

**Memo**

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

**From** District Surveyors Office  
Environment Department

**Tele phone** [REDACTED]

**Email** [REDACTED]



**Date** 6 May 2025

**Our Ref** DS/FS25/0025

**Your Ref** PT\_A ZT/25/00529/FULEIA

**Subject** 130 Fenchurch Street London EC3M 5DJ

**In response to your request for comments in relation to the submission the District Surveyors Office has the following comments to make:**

I have reviewed the submitted information and have no comments.

I consider that policies D5 and D12 have been met.

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25/00529/FULEIA - 130 Fenchurch Street

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From Varma, Vimal <[REDACTED]>

Date Sun 11/05/2025 11:51 PM

To Thwaites, Alex <[REDACTED]>

Cc Turner, Lee <[REDACTED]>

Hi Alex,

The proposed waste storage and collection facilities indicated on Drawings No. 02163-WEA-ZZ-B2-DR-A-0996 Rev P00 and 02163-WEA-ZZ-00-DR-A-0999 Rev P00 and as outlined in the Outline Delivery and Servicing Plan, April 2025, are adequate for this proposal. Therefore, this division, will not raise any objection to this application.

Thanks

Vimal

-----Original Message-----

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 02 May 2025 10:06

To: Varma, Vimal <[REDACTED]>; Turner, Lee

<[REDACTED]>

Subject: Planning Application Consultation: 25/00529/FULEIA

Dear Sir/Madam

Please see attached consultation for 130 Fenchurch Street London EC3M 5DJ .

Reply with your comments to HYPERLINK "<mailto:PLNComments@cityoflondon.gov.uk>"

PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Alex Thwaites

Environment Department

City of London

APPLICATION COMMENT FORM	
<b>From:</b> Ella Brown, Environmental Resilience Officer <b>Application No:</b> 25/00529/FULEIA <b>Development Management Case Officer:</b> Alex Thwaites	
<b>Site Address:</b> 130 Fenchurch Street, London, EC3M 5DJ  <b>Proposal:</b> Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.	
<b>Application Received:</b> 2 May 2025 <b>Request for Comment Received:</b> 2 May 2025 <b>Response issued:</b> 12 May 2025	
<b>Comment:</b> Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Sustainability Statement prepared by ARUP. The Sustainability Statement has directly considered the six City of London climate risks and carried out a climate risk assessment in line with BREEAM Wst 05 (see Appendix A.1).  <b>Overheating</b> <ul style="list-style-type: none"> <li>• Design Measures: The building design includes a closed cavity façade (CCF) system with automated internal blinds to manage solar gains.</li> <li>• Balconies and terraces provide passive solar shading in summer while allowing useful solar gain in winter.</li> <li>• Thermal Performance: Enhanced building envelope thermal performance targets reduce space heating demand in winter and minimize the risk of summertime overheating.</li> <li>• Cooling Systems: A free cooling displacement ventilation system is used to satisfy internal cooling demands, system is also designed to operate in high temperatures.</li> <li>• <b>Two new street trees proposed which will provide shading / cooling to Fenchurch Street.</b></li> </ul> <b>Flooding</b> <ul style="list-style-type: none"> <li>• Flood Risk Assessment found the site to be at low risk of flooding from all sources.</li> <li>• Development's drainage scheme includes blue and green roofing and rainwater harvesting.</li> <li>• Surface water will be restricted to 2l/s, providing a 96% betterment over existing rates.</li> </ul> <b>Water stress</b>	Date & Initials

## APPLICATION COMMENT FORM

- A water storage tank will provide 50% of a full day of fresh water storage for the building. Rainwater and greywater recovery systems are being considered to reduce fresh water demand.
- All fixtures and fittings will meet or exceed BREEAM water efficiency standards.
- Automatic, sensor driven irrigation system to be included for all planting areas.
- Inclusion of drought tolerant plant species.

### Biodiversity

- 'Green spiral concept' landscape design will be delivered through layered greening across terraces, linear balconies, vertical greening and two new street trees.
- Biodiverse green roof at level 32, sown with UK provenance wildflower seed and native annual species.
- Integrated birdboxes to be provided
- Development will achieve an UGF of 0.321 and BNG of 3.99 bu/ha. Complying with City Plan policies.

### Pests and Diseases

- Consideration given to using non-native species within planting palettes and using reputable sources for imported plant stock and including inspections.
- Maintenance plan will include the regular removal of potentially harmful or infected material.
- Air intake and exhaust louvres will be provided with bird mesh to prevent animal ingress to ventilation system. Vent pipes and drainage outfall will have traps and screening to prevent animal ingress.
- Ventilation system for the building is designed to limit the spread airborne viruses. Open plan offices have underfloor air supply meaning the occupied zone has a higher air quality than mixed system.

### Food, trade and infrastructure

- All materials and construction methods have been selected for their durability and ability to withstand impacts such as increased rainfall, wind speeds and temperature fluctuations.
- Development is car-free with one accessible space.
- Cycle parking and end of trip facilities provided.
- Off-site freight consolidation strategy will reduce deliveries by 75% with a future target of 90%

### Recommendation:

The proposed development **is** 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.

**EB**  
**12/05/25**



## Memo

To Assistant Director (Development Management)  
Environment Department

From Lead Local Flood Authority  
Environment Department

Tele phone [REDACTED]

Email [REDACTED]



Date 09/05/2025

Our Ref DS/ SUDS25/0012

Your Ref PT\_ A ZT/ 25/00529/FULEIA

Subject 130 Fenchurch Street

### **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 submitted information 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 harvesting, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 186m<sup>3</sup>;
- (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  
Email: [plncomments@cityoflondon.gov.uk](mailto:plncomments@cityoflondon.gov.uk)



From Donal Rooney  
Environmental Health Officer  
Department of Markets and Consumer Protection  
Telephone [REDACTED]  
Email [REDACTED]

Date 29 May 2025  
Our Ref 25/03199/NPLN  
Your Ref 25/00529/FULEIA

Subject 130 Fenchurch Street London EC3M 5DJ

**Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.**

Thank you for your memorandum. I have reviewed the application and I would recommend that the following conditions are attached to any consent:

- (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 worst affected noise sensitive premises (see informative). The background noise level shall be expressed as the lowest typical LA90 (15 min) during which time 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 shall be taken (unless otherwise agreed in writing by the local planning authority) 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 ensure that the proposal meets the requirements of the Agent of Change principle and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.

INFORMATIVE : Part (a) “noise sensitive premises” includes commercial properties such as offices. Part of the rationale for the 10dB below background is the prevention of ambient creep i.e. the gradual increase in background noise levels due to successive small incremental changes. This has become more important with the increasing uptake of electric vehicles and other quieter forms of transport in recent years. With this trend likely to continue plant noise will become the dominant noise source in highly built-up areas such as the City of London. It is, therefore, important to maintain or improve the general acoustic environment in order to minimise adverse noise impacts on residents, workers and visitors in the area. The lowest typical background noise level should be determined on a case by case basis with due regard to BS4142 and other relevant standards. Justification for the method of determination of the lowest typical background noise level should be provided. Background noise levels should be determined over a period of time when it would be anticipated that noise levels are likely to be at their lowest. A minimum measurement period of 3 days is recommended and should preferably include weekdays and weekends. Any “emergency plant” should meet the requirements of this condition. Part (b) Plant noise measurements should be taken near to the plant and the levels at the receptors extrapolated in accordance with good practice.

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.

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. 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 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.

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. 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 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.

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 commercial kitchen 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 kitchen use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

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.

Demolition works shall not begin until a Deconstruction Logistics Plan 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. The Deconstruction 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 demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and 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.

Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The 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 development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

Prior to the commencement of 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 NRMM Regulations and the 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. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

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 have 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.

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 commercial kitchen 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 commercial kitchen use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

Drainage serving commercial kitchens within this development shall be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825- 2:2002 or other effective means of grease removal. The details of the grease separator shall be provided to the planning authority prior to the operation of the kitchen. The grease separator shall be retained and kept in serviceable condition so long as the commercial food use continues.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8.

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

The external terraces hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on 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.

No amplified or other music shall be played on the 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.

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 water 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.

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.

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.

Regards



**Donal Rooney**

**Environmental Health Officer**

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob:





Outlook

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Re: Pre-application advice at 130 Fenchurch (25/00529/FULEIA)

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From Claire Giraud &lt;[REDACTED]&gt;

Date Fri 11/07/2025 12:27 PM

To Thwaites, Alex &lt;[REDACTED]&gt;

Cc claire.giraud &lt;[REDACTED]&gt;; Nutt, Lydia &lt;[REDACTED]&gt;

THIS IS AN EXTERNAL EMAIL

Dear Alex

thanks for this, I am exceedingly pleased with the changes, I now think this is safe and I really to thank you for your excellent work on this.

Kind Regards

Claire Giraud

Senior Public Health Practitioner

Disclaimers apply, for full details see: <https://hackney.gov.uk/email-disclaimer>

On Fri, 11 Jul 2025 at 11:52, Thwaites, Alex <[REDACTED]> wrote:

Hi Claire,

As discussed please see attached.

Thanks,

Alex

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Alex Thwaites MRTPI | Principal Planning Officer

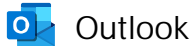
Environment Department | City of London | Guildhall | London EC2V 7HH

[REDACTED] | [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

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From: Claire Giraud <[REDACTED]>

Sent: 11 June 2025 3:26 PM



Outlook

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RE: 130 Fen - Public Realm Officer Comments 25/00529/FULEIA

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From Roebuck, Alex <[REDACTED]>

Date Mon 14/07/2025 3:49 PM

To Thwaites, Alex <[REDACTED]>

Hi Alex, thanks for this. Yes some concerns do remain about the removal of the tree. Likewise happy to chat with you in the first instance or we could speak to the applicant directly to understand the reason for removal if you are happy to put us in touch.

Thanks

Alex



Alex Roebuck

Arboricultural Projects Officer | Gardens and Cleansing  
City of London | Environment Department | Guildhall |  
London | EC2P 2EJ  
[REDACTED]

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From: Thwaites, Alex <[REDACTED]>

Sent: 11 July 2025 09:00

To: Roebuck, Alex <[REDACTED]>

Subject: Fw: 130 Fen - Public Realm Officer Comments 25/00529/FULEIA

Hi Alex,

Hope you are well.

Please see below and attached. Happy to have a chat about this if there are still concerns.

Thanks,

Alex



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**Alex Thwaites MRTPI | Principal Planning Officer**

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

[REDACTED] | [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

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From: Liam Lawson Jones <[REDACTED]>

Sent: 10 July 2025 9:30 AM

To: Thwaites, Alex <[REDACTED]>; Charlotte Allen <[REDACTED]>

Subject: RE: 130 Fen - Public Realm Officer Comments



**CITY OF LONDON CORPORATION**  
**TRANSPORT COMMENTS**

<b>Application reference:</b> 25/00529/FULEIA		<b>Address:</b> 130 Fenchurch Street		<b>Date:</b> 16/07/2025	
<b>Proposal:</b> Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.					
<b>More info needed</b>	<b>No Objection</b>	<b>No objection</b>	<b>Concerns Raised</b>	<b>Objection</b>	
	X				
<b>Initial Observations</b>		<b>Transport Officer:</b>		<b>DM Officer:</b>	
<b>Full Observations</b>	x	Taluana Patricio		Alex Thwaites	

## Highways and Transportation

### Surrounding Highway Network, Site Accessibility and Proposed Development

The site is situated on the southern edge of the City Cluster, within a designated tall building zone. It is bordered by Fen Court Garden to the north, Fen Court to the east, Fenchurch Street to the south, and Cullum Street to the west. Along its northern boundary, the site shares a party wall with adjacent properties within the Lime Street Estate and 34 Lime Street.

Fenchurch Street serves as an important east-west thoroughfare, connecting Aldgate in the east with Gracechurch Street to the west. Gracechurch Street, in turn, functions as a key north-south route within the local area. The site benefits from excellent public transport accessibility,

with numerous bus stops, underground, and mainline train stations nearby. Additionally, a network of pedestrianised streets and alleyways provides convenient shortcuts and links to surrounding urban amenities.

The existing site comprises an office development of approximately 13,957 sqm (GIA), including ancillary retail space at ground floor level. It also features a basement car park with 20 spaces and servicing facilities, accessed via Cullum Street. In 2019, planning permission (reference: 16/00809/FULMAJ) was granted for a redevelopment scheme, although this consent lapsed in 2022. The approved proposal included around 36,500 sqm (GIA) of office space (Use Class E(g)(i)) and approximately 450 sqm (GIA) of retail space (Use Class E). The scheme incorporated a ground floor service yard accessed from Cullum Street, where—due to the street’s constrained layout and in line with existing conditions—servicing vehicles would have been required to reverse into the yard.

#### Comparison of Existing and Proposed GIA

Use Type	Existing GIA (sqm)	Proposed GIA (sqm)
Office (Class E9(g))	13,957	57,491
Culture (Class F1/E)	n/a	569
Public viewing gallery (Sui Generis)	n/a	644
Flexible Retail	n/a	370
Retail (Ancillary)	Included in office	450
Plant		10,480
Total	13,957	69,553

The Proposed Development will demolish all existing buildings and structures to redevelop the site and provide a total floor area of 69,553sqm GIA, comprising 57,491sqm office floor space.

## **Trip Generation - Pedestrians**

The trip generation methodology has been developed using a combined data from Census and the TRICS database, supplemented by manual adjustments to mode share distributions. The existing site, including the ground floor retail unit, has been assessed as employment-generating floorspace. It is assumed that trips associated with the retail component primarily consist of incidental pedestrian visits.

Mode share data for all journey purposes during the AM and PM peak periods has been extracted from TRICS for office-related arrivals and departures. To ensure the methodology reflects local travel behaviour and public transport accessibility, the TRICS-derived mode shares have been adjusted using data from the 2011 Census ‘Method of Travel to Work’ dataset. This approach is consistent with methodologies adopted in previously approved developments within the area, thereby ensuring continuity and comparability in the assessment process.

The adjustment of transport mode shares was based on Census data for the City of London 001 MSOA. Rail-based trips were split into 41% London Underground and 59% National Rail. Bus, cycling, and walking shares remained as per TRICS data. All other modes were proportionally adjusted using Census data to better reflect local travel patterns. Peak period trip rates are detailed in Table 6-4 of the transport assessment.

**Table 6-4: Existing site Total Person Trip Rates (per 100sqm) and Total Person Trips (13,957sqm GIA)**

TIME	TOTAL PERSON TRIP RATES			TOTAL PERSON TRIPS		
	ARRIVALS	DEPARTURES	TOTAL	ARRIVALS	DEPARTURES	TOTAL
AM Peak	3.3	0.4	3.6	455	49	504
PM Peak	0.2	2.8	3.1	536	62	598
Daily Total	11.1	11.0	22.1	1,555	1,532	3,087

The proposed development is expected to increase pedestrian activity along the adjacent footways. To ensure a robust and methodologically sound assessment, the analysis has been based on the net trip generation figures presented in Table 4-4 as shown below and extracted from the transport assessment. This approach focuses on the net change in pedestrian movements rather than the total number of trips, providing a more accurate reflection of the development's potential impact on the pedestrian network.

During the morning peak period, the development is projected to generate approximately 2,445 total additional trips, of which 1,941 are net new pedestrian movements. These figures include trips made on foot, including those accessing nearby public transport facilities.

Trip distribution across the local pedestrian network has been determined using origin-destination data from the Census.

The projected office travel demand was estimated using the same total person trip rates applied in the assessment of the existing conditions. The forecast number of employee and visitor trips associated with the office use is presented in Table 6-9, as extracted from the submitted Transport Assessment.

Due to the small scale of the retail unit, it is anticipated that it will primarily attract pass-by pedestrian trips, and as such, has not been assessed in detail. This approach has been considered acceptable.

The public space is expected to operate with varied opening hours. However, it is not anticipated to generate significant demand during traditional peak periods. Most visitors are expected during evenings and weekends, with travel predominantly by sustainable modes.

**Table 4-4: Forecast Development Pedestrian Trips by Mode - AM Peak (08:00 – 09:00)**

MODE OF TRAVEL	AM 0800-0900			PM 17:00 -18:00		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Underground, metro, light rail or tram	557	12	569	442	10	452
Train	813	18	832	639	14	653
Bus, minibus or coach	245	5	250	194	4	198
Taxi	7	1	8	5	1	6
Motorcycle, scooter or moped	0	0	0	-4	-1	-4
Driving a car or van	0	0	0	-5	-1	-6
Passenger in a car or van	0	0	0	-1	0	-1
Bicycle	298	14	312	253	14	267
On foot	287	188	475	228	148	376
<b>Total</b>	<b>2206</b>	<b>239</b>	<b>2445</b>	<b>1751</b>	<b>190</b>	<b>1941</b>

Table 6-9: Forecast Total Trips (67,694sqm (GIA))

TIME PERIOD	ARRIVALS	DEPARTURES	TOTAL
AM Peak (08:00 – 09:00)	2,206	239	2,445
PM Peak (1700 – 1800)	137	1,929	2,066

## Pedestrian Comfort Levels (Pedestrian Footway Assessment)

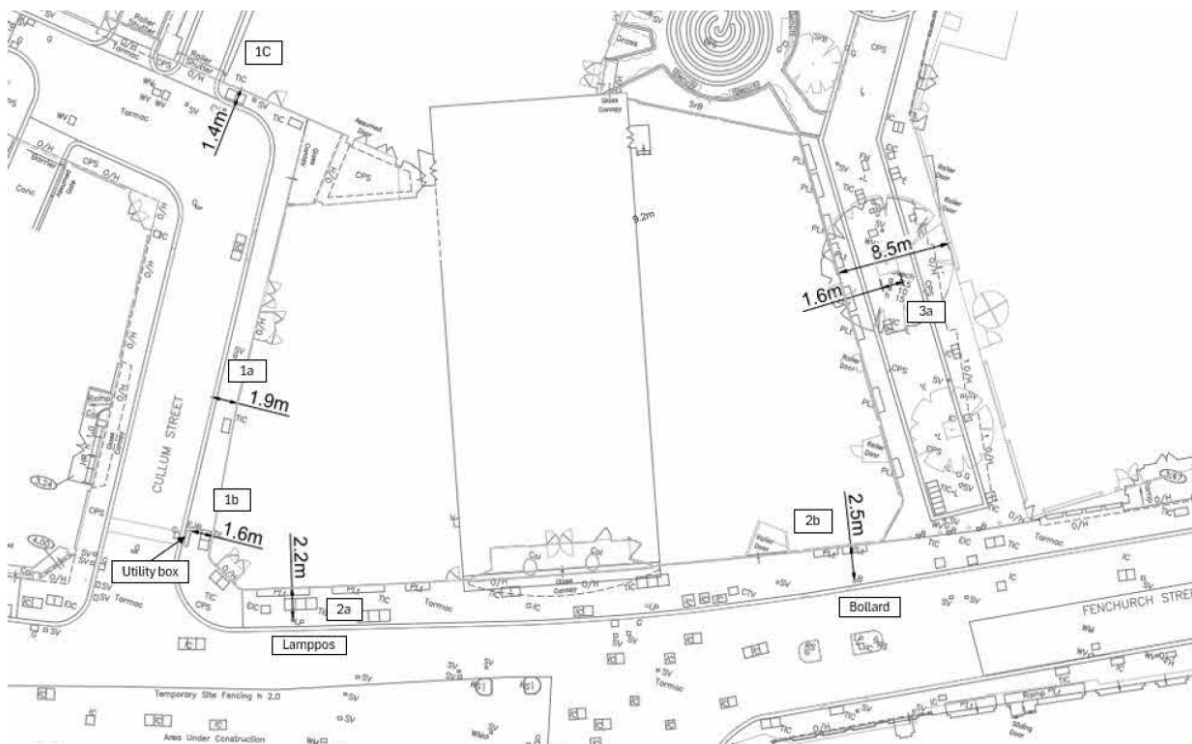
Pedestrian Comfort Level (PCL) is a measure used to assess how comfortable and safe a pedestrian environment is, particularly in terms of space and flow. It is commonly used to evaluate footway conditions and ensure they meet the needs of pedestrians.

PCL levels range from A to E, representing varying degrees of suitability for pedestrian movement. These levels are categorised as: comfortable, acceptable, at risk, and unacceptable/uncomfortable.

The PCL assessment was included within a comprehensive section of the transport assessment, to determine the existing and proposed comfort levels in the vicinity of the development. The assessment followed Transport for London's (TfL) guidance document Pedestrian Comfort Level Guidance v2 (2019).

The figure below (extract of the transport assessment) shows the PCL assessment locations and associated footway widths for the existing situation.

Figure 4-1: Footway Assessment Locations and Existing Widths

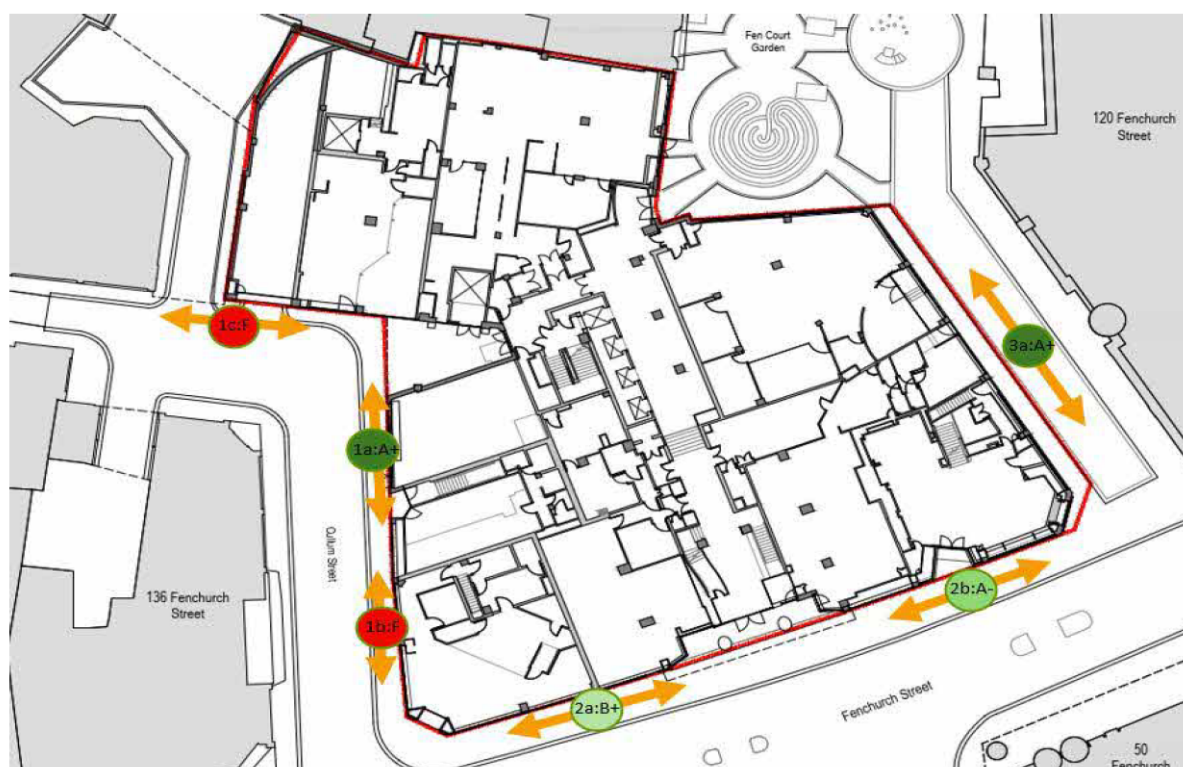


Footway widths were surveyed at four strategic points around the site, capturing both standard dimensions and any pinch points where relevant. These measurements reflect the current building lines and the full extent of the footway, as shown in the table below and on table 4.6 from the transport assessment.



Location	Existing Width	PCL Width	AM Peak Flow	AM Peak Crowding	AM Peak PCL	Lunchtime Peak Flow	Lunchtime Peak Crowding	Lunchtime Peak PCL	PM Peak Flow	PM Peak Crowding	PM Peak PCL
1a	1.9	1.5	256	2.8	A+	379	4.2	A	215	2.4	A+
1b	1.6	1.2	256	3.6	F	379	5.3	F	215	3	F
1c	1.4	1	256	4.3	F	379	6.3	F	215	3.6	F
2a	2.2	1.8	1052	9.7	B+	1066	9.9	B+	1092	10.1	B+
2b	2.5	2.1	1052	8.3	A-	1066	8.5	A-	1092	8.7	A-
3a	6.9	6.1	830	2.3	A+	822	2.2	A+	741	2	A+

Figure 4-6: 2024 Base Pedestrian Flows Diagram



In the existing scenario (as shown above), all footways, except for the pinch point on the eastern side of Cullum Street (sections 1b and 1c), achieve a Pedestrian Comfort Level (PCL) of C+ or higher. However, Cullum Street (1b, 1c) consistently records a PCL of F across all time periods due to congestion caused by the pinch point. Fen Church Street (sections 2a and 2b) maintains a PCL of B+ to A-, indicating moderate pedestrian volumes. Meanwhile, Fen Court (4a) achieves a PCL of A+ throughout the day, reflecting a high level of pedestrian comfort.

In the proposed (2040 baseline) scenario, all footways—except the eastern side of Cullum Street (1b, 1c)—achieve a Pedestrian Comfort Level (PCL) of C+ or higher. Cullum Street continues to experience a PCL of F due to congestion at a pinch point. Fen Church Street (2a, 2b) sees increased pedestrian flows but maintains a PCL of B+, while Fen Court (3a) consistently achieves A+. Overall, pedestrian flows rise across all locations compared to 2024, but comfort levels remain stable, with Cullum Street being the only area with poor performance. See below extract diagrams of the transport assessments.

Figure 4-8: Future Footway Widths

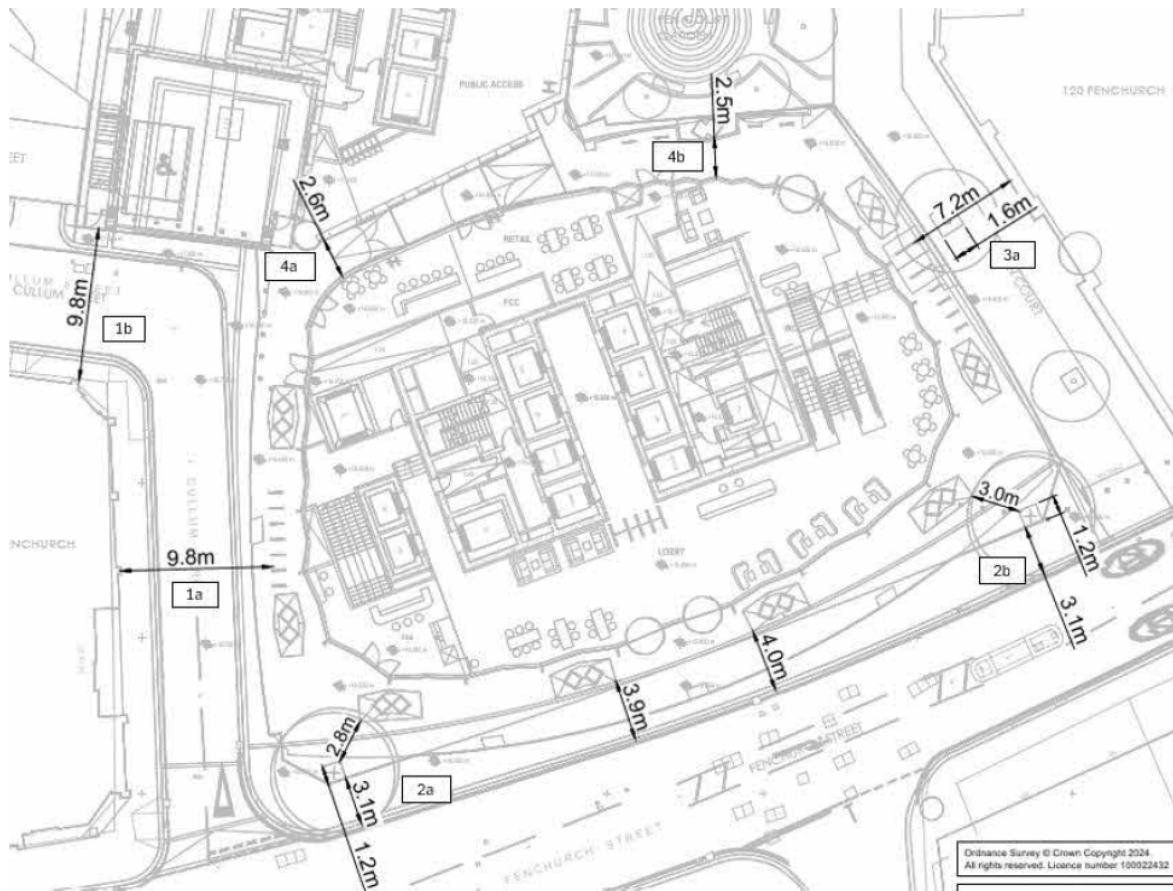
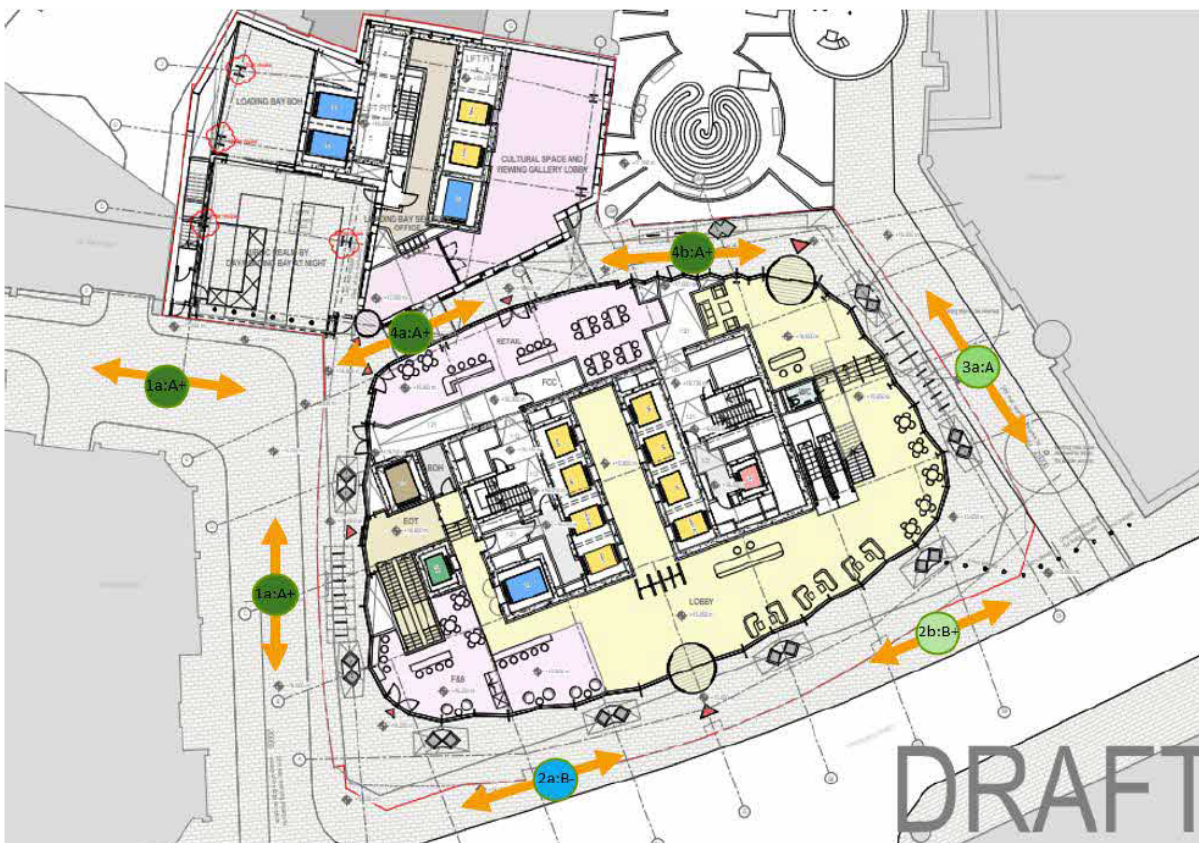


Figure 4-9: 2040 Base Pedestrian Flows Diagram



The Proposed Development will transform Cullum Street into a raised shared space designed to accommodate all road users, enhancing both accessibility and the pedestrian experience. It will also create a pedestrian-only link between Cullum Street and Fen Court, along with improvements to Fenchurch Street. The footways fronting the site will benefit from increased width, incorporating both public highway and private areas. Figure 4-8 illustrates the proposed future footway widths.

These improvements will be delivered as part of a Section 278/38 Agreements and are designed to mitigate pedestrian impacts while significantly enhancing walking conditions in the surrounding area. They also support broader transport sustainability objectives by improving the quality of the pedestrian environment around the site.

Below are the proposed PCLs (extract of the transport assessment) following the highway improvement works.

Table 4-5: Future Base 2040 with Development – PCL Footway Assessment

PCL PARAMETERS			AM PEAK			LUNCHTIME PEAK			PM PEAK		
Location	Existing Width	PCL width	PCL Flow	Crowding	PCL	PCL Flow	Crowding	PCL	PCL Flow	Crowding	PCL
1a	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
1b	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
1c	9.8	9.4	621	1.1	A+	577	1.0	A+	527	0.9	A+
2a	3.1	2.7	2452	15.1	B-	1780	11.0	B+	2310	14.3	B-
2b	3.1	2.7	1561	9.6	B+	1366	8.4	A-	1548	9.6	B+
3a	5.6	4.8	1258	4.4	A	1069	3.7	A	1111	3.9	A
4a	2.6	2.2	245	1.9	A+	178	1.3	A+	231	1.8	A+
4b	2.5	2.1	245	1.9	A+	178	1.4	A+	231	1.8	A+

Table 4-6: Base 2024 vs Future Base 2040 with Development – Comparison

BASE 2024				FUTURE BASE 2040			
1a	A+	A	A+	1a	A+	A+	A+
1b	F	F	F	1b	A+	A+	A+
1c	F	F	F	1c	A+	A+	A+
2a	B+	B+	B+	2a	B-	B+	B-
2b	A-	A-	A-	2b	B+	A-	B+
3a	A+	A+	A+	3a	A	A	A
N/a	.	.	.	4a	A+	A+	A+
N/a	.	.	.	4b	A+	A+	A+

The proposals are considered acceptable as they align with the current transport strategy objectives by supporting the creation of a high-quality public realm that is inclusive, accessible, and enhances the experience of walking, cycling, and wheeling. Complementing this, Policy CS16 focuses on improving public transport, streets, and walkways by enhancing the public realm to support pedestrian movement and safety, including the development of new pedestrian routes.



## **Trip Generation – Servicing and Delivery**

Under the current City's Transport Strategy and its proposals and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure will be maintained and improved, by minimising road danger, congestion, and reducing vehicle emissions. Refuse and recycling vehicle trips to be made outside of peak hours: 7:00 – 10:00, 12:00 – 14:00 and 16:00 – 19:00. Depending on the proposals evening servicing can be considered.

The existing sites comprises an office development of approximately 13,957 sqm (GIA) with ancillary retail accommodation at ground floor level. The existing site has a basement car park with 20 spaces and basement servicing facilities, with access taken from Cullum Street.

The Proposed Development will demolish all existing buildings and structures to redevelop the site and provide a total floor area of 69,553sqm GIA, comprising 57,491sqm office floor space.

The CoL Loading Bay Ready Reckoner tool has been used to estimate the daily number of servicing vehicles that the Proposed Development may generate, and in the absence of survey data for the existing site, the same tool has also been applied to assess the current office development.

Servicing rates based on CoL parameters: 0.22 trips per 100 sqm per day for office use and 1.35 trips per 100 sqm per day for retail use have been applied to the Proposed Development's floorspace, with elevated public spaces assessed using retail rates.

This development includes an initial proposal for 50% consolidation, capped at 99 vehicles per day (net change of 68 one-way trips). The aim is to reduce deliveries by 75%, with a future target of 90% consolidation, as achieved in similar City of London schemes.

This strategy involves combining multiple deliveries and collections into fewer, larger movements to enhance efficiency and reduce environmental impact, contrasting with the current unconsolidated delivery approach at the site.

The current servicing strategy allows unrestricted vehicle access via Cullum Street to a basement car park and servicing area, with deliveries occurring throughout the day and no consolidation measures in place.

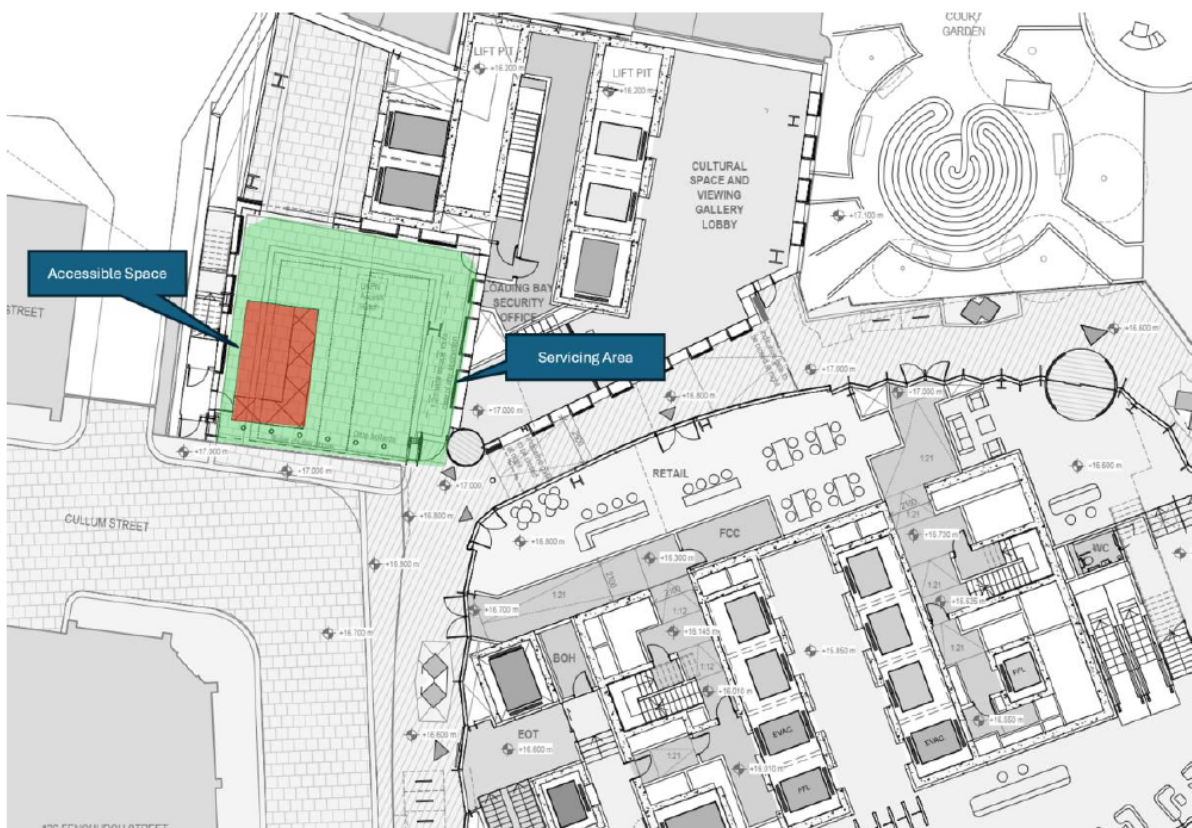
The proposed strategy introduces off-site freight consolidation in line with City of London (CoL) policy, aiming to reduce delivery volumes by 75%, with a future target of 90%, as achieved in similar schemes.

All deliveries, except those made by cargo bikes, will be restricted to overnight hours (11 pm–7 am) to minimise conflicts with pedestrians and cyclists. Deliveries and servicing will be pre-booked, and personal deliveries will not be permitted. During the day, the area will be served by a Blue Badge bay, managed by a facilities management

company. The bay's management details will be secured through the Section 106 Agreement.

During the day, cargo bikes can use the servicing yard as seen in the below image and extracted from the transport assessment. Vehicle access will be limited to an 8m rigid lorry, which must reverse into the site, while smaller vehicles like Transit Vans can manoeuvre in forward gear.

Figure 5-1: Proposed Servicing Arrangement



The Proposed Development will include two dedicated loading bays within the service yard, designed to meet servicing needs while allowing safe vehicle manoeuvring and forward egress onto Cullum Street, as confirmed by swept path analysis. A Road Safety Audit of both the Cullum Street improvements and servicing strategy raised no safety concerns.

If planning permission is granted, a Delivery and Servicing Management Plan (DSMP) will be secured through the Section 106 Agreement and monitored for five years. To avoid conflicts with delivery and servicing activities and to comply with the permitted hours of use, it is recommended that refuse and recycling collections be integrated into the same system that manages delivery and servicing slots.

The allocated slots for refuse and recycling can be reviewed periodically to suit different parts of the development, but any changes must be agreed upon in advance by all parties occupying the site. This approach ensures that the loading and parking area is managed within designated times and accommodates varying operational needs. Further details regarding refuse and recycling arrangements, such as

identifying collection points without interfering with other building activities, will be secured as part of the DSMP via a Section 106 obligation.

These proposals comply with the City of London Local Plan 2015, specifically Core Strategic Policy CS16 and Development Management Policies DM16.5 and DM16.6, which promote sustainable, coordinated, and conflict-free servicing strategies.

## **Cycle Parking**

The existing site currently lacks any dedicated cycle parking, including both long and short stay spaces.

The Proposed Development will deliver a total of 860 long stay and 48 short stay cycle parking spaces.

The long stay provision, located at basement level 1, includes a mix of 43 accessible spaces (5%), 43 Sheffield stands (5%), 648 two-tier racks (75%), 39 vertical racks (5%), and 88 active travel lockers (10%). This provision exceeds the 19% mode share requirement, ensuring compliance with current policy.

To further support active travel, high-quality end-of-trip facilities will be provided, including lockers, showers, and changing rooms, with a ratio of one shower/changing room per 12 cycle spaces.

The layout of the cycle parking at basement mezzanine 01 and the end-of-trip facilities at basement level 1 are illustrated in Figures 3-16 and 3-17 below (extract from the transport assessment), respectively.

In accordance with the London Plan, a total of 48 short-stay cycle parking spaces are required. The proposal includes 30 short-stay spaces (provided via 15 Sheffield stands) and four accessible spaces (via two enlarged Sheffield stands) within the site boundary. Additionally, 18 active travel lockers for visitors will be installed adjacent to the public area accessed from Cullum Street. This is shown in Figure 3.18, circled in red. The racks are located within private areas and not on the public highway.

## Cycle Parking

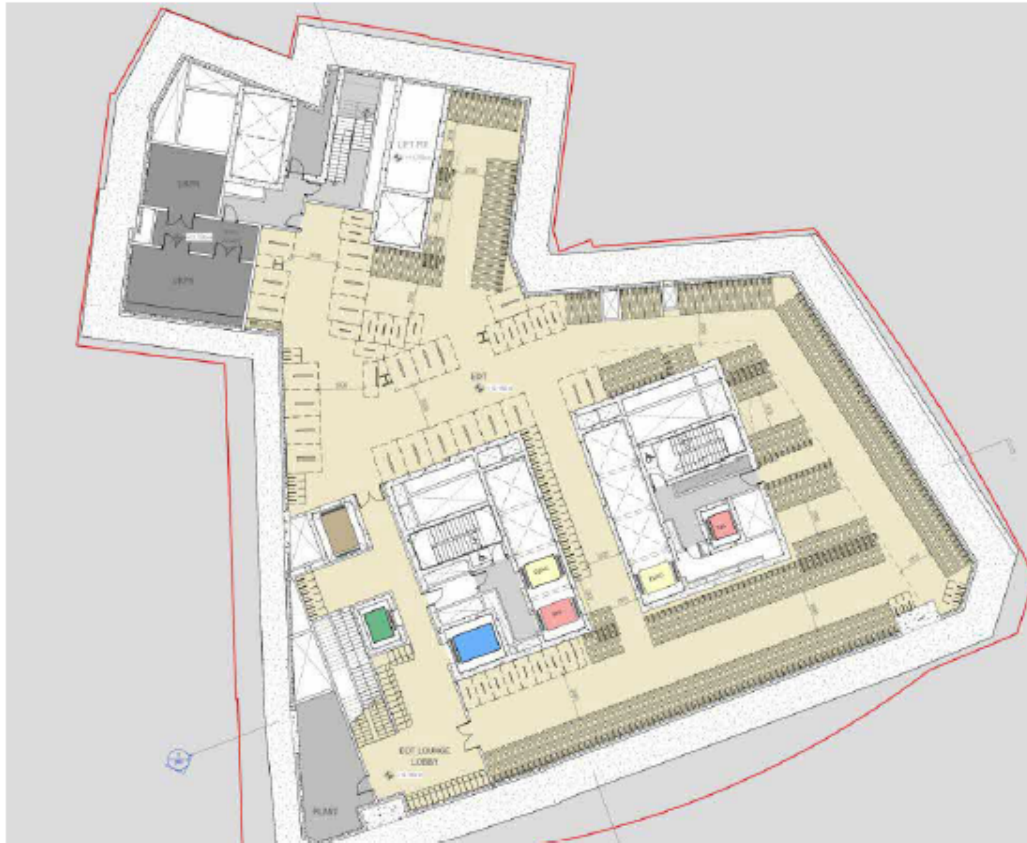


Figure 3-17: Basement 01 - End-of-Trip Facilities

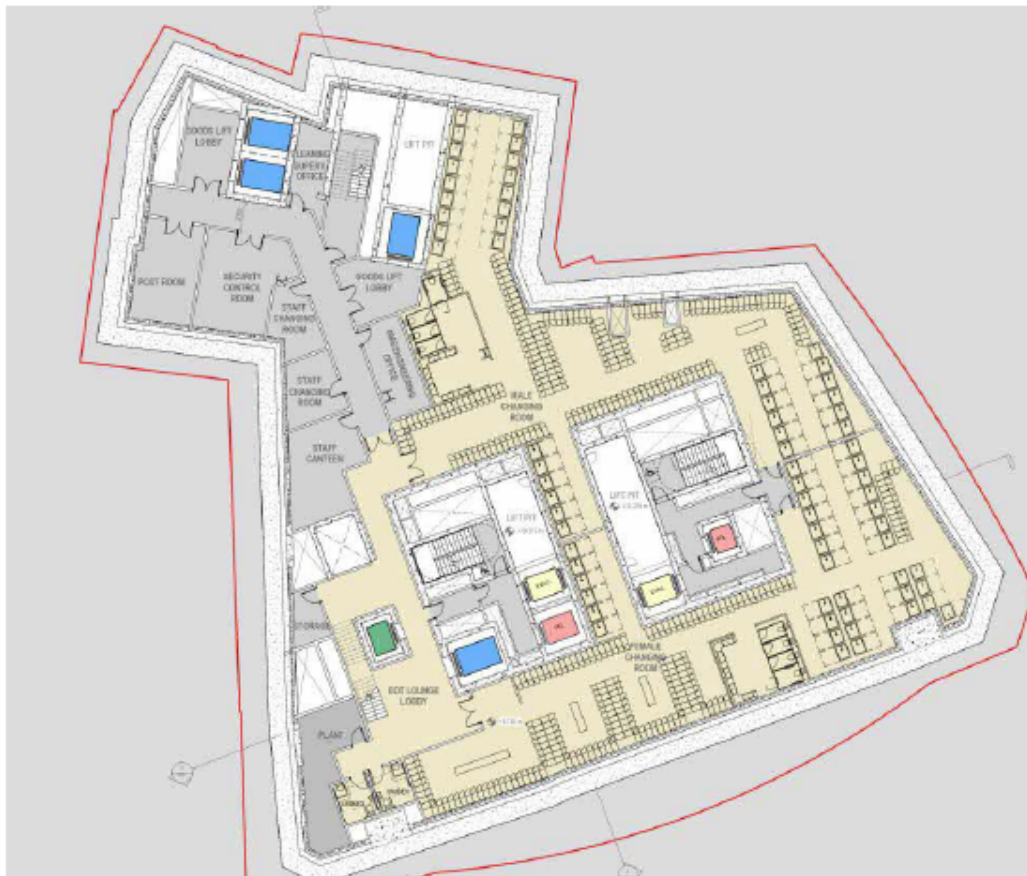




Figure 3-18: Short-Stay Cycle Parking



## Car Parking (Blue Badge)

The basement car park and servicing yard, accessed via Cullum Street, provides 20 car parking spaces. The entire City of London is designated as a Controlled Parking Zone (CPZ), with restrictions in place from Monday to Friday between 07:00 and 19:00, and on Saturdays from 07:00 to 11:00; no restrictions apply on Sundays. Along Fenchurch Street, double yellow lines prohibit parking, and intermittent single and double yellow kerb markings further restrict stopping and loading. Disabled parking bays are available on Mincing Lane, approximately 150 metres south of the site, and on London Street, around 200 metres to the east. These bays permit parking for up to four hours on weekdays, with no time limits on weekends, as shown in figure below.



The architectural site plan illustrates the proposed accessible space and servicing area for the University of the Pacific. The accessible space is highlighted in green, and the servicing area is highlighted in orange. The plan includes various labels for existing and proposed features, such as 'Cultural Space and Viewing Gallery Lobby', 'Retail', 'FCC', 'BOH', 'EOT', 'FNC', 'PP', 'LIFT PIT', 'LOADING BAY SECURITY OFFICE', and 'COURTYARD GARDEN'. Elevation markers are provided throughout the site, ranging from +15,600 m to +17,200 m. The site is bounded by Cullum Street to the west and a parking lot to the east.

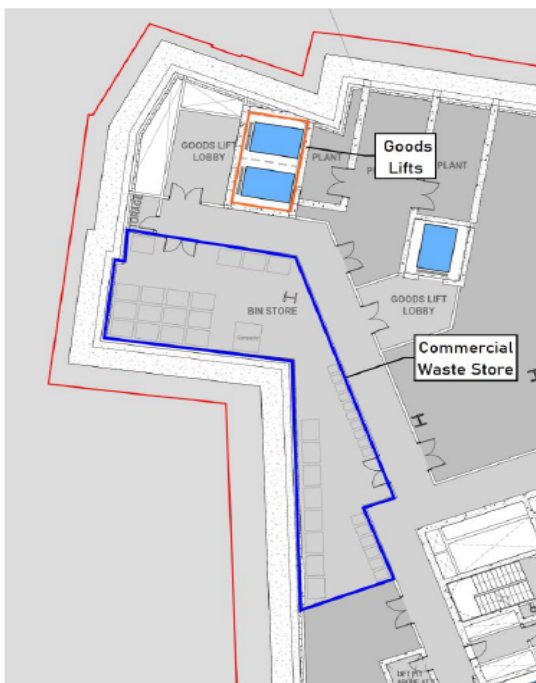
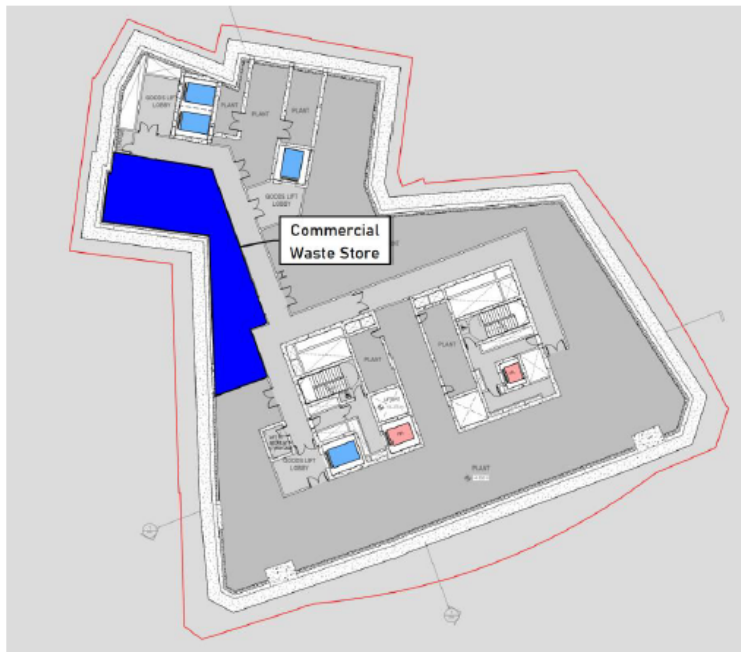
The accessible parking space will be available for use between the hours of 07:00 to 23:00 when servicing is not taking place and will be privately managed, being available for building users only.

## Refuse Management/Waste Strategy

The proposed commercial waste management strategy aims to deliver a high-quality service to tenants while complying with relevant guidance. All waste storage and presentation facilities will be designed in accordance with British Standard BS5906:2005, incorporating features such as a nearby water point for wash-down, sealed and easy-to-clean surfaces, a suitable floor drain, and adequate lighting and ventilation. Commercial tenants will maintain temporary internal waste storage areas to enable segregation at source.

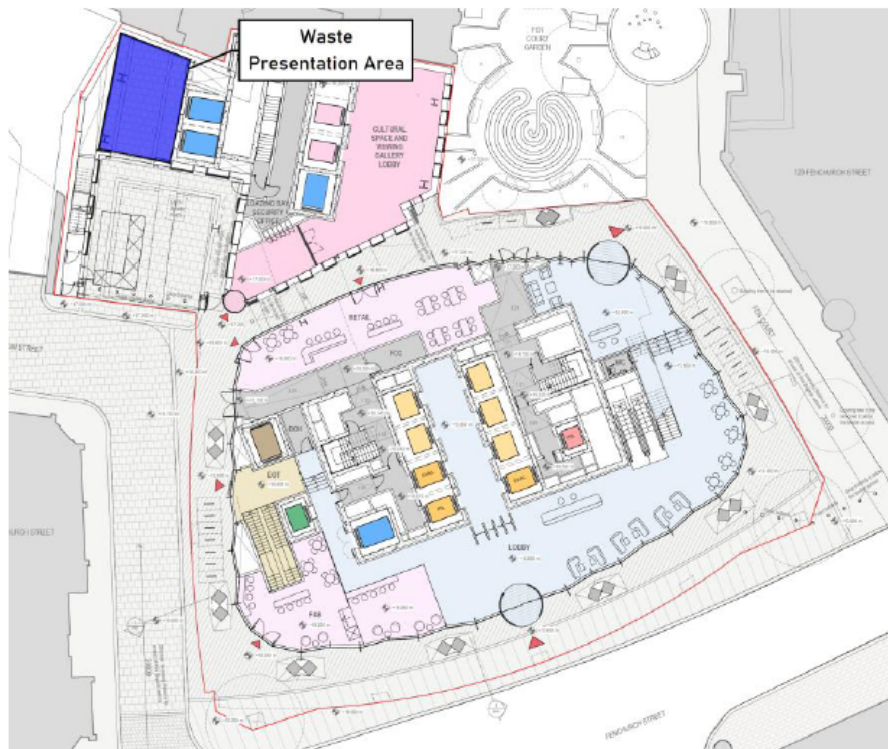
13

waste store at Basement Level 01. Retail tenants will transfer their segregated waste to the same store outside of peak hours. A dedicated commercial waste store is located at Basement Level 02, where all residual waste, dry mixed recyclables (DMR), food waste, and glass waste generated within the development will be stored prior to collection. The location of this store and its configuration is illustrated in the figure below. The proposals have been agreed upon with the City of London.



The Proposed Development will have separate waste streams collected multiple times weekly by a licensed contractor. The on-site facilities management (FM) team will use service lifts to move bins from the basement to a designated ground-level presentation area near the loading bays. Two goods lifts ensure reliability during maintenance or breakdowns. Waste will be presented in timed windows within approved servicing hours, without placing bins on public

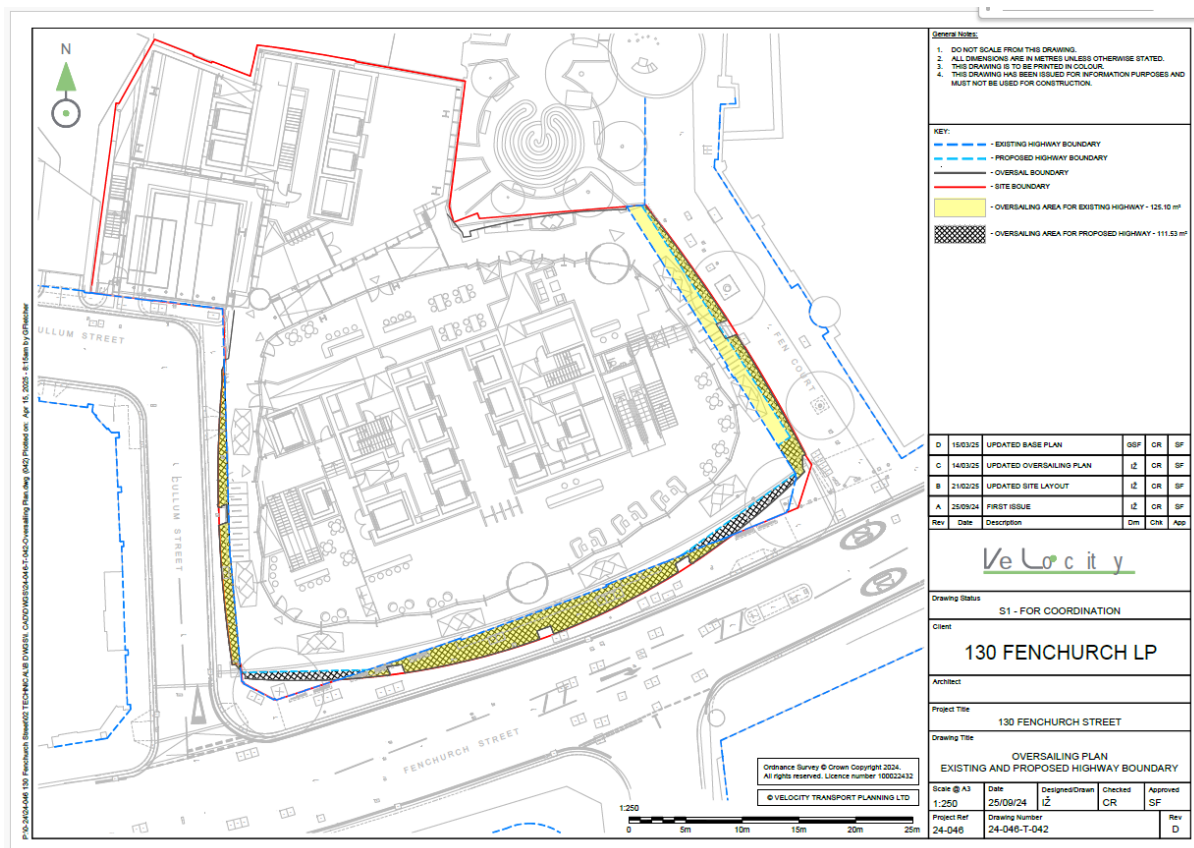
highways. Collection vehicles, no longer than 8 metres, will access the site via Cullum Street. The route for moving bins will comply with BS5906:2005 standards. After collection, bins will be returned to the basement by the FM team.



## Oversailing/Undersailing

Structures that permanently oversail the public highway must be licensed by the local authority, typically in accordance with Sections 177 and 179 of the Highways Act 1980.

This development proposes both oversailing and undersailing, which are subject to the licences mentioned above, as referenced in Drawing No. 24-046-T-042.



## Highway Boundary - Stopping Up and Adoption

As the highway authority, the City of London has the power to stop up areas designated as highway land by making orders known as 'stopping up' orders. The term 'stopping up' means that once such an order is made, the highway land ceases to be a maintainable highway at public expense and is 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 to enable development to be carried out. That process would be carried out under separate procedures from the considerations of the applications currently before you.

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.

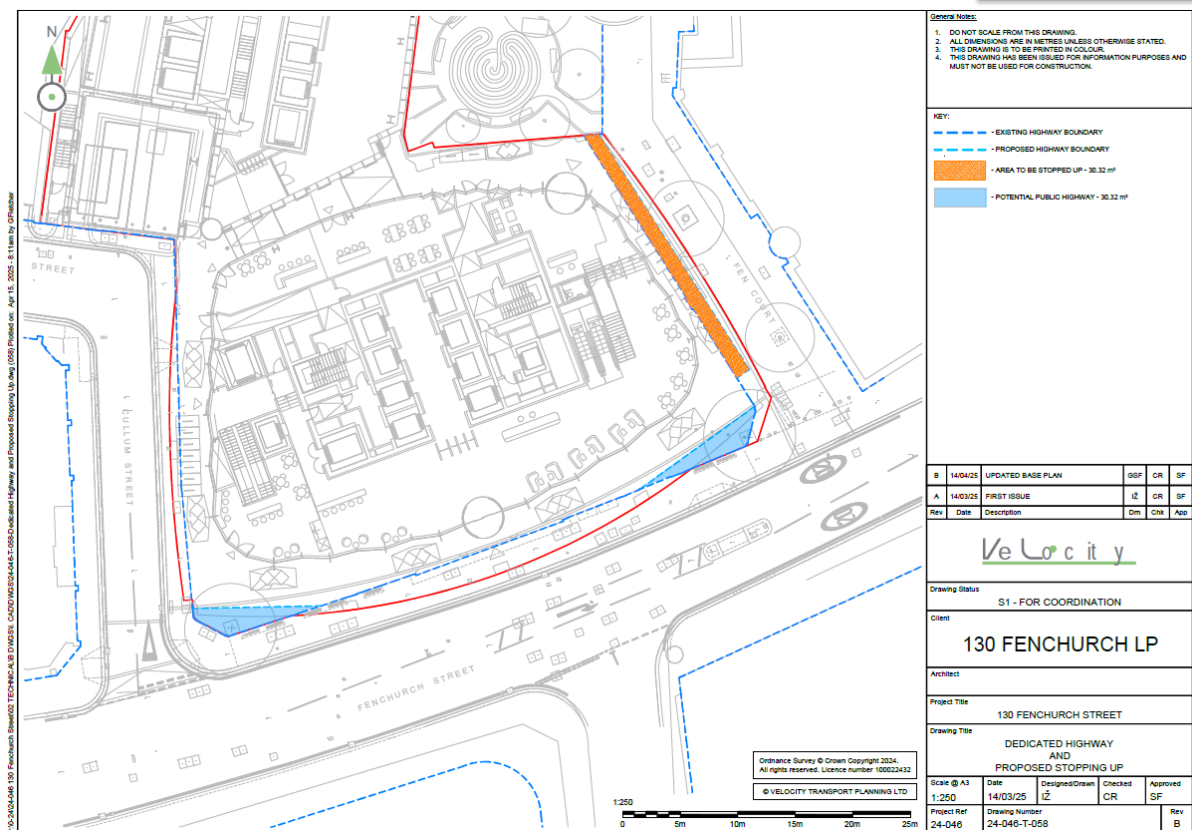
The submitted application includes proposals (Dwg No. 24-046-T-058) to stop up a section of the public highway located within the site boundary. The area in question encompasses the footprint of structural columns that would be positioned within the public highway and has been extended to establish a more coherent and rationalised highway boundary along Fen Court.

To compensate for the loss of public highway, two areas along Fenchurch Street are proposed for adoption, ensuring that the total area dedicated to public highway remains equivalent to the land being stopped up. In addition, the proposals will deliver a significant increase in



permissive path, enhancing pedestrian connectivity and contributing to wider public realm improvements.

The area proposed to be stopped up on Fen Court measures 30.32 sqm, with an equivalent area to be re-dedicated as public highway. Furthermore, 315.95 sqm will be provided as permissive path—privately owned land that will remain accessible to the public.



## Highways Works - Section 278/38 Agreements

The proposed public realm enhancements surrounding the site aim to improve pedestrian experience and connectivity through widened footpaths, the introduction of two new street trees along Fenchurch Street, and the provision of short-stay cycle parking.

The building line along Fenchurch Street will be set back to create a broader public realm, including a new permissive path. A new pedestrian route is proposed between Cullum Street and Fen Court, offering a more direct connection and easing foot traffic on Fenchurch Street; this route will be closed overnight between 23:00 and 07:00.

Cullum Street will feature a shared surface treatment to prioritise pedestrians during the day while accommodating servicing needs at night. The service yard will serve as a multifunctional space, supporting accessible parking, managed by the facilities team under an Accessible Parking Management Plan, and overnight servicing.

These improvements are expected to enhance pedestrian comfort along both Cullum Street and Fenchurch Street. The development aligns with Healthy Streets principles by offering shade and shelter, places to rest, and engaging public features, ultimately delivering a significant upgrade for current and future non-motorised users.

As part of the City's Transport Strategy Delivery Plan for 2025/26 to 2030/31, a Healthy Streets Plan is currently being developed for the area surrounding Fenchurch Street Station. This plan includes proposed upgrades and extends south to the River Thames, encompassing Eastcheap and the Monument junction.

It will provide a framework for public realm enhancements and traffic management to support the wider Transport Strategy. These initiatives form part of a rolling programme of small-scale interventions at targeted locations across the City. Over the course of a three-year period, raised carriageways will be introduced on side streets in this area to reduce road danger, improve accessibility, and enhance the walking and cycling experience. Additional schemes will be developed as the programme progresses.

This development will contribute towards the vision above, via a Section 278 scheme for highway improvement works related to this development, providing an accessible area for walking, cycling, and wheeling.

The scope of the Section 278 works will include (but not limited to):

#### *Fenchurch Street*

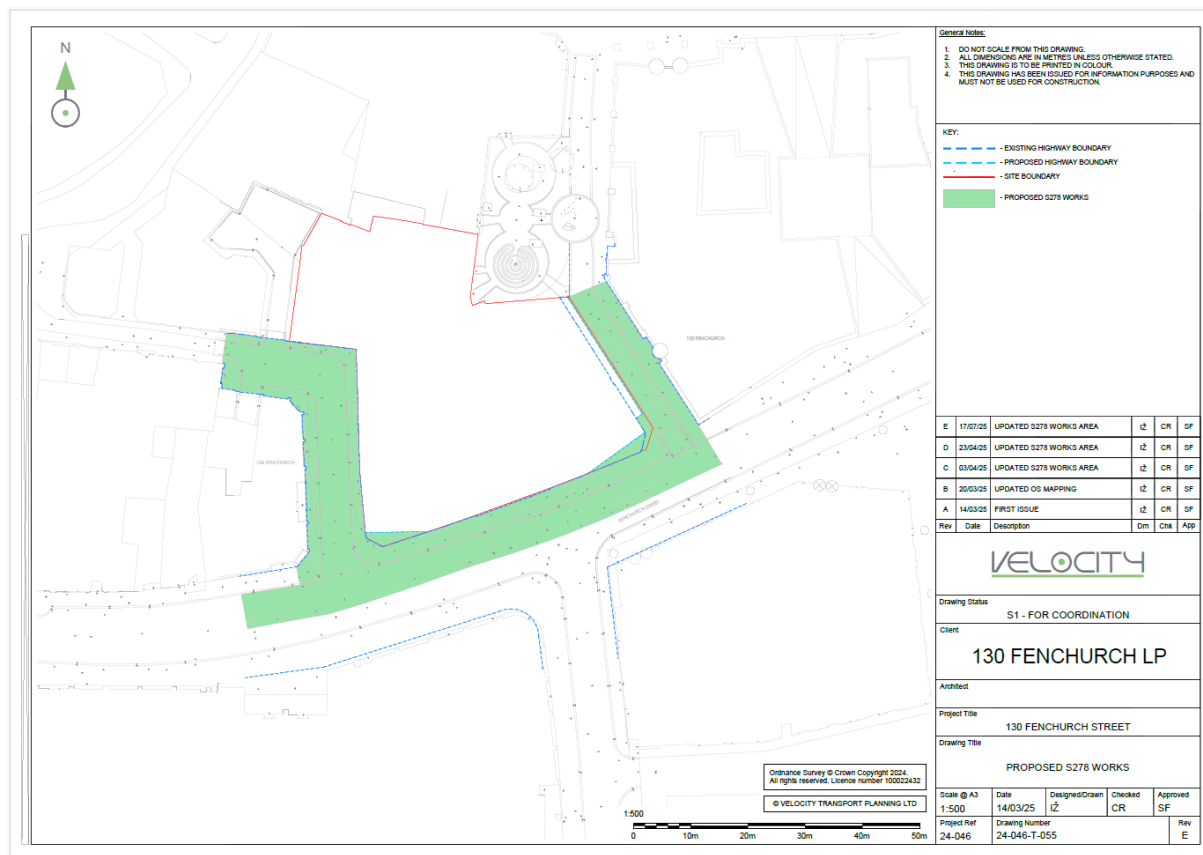
- Reconstruction of the footways fronting the site
- Resurfacing of the carriageway
- Reinstatement of pedestrian island following construction, subject to detailed design and pedestrians desire line.
- Reinstatement of road markings

#### *Cullum Street*

- Reconstruction of the footways fronting the site to accommodate new site layout
- Provision of raised carriageway
- Highways Drainage
- Reinstatement of road markings and associated traffic orders

#### *Fen Court*

- Reinstatement of paved areas and associated works



## Construction Logistics Plan

The proposal involves a significant amount of demolition and construction work, which will generate a large number of construction vehicle movements during the overall construction period. These proposed works could significantly impact the operation of the public highway in the local area if not managed effectively. The primary concern is public safety, but it is also essential to ensure that construction traffic does not unreasonably create or add to existing traffic congestion, or impact the road safety or amenity of other highway users.

The proposal (see figure below) is also likely to lead to various amenity issues for local businesses that need to be carefully managed (e.g., noise, vibration, air quality).

To mitigate the above, an outline Construction Logistic Plan (CLP) has been submitted in support of the planning application.

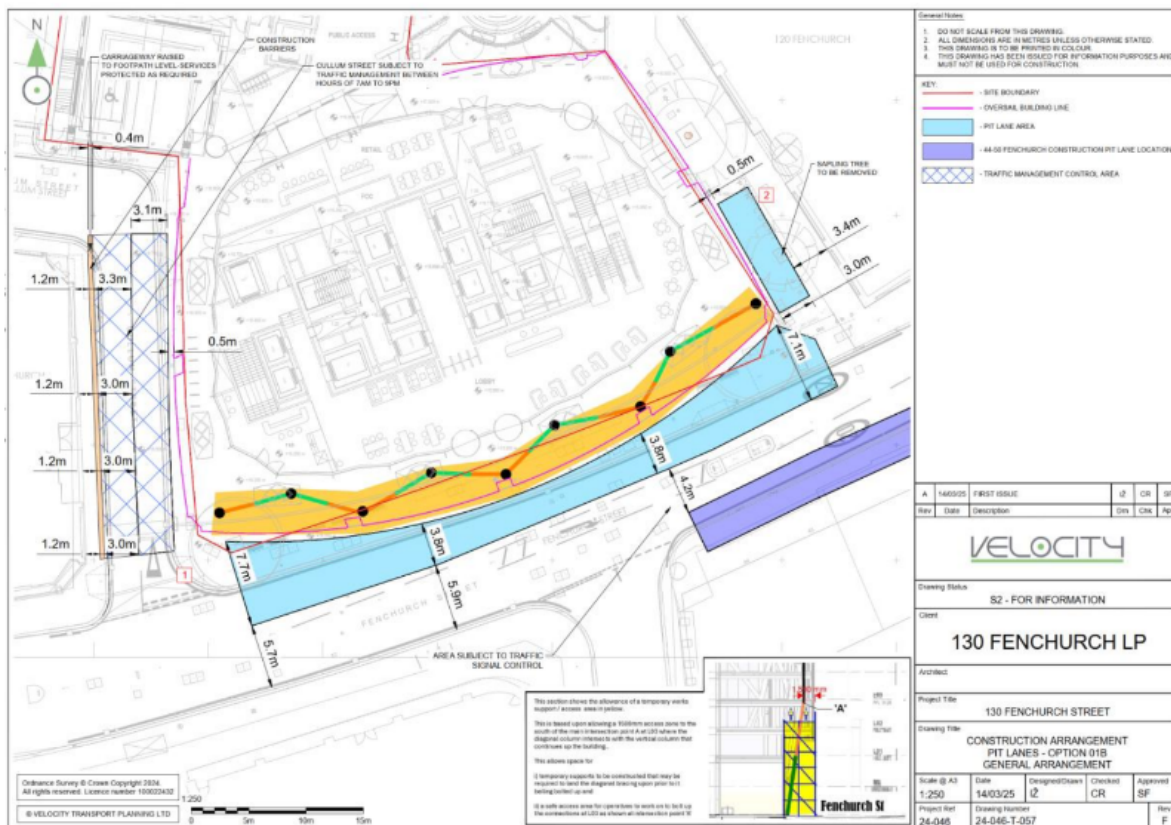
This plan provides information describing the proposed works and how, at this preliminary stage, they could be undertaken. It also details how the impacts associated with the construction period would be mitigated and highlights concerns of local stakeholders early on to ensure these are accounted for within the detailed Construction Logistics Plan. This requirement should be secured by condition and prepared once a Principal Contractor has been appointed.

This document will need to align with Transport for London's Construction Logistics Plan Guidance and will be subject to City of London approval before demolition and construction can commence. The detailed Construction Logistics Plan should highlight, among other things, how public liaison and coordination with other nearby construction sites will be

managed. The appointed contractor will be required to join the construction cluster groups, which are groups formed by nearby construction sites holding regular meetings with the attendance of the City of London's highways officers to ensure coordination.

Commencement of works will be subject to appropriate legislation under the London Permitting Scheme, which falls under the Traffic Management Act 2004. The construction works of the development will need to be coordinated with the nearby sites. Proposed construction proposals may have to be reviewed for coordination.

If planning permission is granted, the submission of a detailed CLP should be secured separately via condition to ensure the construction and demolition of the site comply with The London Plan Policy T7 and DM16.1 of the City of London Local Plan 2015 and with the emerging City Plan 2040. This would provide a mechanism to manage and mitigate the impacts the proposed development would have on the local area. The detailed CLP would need to be approved by the City of London prior to the commencement of works on site, should planning permission be granted.



## Recommendation

The scheme benefits from high levels of public transport accessibility, would be car-free and it promotes cycling and walking as sustainable modes of transport. The proposals are considered acceptable in transport terms, subject to conditions and S106 obligations.

Should planning permission be granted the following conditions (as a minimum) along with the Section 278 and Section 38 of the Highways Act 1980 to be secured:



- A planning condition requiring the provision of 860 long stay cycle parking spaces, 48 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 the 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.
- A S106 obligation to secure a Delivery and Servicing Management Plan (DSMP) including details as referenced within this report (but not limited to). The clause shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be adhered to.
- A S106 obligation to secure an Accessible Car Park Management Plan (ACPMP) including details of how the accessible parking spaces will be managed to accommodate the users and their requirements.
- A S106 obligation to secure a Travel Plan (TP) for the development. The obligation shall state that the TP shall be approved prior to the first occupation of the site and the approved travel plan shall be followed for 5 years, unless otherwise agreed with the Highway Authority.

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.

## **Transport Planning Obligations**

1. To enter into a Section 278 Agreement of the Highways Act 1980 with TFL
3. Accessible Car Parking Management Plan to include management and criteria for use of the disabled parking space.
4. Travel Plan (TP) including a cycle promotion plan.
5. Number of vehicle trips attending the servicing area to be capped at 99 one-way trips
6. Delivery Servicing Management Plan (DSMP): Details of a 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 first occupation of the development hereby permitted. The Servicing Management Plan shall be

submitted yearly for a period of 5 years. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.

## **Transport Planning Conditions**

### Threshold levels

1. Before any construction work, including demolition, begins, the proposed threshold levels within the entire perimeter of the site must be submitted to the Local Planning Authority for approval.

*REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory ground levels in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement and should be submitted in Cad Format for analysis.*

### Doors not to open outwards

2. No doors, gates or windows at ground floor level shall open over the public highway.

*REASON: In the interests of public safety and comply with the Section 153 of the Highways Act 1980.*

### Site Condition Survey

3. Before any construction works including demolition are begun, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out. Details must be submitted to and approved in writing by the local planning authority

*REASON: To ensure the satisfactory reinstatement of the highways, upon completion of construction works, in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement of any construction works to record the condition of the surrounding highways.*

### Stopping Up Order

4. Prior to the commencement of any construction works, the applicant is required to apply for a stopping up order under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at:

<https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways>. The application form should be submitted to: [transport.planning@cityoflondon.gov.uk](mailto:transport.planning@cityoflondon.gov.uk)

*REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.*

#### Demolition and Construction Logistic Plans

5. Prior to the commencement of any construction works, details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing. The details shall be drafted in accordance with the Mayor of London's Construction Logistics Plan Guidance dated April 2021, 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. Traffic management drawings must accompany the document and be drafted in accordance with the "Safety at Streetworks and Road Works – A Code of Practice". No demolition or construction shall be carried out other than in accordance with approved details and methods.

*REASON: To ensure that demolition and construction works do not adversely impact public safety and the transport network, in accordance with London Plan Policy 6.14 and Local Plan policies DM15.6 and DM16.1. These details are required prior to the commencement of demolition and construction works to minimize the impact on the transport network from the start of these activities.*

#### Protection of Subway Pipes

6. Prior to the commencement of any construction works, a basement impact and ground movement assessment is required to be submitted to and approved by the Local Planning Authority in writing.

*REASON: To ensure that demolition and construction works do not adversely impact the existing Fenchurch Avenue subway pipes, in accordance with London Plan Policy 6.14 and Local Plan policies DM15.6 and DM16.1.*

#### Servicing and Delivery

7. Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors.

*REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.*

8. Before the use authorised by this permission commences, adequate facilities for servicing must be provided within the curtilage of the site for loading and

unloading. Details of such facilities must be submitted to and approved in writing by the Local Planning Authority. The approved facilities must be maintained and used as approved for the life of the building.

*REASON: To ensure that traffic in surrounding streets is not impeded, and a free flow of traffic is maintained in accordance with the following policy of the Local Plan: DM16.5.*

#### Hours of servicing

9. Deliveries, servicing, including refuse recycling vehicle trips (excluding any on-foot and cargo bike deliveries) shall take place between the hours of 23:00 to 7:00, Monday to Sunday.

*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: CS16, DM15.7, DM16.2, DM16.1, DM21.3.*

#### Car parking

10. Designated car parking spaces shall be provided on the site for use by people with disabilities in accordance with the requirements of the London Plan. These spaces shall be clearly marked, maintained throughout the life of the building, and be readily available for use by disabled occupiers and visitors at no charge to the individual end users of the parking.

*REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.*

#### Public Highway to be maintained prior to closure order

11. The public highways shall remain as public until such time as the necessary Stopping-up Order has come into effect. No implementation is permitted until then.

*REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.*

## **Transport Planning Informative**

#### Highway Authority

1. This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as the Highway Authority; and works on the public highway must not be commenced until the consent of the Highway Authority has been obtained along with relevant licences and legal agreements.

2. Works to the public highway, are undertaken via a Section 278/38 Agreement. It forms part of a separate process along with associated fees. The planning permission hereby granted does not authorise these works to be carried out without the necessary agreement, approvals and relevant highways licences.
3. A stopping up order is a legal process under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at: <https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways>. The application form should be submitted to: [transport.planning@cityoflondon.gov.uk](mailto:transport.planning@cityoflondon.gov.uk)
4. You are advised to comply with the New Roads and Street Works Act 1991 and notify the Street Authority of any proposed works in accordance with the Act.
5. The City Operations (Highways Management & Maintenance) must be consulted on the following matters which require specific approval:
  - a. Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works, including temporary crossovers. Information can be found at: [Highway licences - City of London](#)
  - b. The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the City Operations is recommended to ensure the design of the building provides for the inclusion of street lighting. Information can be found at: [deshighwaysupport@cityoflondon.gov.uk](mailto:deshighwaysupport@cityoflondon.gov.uk)
  - c. The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). Information on projection licences can be found at: [Bridges and highway structures - City of London](#)

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the

land owner to secure the air space. Please contact the Corporate Property Officer, City Surveyor's Department at: [district.surveyor@cityoflondon.gov.uk](mailto:district.surveyor@cityoflondon.gov.uk)

- d. Bridges over highways, approval for moving an abnormal load through the City of London is required prior to operations. Your proposal must include your intended route and should be emailed to the [Bridges team](#) at [bridges@cityoflondon.gov.uk](mailto:bridges@cityoflondon.gov.uk). Allow at least three working days for us to process your application.

# Memo

To Assistant Director (Development Management)  
Environment Department

Email [plncomments@cityoflondon.gov.uk](mailto:plncomments@cityoflondon.gov.uk)



From Paul Bentley  
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 05/08/2025

Your Ref: 25/00529/FULEIA

**Subject:** 130 Fenchurch Street, London, EC3M 5DJ

Phased development for the demolition of all buildings and structures to existing slab level, erection of a new building comprising 3 basement levels, ground plus 34 storeys (161.46m AOD, 145.86m AGL) to provide a mixed use office (Class E(g)), culture (Class F1/E), public viewing gallery (Sui Generis), flexible retail (Class E(a)-(b)) development with soft and hard landscaping, pedestrian and vehicular access, cycle parking, flexible public realm including programmable space with associated highway works and all other works associated with the development.

An ES has been submitted as part of the EIA, with an Air Quality Chapter included. Due to being an EIA, in addition to an Air Quality Neutral Assessment an Air Quality Positive Statement has also been submitted as part of the application. In addition, following a number of queries on the documentation submitted as part of the ES a response note was provided by the AQ consultant.

The development has proposed the installation of a single landlord backup diesel generator. The generator is for life-safety emergency operation only and cannot be used for any level of business continuity. The applicant has advised that there may be provision for future tenants to install further generator(s) for tenant use. Therefore, the assessment of any future proposed tenant generators will be conditioned. Alternatives to the landlord diesel generator for emergency power supply have been explored, with the proposed use of a diesel generator justified. If installed, as per the condition recommended, the generator should be fitted with mitigation, such as SCR, to reduce NO<sub>x</sub> emissions to comply with the City of London Air Quality SPD and only tested only in-line with manufacture guidance.

The development is Air Quality Neutral, as per GLA guidance, with one blue-badge car parking space and the heating demand provided by air source heat pump technology. It should be noted that emissions from the proposed emergency life-safety generator and service and delivery vehicles are exempt from Air Quality Neutral.

The Air Quality Positive Statement submitted was generic and did not include any evidence of air quality influencing design development and there was no Implementation and Monitoring Plan included within the statement. These comments were addressed in the response note submitted following officer questions.

Should the development be approved please attach the following conditions:



### **Landlord Plant Emissions**

The landlord generator must comply with the Air Quality SPD 2017 and details of the appliance/plant must be submitted to and agreed by the LPA before installation. Any generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose, and shall not be used at any other time

#### **Reason**

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with Local Plan policy DM15.6, London Plan policy SI 1 and emerging City Plan 2040 policy HL2.

### **Tenant Plant Emissions**

Prior to any tenant generator being commissioned and installed in or on the building an Air Quality Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall include an Air Quality Neutral assessment completed in line with the latest Air Quality Neutral guidance. The assessment shall detail how the plant will minimise emissions and comply with the Air Quality SPD 2017. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the operation of the building.

#### **Reason**

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with Local Plan policy DM15.6, London Plan policy SI 1 and emerging City Plan 2040 policy HL2.

### **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 SI1.

### **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 SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

### **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)

# **Public Access and Inclusivity**

## **Policy Context**

Accessible and inclusive design is covered by NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and emerging City Plan 2040 policy HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.

Local Plan policy DM 10.8 requires “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.

## **Arrival at the Site**

The site is well-served by public transport, including London underground from Bank and Monument, national rail links from Fenchurch Street and Cannon Street and buses from Eastcheap, Cannon Street and King William Street. It is noted that neither Bank or Monument are step free and the closest step free underground station is Liverpool Street Station, all public transport nodes exceed the recommended 50m travel distances without a rest.

Noting that public transport is not accessible to some users, suitable drop-off points are recommended in best practice guidance BS 8300. The closest taxi rank is located on Mincing Lane which is approximately 100m from the site. No specific drop-off points are identified as part of the proposal however informal drop-off anticipated along Cullum Street which is within 50m of the site.

The walking distances from key public transport nodes and on-street carparking exceed the recommended 50m without a rest. It is therefore recommended that opportunities for such resting points with accessible seating are explored, at maximum intervals of 50m along the approaches to the building from key points of arrivals. Exploring such opportunities and their feasibility is therefore included within the scope of the s278 and s106 agreement being secured.

An accessible parking space would be provided on site within the loading bay accessed directly off Cullum Street. The parking space would be for staff only and visitors to the building would be expected to use the two existing on-street parking spaces along Mincing Lane approximately 100m south of the site. Officer users would be able to access the office entrances by exiting the building and moving around the building externally via either Cullum Street or the new public route. Further details of management and design of this entry point and Electric Vehicle Charging (EVCP) would be included within an AMP and secured via condition.

A travel plan would be secured via a Section 106 agreement to detail how disabled visitors could request support to get to/from this site if required. Further details of the travel plan are set in the Transport and Highways section of this report.

Continuing provision of the existing Blue Badge space in the area during construction is important provided it is safe for use, and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

### Public Realm

A new publicly accessible route is proposed through the city block, creating a step free route between Cullum Street and Fen Court Garden. The new route will be sloped to ensure there is level threshold into the retail entrances and cultural entrance. The new route would be designed to be welcoming and safe, through the integration of lighting, natural surveillance from the active ground floor uses and clear sight lines. Further detail will be secured via condition

The setting back of the building at the lower levels will create more generous pavement widths around the base of the building. Where new thresholds are created these will be level and step free. The new public realm should be designed in line with the Mayors Public London Charter and further detail regarding the hard and soft landscaping will be secured via condition.

### Cycle and End of Trip Facilities

The long stay cycle parking would be accommodated on the mezzanine of basement level 01 and is access via a sliding door directly off Cullum Street. The internal access to the cycle store is via cycle lift, one lifts is provided, and two staircases. All gates and doors along the route would be automated and sized in accordance with Approved Document M. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users. Further detail will be secured via condition.

Routes from the cycle store to end of trip facilities, located on basement 01, would be via steps and dedicated end of trip shuttle lift. Access from the cycle store and EoT facilities to the office receptions on either ground or mezzanine would be via the dedicated EoT shuttle lift, providing a logical and accessible route. All doors along routes would be automated or power assisted. Two accessible showers would be provided directly off the EoT lounge lobby, in close proximity to the lifts, providing an accessible shower, toilet and lockers, further detail would be secured by condition.

Short stay cycle parking would be accommodated in the public realm around the base of the southern block, with a mixture of standard and accessible Sheffield stands.

It is noted that 5% of long stay 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. Full details of the cycle stand types and the setting out of the bike store, and end of trip facilities are reserved for condition to ensure these are well-detailed and are useable promoting a safe, inclusive and welcoming environment.

### Entrances and Arrival Experience

London Plan D5 requires entrances to be easily identifiable and to allow independent use without separation. All entrances to the development would be step free, automated and with a minimum clear opening width of at least 1000mm. Further detail will be secured via

condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door furniture are designed to in line with inclusive-design best practice guidance.

### *Office*

The primary office entrances along Fenchurch Street and Fen Court are formed by two large drum barrel doors. The use of automated large drum doors would provide entrances into the office which are easily identifiable and allows a wide range of people to use the same entry point independently without additional effort, separation or special treatment.

The ground floor office lobby is arranged over two levels which are navigated via five steps or retracting staircase platform lift. The platform lift should be designed for independent use any associated signage and wayfinding should be logical and inclusive. Further detail will be secured by condition and the IAMP.

Security barriers between the reception and main core would feature at least one barrier in each location with a minimum clear-opening width of 1000mm.

Due to limited space at ground floor not all lifts come to ground, and office users would either access the lift cores via the security gates at ground floor or via the mezzanine level reception. Prior to the security line the mezzanine level reception is accessed either by steps or escalator and no step free route is provided prior to the security line. Step free access to the mezzanine level reception would be via the southern lift core access via ground floor. Users who require access to the northern lift core would be required to transfer at the mezzanine level, users would not be required to navigate the security barriers more than once. Wayfinding and management of the lifting strategy will be secured via condition and IAMP to ensure the routes are logical and easily identifiable.

Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2 Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details would be provided through condition.

### *Cultural Provision*

The primary entrance to the cultural spaces would be via a drum door located on the corner of the north building along Cullum Street adjacent to the new public route through the building. The security line will be located internally and is formed of a double leaf swing door, this door should be automated, and further detail will be secured via condition. From the entrance lobby visitors will be transported up to either level 17 or 20 via two lifts. The access to both the cultural space and level 20 viewing terrace have been designed to be welcoming, inviting and inclusive with security at a minimum under the current security threat. The access and experience will be required to meet the aspirations of the Mayors Public London Charter and further details on inclusion measures will be provided within the IAMP.

### *Retail and F&B*

The entrances to both the retail unit and the F&B spaces associated with the ground floor office would be formed of double leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Further detail will be secured via condition to ensure that the entrances are easily identifiable and logical.

The F&B unit is arranged over two levels which are navigated internally via two step or a platform lift. The platform lift should be designed for independent use any associated signage and wayfinding should be logical and inclusive. Further detail will be secured by condition and the IAMP.

### Vertical Movement

London Plan D5, (B)5 states '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'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure. Both the cultural and office accommodation will be served by two FF lifts and two EVAC lifts. Further detail regarding the design, management and maintenance of all lifts will be secured via condition.

### Evacuation and Fire Safety

All fire escape routes are step free through the use of EVAC lifts, slopes and ramps. All gates and doors along the route would be automated sized in accordance with Approved Document M and ramps and corridors would be sized accordingly to allow a minimal 1500mm clear width and handrail in line with Approved Document M and K.

Details of the management protocol for people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition.

### Horizontal Movement

Corridor widths and door openings are confirmed as consistent with AD M(2), including sufficient door widths and passing places for wheelchairs and will be subject to detailed design development.

### Terraces and Landscaping

Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and armrests for support when rising, as well as a wheelchair user to transfer.

The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.

All terraces should be designed to meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping



will be secured by condition, and that details on how the planting specification would be inclusive is provided.

Spend areas for assistance animals are not currently identified but will be reserved by condition. It recommended that details of all landscaping are reserved by condition including surface materials, planting, seating (with options to include seating with backs and arm rests for support).

### *Office*

The office terraces are accessed via single leaf sliding doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors will be secured via IAMP.

Two types of terraces are proposed with linear terraces at lower levels and larger terraces at upper levels. The linear terraces would have no fixed furniture and where loose furniture is introduced this should ensure that a minimum clear width 1500mm is maintained. The balustrade height around the linear terraces would be formed of 900mm planter with a 500mm mesh screen above.

The larger terraces found levels 28, 29, 30 and 31 would have integrated fixed seating into the planters, this seating should be designed to incorporate a range a seat heights, backrests and armrests. Where loose furniture is introduced, this should ensure that a minimum clear width 1500mm is maintained. The balustrade would be fully glazed and at a minimum height of 1500mm allowing for opportunities to views out from the terrace for a range of users.

Further detail regarding the planting strategy and balustrade design will be secured via condition to ensure that there is an equal opportunity to a view and that the planting is not overly scented and that unwanted touch is avoided.

### *Cultural Provision*

The terrace doors out onto public viewing terrace and cultural terrace are formed of double leaf swing doors and single leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors will be secured via IAMP.

The detailed design for the level 17 terrace and level 20 public viewing terrace should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. Where seating is integrated into the planting it would be designed to allow wheelchair users to sit alongside and transfer. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

The balustrade height around the public terraces would be formed of 600mm planter with a 2200mm glazed screen above, allowing for opportunities to views out from the terrace for a range of users.

### Sanitary Facilities

Building regulations say that wheelchair users should not have to travel more than 40m to reach sanitary facilities, including any transfer between floors (AD M 2 5.10) and there should be sanitary facilities at the point of entry.

A mixture of left- and right-hand transfer options would be provided throughout the building to accommodate a wider range of users. Further detail will be secured via condition.

#### *Office*

It is confirmed that an accessible toilet will be provided within the ground floor office reception lobby prior to the security line. The upper levels will cluster the sanitary provision around the cores, providing both ambulant and accessible toilets. The sanitary provision varies in location, arrangement and provision as you move up the building. The sanitary provision for the office floor accommodation would provide a mixture of gendered and non-gendered WC's in accordance with approved document Part T and at least one accessible WC and two ambulant WC's per floor. Further detail will be secured via condition.

#### *Cultural Provision*

The sanitary provision for the cultural space includes three toilets including one accessible on each of the upper levels of accommodation, no sanitary facilities are provided at ground floor and no baby changing facilities have been included. Further detail regarding how baby changing facilities, ambulant toilets and ground floor sanitary facilities can be integrated will be secured via condition.

#### *Retail and F&B*

Both the retail unit and the F&B unit would have a single accessible toilet which is accessible from the entrance level, further detail will be secured via condition.

#### Cultural Provision

The proposal includes internal and external cultural space at level 17 and level 20 including a public viewing terrace.

The internal arrangement of the cultural space should be designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9. Further detail will be secured by condition, the IAMP and S106.

An end-user has not been identified for the culture use and conditions are imposed to ensure that the cultural offer is inclusive of the greatest range of people at all levels of operation with opportunities for co-creation, co-curation, mentoring and volunteering for relevant groups.

An obligation for Inclusive Procurement has been made under the Section 106 including but not limited to opportunities of co-creation / co-curation, partnerships with artists from underrepresented groups, as well as opportunities for volunteering, training and mentoring for underrepresented groups of people.

#### Signage and Wayfinding

Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of 'two senses'. Details of signage and wayfinding will be secured by condition.

#### Access and Inclusivity Conclusion

The proposal has been designed to ensure that the site meets the highest standard of inclusive design in line with Local Plan DM10.8 and London Plan Policy D5. In order for the proposed office, retail and cultural uses to fulfil its goal of being an inclusive and welcoming place to work and visit, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to improve the accessibility of the site in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Inclusive Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.

Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.