



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Telephone 020 7332 1949

Email ella.brown@cityoflondon.gov.uk

Date 07/02/24

Our Ref DS/SUDS24/0007

Your Ref PT_GD/23/01304/FULEIA

Subject 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

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the Drainage Strategy for the above application and would recommend the following conditions should the application be approved:

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, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 9.9 l/s from all outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 736 m³;
- (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.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

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.



Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Environment Department

Telephone 020 7332 1953

Email mark.pundsack@cityoflondon.gov.uk

Date 5 March 2024

Our Ref DS/FS24/0005

Your Ref PT_GD/23/01304/FULEIA

Subject 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

In response to your request for comments in relation to the revised fire statement the District Surveyors Office has the following comments to make:

The District Surveyors Office has reviewed the fire statement and has no comments to make.

The proposal is considered to comply with policies D5 and D12.

APPLICATION COMMENT FORM

From: Sam Murphy, Environmental Resilience Officer

Application No: 23/01304/FULEIA

Development Management Case Officer: Gemma Delves

Site Address: 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

Proposal: 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.

Application Received: 20th November 2023

Request for Comment Received: 12th December 2023

Comment:

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.

Overheating and the urban heat island effect

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 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 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

Date &
Initials

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22/01/24

APPLICATION COMMENT FORM

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 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 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 South East by 2050 in a high emissions rate scenario. Whilst *Betula pendula* (Silver Birch) has been as 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.

APPLICATION COMMENT FORM

- Facilities are provided to enable occupiers to use active transport.
- Infrastructure is set up to reduce 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.

There is an Operational Waste Management Strategy and a sustainable procurement plan to ensure promote circular economy and supply chain resilience.

Recommendation:

The proposed development is **partially compliant** 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 street level shading. Information as to why more extensive street level planting on the carriageway was not considered or included should be provided.

From: [Patel, Dawn](#)
To: [Delves, Gemma](#); [Williams, Amy](#)
Cc: [Whitehouse, Robin](#); [Donal Rooney](#); [Pye, Rachel](#)
Subject: FW: London Wall West. 23/01304/FULEIA. Contaminated land
Date: 05 February 2024 15:40:59
Attachments: [image004.png](#)
[image006.png](#)
[image007.png](#)
[London Wall west memo.docx](#)

Hi both,

As an update, we have asked our contaminated land consultants to review the submissions. They have reviewed the ES Ground Conditions Chapter and the Geoenvironmental Desk Study included in the appendices. Based on our understanding of the development, which will be a mixed use development including basements and information available at this time they have added the following comments.

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 I recommend that the following phased approach to contamination assessment is conditioned as part of any approval.

The phased contamination condition should consider the following components

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.

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.

The conditions already suggested in the attached memo M20D, M21D and M22D remain unchanged however I would be grateful if you could share this detail with the applicant and their agent.

I note that the EA have responded but not commented specifically on land contamination matters. I suggest 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.

Thanks

Dawn



Dawn Patel (she/her) | Environmental Health Officer – Pollution Team

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Bob Roberts
Interim Executive Director Environment

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Register non-road mobile machinery (NRMM) via this link: nrmm.london

From: Patel, Dawn
Sent: Friday, January 26, 2024 5:11 PM
To: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>; Williams, Amy <Amy.Williams@cityoflondon.gov.uk>
Cc: Whitehouse, Robin <Robin.Whitehouse@cityoflondon.gov.uk>; Donal Rooney <Donal.Rooney@cityoflondon.gov.uk>; Pye, Rachel <Rachel.Pye@cityoflondon.gov.uk>
Subject: FW: London Wall West. 23/01304/FULEIA

Hi both,

Please see attached memo. Happy to discuss any aspects.

Thanks

Dawn



Dawn Patel (she/her) | Environmental Health Officer – Pollution Team

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Interim Executive Director Environment

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Register non-road mobile machinery (NRMM) via this link: nrmm.london

From: Gentry, Sarah <Sarah.Gentry@cityoflondon.gov.uk>
Sent: Friday, January 5, 2024 5:18 PM

To: Patel, Dawn <Dawn.Patel@cityoflondon.gov.uk>

Cc: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>; Williams, Amy <Amy.Williams@cityoflondon.gov.uk>

Subject: RE: PLEASE READ: LWW Timescales

Hi Dawn,

It is 23/01304/FULEIA.

Thanks,

Sarah

Sarah Gentry

Planning Officer (Development Management)

Development Division

Environment Department



Environment Department
City of London Corporation

City of London Corporation | PO Box
270 | London EC2P 2EJ |
www.cityoflondon.gov.uk



From: Patel, Dawn <Dawn.Patel@cityoflondon.gov.uk>

Sent: Friday, January 5, 2024 5:08 PM

To: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>; Parker, Joanna <Joanna.Parker@cityoflondon.gov.uk>; Carroll, Phillip <Phillip.Carroll@cityoflondon.gov.uk>; Patel, Chhaya <Chhaya.Patel@cityoflondon.gov.uk>; Patricio, Taluana <Taluana.Patricio@cityoflondon.gov.uk>; Munday, Tim <Tim.Munday@cityoflondon.gov.uk>; Francis, Fleur <Fleur.Francis@cityoflondon.gov.uk>; Kane, Kerstin <Kerstin.Kane@cityoflondon.gov.uk>; Hawkins, Helen <helen.hawkins@historicengland.org.uk>; Bell, Harriet <Harriet.Bell@cityoflondon.gov.uk>

Cc: Williams, Amy <Amy.Williams@cityoflondon.gov.uk>; Gentry, Sarah <Sarah.Gentry@cityoflondon.gov.uk>; Richards, Gwyn <Gwyn.Richards@cityoflondon.gov.uk>; Horkan, David <David.Horkan@cityoflondon.gov.uk>; Zdunik, Rafal <Rafal.Zdunik@cityoflondon.gov.uk>; Watson, Davis <Davis.Watson@cityoflondon.gov.uk>

Subject: RE: PLEASE READ: LWW Timescales

Thanks for the heads up Gemma.

Please can you share the application reference so that we can look at this promptly.

Thanks

Dawn



Dawn Patel (she/her) | Environmental Health Officer – Pollution Team

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Interim Executive Director Environment

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Register non-road mobile machinery (NRMM) via this link: nrmm.london

From: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>

Sent: Friday, January 5, 2024 5:03 PM

To: Parker, Joanna <Joanna.Parker@cityoflondon.gov.uk>; Carroll, Phillip <Phillip.Carroll@cityoflondon.gov.uk>; Patel, Chhaya <Chhaya.Patel@cityoflondon.gov.uk>; Patricio, Taluana <Taluana.Patricio@cityoflondon.gov.uk>; Munday, Tim <Tim.Munday@cityoflondon.gov.uk>; Patel, Dawn <Dawn.Patel@cityoflondon.gov.uk>; Francis, Fleur <Fleur.Francis@cityoflondon.gov.uk>; Kane, Kerstin <Kerstin.Kane@cityoflondon.gov.uk>; Hawkins, Helen <helen.hawkins@historicengland.org.uk>; Bell, Harriet <Harriet.Bell@cityoflondon.gov.uk>

Cc: Williams, Amy <Amy.Williams@cityoflondon.gov.uk>; Gentry, Sarah <Sarah.Gentry@cityoflondon.gov.uk>; Richards, Gwyn <Gwyn.Richards@cityoflondon.gov.uk>; Horkan, David <David.Horkan@cityoflondon.gov.uk>; Zdunik, Rafal <Rafal.Zdunik@cityoflondon.gov.uk>; Watson, Davis <Davis.Watson@cityoflondon.gov.uk>

Subject: PLEASE READ: LWW Timescales

Importance: High

Happy New Year All!

As you might be aware, the London Wall West application was submitted at the end of last year and the consultation and publicity process is underway.

Timescales

We are looking to efficiently deal with the application, with a view to possibly taking the scheme to committee on **17 April 2024**. On this basis we are working to the timescales set out below.

Please could you make a note of the timescales and give comments/completed sections of the committee report by the dates set out below where possible. It would be great if people could look at the application asap so that if any further information needs to be requested from the applicant that may trigger re-consultation we would have time to build this into the timescales.

31 January 2024 – Deadline for consultation responses

7 February 2024 – First Draft of relevant committee sections to be passed over to DM (attached is a draft structure of the committee report that sets out responsibility for the drafting of each section, please let me know if there are any issues)

26 February 2024 – First draft of report to managers (Managers to return report by 28 February 2024)

4 March 2024 – First draft of report to legal (legal to return report by 7 March 2024)

12 March – 15 March 2024 – Report to Counsel

20 March 2024 – 27 March 2024 – Final editing

27 March 2024 – Report to admin (factoring in Easter)

2 April 2024 – Print deadline

We will set up a shared document for the committee report and circulate next week.

Important Note

As the City is the applicant for the case the scheme is accompanied by a handling note. Please note the following from the handling note:

“Any communications, documents or other information generated by those exercising the Local Planning Authority function which would not normally be shared with an Applicant should be marked “CONFIDENTIAL: LOCAL PLANNING AUTHORITY ONLY”, and should not be stored on file space accessible to any person other than those exercising the Local Planning Authority function (unless this is authorised by the Interim Development Director and Chief Planner and he has satisfied himself that, where applicable, such disclosure would be compliant with the EIA Regulations) “

Neel Devlia has set up a folder (see attached email) which you should have been invited to where we can store confidential items, if you don't have access let me know.

Any questions on the above please do not hesitate to ask myself, Sarah or Amy.

Thank you

Gemma



Gemma Delves | Principal Planning Officer

Environment Department | City of London | Guildhall | London EC2V 7HH

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Please note that my working days are: Tuesday, Thursday and Friday

Memo

To Assistant Director (Development Management)
Department of the Environment
Email: plncomments@cityoflondon.gov.uk



From Dawn Patel
Environmental Health Officer
Environment Department
Telephone 020 7606 3030
Email Dawn.patel@cityoflondon.gov.uk

Date 19 January 2024

Our Ref

Your Ref 23/O1304/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

RE: 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.

Thank you for consulting our team on the above application.

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. So 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.

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.

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

[Code of Practice for Deconstruction and Construction Sites \(cityoflondon.gov.uk\)](https://www.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.

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.

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.

Conditions

It is noted that the application is currently at the EIA stage. However, please see conditions below likely to be recommended by this department should a full application be submitted:

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.

I11C No live or recorded music that can be heard outside the premises shall be played.

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.

I12C 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.

I16D 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.

I17C The use hereby permitted shall not be carried on except between the hours of [INSERT] and [INSERT] on Monday to Saturday excluding Bank Holidays and [INSERT] and [INSERT] on Sundays and Bank Holidays.

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.

Hours of servicing

I18C No servicing of the premises shall be carried out 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.

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.

I19C 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.

To require 'self-closing' doors

I20C 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.

I21C 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.

I26 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.

I27 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.

Promoted Events

I28 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.

M7D (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.

M12F 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.

M16D 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.

M18D 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.

M19C 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.

M20D 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.

M21D 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'.

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.

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.

M22D 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.

M23D 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: DM10.1. 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.

M27B 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.

M33 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

Regards

Dawn Patel

Environmental Health Officer

Pollution Team

Environment Department

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Tel: 020 7606 3030

Memo

To Assistant Director (Development Management)
Environment Department

From Access Advisor
Environment Department

Telephone 07751729630

Email harriet.bell@cityoflondon.gov.uk



Date: 27.2.4

Our Ref: 23/01304/FULEIA

Subject: London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaffesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

The proposals are for:

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.

The planning application has been assessed to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2036 Policy HL1.

The Access Team promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

Principal concerns:

- Lack of Changing Places toilet
- Location of accessible parking and accessible cycle storage
- Access to Aldersgate Plaza

- Level change/cross falls in Plazas
- Straight access ramp by Barber Surgeons' Hall gardens/ Bastion House
- Inclusive space the Glade/Oculus/Central Performance Space
- Inclusive cultural offer
- Wayfinding and management

The development

London Plan D5 3 says that development should 'be convenient and welcoming with no disabling barriers'. An Inclusive Design and Accessibility Statement is included as part of the DAS.

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.

There are, however, aspects of the proposals which are less accessible and inclusive, or which require further information to demonstrate how they meet the requirements of the London and Local Plan. These comments are structured according to the usual pattern of considering arrival at the site, journeys through and away from site, including emergency escape, as well as provision for people with sensory, neurological and information processing differences.

Further details will also be requested for the next design stage to ensure an inclusive environment, including further information on: tactile paving, handrails, entrance thresholds, manifestations, visual contrast, material surfaces, glare, security control points, interpretation boards, assistive technology, street furniture and wayfinding.

Engagement

London Plan Policy D5 D5.C says that the D&A statement should include an Inclusive Design Statement that details 'engagement with relevant user groups, such as disabled or older people's organisations, or other equality groups'. Details of the engagement strategy are included with the application and access sessions are listed from Dec 2021 and June 2022, but do not appear to have included early-stage engagement with CoLAG.

Arrival

Parking

- No on-street Blue Badge parking is provided with the application and there are no designated drop-off points proposed. The nearest underground stations are St Paul's and the Barbican, neither of which are currently step-free. The nearest step-free access is from Faringdon station – at some distance from the site. There are bus stops at 118m and within the vicinity. Bus travel is not accessible to all people. Step-free access provided by parking within the building is consequently of great significance.
- 5 Blue badge parking bays are proposed in the basement of the existing London Wall car park. Two are retained and the additional three are the minimum required by the London Plan T6.5 for each new structure.
- BS 8300 1: 7.5 says that accessible parking bays should be 'as close as feasible' and 'normally be within 50 m of an accessible entrance'. The travel distance between the outer bay and external lift is 80m. It is 90m to the exhibition area. These distances exceed best practice.
- The location of the accessible bays requires people using these spaces to pass through the cycle hub and area of short stay cycle parking. There are significant concerns about high sensory load (PAS 6463) in this area.
- The route from all Blue Badge bays will also be further from accessible toilet facilities.
- Where travel distances exceed 50m BS 8300 1:7.5 note 2 recommends seating, or rest points. Whilst a note in the Access Statement suggests mitigatory seating could be investigated at the next stage of design development, there is no indication of where these rest points could go and it is hard to identify likely locations.
- It is noted that protection zones proposed are consistent with guidance in BS 8300: 1.
- Preview information for visitors should be made available including whether these spaces can be reserved, information about travel distances to the different spaces on site, and any time limits – this could form part of an AMP.

Cycle parking

- 5% of cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards

8.2.1 guidance and with associated facilities and sanitary provision. The dimensions of wider cycle storage locations are indicated on the plans and are noted as subject to further design development, but should also be subject to condition and provided through the AMP. Wider end spaces for Sheffield stands should be clearly demarcated.

- Cycle lifts are provided for all new buildings. They should have a minimum internal dimension of 1200mm x 2300mm, with a minimum door opening of 1000mm (London Cycling Design Standards).
- It is regrettable that accessible changing facilities are not all on the same level as cycle storage as this will create a barrier for some people.

Mobility scooters

Whilst capacity for the largest mobility scooters in the lift adjacent to new Bastion House is welcome, this is not provided by all lifts. Mobility scooters/wheelchair storage and charging is not provided by the scheme, which is regrettable. Securing appropriate locations during the next stage of design development could form part of an AMP.

Lifts

- The site accommodates significant level changes from below ground to the High Walk. There will be step-free access from street to High Walk level, with four accessible lifts at dimensions greater than 1100x1400mm, retaining the existing lift to the High Walk to the south of London Wall. Lifts are spread across the site, with the area of least coverage at the north-western corner.
- The new access lifts for the public realm should facilitate ease of access and change of direction, and ideally have sufficient room for mobility scooters or for a wheelchair to turn. Details of all lifts including door widths, car sizes and controls should be reserved by condition.
- Landing widths outside lift entrances are already shown as 1500mm clear, consistent with the guidance.
- Para. 2.7.2 of the IDAS says that the space for lift B will be consistent with BS8300-2 Table G.4, although the dimension of 700mm width quoted is for an unoccupied scooter. Can this point be clarified?
- Lift D is located within New Bastion House. Careful wayfinding and management will be needed to ensure that this is prominent and legible in the public realm and managed to ensure that it stays so, including out of hours. Preview information should also be made available. This could form part of the AMP.
- Further comment on lifts within proposed buildings is contained in the relevant sections.

Public realm and landscape

The landscaping proposed broadly will support greater accessibility and permeability of the site, with more opportunity for changing level between ground and High Walk. 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 will also allow people who require step-free access to move through the site without dependence on mechanical lifting devices .

- Sections of the paths will be gentle slopes, but others will be ramped – at a gradient of 1:20 to 1:15. Whilst these ramps themselves are not steeper than recommended in BS 8300:1, there are also areas of cross-fall of 1:30, which is more than the recommended 1:50. Cumulatively, these may inhibit independent step-free movement for wheelchair users and people with mobility impairments. Providing the required landings and a sufficient number of appropriately located resting points will be key mitigations. It is recommended that a specific inclusive public realm strategy is reserved by condition, testing scenarios.
- The proposals include new step-free access to Barber Surgeons' Hall Gardens, which is welcome.
- The ramped route to the side of Barber Surgeons' Hall Gardens includes a returning ramp with eight sections at a gradient of 1:17 routes and two at 1:15. The return is straight and this access route is situated to the side of New Bastion House and the Gardens. Whilst there are clear sightlines, there is no gentle flow to the pattern of paths as there is elsewhere in the gardens (PAS 6463, and although providing a straight and step-free route (BS 8300:1 5.2.2), it is not an inviting design feature.
- The steepest gradients at 1:15 are also at the highest point of the ramp, which may be fatiguing for some people, including wheelchair users. It is recommended that this route is reviewed through the next stage of the design process to see whether a more undulating route and less steep gradient can be achieved.
- The principal step-free entrance into Aldersgate Plaza will be via two gentle slopes at 1:21. The landing between the slopes is less than the full width of the ramp and does not meet the recommendation of BS 8300:1 9.2.4. The alternative stepped route is also not consistent with guidance in BS 8300 as the risers proposed are 125mm high, as noted in the IDAS. This is a significant entry point into the Plaza and should be

welcoming and inclusive of people who require step-free routes. Further review of this access point is strongly recommended.

- Steps which are more than 2m wide should have second handrails as detailed in diagramme 1.5 of AD K.
- The proposed seating at every 500mm rise on other sloped and ramped access routes will help to mitigate the number of ramped sections by providing places for rest and recovery. However, e.g. fig 2 of the IDAS shows that there are locations where the distance between seats exceeds BS 8300 1: 10.7, and it is recommended that further resting points are identified for these locations.
- Suitable path widths of 1800mm are largely proposed including areas which will achieve a pedestrian comfort level of B+ - as well as passing places of at least 1800mm wide and long. The turning space for a mobility scooter at key decision and turning points is welcome.
- A mix of quiet and more public spaces will be inclusive of a greater range of people, including people with sensory, neurological or information processing differences. The landscape proposals include opportunities for rest and recovery, and a range of planting, with areas of shade. This is consistent with guidance in PAS 6463: Design for the Mind.
- There does not appear to be any detail of an upstand on the edges of footpaths which could be detectable by a person using a long cane. This may be a particular issue in winter when plants die back (p.28) and needs further consideration. It is recommended that details of the boundary edge are subject to condition.
- It is recommended that the benches surrounding the central lawn include areas where a wheelchair or buggy can be parked without protruding into the pathway. These are not currently indicated. Further details could be reserved by condition or as part of the inclusive public realm strategy. Any projection should be consistent with BS8300 1 figs 9&10.
- It is recommended that detailed consideration is given to guidance in PAS 6463 regarding plant scents and textures, as well as the potential for unwelcome tactile stimulus or allergens
- Access to public roof terraces should ensure a level threshold and power assisted doors are recommended.
- Hazard protection may be required for seating and other furniture and public art – including the relocated Aldersgate Flame - and details could be reserved by condition.

Ampitheatre/central performance space

- The ampitheatre/performance space is a key feature of the public realm and has a distinctive form that will assist with wayfinding (PAS 6463: 6).
- Owing to level changes across the site at ground level is a 500mm level change in the Plaza. There is an associated section steeper than 1:211 adjacent to an area of 1:30 crossfall, and which is greater than 1:50 recommended in AD M1 8.14. As mentioned above, there is potential for this area to be particularly challenging for wheelchair users and people with mobility impairments. Testing scenarios, through an inclusive travel condition, could help identify and remove any avoidable barriers.
- The performance area seating design as proposed does not appear to include recesses/ space for wheelchair or buggies. Further design development should include this and should be reserved by condition.
- The containing wall/seating for the performance area should provide sufficient contrast and be consistent with guidance in AD K and BS 8300 1: 8.2.1.2 and figs 9& 10 accommodating level changes and avoiding hazards.
- It is recommended that details of this element of the scheme are reserved by condition and further design developed in consultation with an inclusive access consultant.
- The ampitheatre/central performance space will be part of the reprovisioned cultural offer for the site. The next iteration of the Culture Strategy should demonstrate how it will be inclusive in procurement and programming, and deliver opportunities that are inclusive. This could eg include opportunities for co-production, co-curation, performance, mentoring etc. It is recommended that an inclusive culture plan is reserved.
- There are entry points to the Central Culture space from Aldersgate Plaza, Central Plaza and the exhibition space. Table 2 of BS 8300 2 requires the effective clear width of entrance doors to be 1000mm. There is a mix of single and double doors proposed. The width of individual leaves of double doors would be less than 1000mm and it is not clear whether they would be automated. Details should be reserved. Revolving doors would not be supported as they are not inclusive of a range of people (BS 8300 2: 8.2.4)
- The oculus will provide viewing opportunities to the lower cultural space, but may create strong light/dark contrasts in direct sun. Studies could be reserved by condition to indicate how transitions or mitigations can be achieved.
- Manifestations should be used where appropriate, consistent with AD K.

New Bastion House

- The principal entrance is from the Central Plaza. Table 2 of BS 8300 2 requires the effective clear width of entrance doors to be 1000mm. There is a double door lobby proposed for the principal point of entry and details of this, and opening mechanism need to be confirmed as the single door width of each leaf is only 870mm. Revolving doors would not be supported as they are not inclusive of a range of people (BS 8300 2: 8.2.4), as above.
- A cycle lift is provided, consistent with guidance in London Cycling Design standards. It is recommended that the doors to the cycle storage are power-automated and a minimum 1000mm wide (London Cycling Design Standards 8.2.1). Accessible cycle storage and changing facilities are proposed and include larger accessible sanitary facilities. There is a proportion of larger cycle storage space allocated. Further details should be required as the design development progresses, as referenced above.
- Reception facilities currently include an accessible toilet and unisex toilet to either side of the controlled entry. Further details of the reception area, including desk, seating and sanitary facilities should be reserved.
- London Plan 2021 Policy D5 states that 'in all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. This is identified in the current proposals but further details should be reserved, including management of any shared facilities.
- Corridor widths should be consistent with BS 8300 2.9 and table 8 and allow for ease of movement and change of direction. Indicative corridor widths are 1800mm or allow for passing places at least 1800mm wide at 1800mm long.
- Sanitary facilities for the office do not currently show ambulant accessible toilet cubicles and include an inward opening door for the accessible toilet. Details of all toilet and shower facilities should be reserved. It is recommended that options for male and female and gender neutral toilets are included, consistent with emerging government guidance, as also referenced in the IDAS, as well as options for left and right hand transfer.
- Details of the proposed ground floor restaurant layout should be reserved by condition to ensure that the design is inclusive.

- Details of access doors and threshold to the rooftop terrace should be reserved to ensure level access.
- It is recommended that office and culture top floor plans identify provision for staff who have sensory, neurological or information processing differences, including options for calm rooms and quiet working.
- Rooftop seating should include a range of options, including seating with backs. Any projection should provide sufficient contrast and avoid creating a hazard. Arm supports should be provided to give options for left, or right hand side support when rising. Options for single and non-fixed seating will give options for a greater range of people. Guidance on a range of seating heights is given at BS8300 1:10.7.
- It is recommended that tables should have 700mm under-table clearance.
- Materials should avoid glare, be non-slip where relevant, and provide sufficient contrast. PAS 6463 indicates that repetitive and modular patterns may cause discomfort for some people.
- To ensure greater inclusivity, it is recommended that trials of surface materials are undertaken with relevant stakeholders as part of an Inclusive Public Realm plan, as mentioned above.
- Details of manifestations will be required at a later stage, including for viewing windows.

Rotunda

- It is regrettable that accessible cycle changing facilities are not on the same level as larger space cycle storage as this may be a barrier to some people.
- Table 2 of BS 8300 2 requires the effective clear width of entrance doors to be 1000mm. There is a double door lobby proposed for the principal point of entry and details of this need to be confirmed as the single door width is only 870mm. Power operated doors would be most inclusive. Revolving doors would not be supported in this location, as they are not inclusive of a range of people and depend on the use of separate pass doors (BS 8300 2: 8.2.4).
- A cycle lift is provided, consistent with guidance in London Cycling Design standards. It is recommended that the doors to the cycle storage are power-automated and a minimum 1000mm wide (London Cycling Design Standards 8.2.1). Accessible cycle storage and changing facilities are proposed on different levels and as identified in the IDAS, the lobby/cubicle arrangement does not look accessible for

a wheelchair user trying to access the shower space. There is a proportion of larger cycle storage space allocated. Further details should be required as the design development progresses, as referenced above.

- Reception facilities currently include an accessible toilet and unisex toilet to either side of the controlled entry. Further details of both reception areas, including desk, seating, assistive technology and sanitary facilities should be reserved.
- London Plan 2021 Policy D5 states that 'in all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. Further details should be reserved, including management of any shared facilities for the Culture Cap lift. Suggest considering whether a management clause could form part of the AMP.
- Corridor widths should be consistent with BS 8300 2.9 and table 8 and allow for ease of movement and change of direction. Indicative corridor widths are 1800mm or allow for passing places at least 1800mm wide at 1800mm long.
- It is disappointing that the feature stairs to lower ground floor and mezzanine are set apart from the access lifts as this creates a degree of separation for people who need to use step free routes
- Sanitary facilities for the office do not currently show ambulant accessible toilet cubicles and include an inward opening door for the accessible toilet. Details of all toilet and shower facilities are not currently inclusive and should be reserved. It is recommended that options for male and female and gender neutral toilets are included, , as also referenced in the IDAS, as well as options for left and right hand transfer.
- Details of access doors and threshold to the rooftop terrace should be reserved to ensure level access.
- It is recommended that office and culture cap floor plans identify provision for staff who have sensory, neurological or information processing differences, including options for calm rooms and quiet working spaces (PAS 6463).
- Rooftop seating should include a range of options, including seating with backs. Any projection should provide sufficient contrast and

avoid creating a hazard. Arm supports should be provided to give options for left, or right hand side support when rising.

- The Culture Statement is quite high level –further details should demonstrate how it will be inclusive in procurement and programming, to deliver opportunities for a range of people. This could including opportunities for co-production, curation, performance, mentoring etc.

North Building

- A cycle lift is provided, consistent with guidance in London Cycling Design standards. It is recommended that the doors to the cycle storage are power-automated and a minimum 1000mm wide (London Cycling Design Standards 8.2.1). Accessible cycle storage and changing facilities are proposed on different levels which is regrettable. There is a proportion of larger cycle storage space allocated. Further details should be required as the design development progresses, as referenced above
- Table 2 of BS 8300 2 requires the effective clear width of entrance doors to be 1000mm. There are double doors proposed for the principal office point of entry and details of this need to be confirmed as the single door width is only 700mm. Revolving doors would not be supported as they are not inclusive of a range of people. (BS 8300 2: 8.2.4) The same standards apply to the door from Aldersgate St
- Reception facilities currently include an accessible toilet, although this currently has an inward opening door. Further details of the reception area, including desk, seating, assistive technology and sanitary facilities should be reserved.
- London Plan 2021 Policy D5 states that 'in all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'.
- At present it appears that there is a stepped change in level at ground floor north west of the reception, without a ramped alternative. One lift is currently shown as a through lift for step-free access and it is essential that an equitable, alternative provision is maintained through the design development.
- Corridor widths should be consistent with BS 8300 2.9 and table 8 and allow for ease of movement and change of direction. Indicative

corridor widths are 1800mm or allow for passing places at least 1800mm wide at 1800mm long.

- Sanitary facilities for the office do not currently show ambulant accessible toilet cubicles and include an inward opening door for the accessible toilet. Sanitary facilities are not currently inclusive and details should be reserved. It is recommended that options for male and female and gender neutral toilets are included, as well as options for left and right hand transfer.

Ironmongers' Hall

Proposals do not include an inclusive access review of Ironmongers' Hall.

Roman wall

Platform lifts are not considered inclusive of all users as set out in BS 8300 2: 10.5 and Approved Doc. M2: 3.22. However, new generation platform lifts operate without the need for continuous pressure. It is strongly recommended that this type of platform lift is used and details reserved by condition.

Sanitary provision

Changing Places toilet

- It is highly regrettable that no Changing Places toilet is provided as part of the development. Whilst the capacity for the cultural venues may not automatically trigger the requirement for a Changing Places toilet, provision of one would result in a much more inclusive environment. It is strongly recommended that this lack of provision is reviewed. It is also noted that the Inclusive Design and Accessibility Statement (IDAS) also recommends this.
- If the accessible unisex toilet at basement level adjacent to the Roman wall is to accommodate baby changing facilities then an enlarged unit would more comfortably accommodate both functions, as waste bins can limit space for manoeuvring. It appears that there is sufficient space to bring the wall forward, as noted in the IDAS.

Lighting

It is noted that lighting proposals have been designed as broadly consistent with the CoL Lighting SPD, concentrating lighting on routes (including stepped routes), thresholds and at level changes, allowing for facial recognition and recognising the importance of a sense of safety.

- A range of fittings is proposed including spike, lumiere or bollard fittings at a range of heights. It may be appropriate to condition providing sample tests to be reviewed with relevant user groups.
- Interpretive lighting should be consistent with the CoL Lighting SPD and best practice for inclusive cultural interpretation.

Wayfinding and interpretive information

Guidance on wayfinding and interpretive information is provided in BS 8300 1 5.2.3, 5.2.4 and 8.3. Wayfinding, signage and interpretive information and should follow the principles of 2+ sense, as reiterated in PAS 6463.

Please let me know if you would like to discuss anything.

Harriet Bell

Access Advisor

Memo

To Assistant Director (Development Management)
Environment Department

Email plncomments@cityoflondon.gov.uk



From Paul Bentley
Air Quality Officer

Telephone 07547 106 074

Email paul.bentley@cityoflondon.gov.uk

Date: 06/03/24

Your Ref: 23/O1304/FULEIA

Subject: London Wall West, 140–150 London Wall

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.

The proposed development will be car free and heating will 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.

Should the development be approved please attach the following conditions:

Condition M29

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 S11.

Condition M32 NRMM

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 S11D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

NO₂ Impact Quantification

As part of the Construction Environmental Management Plan a local NO₂ monitoring strategy shall be submitted. 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 S11 and SD4 D.

Informatives

Roof gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.

In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: [Medium combustion plant and specified generators: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generators-environmental-permits)