified in the Local Procurement Charter and benchmarking that performance against the approved Local Procurement Strategy (Construction) and the actual total construction procurement spend on all goods and services;
 - ii. Providing details of all Local SMEs which were used to procure goods and services together with the total spend on goods and services procured from Local SMEs, such details to include the name and contact details of the appropriate person(s) within the Local SME
- E. The Development shall be carried out in accordance with the approved Local Procurement Strategy (Construction) and the Local Procurement Code & Guidance as may be revised under Part C above until the development is occupied.

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

99. Local Training Skills and Job Brokerage Strategy Demolition (PC)

In this condition "Central London Forward Boroughs" means the London boroughs of Camden, Hackney, Haringey, Islington, Lambeth, Lewisham, Southwark, Tower Hamlets, Wandsworth, the Royal Borough of Kensington and Chelsea and the City of Westminster (and any other members of Central London Forward or superseding body);

- A. A Local Training Skills and Job Brokerage Strategy (Demolition) shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works including any demolition. The submitted strategy shall include details of:
- i. the advertising of all vacancies relating to the demolition works within the City of London and the Central London Forward Boroughs via local job brokerage and employment support agencies;
 - ii. identifying in advance skills needs which could be met through local training providers and shall provide a plan for meeting such needs;
 - iii. measures to meet a target of 20% of the total workforce on the site being resident in the City of London and Central London Forward Boroughs;
 - iv. the proposed target of apprenticeships to be generated on the Site and recruited from the City of London and Central London Forward Boroughs;
 - v. providing appropriate training to ensure effective transition from unemployment to work;
 - vi. undertaking at least two community benefit and/or education projects per year of construction activity; and
 - vii. providing information on the timing and implementation of these initiatives and suitable monitoring mechanisms.
- B. The development shall be carried out in accordance with the approved Local Training Skills and Job Brokerage Strategy (Demolition).

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

100. Local Training Skills and Job Brokerage Strategy Construction (PC)

In this condition "Central London Forward Boroughs" means the London boroughs of Camden, Hackney, Haringey, City of London, Islington, Lambeth, Lewisham, Southwark, Tower Hamlets, Wandsworth, the Royal Borough of Kensington and Chelsea and the City of Westminster (and any other members of Central London Forward or superseding body);

- A. A Local Training Skills and Job Brokerage Strategy (Construction) shall be submitted to and approved in writing by the Local Planning Authority prior to implementation of the development. The submitted strategy shall include details of:
- i. advertising of all vacancies relating to the construction works within the City of London and the Central London Forward Boroughs via local job brokerage and employment support agencies;
 - ii. identifying in advance skills needs which could be met through local training providers and provide a plan for meeting such needs;
 - iii. measures to meet a target of 20% of the total workforce on the site being resident in the City and Central London Forward Boroughs;
 - iv. proposed target of apprenticeships to be generated on the site and recruited from the City and Central London Forward Boroughs;

- v. providing appropriate training to ensure effective transition from unemployment to work;
 - vi. undertaking at least two community benefit and/or education projects per year of construction activity; and
 - vii. providing information on the timing and implementation of these initiatives and suitable monitoring mechanisms.
- B. The development shall be carried out in accordance with the approved Local Training Skills and Job Brokerage Strategy (Construction).

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

101. Be-Seen Energy Monitoring (PFO)

In this condition “Defects Liability Period” means such period of time following Practical Completion of a Building in which a contractor may remedy defects as may be included in the building contract for the relevant Building.

- A. Prior to the first occupation of the development hereby permitted, the applicant shall provide updated accurate and verified ‘as-built’ design estimates of the ‘Be Seen’ energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the ‘As-built stage’ chapter of the GLA ‘Be Seen’ energy monitoring guidance (or any document that may replace it). All data and supporting evidence should be submitted to the GLA using the ‘Be Seen’ as-built stage reporting webform. The applicant should also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in the ‘In-use stage’ of the GLA ‘Be Seen’ energy monitoring guidance document (or any document that may replace it).
- B. Upon completion of the first year of occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the applicant is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the ‘In-use stage’ chapter / section of the GLA ‘Be Seen’ energy monitoring guidance document (or any document that may replace it). All data and supporting evidence should be submitted to the GLA using the ‘Be Seen’ in-use stage reporting webform. This condition will be satisfied after the applicant has reported on all relevant indicators included in the ‘In-use stage’ chapter of the GLA ‘Be Seen’ energy monitoring guidance document (or any document that may replace it) for at least five years.
- C. In the event that the ‘In-use stage’ evidence submitted under part B of this condition shows that the ‘As-built stage’ performance estimates derived from part A of this condition have not been or are not being met, the applicant should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the ‘Be Seen’ in-use stage reporting webform. An action plan comprising measures identified in part B of this condition shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and

measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.

REASON: To ensure the proposal complies with Policy SI2 of the London Plan (2021): Minimising greenhouse gas emissions.

102. Utility Connection Requirements (PCED)

No works except demolition to basement slab level shall take place before details of the utility connection requirements of the development (or relevant part thereof) including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the development and a programme for the ordering and completion of service connections from the utility providers have been submitted to the Local Planning Authority and approved in writing. No service connections shall be ordered in connection with the development unless in accordance with the final programme approved pursuant to this condition.

REASON: To ensure that the utilities infrastructure arising from the development are met in accordance with policy CS2 of the Local Plan.

103. Culture Cap and Public Viewing Gallery (Management Plan) (PFO)

Prior to commencement of the development, a Culture Cap and Public Viewing Gallery Management Plan shall be submitted to and approved in writing by the Local Planning Authority, which shall include details of:

- A. visitor monitoring and capacity management arrangements for the safety, control and public access to the Culture Cap and Public Viewing Gallery;
- B. public access arrangements including public visitor times, visitor numbers and capacity management arrangements
- C. management, maintenance and cleaning of associated facilities, including public lifts and public toilets.
- D. booking system and arrangements for bookings of larger groups;
- E. publicity, marketing and promotion details (to include details of websites);
- F. security and emergency arrangements; and
- G. details of signage and wayfinding to promote public access
- H. The operator/s responsible for leasing, operating and managing the Culture Cap and Public Viewing Gallery

No public access shall be provided until this condition is satisfied by the Local Planning Authority. The Culture Cap and Public Viewing Gallery shall be constructed, maintained and managed in accordance with the approved a Culture Cap and Public Viewing Gallery Management Plan (or any amended Culture Cap and Public Viewing Gallery Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the development. Annual monitoring reports shall be submitted to the Local Planning Authority for five years following the date of first occupation.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure delivery of high quality, publicly accessible elevated viewing spaces in accordance with the following policies of the Local Plan policy DM10.3 and City Plan 2040 Policy CV2, DE4.

104. Scheduled Monument (Management Plan) (PC)

Prior to commencement of the development, a Scheduled Monument Management Plan shall be submitted to and approved in writing by the Local Planning Authority, which shall include details of:

- A. Free public access to the Scheduled Monument, including public visitor times, visitor numbers and capacity management arrangements.
- B. Security and emergency arrangements
- C. Large group booking requirements and access arrangements
- D. A maintenance and conservation regime for the Scheduled Monument
- E. Presentation and design of display and content of the Scheduled Monument, including artefact display, historical Images, heritage interpretation and information and the maintenance thereof.
- F. Management of associated facilities including public lifts and public toilets.
- G. Wayfinding and signage to promote public access.

The Scheduled Monument shall be operated in accordance with the approved management plan (or any amended Scheduled Monument Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the development.

REASON: To ensure a high standard of design and to preserve, protect and enhance the Scheduled Monument in accordance with Local Plan policies CS11, DM10.1 and DM12.4. These details are required prior to construction work commencing in order to ensure that management is secured.

105. Cultural Implementation Strategy: (PC)

Prior to commencement of the development, a Cultural Implementation Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall include details of:

- A. A timeline of the implementation of cultural deliverables from occupation onwards;
- B. Coordination and management of any planned public art commissions, events, exhibitions, live performances, lectures or workshops within the development or public realm and to include details of how inclusion, equalities and diversity are addressed, and;
- C. How the cultural offer will contribute towards the City Corporation's Destination City initiative (or equivalent initiative)

From the first anniversary of the Occupation Date, an annual review of the approved Cultural Implementation Strategy shall be submitted to the Local Planning Authority

for five years following Completion of the Development. The development shall be implemented in accordance with the approved Cultural Implementation Strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure cultural enhancements are delivered in accordance with the following policies of the Local Plan: CS11, DM11.1, DM11.2 and City Plan 2040 Policy S6 CV2 and CV3. These details are required prior to construction work commencing in order to ensure that management is secured.

106. Central Cultural Hub (management plans) (PC)

Prior to commencement of the development, management plans shall be submitted to and approved in writing by the Local Planning Authority, for the areas of:

- A. The Central Event Space
- B. The Gallery
- C. The Workshop

The management plans shall include details of:

- i) visitor monitoring and capacity management arrangements for the safety, control and public access;
- ii) Public access arrangements including public visitor times, visitor numbers and capacity management arrangements
- iii) management, maintenance and cleaning of associated facilities, including public lifts and public toilets.
- iv) booking systems (where applicable) and arrangements for bookings of larger groups;
- v) publicity, marketing and promotion details (to include details of websites);
- vi) security and emergency arrangements;
- vii) details of signage and wayfinding to promote public access ; and
- viii) The operator/s responsible for leasing, operating and managing the cultural space

No public access shall be provided until this condition is satisfied by the Local Planning Authority. The Central Event Space, The Gallery and The Workshop shall be constructed, maintained and managed in accordance with the applicable management plan (or any amended management plan that may be approved from time to time by the Local Planning Authority) for the life of the development. Annual monitoring reports shall be submitted to the Local Planning Authority for five years following the date of first occupation.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure cultural enhancements are delivered in accordance with the following policies of the Local Plan: CS11, DM11.1 and City Plan 2040 Policy S6 CV2 and CV3. These details are required prior to construction work commencing in order to ensure that management is secured.

107. Highwalk Studios (Management Plan) (PC)

Prior to commencement of the development, a Highwalk Studios Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The management plan shall include details of:

- A. the size, location and fit out of the Highwalk Studios;
- B. the programme for delivery of the Highwalk Studios;
- C. the marketing strategy for the Highwalk Studios aimed at attracting qualifying occupiers;
- D. details of the operator responsible for leasing, operating and managing the Highwalk Studios;
- E. management arrangements for the Highwalk Studios;
- F. occupation arrangements;
- G. the rent payable by qualifying occupiers for use of the Highwalk Studios, which shall not exceed fifty per cent of the open market rent;
- H. business support facilities provided at no extra costs to qualifying occupiers; and
- I. details of how inclusion, equalities and diversity are to be addressed;

The Highwalk Studios shall be constructed and operated in accordance with the approved Highwalk Studios Management Plan (or any amended Highwalk Studios Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the development.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to encourage a range of workspaces are delivered suitable for incubators, start-ups, technology-based companies and creative industries in accordance with the following policies of the City Plan 2040 Policy OF1 and London Plan policies HC5 and E8. These details are required prior to construction work commencing in order to ensure that management is secured.

108. Affordable Workspace (Management Plan):(PC)

Prior to commencement of the development, an Affordable Workspace Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The management plan shall include details of:

- J. the size, location and fit out of the Affordable Workspace;
- K. the programme for delivery of the Affordable Workspace;
- L. the marketing strategy for the Affordable Workspace aimed at attracting qualifying occupiers;
- M. details of the operator responsible for leasing, operating and managing the Affordable Workspace;
- N. management arrangements for the Affordable Workspace;
- O. occupation arrangements;
- P. the rent payable by qualifying occupiers for use of the Affordable Workspace, which shall not exceed fifty per cent of the open market rent;

- Q. business support facilities provided at no extra costs to qualifying occupiers;
and
- R. details of how inclusion, equalities and diversity are to be addressed;

The Affordable Workspace shall be constructed and operated in accordance with the approved Affordable Workspace Management Plan (or any amended Affordable Workspace Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the development.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to encourage a range of workspaces are delivered suitable for incubators, start-ups, technology-based companies and creative industries in accordance with the following policies of the City Plan 2040 Policy OF1 and London Plan policies HC5, E3, E8. These details are required prior to construction work commencing in order to ensure that these details are secured.

109. Scheduled Monument Consent (PC)

Scheduled monument consents must be obtained before works may begin, for all monuments which will be physically affected.

REASON: In the interests of safeguarding the designated heritage asset in accordance with the following policies of the Local Plan: CS12 and DM12.4 These details are required prior to demolition in order that the impact on relevant scheduled monuments is minimised from the time that development starts.

Informatives

1. The current design team or an equivalent team in quality and experience shall be retained for the construction and completion stage of the development to meet London Plan D4 (F) part 4.
2. In relation to the relevant archaeology condition written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
3. Informative: In relation to the relevant archaeology condition a plan of the relevant Jewish Cemetery area should be produced and approved by GLAAS.

This plan should then be incorporated into all relevant method statements, including but not limited to landscaping, new services, SUDs and the Construction Management plan. The area shown on the plan should also be approved by the CPJCE.

4. Informative: In relation to the relevant archaeology condition refer to Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.
5. Landscaping proposals on public highway and open spaces owned and/or managed by the City Corporation will be developed and approved in consultation with City Operations and City Gardens.
6. Informative 005B - CIL

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sqm

Retail £165 sqm

Hotel £140 sqm

All other uses £80 per sqm

These rates are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sqm for offices, £150 per sqm for Riverside Residential, £95 per sqm for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.co.uk/planning/policy-and-legislation/CIL/download-the-forms).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.