

Good Growth

[REDACTED]

Our ref: 2021/1224/P2I

Date: 29 June 2022

By email

Dear [REDACTED]

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: London Wall West, 140-150 London Wall

LPA: London Borough of City of London

Our reference: 2021/1224/P2I

Further to the pre-planning application meeting held on 21 January 2022, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely

[REDACTED]

Head of Development Management

cc [REDACTED], Deputy Head of Development Management
TfL

London Wall West, 140-150 London Wall

Local Planning Authority: City of London Corporation

The proposal

Redevelopment of the existing buildings on site to provide a mix of commercial, cultural and other public retail and community uses in the form of at least three new buildings alongside public realm improvements, reconfiguration of the existing gyratory, part pedestrianisation of Aldersgate Street, London Wall and reconfiguration of car park access to London Wall and other associated works.

The applicant

The applicant is **City of London Corporation**, the Architect is **Sheppard Robson**.

Assessment summary

The applicant must confirm the existing and proposed quantum of floorspaces at the site alongside the relocation arrangements for the existing Museum of London. Subject to this, the redevelopment of this brownfield site located within the CAZ for a mix of commercial and community uses is supported in principle. Early engagement from the applicant is welcomed and should continue in the lead up to the submission of any application to resolve issues in respect to land use principles, urban design and sustainable development which should be addressed prior to the submission of a formal planning application.

Key next steps

The future application will need to address the issues raised in this report with respect to land use principles, affordable housing, urban design and sustainable development.

Follow up meetings

A follow up meeting is recommended on land use principles, urban design, transport and sustainable development to progress the key next steps above.

Context

1. On 21 January 2022 a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held virtually via Microsoft Teams with the following attendees:

GLA group

- [REDACTED] – Principal Strategic Planner, GLA (case officer)
- [REDACTED] – Team Leader – Development Management, GLA
- [REDACTED] – Design Lead - Urban Design, GLA

Local Authority

- [REDACTED] – Planning Lead – City of London

Applicant

- [REDACTED] – Project Director (on behalf of City Surveyors)
- [REDACTED] – Diller, Scofidio and Renfro
- [REDACTED] – Sheppard Robson
- [REDACTED] – Tavernor Consultancy;
- [REDACTED] – Buro Happold;
- [REDACTED] – Gerald Eve
- [REDACTED] – Gerald Eve
- [REDACTED] – Gerald Eve
- [REDACTED] – Gerald Eve

2. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3. The site is located on the north side of London Wall, bound by the Barbican Estate to the north, Aldersgate Street to the west. The existing site comprises the Museum of London (150 London Wall) and Bastion House (140 London Wall). The Museum of London occupies the plot of 150 London Wall and comprises 3 storeys of museum floorspace. The existing museum is proposed to relocate to Smithfield market. The surrounds of the site comprise a mix of commercial, cultural and residential uses. The Barbican and Golden Lane Conservation Area wrap the eastern and northern boundaries of the site extending north through the wider estate. The surrounding area contains a number of listed buildings, in closest proximity to the site is the Grade II Listed Barbican Estate, the Grade I Listed Church of St. Giles Cripplegate. The Barbican is also designated as a Grade II* Registered Park and Garden of special historic interest. There are several Scheduled Ancient Monuments associated with the London Wall in the vicinity of the site (set out in paragraph 32-38).
4. The site records a good Public Transport Accessibility Level (PTAL) of 6b, on a scale of 0-6b where 6b represents the most accessible locations.

Details of this proposal

5. Redevelopment of the existing buildings on site to provide a mix of commercial, cultural and other public retail and community uses in the form of at least three new buildings alongside public realm improvements, reconfiguration of the existing gyratory, part pedestrianisation of Aldersgate Street, London Wall and reconfiguration of car park access to London Wall and other associated works.
6. The future application may be referable to the Mayor at the discretion of the City Corporation under the following category of the Mayor of London Order 2008:
 - Category 3E: *“which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and comprises or includes the provision of more than 2,500 square metres of business floorspace”*.

Strategic planning issues and relevant policies and guidance

7. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan (2015) and the London Plan 2021.
8. The following are relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance; and,
 - The Draft City Local Plan 2021.
9. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

• Central Activities Zone	<i>London Plan;</i>
• Culture/tourism and leisure	<i>London Plan;</i>
• Office	<i>London Plan;</i>
• Urban design	<i>London Plan; Character and Context SPG; Public London Charter draft LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG;</i>
• Inclusive access	<i>London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG;</i>
• Heritage	<i>London Plan; World Heritage Sites SPG;</i>
• Sustainable development	<i>London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; ‘Be Seen’ Energy Monitoring Guidance draft LPG; London Environment Strategy; and,</i>

- Air quality

London Plan; the London Environment Strategy; Control of dust and emissions during construction and demolition SPG.

Summary of meeting discussion

10. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use principles, urban design and sustainable development. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Land use principles

Central Activities Zone

11. London Plan SD4 sets out that the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values. Policy SD4 goes on to set out that the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions should be promoted and enhanced. The proposals to provide optimised office and commercial space at this site is welcomed in line with the policies outlined above. The reprovion of cultural uses at the site is welcomed but will need to be considered alongside the relocation details of the existing Museum of London. Subject to the appropriate relocation/reprovion of the Museum of London, the provision of rationalised office space alongside other appropriate CAZ functions including visitor infrastructure is supported in line with the policies outlined above.

Office space

12. Policy E1 of the London Plan seeks improvements to the quality, flexibility and adaptability of office space at varying sizes within the Central Activities Zone, alongside increases to the overall quantum of available office stock. Increases in the current stock of offices should be supported in the CAZ.
13. Notwithstanding the broad policy objectives to increase the provision of office floorspace within the Central Activities Zone; Policy E1(I) of the London Plan provides scope for the redevelopment, intensification and change of use of surplus office space to other uses, subject to consideration of the need for a range of suitable workspace including small units, flexible and affordable work spaces. In this respect, the applicant should engage in collaborative discussions with the City Corporation to establish what affordable workspace offer could be viable at this site. At application stage the full details regarding the depth of discount and qualifying criteria should be finalised.

Social infrastructure

14. London Plan Policy S1 establishes that proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. The applicant is yet to finalise the composition of proposed uses at the site but has indicated its

intention to include a community use within the scheme. Given the history of the site, its highly accessible location and its broader characteristics the provision of community uses here would be supported. At application stage the need for such space should be well evidenced, and the applicant is encouraged to engage with potential operators/user groups at as early a stage as possible to ensure the specification of spaces is suitable.

Existing uses

15. Policy HC5 is clear that development proposals should protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity. The loss of museum floorspace at this site will need to be carefully balanced against the planning benefit of the new uses proposed. A key part of the consideration in this regard will also be a full understanding of the relocation arrangements for the Museum of London (including a phasing strategy which would provide the Museum with appropriate continuity of use and operation). At application stage these details should be established in full.

Designated open space

16. London Plan Policy G4 requires that development proposals do not result in the loss of protected open space and, where possible; create new areas of publicly accessible open space, particularly in existing areas of deficiency. The proposals would improve access to the existing area of open space and increase the area of public amenity space at the site. This has the potential to be a significant benefit of the scheme and would be supported. At application stage the full details of how public access would be managed and secured must be set out. In line with urban design comments below, the applicant should seek to improve the existing relationship between the areas of proposed public realm and the highway which runs in close proximity to the plot and which has the potential to limit peoples enjoyment of any open space.

Land use principles conclusion

17. The applicant must confirm the existing and proposed quantum of floorspaces at the site alongside appropriate relocation arrangements for the existing Museum of London. Subject to this, the redevelopment of this brownfield site located within the CAZ for a mix of commercial and community uses is supported in principle.

Urban design

18. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Optimising development capacity

19. In accordance with Policy D3, higher density developments should generally be promoted in locations that are well connected to jobs, services,

infrastructure and amenities by public transport, walking and cycling. In this regard, the site is within the CAZ, and has a PTAL rating of 6b and such would qualify as an appropriate location for high density development.

20. Notwithstanding this, the development should also demonstrate that it meets the criteria set out in Part D of Policy D3 in terms of form and layout, experience and quality and character. In line with Policy D4 of the London Plan, developments which propose a tall building as defined by the borough, must have undergone at least one design review early on in their preparation and prior to submission of an application or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E of Policy D4. Whilst the applicant has been in dialogue with the City Corporation on design matters for some time it is understood that the scheme is yet to go through an independent design review. In line with Policy D4, the scheme should undergo an independent design review process prior to submission of an application. In the absence of a local design review panel the applicant should consider presenting the scheme to the Mayor's London Review Panel (www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design/london-review-panel).

Height and massing

21. London Plan Policy D9 states that development plans should define what is considered a tall building for specific localities (although not less than 6 storeys or 18 metres) and identify suitable locations; and identify appropriate tall building heights on maps in Development Plans (Parts A and B). Policy D9 also sets out further requirements for assessing tall buildings (Part C) including addressing visual, functional, environmental and cumulative impacts.
22. The City's Local Plan at 3.14 defines tall buildings as those which significantly exceed the height of their general surroundings. Proposals for new tall buildings should take account of the cumulative impact of the proposed development, in relation to other existing and proposed tall buildings. The City Corporation will require proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, which have a detrimental impact on amenity, and maintain pedestrian permeability. The City Corporations draft Local Plan at Policy S12 defines tall buildings within the City of London are defined as buildings over 75m above Ordnance Datum (AOD) in height.
23. The proposed buildings would range in height between 4-17-storeys, the lower 4-storey building would be located at the northwestern corner of the site. A 13-storey element would be located in the southwest of the site with the tallest 17-storey building to the east of the plot.
24. The site falls within the area defined in the emerging local plan as potentially suitable for tall buildings. GLA officers acknowledge that Bastion House at 140 London Wall is 85.3 metres in height. The emerging Local Plan and London Plan at Policy D9(c) require that the full visual, functional, environmental and cumulative impacts to be assessed and be found acceptable. Accordingly, collaborative discussions with the borough should continue in the lead up to the submission of an application to ensure these matters are suitably addressed. At

application stage with respect to Part C of Policy D9, it must be demonstrated to the satisfaction of the GLA and LPA that the visual, functional, environmental and cumulative impacts referred to below have been appropriately addressed.

25. In summary the development includes tall buildings that meet with the locational requirement of the emerging local plan. The appropriateness of the tall building proposed will need to be considered with regard to the extent to which all other tall building assessment criteria have been addressed, as well as the other material considerations of the case.

Layout

26. Overall, the proposed layout is generally supported. The proposed site strategy and land use distribution within the site seem well considered and rationalised. The applicant alongside the feedback within the height and massing section of this report should undertake daylight/sunlight assessments to ensure the proposed layout optimises the levels of natural daylight/sunlight to areas of public realm and minimises impacts to surrounding residential/sensitive receptors. The proposed road realignment would increase the area of public realm at the site by reducing surface areas allocated to vehicle parking. This is supported from an urban design perspective, but should be subject to further discussions with TfL to understand any highway implications to the wider network.

Public realm

27. The principles of the proposed public realm and landscape approaches are supported in principle. However, more details should be provided to allow a full assessment of the proposals at application stage. The applicant outlined its intention to increase the public accessibility and quality of amenity areas which is supported. The proposals for a public amphitheatre is supported offering high-quality open space. However, additional detail should be provided regarding how the proposed public realm helps to celebrate the historical assets within and nearby the site whilst responding to the environmental constraints of the site (particularly the adjacent highway).

Architectural quality

28. Given the early stage of design the proposed material palette is still in development. GLA officers note the redevelopment of the Museum of London has the potential/needs to meet very high standard in terms of quality of the buildings and public spaces. The development is in prominent and historic location accordingly the design must take in consideration the unique context of the site. The Barbican Estate adjoins the site, the treatment of the façades, particularly those fronting the estate should be softened and be more responsive to the other land uses nearby.

Fire safety

29. In line with Policy D12 of the London Plan the future application should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

30. Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. 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 buildings.

Inclusive access

31. Policy D3 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The future application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment. At application stage it must be demonstrated that the scheme appropriately acknowledges the requirements of Policy D3.

Heritage and views

Listed buildings and conservation areas

32. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to conservation areas, for all planning decisions “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In relation to listed buildings, all planning decisions should ‘should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.
33. Policy HC1 of the London Plan states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. In line with case law, any harm identified must be given considerable importance and weight.
34. Paragraph 189 of the NPPF further specifies that in determining applications, local planning authorities should require an applicant to describe the significance of any affected heritage assets, including any contribution made by their setting.
35. Barbican And Golden Lane conservation area wraps the eastern and northern edges of the site and extend through the Barbican Estate which is Grade II Listed. Just north of the site is also the Grade I Listed Church of St. Giles Cripplegate. The Barbican is also designated as a Grade II* Registered Park and Garden of special historic interest.
36. The surrounds of the site contain a number of Scheduled Ancient Monuments associated with the London Wall:
- West and North of Monkwell Square;
 - West Gate of Cripplegate Fort (located within the London Wall car park);
 - Gateway of Cripplegate;
 - St. Alphage Garden incorporating St. Alphage Church;
 - Wall and Bastion at Noble Street;

- Gateway at Aldersgate;
- Postman's Park and King Edward Street;
- Remain of Roman Fort Wall and Eastgate.

37. The applicant must at Stage 1 provide a full heritage statement which assesses the impact of the proposals from within the surrounding area and assesses the potential harm arising from the redevelopment of the site. In addition, where harm is identified the full package of public benefits arising from the proposals must be detailed to allow for a full assessment of their weight.

38. The applicant has provided a series of draft views from the surrounding area which demonstrate the proposals visual impact from a series of key viewpoints within the neighbouring conservation areas and viewpoints agreed with the City Corporation. Whilst it is acknowledged that the TVIA is still being developed GLA officers envisage that the proposal would result in some heritage harm – for example to Church of St. Botolph (Grade I) in view 3B from Postman's Park. The degree of harm across all the views assessed will need to be carefully assessed once the heritage assessment and TVIA are finalised. Meantime the applicant should continue to engage with the City Corporation as these documents are worked up.

Strategic views

39. For clarification the avoidance of doubt, whilst in close proximity to a number of strategic views the site does not fall within any strategic viewing corridors or their backdrop.

Sustainable development

Energy strategy

40. Applicants should follow the [GLA Energy Assessment Guidance 2020](#) which sets out the information that should be provided within the energy assessment to be submitted with a planning application.

Net zero carbon target

41. The London Plan 2021 requires all major developments (residential and non-residential) to meet a net-zero carbon target. This should be met with a minimum on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund.

42. Applicants should submit a completed [Carbon Emissions Reporting spreadsheet](#) alongside any planning application to confirm the anticipated carbon performance of the development and should clearly set out the carbon emission factors they are proposing to use in their energy assessment. Although results for both sets of carbon emission factors should be submitted, applicants are encouraged to use the SAP 10.0 carbon emission factors for referable applications when estimating carbon dioxide emission performance against London Plan policies. For developments in Heat Network Priority Areas with the potential to connect to a planned or existing district heating network (DHN) the SAP 2012 emission factors may be used provided that the heat network operator has developed, or is in the process of developing, a strategy to decarbonise the network which has been agreed with the GLA.

43. The carbon emission figures should be reported against a Part L 2013 baseline. Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets for all stages of the energy hierarchy should be provided to support the savings claimed.

Be Lean

44. Applicants are expected to meet the London Plan energy efficiency targets:
- a. **Non-residential** – at least a 15% improvement on 2013 Building Regulations from energy efficiency measures alone
45. The applicant will be expected to consider and minimise the estimated energy costs to occupants and outline how they are committed to protecting the consumer from high prices. See the guidance for further detail.

Energy flexibility

46. Applicants will be expected to investigate the potential for energy flexibility in new developments, include proposals to reduce the amount of capacity required for each site and to reduce peak demand. The measures followed to achieve this should be set out in their energy assessment. See the 2020 guidance for further details. Thermal as well as electrical storage measures should be considered.

Cooling and overheating

47. The Good Homes Alliance (GHA) [Early Stage Overheating Risk Tool](#) should be submitted to the GLA alongside any planning application to identify potential overheating risk and passive responses early in the design process.
48. Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the cooling hierarchy. Dynamic overheating modelling in line with CIBSE Guidance should be carried out (TM59 for residential and TM52 for non-residential) for all TM49 weather scenarios.
49. The area weighted average (MJ/m²) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional.

Be Clean

50. The applicant should investigate opportunities for connection to nearby existing or planned district heating networks (DHNs). Where such opportunities exist, this should be the priority for supplying heat to the site in line with the London Plan heating hierarchy. Evidence of this investigation should be provided including evidence of active two-way communication with the network operator, the local authority and other relevant parties. This should include information on connection timescales and confirmation that the network has available capacity. See the guidance for full details on the information to be provided.
51. The site should be provided with a single point of connection and a communal heating network where all buildings/uses on site will be connected. Relevant drawings/schematics demonstrating the above should be provided.

52. The applicant should provide evidence confirming that the development is future proofed for connection to wider district networks now or in the future, where an immediate connection is not available.
53. Where a DHN connection is not available, either now or in the future, applicants should follow the London Plan heating hierarchy to identify a suitable communal heating system for the site.
54. The London Plan limits the role of CHP to low-emission CHP and only in instances where it can support the delivery of an area-wide heat network at large, strategic sites. Applicants proposing to use low-emission CHP will be asked to provide sufficient information to justify its use and strategic role while ensuring that the carbon and air quality impact is minimised.

Be Green

55. All major development proposals should maximise opportunities for renewable energy generation by producing, using, and storing renewable energy on-site. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.
56. Solar PV should be maximised; the applicant proposes this and is seeking to fully exploit both the roof (with low angle E/W panels) and potentially considering BIPV as well. This is welcomed. Applicants should submit the total PV system output (kWp) and a plan showing that the proposed installation has been maximised for the available roof area and clearly outlining any constraints to further PV.
57. Should heat pumps be proposed, the applicant will be expected to demonstrate a high specification of energy efficiency measures under Be Lean, a thorough performance analysis of the heat pump system and, where there are opportunities for DHN connection, that the system is compatible. The detail submitted on heat pumps should include:
 - a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.
 - b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).
 - c. The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently. The distribution loss factor should be calculated based on the above information and used for calculation purposes.
 - d. Whether any additional technology is required for top up or during peak loads (e.g. hot water supply) and how this has been incorporated into the energy modelling assumptions.

Carbon offsetting

58. The applicant should maximise carbon emission reductions on-site. Should the site fall short of the carbon reduction targets and clearly demonstrate that no

further carbon savings can be achieved, the applicant would be required to make a cash-in-lieu contribution to the boroughs' carbon offset fund using the GLA's recommended carbon offset price or, where a local price has been set, the borough's' carbon offset price.

59. Energy strategies should provide a calculation of the shortfall in carbon emissions and the offset payment that will be made to the borough.

Whole Life-Cycle Carbon Assessment

60. In accordance with London Plan Policy SI12 the applicant will be expected to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint. The applicant should submit a whole life-cycle carbon assessment to the GLA as part of any planning application submission, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA's reporting template. The applicant will also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions. The assessment guidance and template are available on the GLA [website](#).

Be Seen

61. The applicant will be expected to monitor their development's energy performance and report on it through an online monitoring portal. The applicant should review the 'Be Seen' energy monitoring [guidance](#) to ensure that they are fully aware of the relevant requirements to comply with the 'Be Seen' policy. The applicant should provide a commitment that the development will be designed to enable post construction monitoring and that the information set out in the 'Be Seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This will be secured through suitable legal wording.

Circular economy

62. The London Plan has introduced circular economy policies including a requirement to submit Circular Economy Statements for developments. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects.
63. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process.
64. Therefore, the applicant is required to submit a Circular Economy Statement in accordance with the GLA [guidance](#).

Environmental issues

Urban greening

65. London Plan Policies G1 and G5 embed urban greening as a fundamental aspect of site and building design. Features such as street trees, green roofs, green walls, rain gardens and hedgerows should all be considered for inclusion and the opportunity for ground level urban greening should be maximised. The

applicant must calculate the Urban Greening Factor as set out in London Plan Policy G5 and seek to achieve the specified target prior to the Mayor's decision-making stage. A landscaping plan should also be provided.

Sustainable drainage and flood risk

66. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with London Plan Policy SI 13. Where greenfield runoff rates cannot be achieved and robust justification is provided, a discharge rate of three times the greenfield rate may be acceptable.
67. The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measure at the top of the drainage hierarchy, as set out in London Plan Policy SI 13. Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, thereby providing amenity and water quality benefits.

Air quality

68. London Plan Policy SI1 states that development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits or create unacceptable risk of high levels of exposure to poor air quality. The application must be accompanied by an air quality assessment. The applicant should continue to work with the Council to identify any appropriate mitigation prior to the application being lodged.
69. Given the scale of the proposals, then the application should be accompanied by an air quality positive statement. This should demonstrate how the applicant has considered ways to maximise benefits to local air quality and what measures or design features will be put in place to reduce exposure to pollution and how it will achieve this, in line with London Plan Policy S1(C). Further information is available in the pre-consultation draft Air Quality Positive guidance.

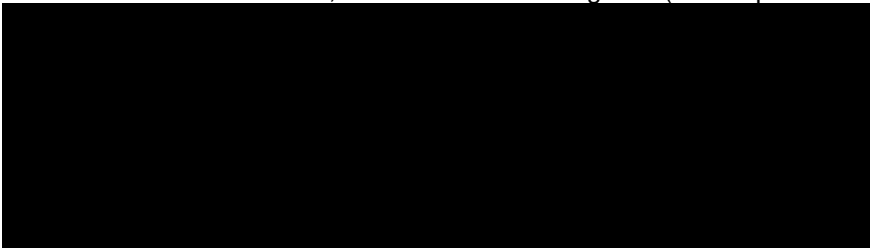
Transport


70. The applicant did not present any detailed transport information given the early stages of the design evolution but noted its intention to engage in TfL's pre-application service. This is encouraged, a link to the service is provided: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

Conclusion

71. The applicant must confirm the existing and proposed quantum of floorspaces at the site alongside the relocation arrangements for the existing Museum of London. Subject to this, the redevelopment of this brownfield site located within the CAZ for a mix of commercial and community uses is supported in principle. Early engagement from the applicant is welcomed and should continue in the lead up to the submission of any application to resolve issues in respect to land use principles, urban design and sustainable development which should be addressed prior to the submission of a formal planning application.

for further information, contact GLA Planning Unit (Development Management Team):



Lucinda Turner, Assistant Director of Planning
email:  [k](#)

London Wall West, Park Royal Road

in the City of London

meeting date: 21 January 2022

meeting time: 14:00

location: Virtually - Microsoft Teams

The proposal

Mixed use redevelopment of the site to provide for a mix of commercial, community and cultural uses in buildings proposed to have a maximum height circa 49 metres.

The applicant

The applicant is **City of London Corporation**, the Architect is **Sheppard Robson**.

Background

GLA officers received a request for a meeting to discuss a scheme for this site, as described above. Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion:

Principle of development

1. The scheme in the context of the existing uses and strategic designations including; CAZ and designated open space.

Urban design

2. Layout, response to surrounding area/ conservation area contexts,
3. Response to context, massing and scale,
4. Public realm and landscaping,
5. Materials and building appearance, sustainability through design.

Inclusive design

6. General discussion on inclusive access principles for the building.

Transport

7. General discussion regarding the approach to transport principles and the transport assessment, including access, car parking, trip generation, pedestrians, cycling and cycle parking, public transport, travel planning, contributions, Mayoral CIL.

Attendees

GLA group

- [REDACTED] – Principal Strategic Planner, GLA (case officer)
- [REDACTED] – Team Leader – Development Management, GLA
- [REDACTED] – Design Lead - Urban Design, GLA

Applicant team

- [REDACTED] – Project Director (on behalf of City Surveyors)
- [REDACTED] – Diller, Scofidio and Renfro
- [REDACTED] – Sheppard Robson
- [REDACTED] Tavernor Consultancy;
- [REDACTED] – Buro Happold;
- [REDACTED] – Gerald Eve
- [REDACTED] planning agent

Local Planning Authority

- [REDACTED] – Planning Lead – City of London

Notes:

Questions:

- Firstly, do you anticipate this will be referable to the GLA? [REDACTED] perhaps you can advise on whether the Council could consider this a departure for any reason?
- Obviously, the works here are closely tied to the relocation of the existing museum, now I know that you received a resolution to grant PP but has this permission been issued and if not what is the update here?
- [REDACTED] presentation - [REDACTED]
- You said that this scheme would enable the relocation of the museum through the funds raised – could you just explain a bit more about this and what this phasing might be?

Land use principles:

- In terms of the principle of development the provision of high quality office space in this readily accessible location is in line with the London Plans aspirations for the CAZ
- As part of this and as we have already alluded to we would need to understand where the uses currently on site would be relocated to and have a real grasp on the idea of net loss/gains etc to fully inform our planning balance – and just for ease it would be useful to have this for all metrics,
- The introduction of community space within the cultural mile is supported, I would have questions around who these spaces would be for and the access arrangements to them? Has any work been done to establish what need exists?
- I mean, highlights of the scheme would obviously include opening up access to the city wall and making this more publicly viewable/accessible
- A portion of the site is designated open land so obviously the access to this space is key and quality of it, obviously in fairly close proximity to what's a fairly well used highway it would be useful to understand how this space will look and feel for potential users and how pedestrians etc will actually get there
- Circular economy and wider sustainability principles being considered at this early stage is really goods too see, too often we find ourselves requesting these docs at application stage by which time it can sometimes feel like the horse has bolted.
- As you correctly identify there are opportunities around retention/recycling adaption of existing buildings and I would just encourage you to continue in this and of course share with us any statements and we can involve our circular economy team
- But as I say really good to see this work stream particularly the scenario testing against the whole life cycle carbon to arrive at the best solution

for further information, contact GLA Planning Unit, Development & Projects Team:

[REDACTED], **Principal Strategic Planner (case officer)**

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[REDACTED]

From: [REDACTED]
Sent: 09 February 2022 12:18
To: [REDACTED]
Subject: 2021/1224 – London Wall West UD Comments

Hi [REDACTED]

See below UD comments for 2021/1224 – London Wall West

Built Form, Height and Massing / Building Layout

- Overall site strategy and land use distribution within the site seem reasonable. The proposal and the overall massing is supported in principle
- Townscape views. The proposal does not seem to negatively affect any protected vista or view of St. Paul Cathedral. The proposed buildings seem to sit quite well within the wider London's townscape. However, it would be beneficial to see how the proposal sit within the immediate context, especially from key points/sensitive locations at street level.
- From the slides presented Postman's Park seems to be quite affected by the proposed rotunda building – perhaps the rotunda should be slenderer to minimise the impact of the tower over this space. The proposed view along Thomas More Highwalk terrace are also quite affected by the new development and some mitigation measure should be put in place e.g., modify the massing to have a gentler approach towards the residential units within the Barbican; Façade treatment should soften the impact of the new buildings (at the moment they look very corporate) However, it should be noted that in this case the context is not really cohesive in townscape terms
- Overall, the building height proposed is supported in principle. However, because there is a significant increase in building heights and massing on the site, it would be good to understand the effect of the new development over the surrounding area. Sunlight and daylight analysis should explore any potential impacts on both the proposal itself as well as the existing context. In particular, over the residential area within the Barbican and on the proposed courtyards/open spaces within the development.
- Given the height of the buildings I also highly suggest having a microclimate wind study – to avoid any tunnelling effect between the buildings and to the open space at GF level.
- The proposed road realignment increases the public realm in the area reduces the surface allocated to cars. This is a good move from an urban design perspective, but it must be subject to further discussions with TfL - to understand various traffic implications on the wider network

Public Realm / Landscape

- Amphitheatre proposal is supported in principle and public space and landscape proposal seems to be of high-quality good. However, more details should be provided in the future - in particular details on how the proposed public realm helps to celebrate the historical asset within and nearby the site.
- Urban greening factor should be at least 0.3

Materiality and Façade Expression

- I am aware that it is still too early to discuss anything about architectural details, materiality and facades. However, the redevelopment of the Museum of London has the potential/needs to meet very high standard in terms of quality of the buildings and public spaces.
- The development is in a very central and highly historical location so the design should take in consideration all these factors. Also, there is a residential area nearby (Barbican) – so the treatment of the façade should be softened and be more sensitive of the other land uses nearby (at the moment the architectural language is very corporate)

[REDACTED]

Senior Strategic Planner / Urban Design, Growth Strategies + Urban Design

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