GREATER**LONDON**AUTHORITY

(by email)

Our reference: MGLA240124-4964

4 March 2024

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 23 January 2024. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

> I would like to request details of documents and correspondence that have taken place between the Corporation of London and the GLA regarding the development at London Wall West (140-150 London Wall).
>
> I have seen documents that were released under your reference MGLA310811-8347 relating to a meeting that took place on 21st January 2022. In the note of the meeting there are a number of proposals for the developer to refer back to the GLA in advance of making an application. As the application has now been launched (https://londonwallwest.co.uk/), I am requesting access to any documents relating to the discussions with the GLA relating to the development after January 2022 and in particular any that concern Design Review, compliance with Part C of Policy D9 (Tall Buildings) and the whole-life carbon assessment of the project,

Our response to your request is as follows:

Please find attached the information that the GLA holds within the scope of your request. Further information in the form of three presentations are also included on the Disclosre Log link sent to you.

Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA240124-4964.

Yours sincerely

Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:
https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information

GREATER**LONDON**AUTHORITY

Good Growth

[redacted]
City of London Corporation
By Email

Our ref: 2023/0837/S1
Your ref: 23/01304/FULEIA
Date: 5 February 2024

Dear [redacted]

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

London Wall West

Local Planning Authority reference: 23/01304/FULEIA

I refer to your letter received by the GLA on 21 December 2023 consulting the Mayor of London on the above planning application, under the terms of the Mayor of London Order 2008.

The applicant proposes: Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway.

The GLA has been consulted on the application under the provision of Article 4 of the Mayor of London Order (Consultation required by Secretary of State direction), as the proposed development is adjacent to wider setting consultation area the following Protected Vista:

- London Panorama: Alexandra Palace 1A.2 to St Paul's Cathedral

The proposed development is also adjacent to the background assessment area of the following Protected Vista:

- Linear View: Westminster Pier to St Paul's Cathedral 8A.1

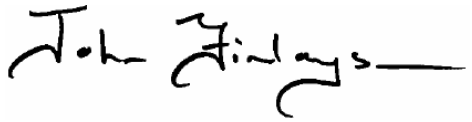
I have assessed the details of the application and, given the scale and nature of the proposals, conclude that the proposals would not result in any impact on the views, or

affect the viewer's ability to appreciate the protected landmark as the development falls outside the protected vistas.

Consequently, under article 5(2) of the above Order the Mayor of London does not need to be consulted on this application.

Your Council may, therefore, proceed to determine the application without further reference to the GLA. I will be grateful, however, if you would send me a copy of any decision notice and section 106 agreement.

Yours sincerely



John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Sakina Sheikh, Chair of London Assembly Planning Committee
National Planning Casework Unit, DLUHC
TfL

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02 December 2021

Our ref: JRA/LLJ/HJH/U0015158
Your ref: 2021/1224

Dear Sir / Madam,

London Wall West
Request for Pre-Planning Application Advice (Level 2)

We write on behalf of our client, the City of London Corporation, to request a pre-planning application advice meeting with officers to discuss the development proposals at London Wall West, Bastion House and Museum of London, 140 and 150 London Wall, EC2 (the 'Site'). The land in question is shown on the enclosed site location plan, prepared by Diller Scofidio + Renfro ("DS+R").

The proposals involve:-

"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 (the north block, new Bastion House and the Rotunda Building) alongside public realm improvements at podium, high walk and ground floor levels, 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."

On the basis of the current proposals, we do not consider that they are likely to be referrable to the Mayor under the provisions schedule 1 of the Town and Country Planning (Mayor of London) Order 2008 (as amended), however it is recognised that the proposals may have potential strategic importance for London and the Implementation of the London Plan. The proposals are linked to the relocation of the current Museum of London which is currently the subject of a separate planning application currently pending consideration (LPA ref: 19/01343/FULEIA, GLA ref: 2020/5429/S1/S1). We are therefore seeking to engage with the Mayor and his Officers at this early stage to seek feedback on the proposals.

Background and Vision

Since 2015, plans were being considered and developed for a new Centre for Music on the Site, once the Museum of London consolidated operations at their new home in West Smithfield Market. Following

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a feasibility study which began in 2018 a number of factors led to the City of London Corporation to cancel the project in February 2021.

The core vision for the redevelopment of the Site is to deliver a commercially led, mixed-use development with a significant cultural and public facing element which promotes social and economic inclusivity and the provision of genuine public benefit at its heart. Designed to be accessible and relevant to a diverse audience and demographic, the development aims to reach beyond the City's traditional boundaries.

The Site lies at the heart of the Culture Mile which is key to unlocking it is the relocation of the Museum of London to West Smithfield. The development aims to be exemplary and respond to current objectives set by the City Corporation in relation to recovery from the pandemic. The Culture Mile is a key initiative which aims to diversify the Square Mile as part of its transformation to a seven day a week economy for the benefit of workers, visitors and residents.

This pre-application request follows initial pre-application discussions and meetings which have been held with City of London Officers. Diller, Scofidio + Renfro ("DS+R"), who were commissioned on the project since the Centre for Music was conceived, have been retained as lead designers for the redevelopment of the Site, with Sheppard Robson appointed as collaborating architects alongside a full project team.

The Applicant team have started separate engagement with Transport for London at a strategic level and we do not wish to discuss transport issues in detail as part of this pre-application request.

Site and Context

The Site is located in the north of the City of London and is bounded by London Wall to the south, Aldersgate Street to the west and the Barbican Estate to the north. The site is comprised of two primary buildings; the Museum of London at 150 London Wall, and Bastion House at 140 London Wall. The Museum of London occupies the entire Site at ground plus three storeys, with Bastion House sitting above a podium and extending upwards.

Several ancillary spaces including the Rotunda, which sits at the south-western corner of the Site atop the existing road gyratory with access provided via highwalk bridges and dedicated lifts, escalators and stairs. Bastion House is accessed from lower ground floor level and podium level. For further information, refer to the pre-application document prepared by DS+R.

After first opening in December 1976, the Museum of London is relocating to Smithfield market to expand its capacity and improve accessibility.

The main buildings that comprise the Site are not located in a conservation area, however the Barbican and Golden Lane Conservation Area lies immediately to the north of the buildings and abuts the red line boundary. Between the site and the Barbican, lies the Ironmongers Hall which is occupied by the Worshipful Company of Ironmongers which is not Listed and is not located within a conservation area.

There are several other conservation areas in the surrounding area; these include Smithfield, Charterhouse Square, Postman's Park and Foster Lane.

In August 2019, the Museum of London and Bastion house was issued a Certificate of Immunity from Listing ('COIL') under the Planning (Listed Building and Conservation Areas) Act 1990 (as amended). The COIL was issued by the Secretary of State to protect the buildings from becoming listed for a certain period. The period of immunity for the buildings is 5 years, expiring in August 2024.

The Site sits within a diverse historic built environment and is surrounded by several Listed Buildings. The Barbican Estate is Grade II Listed, together with the Church of St. Giles Cripplegate, which is Grade I Listed, are both located in close proximity to the north of the Site and sit within the Barbican and Golden Lane Conservation Area. The Barbican is also designated as a Grade II* Registered Park and Garden of special historic interest.

The Barbican is primarily a residential estate, broken down into a series of houses, the closest to the Site being Mountjoy House, Monkwell House, Thomas Moore House, Seddon House and Wallside. The Estate was developed in the post war period following significant bomb damage and in addition to the residential flats, is home to the Barbican Centre, comprised of galleries, cinemas and exhibition spaces and the City of London School for Girls, and independent secondary school.

Adjacent to the east of the Site, as well as in the surrounding area, are several Scheduled Ancient Monuments in relation to the Roman London Wall. The following elements of London Wall are in the vicinity of the Site and comprise above and below ground elements:

- 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.

The Site has an excellent Public Transport Accessibility Level (PTAL) rating 6b with a number of key transport links very accessible to the Site. Barbican Station is located less than a mile to the north of the Site, with St. Paul's Station equidistant to the south along St Martin's Le Grand. Farringdon station is located to the north west and provides access to Thameslink trains and Elizabeth Line services. Moorgate Station is also situated less than a mile to the east of the Site along London Wall.

London Wall is designated as a Borough Distributor Road according to the Local Plan Policies Map B, adopted in January 2015 and updated in September 2020. The City's Transport Strategy, adopted in May 2019, envisages that London Wall will play a significant role in moving road traffic across the Square Mile as a City Access Road.

The Site is not located within any of the London View Management Framework ("LVMF") Landmark Viewing Corridors or Wider Consultation Setting Areas. The existing and proposed buildings at the Site are visible in several designated LVMF River Prospect Views including Hungerford Bridge (17A.1), Waterloo Bridge (15B.1) and Millennium Bridge (13A.1 and 13B.1).

Further detail regarding the existing buildings and surrounding context is set out within the Pre-Application Pack, prepared by DS+R and Sheppard Robson.

Development Proposals

At the heart of the redevelopment proposals is a commercially led development, along with a strong cultural and public facing offer, reinforcing the area as a destination within the Culture Mile. The redevelopment of the Site will include a generous offering of flexible retail space to broaden the appeal of the City as a desirable place to live, work and visit seven days a week.

The main elements of the Site are the redevelopment of Bastion House at ground plus 17 storeys (+87.5 m AOD) to the east of the Site, and the Rotunda building to the south west of the Site at ground plus 13 storeys (+75.03 m AOD), alongside a smaller north commercial building at the north western corner at ground plus four storeys (+38.93m AOD).

It is proposed to provide high-quality, diverse spaces offering distinctive cultural and community uses including provision of affordable workspace and co-working facilities/maker space, ensuring the Site provides a more inclusive cultural offering for the local community and London more widely. It is envisaged at this stage that the land uses would form a mix of Class E, Class F1 and Class F2 including some Sui Generis uses. It is envisaged that these public spaces and uses would have different uses during the day and night to maximise the offer available to members of the public at different times. A 'cultural cap' use is proposed to be located at the top floor of the Rotunda building providing an opportunity to host a variety of diverse, inclusive events and exhibitions for a wide range of people to enjoy.

The three buildings are centred around a generous area of public realm at ground floor and podium level considered the heart of the redevelopment proposals. There are ground floor community, cultural, and commercial uses bordering a plaza space. This space is designed to facilitate the flowing nature of visitor traffic moving north through the Site from London Wall to Aldersgate. Above, the landscape bowl will also help to facilitate the idea of 'layered urbanism' as a core aspect of the spatial strategy of the scheme.

The development proposes the opening up of the Roman Fort Gate, currently within the London Wall Car Park and closed off to the public. It would become a publicly accessible exhibition and make the scheduled ancient monument open to the public adjacent to the upgraded London Wall Garden.

The proposals involve predominantly hard landscaping at grade, with new routes across the site, with more significant green planted elements at upper pedestrian levels. The northern aspects of the Site will contain a wider range of green aspects as opposed to the southern parts of the Site, with the central, cultural bowl acting as a middle point that integrates the differing landscapes. The central outdoor space

will also incorporate an outdoor amphitheatre, further increasing the vast cultural provision on offer at the Site.

The development also proposes the closure of part of the existing gyratory and reconfiguration to provide two-way traffic around the south of the site. The proposals have been developed by the Applicant and discussed at a strategic level with Elena Rhys at Transport for London. This has included detailed junction modelling and traffic capacity testing which is ongoing.

The total area of the development site is currently proposed as approximately 71,000 sqm (GEA) comprising cultural, community and commercial uses.

Policy Summary

Policy SD4 of the London Plan, published in March 2021 sets out the strategic importance of the Central Activities Zone (CAZ) and its strategic functions within Greater London of local, national and international importance. It is noted that a defining feature of the vibrant and distinct character of the CAZ are its arts culture, leisure and entertainment offering, with its varied mix of daytime, evening and night-time uses. Policy SD5 of the London Plan goes on to state that offices and other key CAZ functions are to be given greater weight relative to new residential development.

Strategic Policy S23 of the emerging City of London Local Plan 2036 (publication version, dated March 2021) identifies Smithfield and Barbican as a key area of change set to provide a vibrant, mixed-use environment through the implementation of a cultural quarter, known as Culture Mile, recognised in the new London Plan as a strategic cultural area. The Culture Mile initiative will aim to encourage a culture-led mixed-use development to deliver art and cultural attractions and associated public realm improvements.

Strategic Policy S24 of the emerging Local Plan continues by adding that the City Corporation will promote Culture Mile by encouraging and supporting the potential redevelopment of the current site of the Museum of London on London Wall alongside the relocation of the Museum to Smithfield in order to facilitate the redevelopment of the site. The provision of cultural facilities and uses within buildings will be encouraged and public realm improvements to address increased pedestrian flows and visitor numbers to, from and within Culture Mile are also supported by the City.

Strategic Policy S12 of the emerging City Plan defines tall buildings within the City of London as those over 75m Above Ordnance Datum (AOD). It is noted that tall buildings of world class architecture and sustainable, accessible design will be encouraged on suitable sites. These buildings must have regard to the character and amenity of their immediate surroundings, the impact on the significance of heritage assets and their immediate wider setting and the provision of a high-quality public realm at street level. New tall buildings must enhance permeability and provide the maximum feasible amount of open space at street level and incorporate areas of publicly accessible open space.

Summary

We wish to discuss the following with your Planning, Design and Energy and Sustainability Officers:-

1. Principle of Redevelopment;
2. Approach to height and massing;
3. Mix of land uses across the site;
4. Proposed Energy Strategy;
5. Feedback on design;

In support of this request, we have submitted the following documents:-

- Pre-Application Document, prepared by Diller, Scoficio + Renfro and Sheppard Robson;
- Site Location Plan, prepared by Sheppard Robson;
- Completed pre-application payment form and City of London Purchase Order Number (ref. PO:949250);

The requisite fee of £10,000 (excluding VAT) will be paid by BACS on receipt of the invoice. We trust that this is sufficient to allow this request to be validated and allocated and we look forward to discussing the proposals with you. Please contact [redacted] or [redacted] of this office should you have any queries.

Yours faithfully,

Gerald Eve LLP

Gerald Eve LLP
[redacted]geraldeve.com
[redacted]

GREATER**LONDON**AUTHORITY

Good Growth

[redacted]

Our ref: 2021/1224/P2I
Date: 29 June 2022

By email

Dear [redacted]

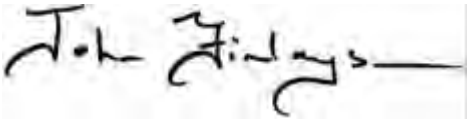
Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

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



John Finlayson

Head of Development Management

cc [redacted] Deputy Head of Development Management
TfL

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

GREATER**LONDON**AUTHORITY

pre-application report 2021/1224/P2I

29 June 2022

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	*London Plan*;
• Culture/tourism and leisure	*London Plan*;
• Office	*London Plan*;
• Urban design	*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*;
• Inclusive access	*London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG*;
• Heritage	*London Plan; World Heritage Sites SPG*;
• Sustainable development	*London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; London Environment Strategy*; and,

- 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 reprovision of cultural uses at the site is welcomed but will need to considered alongside the relocation details of the existing Museum of London. Subject to the appropriate relocation/reprovision 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 rage 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):
[redacted] Principal Strategic Planner (case officer)
email: [redacted]London.gov.uk
[redacted] Team Leader – Development Management
email: [redacted]London.gov.uk
[redacted] Deputy Head of Development Management
email: [redacted]London.gov.uk
John Finlayson, Head of Development Management
email: J[redacted]@London.gov.uk
Lucinda Turner, Assistant Director of Planning
email:[redacted]@London.gov.uk

[redacted]

From: [redacted] <[redacted]cityoflondon.gov.uk>
Sent: 21 December 2023 10:40
To: John Finlayson
Cc: [redacted]
Subject: London Wall West planning application referral - LPA Ref. 23/01304/FULEIA, GLA Ref. 2023/0837

Good morning John,

Just to let you know that we have just submitted the Stage 1 Referral for the planning application for London Wall West (140-150 London Wall) on the GLA Portal. We have referred it on Cat. 4 although it sits *just* outside the LVMF and St Paul's Heights zones. It is a highly sensitive scheme amongst local residents.

Please let [redacted] or myself know if you have any questions.

Kind regards,
[redacted]

[redacted] | [redacted]
Senior Planning Officer (Development Management and Design)
Development Division
Environment Department
Tel: [redacted]

Environment Department
City of London Corporation

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

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THIS IS AN EXTERNAL EMAIL

Hi [redacted]

I am just writing to let you know that this Stage 1 was previously allocated to my colleague in error, but has now been re-allocated to me given my previous involvement on the case at pre-app stage.

I note the 6-week deadline is 31 January due to it being referred just before Christmas on 21 December. I won't be able to meet this deadline, but will do my best to look at it as soon as possible. At this stage, I estimate it may be able to go to the Mayor on 19 February however, I will keep you informed if this changes. Apologies for the delay.

What I can do at this stage to help the applicant resolve any issues we will raise ahead of you finalising your assessment is share some technical feedback with you for the applicant team to get started on.

I hope that's helpful.

Kind Regards,

[redacted]

Senior Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
Union Street, London SE1 0LL

[redacted]

From: [redacted]
Sent: 20 June 2022 17:50
To: [redacted]
Cc: [redacted]
Subject: RE: London Wall West

Hi all

By way of update – I expect this to be issued this Thursday.

Sincerely

[redacted]

Principal Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
169 Union Street, London SE1 0LL
077[redacted]

london.gov.uk
[redacted]london.gov.uk

From: [redacted] <[redacted]geraldeve.com>
Sent: 13 June 2022 12:01
To: [redacted] <[redacted]london.gov.uk>; [redacted]
<[redacted]london.gov.uk>
Cc: [redacted] <[redacted]geraldeve.com>
Subject: London Wall West

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[redacted]

When can we expect pre-application feedback on this project.

The meeting was almost 5 months ago.

Many thanks,

[redacted]

[redacted]
Partner

Tel. +44 207 333[redacted]
Mobile. +44 776[redacted]

[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London W1G 0AY
www.geraldeve.com

-----Original Appointment-----
From: Pre-applications <Pre-applications@london.gov.uk>
Sent: 21 December 2021 17:16
To: Pre-applications; [redacted]; Energy Officers; Urban Design Team; Spatial Planning; [redacted]
Cc: [redacted]
Subject: 2pm Confirmed: London Wall West
When: 21 January 2022 14:00-16:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.
Where: Microsoft Teams Meeting

CAUTION: This email originated from a sender outside the Firm. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi all,

This meeting has been confirmed by the agent. Please contact your case officer, [redacted] if you have any queries.

GLA reference number: 2021/1224/P2I
Site name: London Wall West
Address: 140-150 London Wall
Local Planning Authority: City of London
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 (the north block, new Bastion House and the Rotunda Building) alongside public realm improvements at podium, high walk and ground floor levels, 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
Case officer: [redacted]

Kind regards
[redacted]

LONDON WALL WEST

GLA MEETING - ADDITIONAL INFORMATION

16.02.23

DILLER SCOFIDIO + RENFRO
SHEPPARD ROBSON
BURO HAPPOLD
GROSS.MAX.

1 EMBODIED CARBON REDUCTION - STRUCTURE

2 EMBODIED CARBON REDUCTION - FACADE

3 DAYLIGHT ASSESSMENT

4 HEAT GAIN / LOSS ANALYSIS

5 PASSIVE SOLAR SHADING

6 IMPACT OF EXTERNAL SHADING ON COOLING LOADS

7 MIXED MODE VENTILATION & OPERATIONAL ENERGY SAVINGS

8 CLIMATE RESILIENCE

AGENDA

EMBODIED CARBON REDUCTION - STRUCTURE

Structural Embodied Carbon Principles

- Lean design principles embedded
  - maintain structural simplicity
  - eliminate transfer structures where possible
  - refine loading criteria, balanced with robustness and adaptability considerations
  - refine and maximise structural utilisation at each design stage
  - optimise structural grid and arrangement, including column position and inclination
- Study materiality and alternative construction methods in early stages to optimise
- Use cement replacement (GGBS) to a high level in concrete
- Use high strength steel to reduce overall steel tonnage
- Explore opportunities for component reuse and engagement with circular economy
- Stay aware to technological and market advancement in manufacturing and material processing in timescale of project design stages

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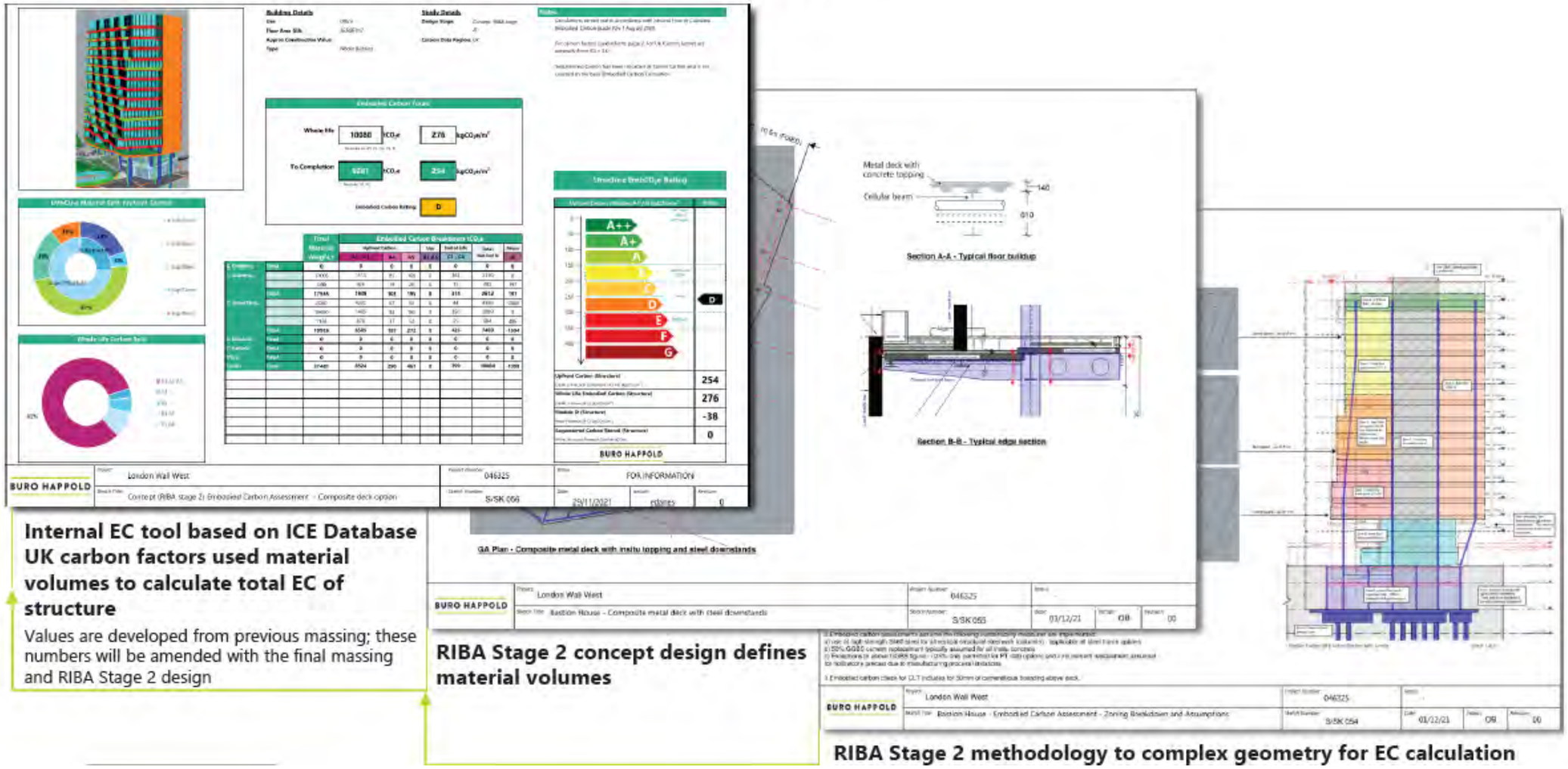
Structural Embodied Carbon Process



Internal EC tool based on ICE Database UK carbon factors used material volumes to calculate total EC of structure

Values are developed from previous massing; these numbers will be amended with the final massing and RIBA Stage 2 design

RIBA Stage 2 concept design defines material volumes

RIBA Stage 2 methodology to complex geometry for EC calculation

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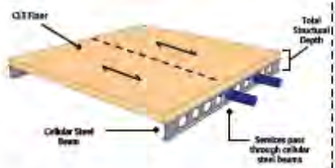
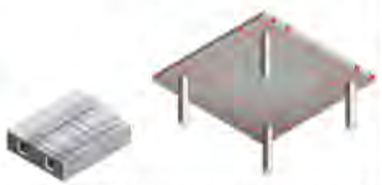
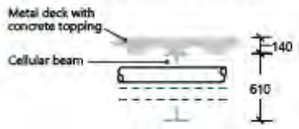
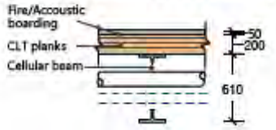
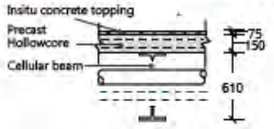
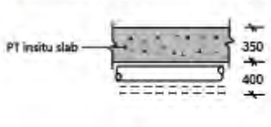
	COMPOSITE DECK ON STEEL	CLT SLAB ON ON STEEL DOWNSTAND	PRECAST HOLLOWCORE PLANKS ON STEEL DOWNSTAND	POST-TENSIONED (PT) INSITU CONCRETE FLAT SLAB
ALL BASED ON A BLENDED STRUCTURAL GRID (9m x 9m) - (12m x 12m)				
Slab/frame/MEP section				
Structural / MEP zone	750mm	860mm	835mm	750mm
Typical floorplate weight	310 kg/m²	190 kg/m²	470 kg/m²	880 kg/m²
Load to foundations	Moderate	Light	Moderate	Heavy
Sub+Superstructure Embodied Carbon kgC02e/m2 (A1-A5 Cradle to PC)	254 $kgCO_2e/m^2$	231 $kgCO_2e/m^2$ (90 $kgCO_2e$/m2 stored)	255 $kgCO_2e/m^2$	269 $kgCO_2e/m^2$
Fire Strategy	Steel intumscently painted. Deck inherent fire protection.	CLT boarding protection. Complex Fire Engineered design approach. Insurance risk. Steel intumscently painted	Steel intumscently painted. Deck inherent fire protection.	Slab inherent fire protection.
Vibration Acoustics		Lack of composite action reduces steel vibration design efficiency.		Slab inherent robustness.
Constructability / Complexity		No wet trades on site Easy service fix	Bespoke planks required to form the sawtooth geometry	Site-intensive construction. PT tendon stressing complexities. Post-construction modifications difficult.
Erection Programme		No wet trades on site Easy service fix		Site-intensive construction. Significant insitu concrete works with associated formwork and concrete delivery requirements.
Possible efficiencies?	Increasing structural steel zone to 650mm for lower long-span areas gives carbon and cost savings	Wet surface screed potentially improves vibration performance.		Reducing slab thickness to 300mm for upper short-span areas gives carbon and cost savings
Structure cost (QS input required)	65 kg/m2 average floorplate steelwork weight	65 kg/m2 average floorplate steelwork weight	55 kg/m2 average floorplate steelwork weight	

BURO HAPPOLD	Project: London Wall West		Project Number: 046325	Status: -	
	Sketch Title: Structural system overall comparison		Sketch Number: S/SK 063	Date: 01/12/21	Initials: OB / Revision: 00

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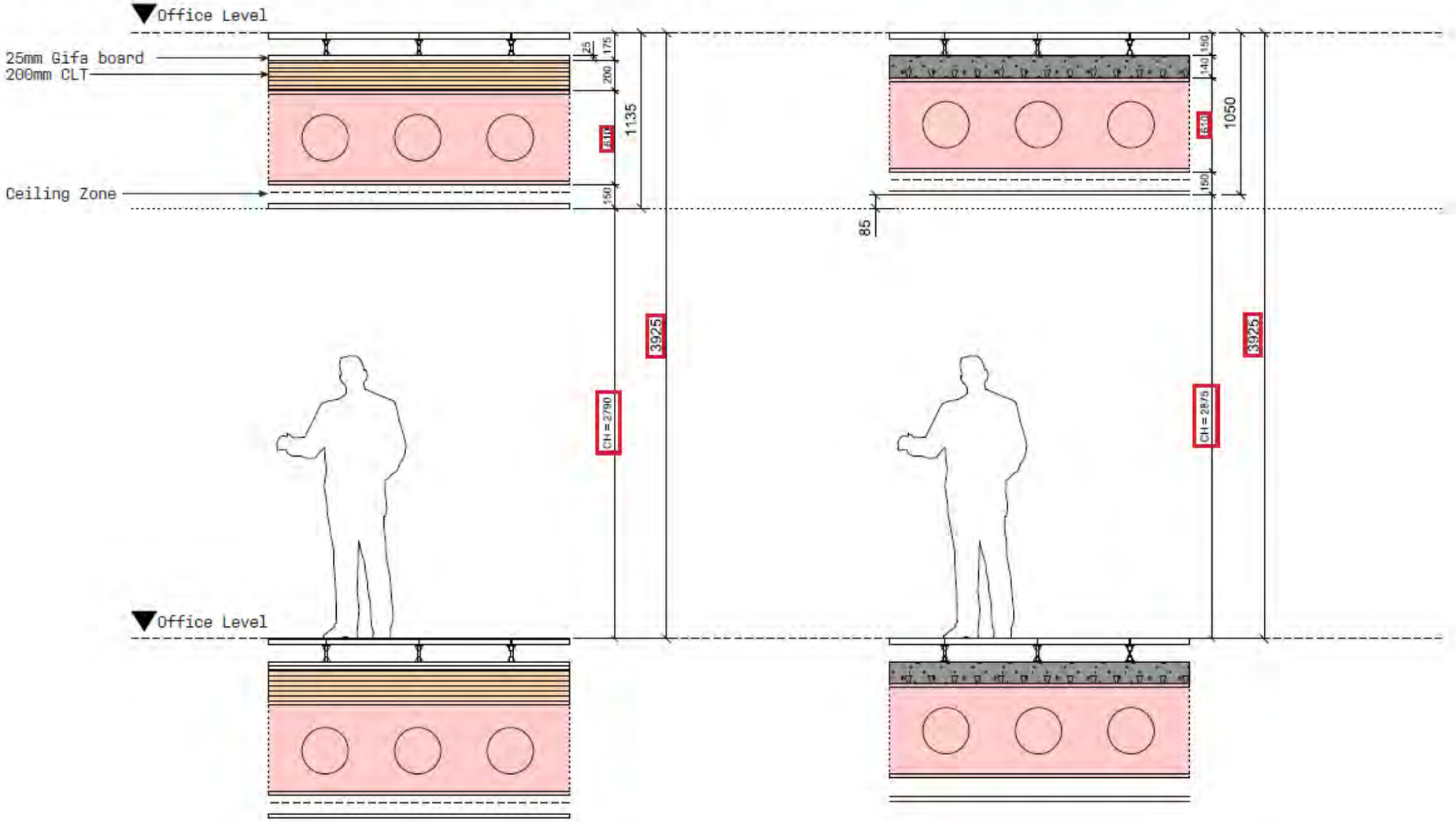
TYPICAL OFFICE FLOOR CONSTRUCTION

Bastion House / Rotunda - 610 mm Structural Zone



CLT **Composite metal decking**

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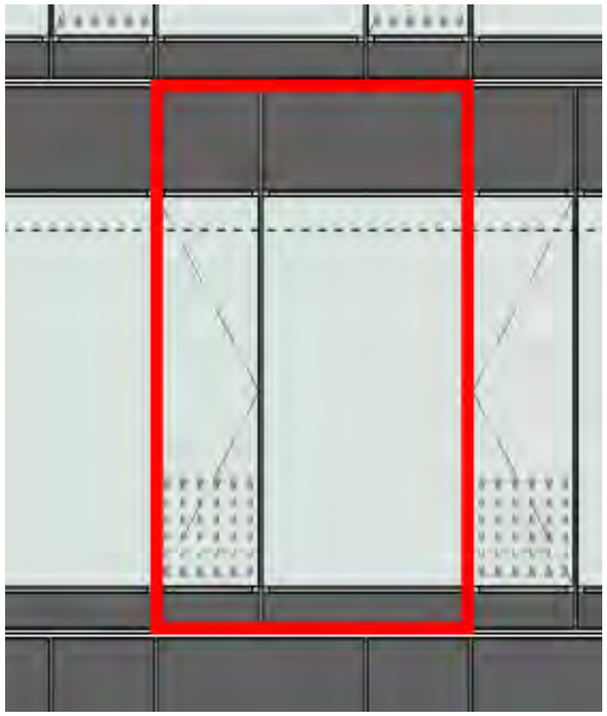
EMBODIED CARBON REDUCTION - FACADE

Husk Façade bay



Typical repetitive Module Assumed 2.25m x 4m with Fins every 0.75m

Note: Internal balustrade not included, a transom has been assumed at 850mm height, reducing the opening vent size

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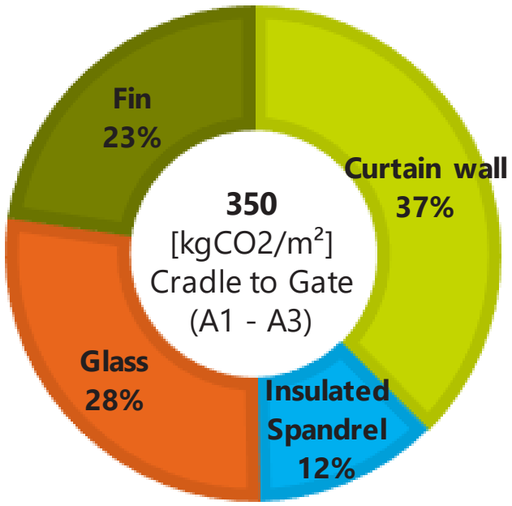
Husk Façade comparison

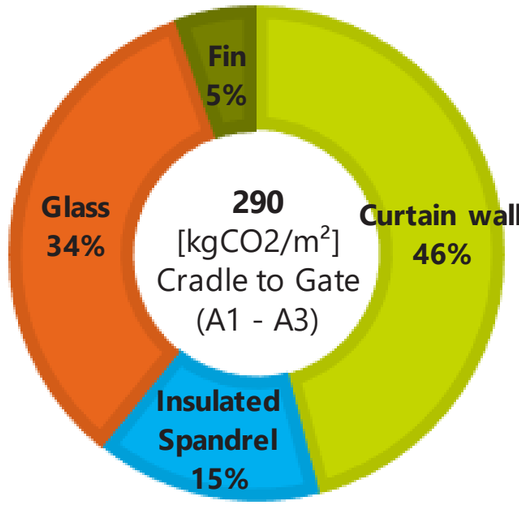
Note: The approximate area for typical unit→ 9 m² (assumed 2.25m x 4m)

Unitized curtain wall with **Aluminium Fin**



*Approximate **weight/m2→100 kg***

Unitized curtain wall with **GRC Fin**



*Approximate **weight/m2→115 kg***

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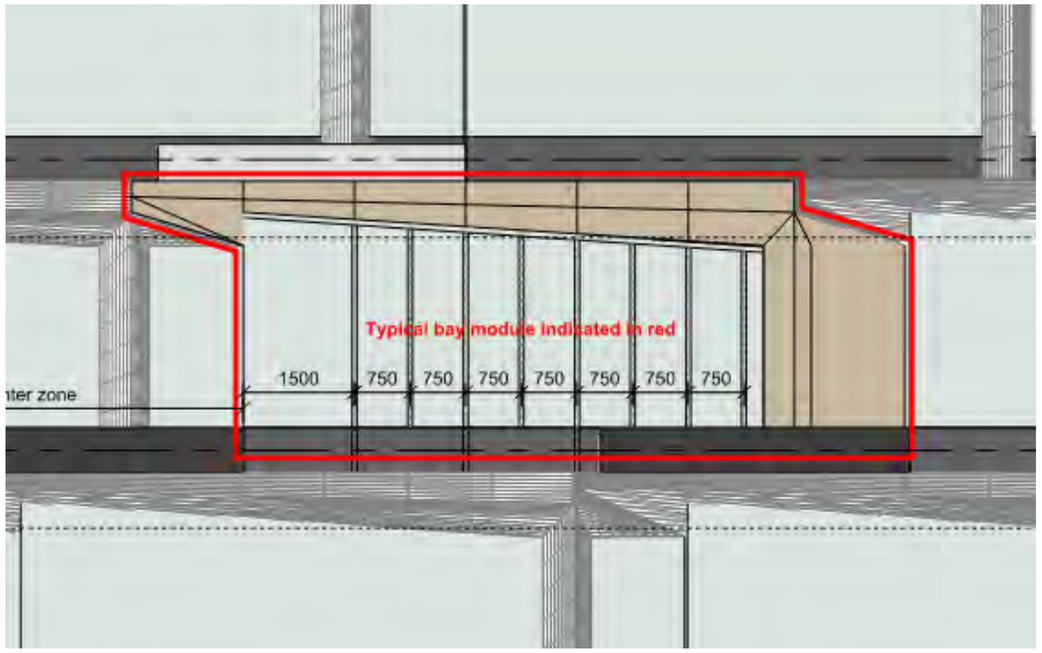
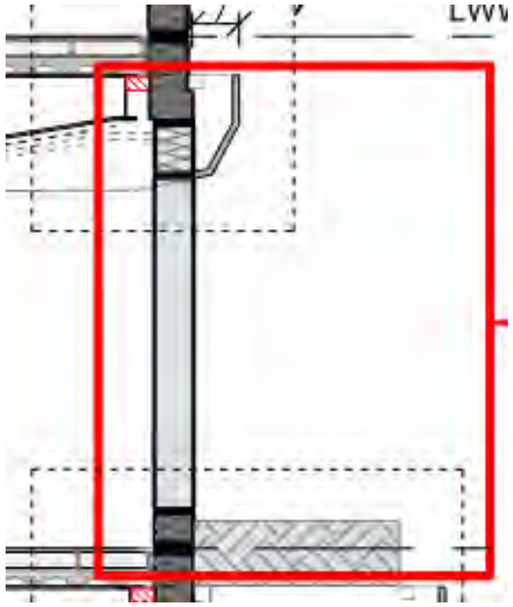
Inner Façade bay





Typical module bay Assumed 2.25m x 4m with Fins every 0.75m

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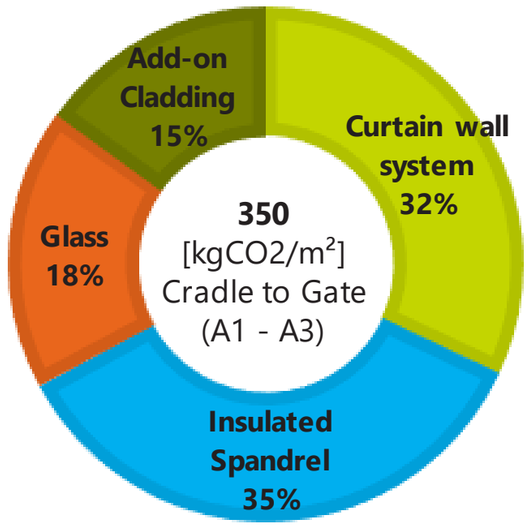
Inner Façade comparison – Curtain Wall

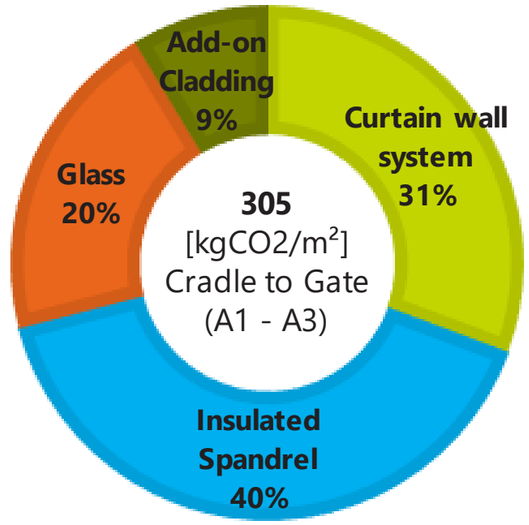
Note: Approximate area for typical Bay→ 40 m²
21m² solid, ***16m² add-on cladding including metallic coping***

Unitized curtain wall with **Aluminium Cladding**



Approximate ***weight/m2→85 kg***

Unitized curtain wall with **GRC Cladding**



Approximate ***weight/m2→95 kg***

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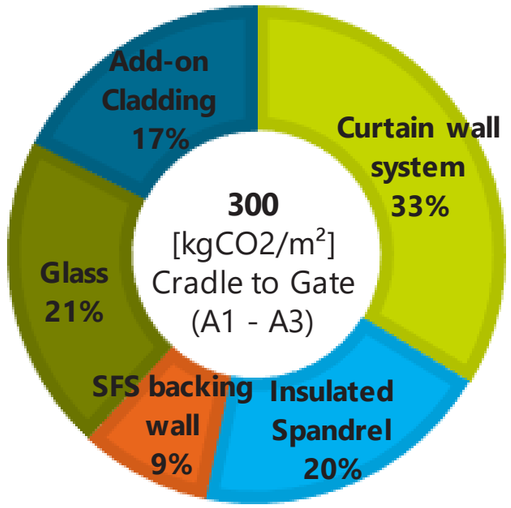
Inner Façade comparison – Window Wall

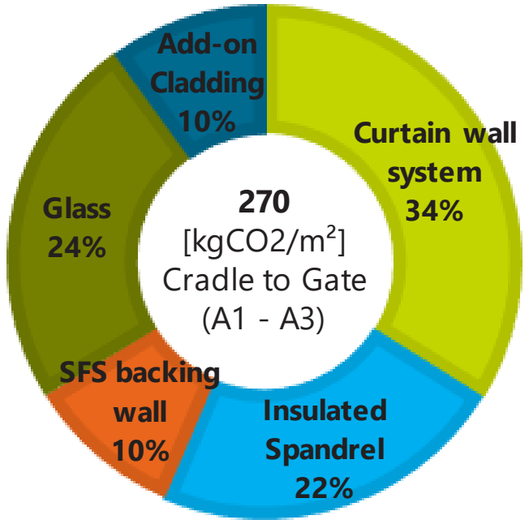
Note: Approximate area for typical Bay→ 40 m²
*21m² solid, **16m² add-on cladding including metallic coping***
Insulated SFS assumed only behind add-on cladding

Window wall system with **Aluminium Cladding**



*Approximate **weight/m2→90 kg***

Window wall system with **GRC Cladding**



*Approximate **weight/m2→100 kg***

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Curtain wall vs Window-Wall

	Option 1: Curtain Wall system	Option 2: Window Wall system
Thermal performance	Main thermal bridges due to aluminium frame. Strategy to minimise frame can be implemented	Multiple thermal weak points due to large quantity of steel (SFS & brackets). Option to minimize impact with thermal breaks at brackets or extra layers of insulation. Window wall system likely required to achieve more stringent U-value targets (internal area loss)
Support Strategy	System installed in front of the primary structure, supported at the top and restrained at the base, Brackets can be either front fixed or installed on top of slab	Base supported glazing with SFS backing wall in correspondence of solid rainscreen fascia. Likelihood of installing large quantities of brackets for rainscreen support.
Weather tightness	Option to prefabricate joints off-site with reduced on-site sealant works.	Joints to be sully sealed on-site. Risk of compromised end-result performances due to poor interface coordination.
Weight	~95kg/m2	~100kg/m2
Installation	Installation does not require scaffolding and is faster compared to option 2 due to higher level of prefabrication. Installation less reliant on on-site workmanship with higher ensured quality.	Installation requires external access through scaffolding or vertical mast climber. More extensive works on-site. Option to prefabricate SFS panels off-site.
Procurement	Less contractor available in the region compared to option 2, especially if unitised curtain wall is preferred over stick solution. Installation package likely to be from unique contractor.	Wall type diffused in the region with multiple contractors optioneering. Installation packages could be broken down into different contractors.
Cost	More fixed price range due to higher prefabrication and reduced installation program	Higher variance due to supply chain constraints and installation program

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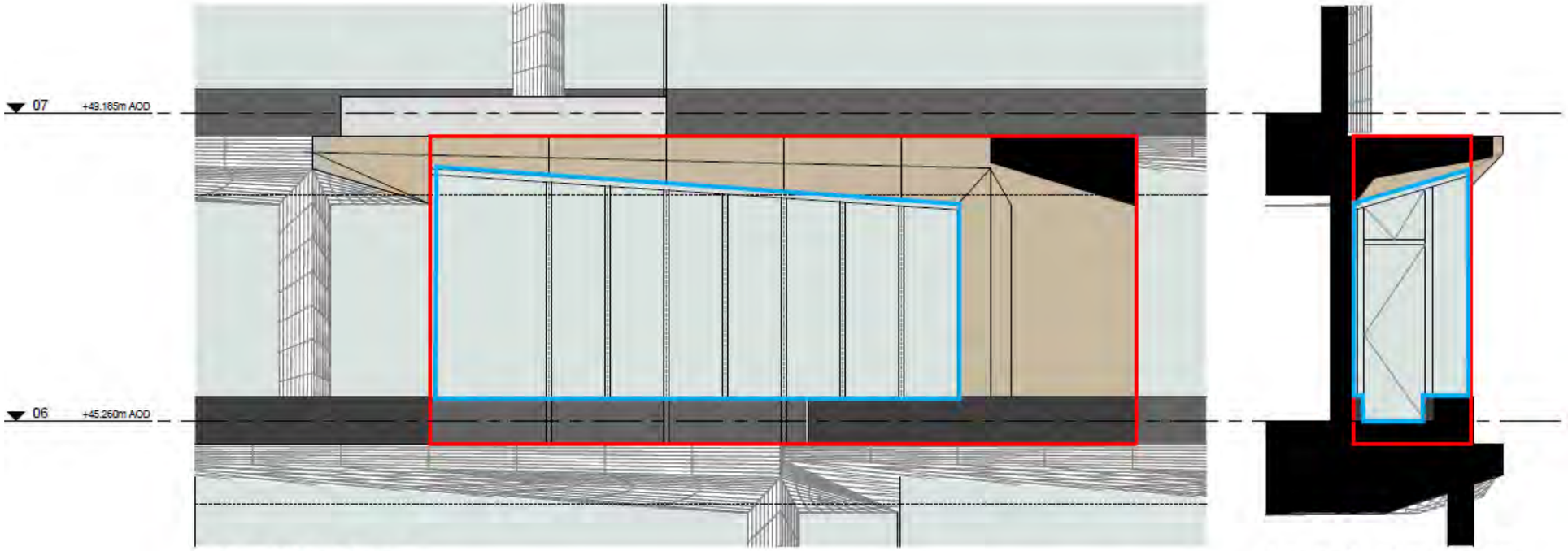
Inner Facade - Insulated wall/spandrel vs Vision glass ratio



Long Elevation

Reveal elevation

	sqm	%
Long elevation	35	100%
Insulated wall/spandrel	17	**49%**
Vision Glass	18	**51%**

	sqm	%
Reveal (short) elevation	5.8	100%
Insulated wall/spandrel	1.5	**26%**
Vision Glass	4.3	**74%**

	sqm	%
Total area of typical bay	40.8	100%
Insulated wall/spandrel	18.5	**45%**
Vision Glass	22.3	**55%**

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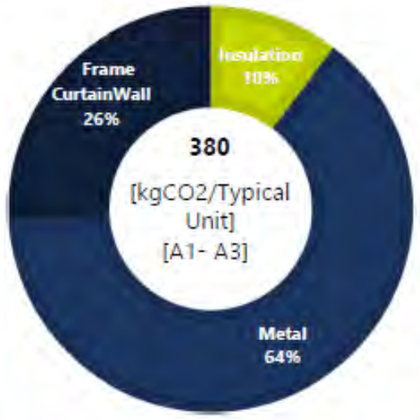
Assessment of embodied carbon of solid wall vs glazed infill panel

Note: The approximate area for typical unit→ 4 m² (assumed 1.5m x 2.7m)

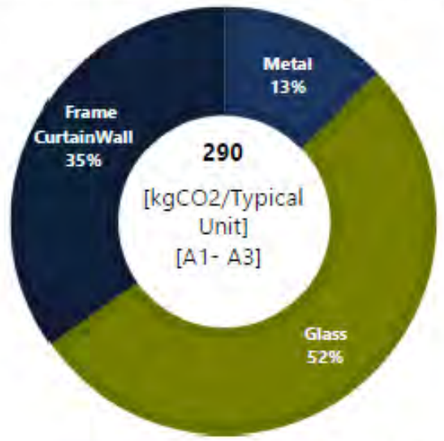
Solid vs Glazed infill panel

Unitized curtain wall with **solid infill** panel



Approximate ***weight per unit→220 kg***

Unitized curtain wall with **glazed infill** panel



Approximate ***weight per unit→450 kg***

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DAYLIGHT ASSESSMENT

Daylighting study

Metrics

A initial daylight glare study has been undertaken to evaluate the performance of the buildings in terms of natural light penetration and potential glare issues. The top and low floor plates of each building have been analysed to illustrate the different daylight levels and glare conditions. Top floors are considered as worst case scenarios in regards of glare and overheating risk.

The methodology followed for the analysis was based on the Useful Daylight Illuminance (UDI). Useful Daylight Illuminance (UDI) is defined as the annual occurrence of illuminance across the work-plane that is within a range considered 'useful' by occupants. It is expressed as a percentage of occupied hours. UDI provides a greater detail about daylight distribution.

LOW levels of daylight - Supplementary (UDI-s)	GOOD levels of daylight - Autonomous (UDI-a)	HIGH levels of daylight - Exceeded (UDI-e)
Poor daylight – artificial lighting required <100 lux	Good daylight 100 – 3000 lux	**Excessive daylight – risk of glare and/or overheating** >3000 lux

Exceeded (UDI-e) will be used as an initial indicator for glare and overheating risk in both Rotunda and Bastion House buildings.

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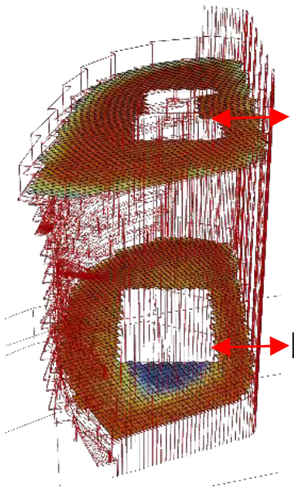
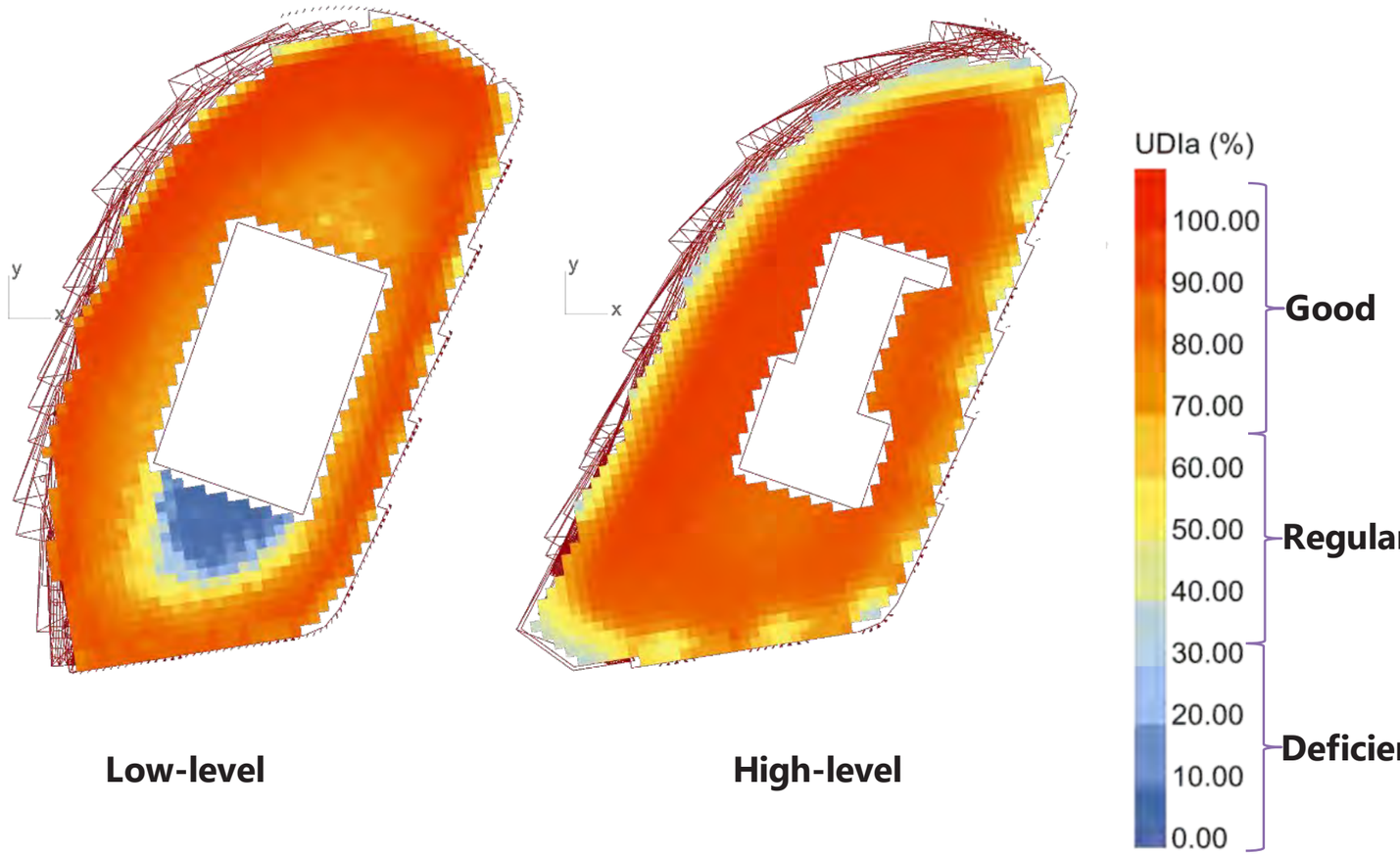
Daylighting study – Bastion House

Update 2022 12 02



UDIa (autonomous)
% of occupied time between 100 Lux and 3000 Lux



Low-level **High-level**

Floor	DF Average %	UDIa Average %
Low level	2.6	74.8
High-level	6.0	77.8

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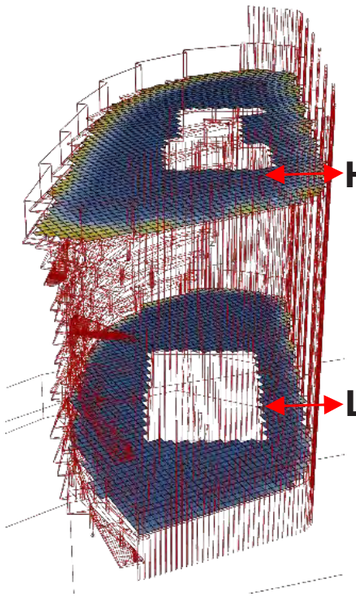
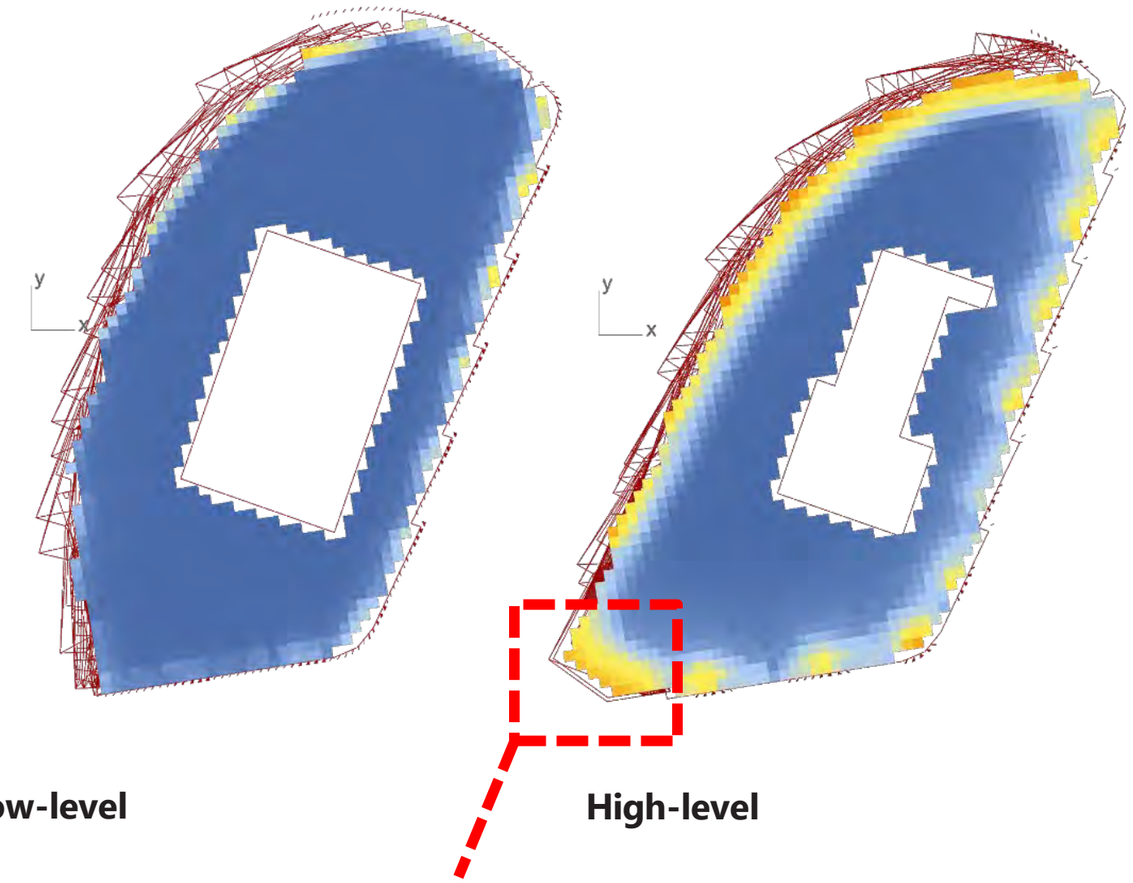
Glare study – Bastion House

Update 2022 12 02



Floor	UDIe Average %
Low level	3.4
High-level	15

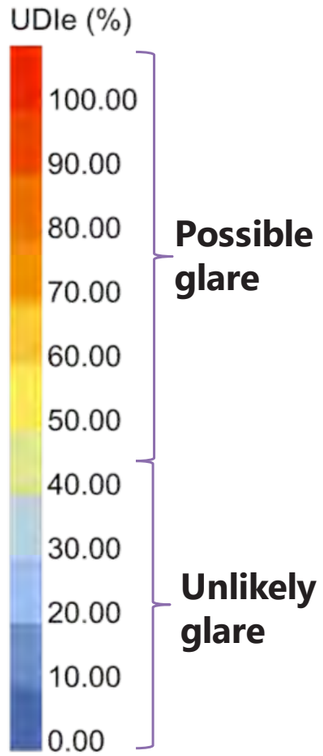
UDIe (exceeded)
% of occupied time above 3000 Lux



Low-level

High-level

Possible glare where external fins are not applied



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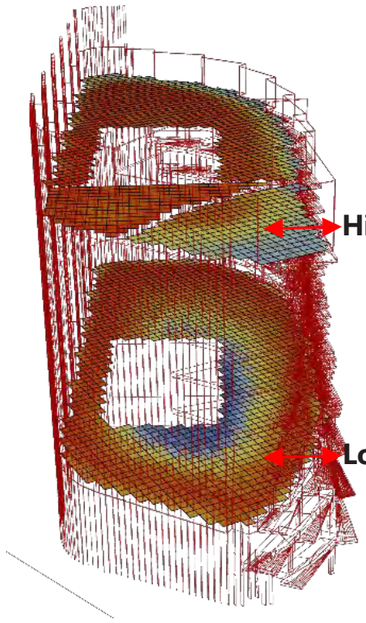
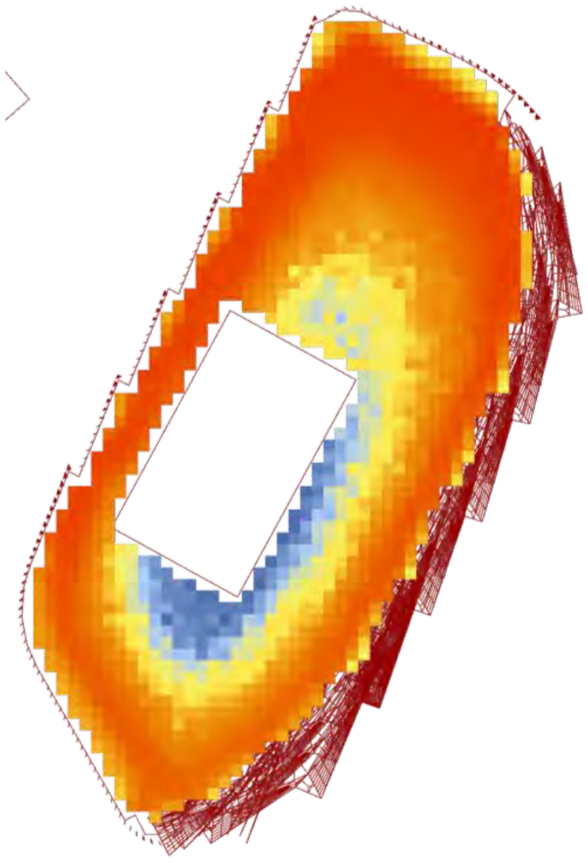
Daylighting study – Rotunda building

Update 2022 12 02

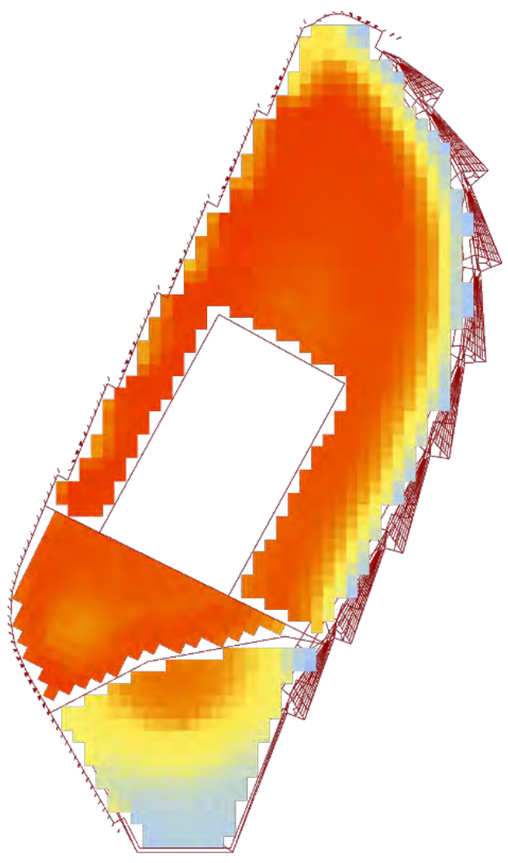


	DF Average %	UDIa Average %
Low level	2.39	69.4
Cultural space	9.3	48.6
Cultural space lobby	3.6	85.1
Office High level	6.4	77.3

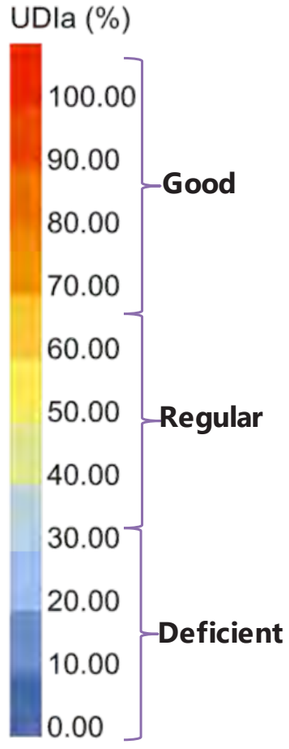
UDIa (autonomous)
% of occupied time between 100 Lux and 3000 Lux



Low-level



High-level



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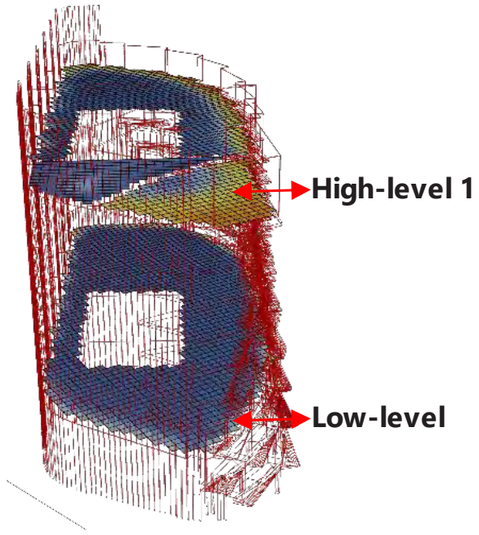
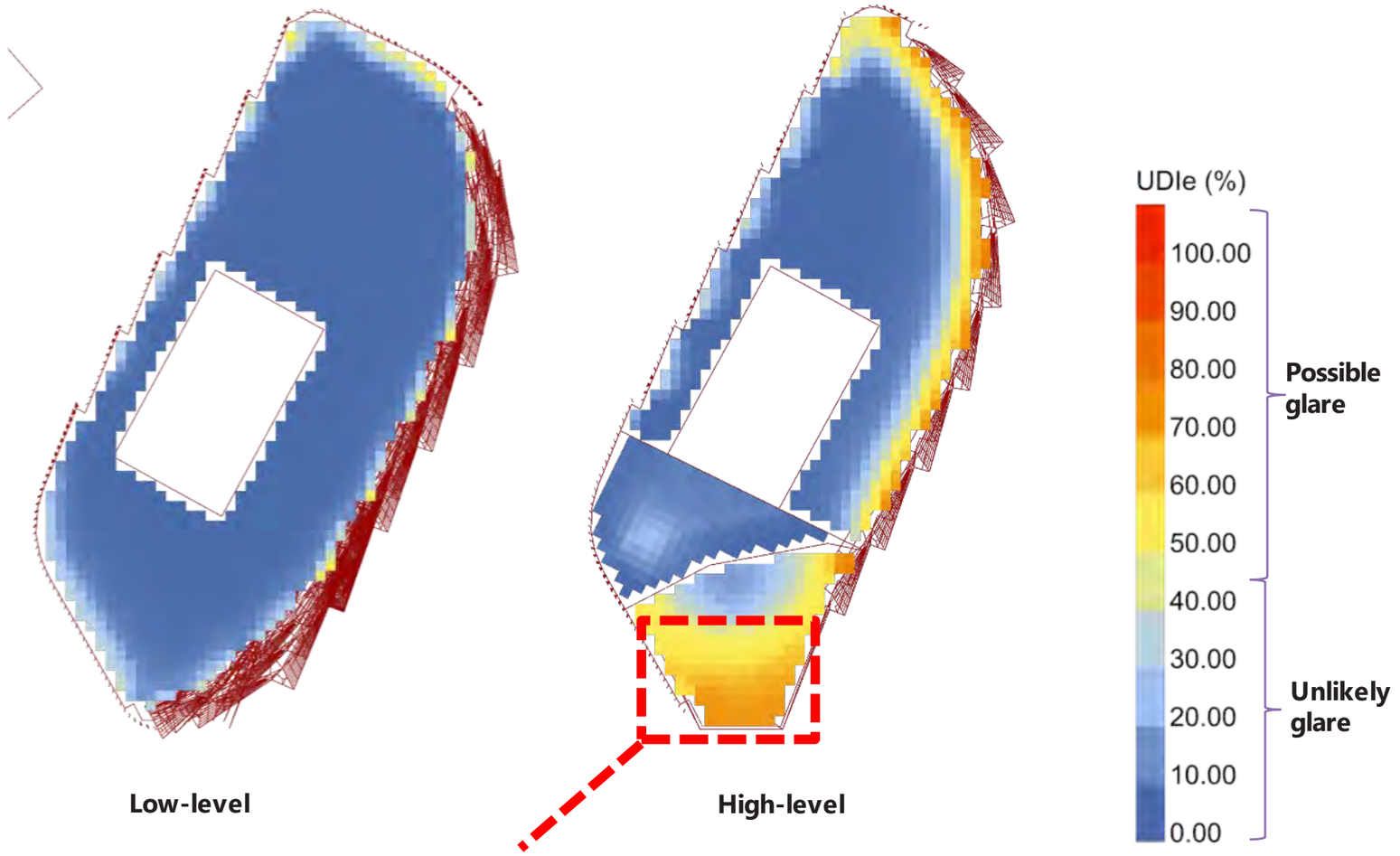
Glare study – Rotunda building

Update 2022 12 02



	UDIe Average %
Low level	3.97
Cultural space	46.9
Cultural space lobby	6.12
Office High level	15.56

UDIe (exceeded)
% of occupied time above 3000 Lux



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Conclusions

Bastion House

- Low level, as expected, shows an area with low levels of daylight access, to the south of the core due to the depth of the floor plan. It is recommended to locate spaces with low daylight requirements (meeting rooms) in that area. Glare risk is minimized with the presence of GRC panel on each façade bay.

- High level shows adequate daylight access. There is risk of glare due to the absence of shading on the west façade on that level.

- Daylight results of the floors analysed are compliant with BREEAM He01 credit.

Rotunda Building

- Low level, as expected, shows an area with low levels of daylight access, to the south and east of the core due to the depth of the floor plan. It is recommended to locate spaces with low daylight requirements (meeting rooms) in that area. Glare risk is minimized with the presence of GRC panel on each façade bay.

- High level shows adequate daylight access in the office space and the lobby of the cultural space. There is high risk of glare due to the absence of shading on the south-east façade and the double height glazing on the cultural space.

- Daylight results of the floors analysed are compliant with BREEAM He01 credit. Solar protection in the cultural space south-east façade is recommended.

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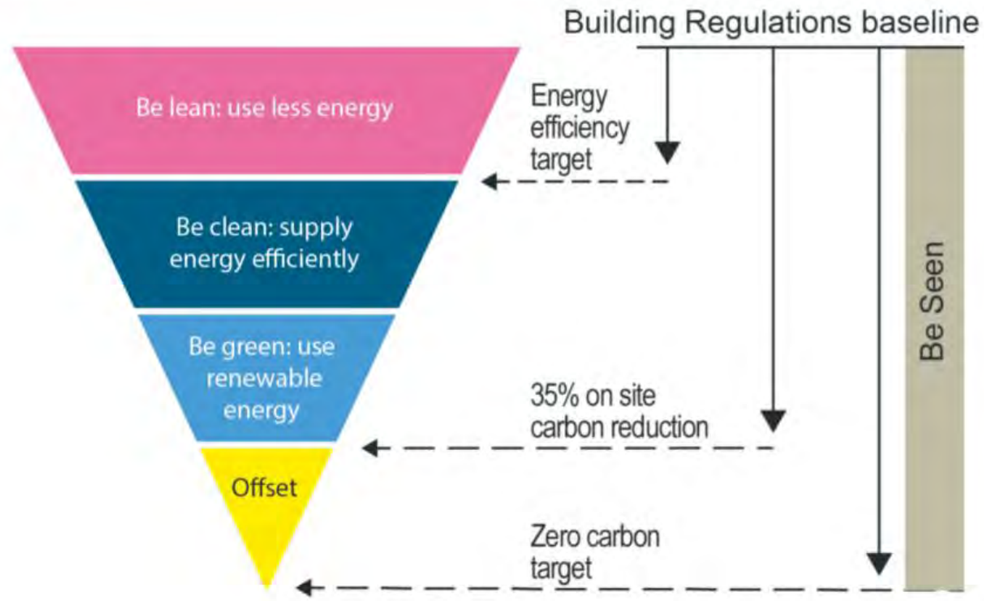
HEAT GAIN / LOSS ANALYSIS

Passive Design

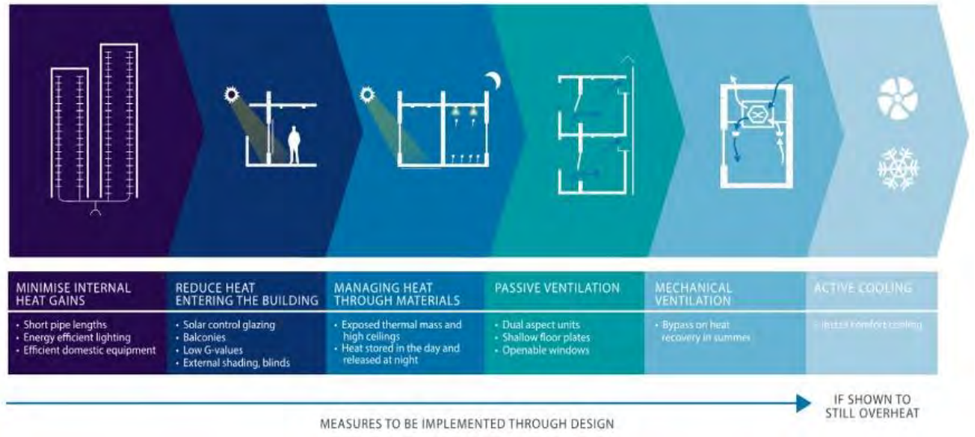
PartL2A New-build:

- 15% for non-domestic from passive measures
- Adopt GLA cooling hierarchy
- Modelling with 2020 weather files
- Optimise daylighting in offices: ADF of 2% and reduce glare risk
- Enhance mixed mode, using a combination of natural and mechanical ventilation
- BREEAM Ene04 credit – Low Carbon Design



Ambitions:

- Exceed 15% target for passive energy
- Exceed ADF of 2% whilst preventing overheating and glare discomfort
- Use modelling to maximise Useful Daylight Illuminance
- 2050 Weather files



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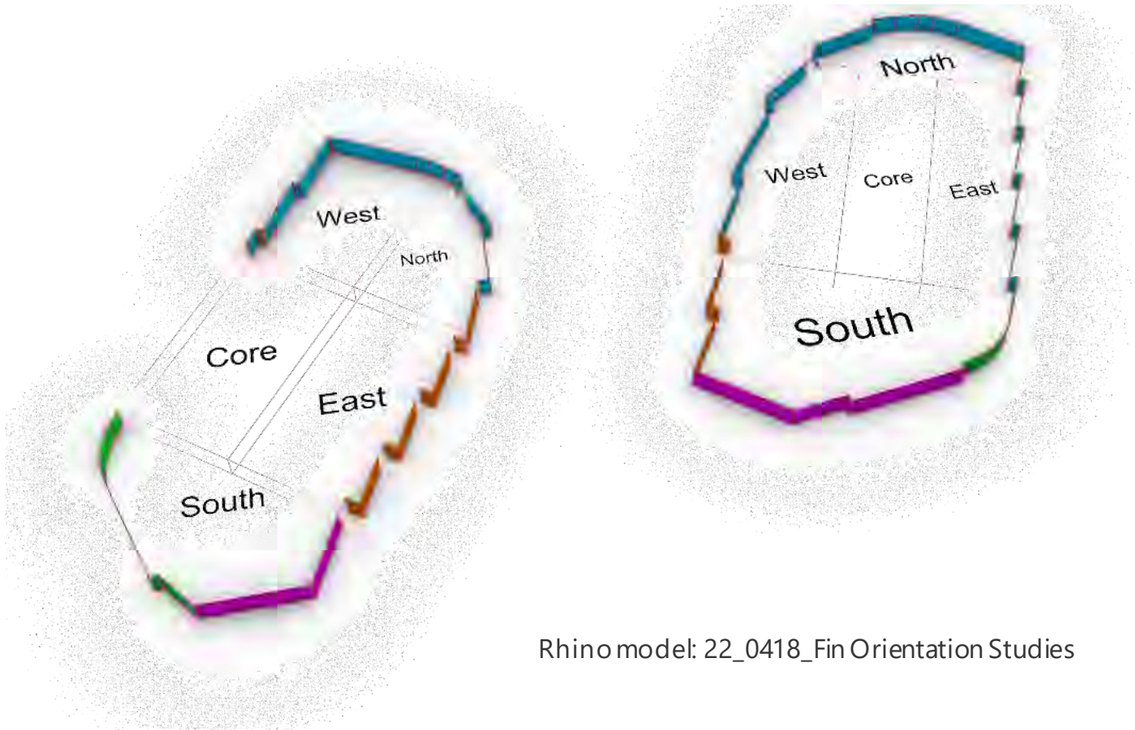
PASSIVE SOLAR SHADING

Modelling input and the solar shading scenarios with fin rotation

Four thermal modelling scenarios have been analysed:

- **Baseline:** No fins
- **Scenario 1:** Fin orientation @90degrees to glazing
- **Scenario 2:** Fin orientation @+45degrees to glazing
- **Scenario 3:** Fin orientation@-45degrees to glazing

Table 1 summarises the thermal properties of glazing to calculate the solar gains and cooling loads.



Rhino model: 22_0418_Fin Orientation Studies

Thermal and solar properties			
Building element	**Inputs**		**Solar transmittance**
External shading orientation	**90**		-
	+45		
	-45		
Glazing	Light transmittance%	**South**	**0.21-0.3**
		South East	**0.3**
		North East	**0.33**
		South West	**0.21**
		North West	**0.33**
		North	**0.33**
Internal Loads for a office open plan	People	0.057	**People/m^2**
	Lighting	6.6	**W/m^2**
	Equipment	7.6	**W/m^2**
	Setpoint	cooling	**24°C**
		heating	**21°C**

Table 1

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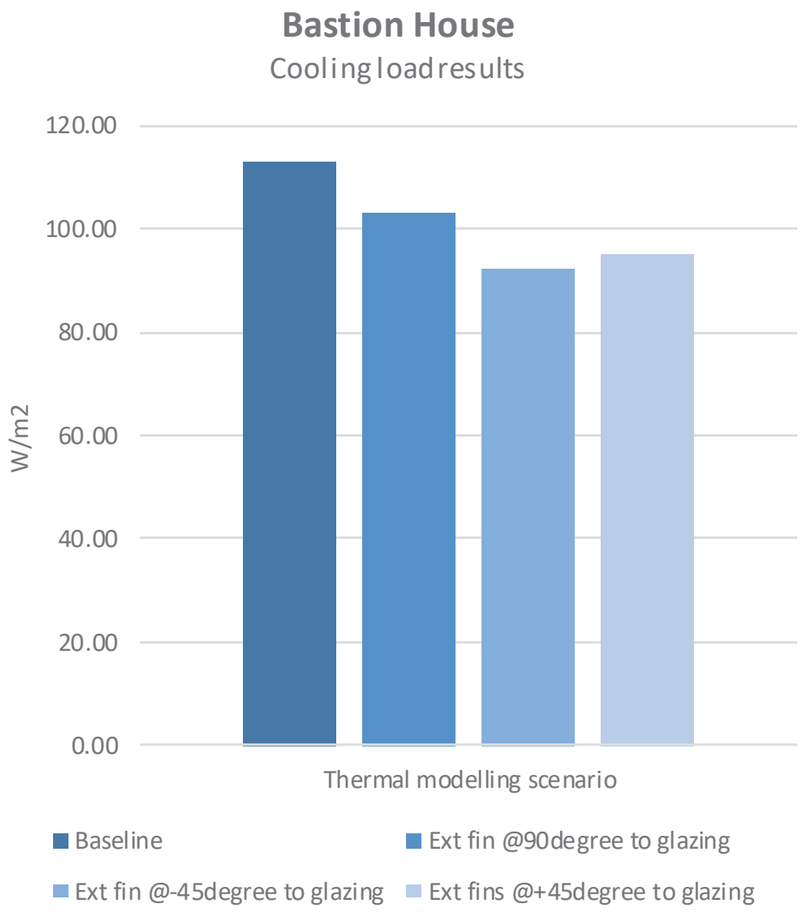
IMPACT OF EXTERNAL SHADING ON COOLING LOADS

Cooling load reduction with passive solar shading

Table 4_Cooling load reduction with external solar shading
Bastion House - typical open plan office

Thermal Modelling scenario	*Fin rotation*	*Thermal zones with fins*	*Cooling load (W/m2)*	*Cooling load reduction (%)*
Baseline	No fins	South/East/North	113	
Scenario 1	90	South/East/North	103	**9%**
Scenario 2	-45	South/East/North	92	**18%**
Scenario 3	+45	South/East/North	95	**16%**

Scenario 2 with external fins rotation at -45degree to glazing showed 18% reduction in cooling loads.



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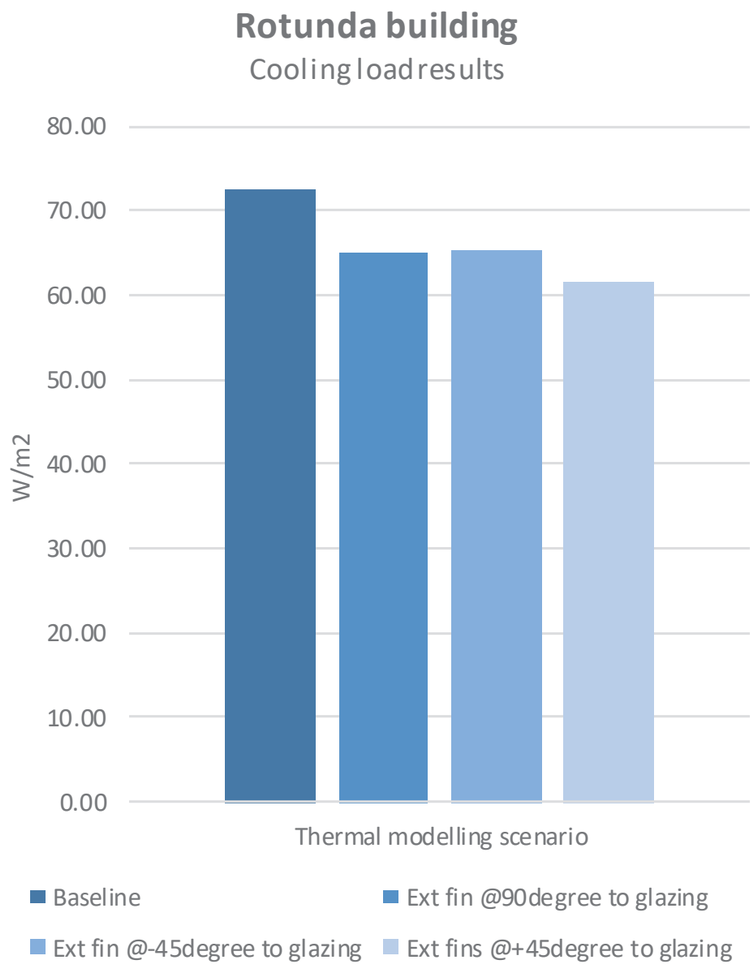
Cooling load reduction with passive solar shading

Table 5_Cooling reduction with external solar shading
Rotunda building – typical open plan office

Thermal Modelling scenario	*Fin rotation*	*Thermal zones with fins*	*Cooling load (W/m2)*	*Cooling load reduction (%)*
Baseline	No fins	South/West	73	
Scenario 1	90	South/West	65	**10%**
Scenario 2	-45	South/West	65	**10%**
Scenario 3	+45	South/West	61	**15%**

Scenario 3 with external fins rotation at +45degree to glazing showed 15% reduction in cooling loads.



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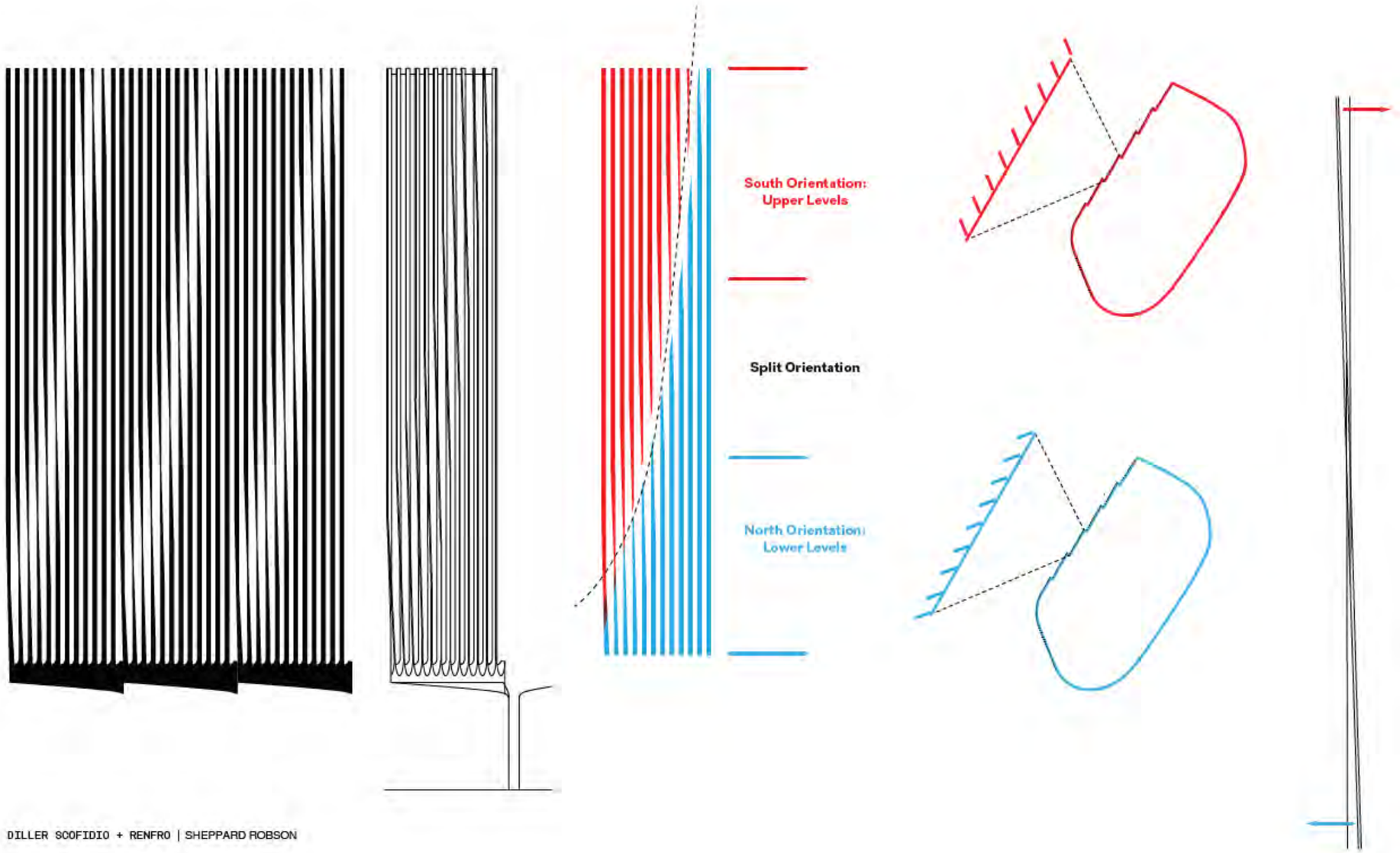
Husk Louver Orientation



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MIXED MODE VENTILATION & OPERATIONAL ENERGY SAVINGS

Comparison of energy saving with hybrid ventilation system

Table 2

Representative open plan office – Bastion House (Level 06)				
Option	**Indicative annual electrical consumption typical floor (MWh)**	**Annual energy savings (%)**	**Improvement[3]**	**Comments**
Base case – (Façade with no openings)	26.2 MWh	-	-	Fully sealed façade as worst case scenario in terms of higher comfort cooling and fan energy
Scenario 1 (pink vents above the door)[4]	22.8 MWh	**13%** (energy reduction from base scenario)	Moderate	*Internal or external balustrade in terms of energy calculations has a negligible impact.*
Scenario 2 (Orange side-hung doors)	22.4 MWh	**15%** (energy reduction from base scenario)	Moderate	*Internal or external balustrade in terms of energy calculations has a negligible impact.*
Scenario 3 (façade with green openings and fins)	24.3 MWh	**7%** (energy reduction from base scenario)	Low	The result demonstrated low saving with introducing the narrow 32 vents. The study demonstrated the air flow entering in the room is limited due to external fins and due to a constrained front clearance free ventilation area also obstructed by the fins.

[3] *Mixed mode ventilation improvement through provision of openable windows within the main office spaces to minimise the need for comfort cooling and to reduce the mechanical ventilation fan power.*
[4] *The pink vents above the door are an adequate solution to reduce comfort cooling and fan energy without including the doors below based on the assessment.*

The energy saving results are not cumulative, each scenario includes exclusively one type of window as described in table 2 to understand the comparable energy reduction against a fully sealed façade solution.

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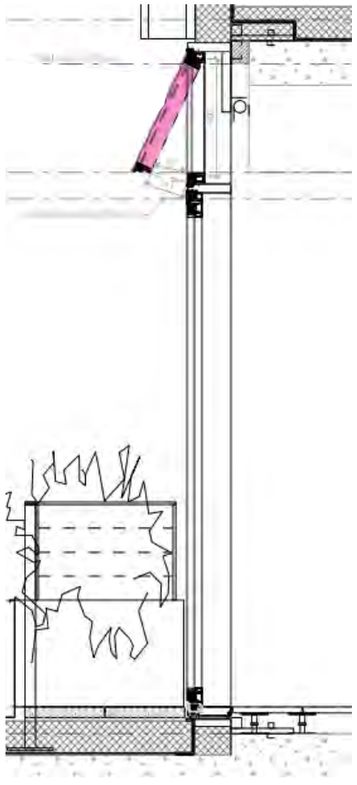
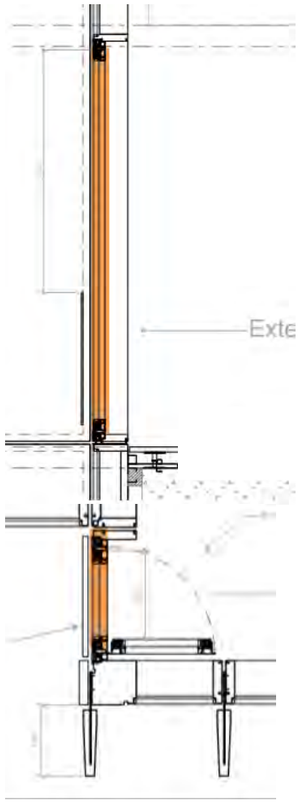
Bastion House – façade and openable vent optioneering

Scenario 1



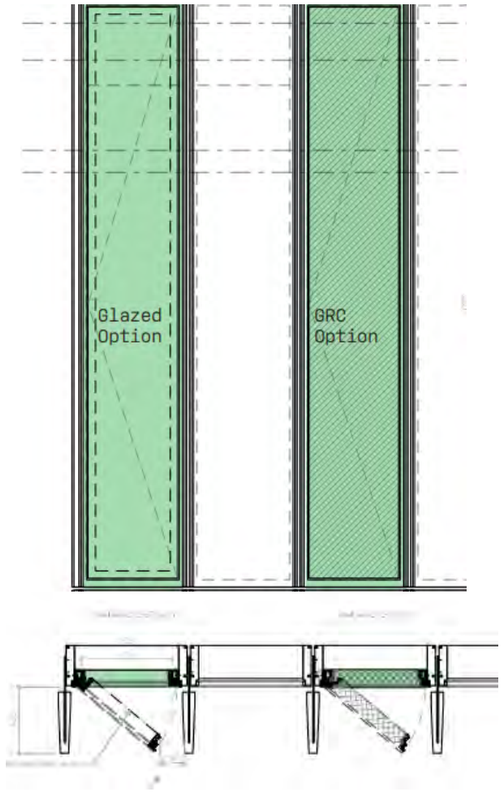
- Vent size: 740x1295mm
- Restrictor length 210mm
- Total free area: 0.30sqm
- Top hung/Outward opening

Scenario 2



- Vent size: 560x2705mm
- Restrictor length: 211mm
- Total free area: 0.86sqm
- Side hung/Inward opening @90deg

Scenario 3



- Vent size: 630x3890mm
- Restrictor length: 135mm
- Fin depth: 400mm
- Front clearance: 0.567sqm
- Side hung/outward opening

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Hybrid ventilation system

- In this study, the potential of hybrid system in providing thermal comfort for workers is assessed for the present weather file TRY_2020High50, and its electricity energy consumption is predicted.
- Mixed mode ventilation with openable façade vents have been simulated to estimate the % energy saving.
- Cooling and heating supplied by terminal units assumed in core zones, auxiliary ventilation assumed 15 l/s/p
- Internal loads across open plan offices are based on BCO 2019, with a total load of 35 (W/m^2 NIA)*
- A representative typical open plan office of Bastion House is assessed.

* Occupancy based on 1 per 8m^2, and assuming lighting power density 6 W/m^2 and small power 80W per workstation

Heating		
Fuel	-	electricity
Generator (Bastion House)	-	ASHP - Air to Air Heat Pump
Heating Seasonal Efficiency	Kw/Kw	3.2
Heat Recovery	%	80
Emitter Supply air diffuser	°C	Winter set-point 20°C
LTHW Pumping	-	Variable pumping flow rate
Cooling		
Fuel	-	electricity
Generator	-	Air cooled chillers
Cooling Seasonal Efficiency	Kw/Kw	4.6
Emitter Supply air diffuser	°C	Summer set-point 26°C
Fan coil units - SFP	W/l/s	0.3
Ventilation		
AHU system		Centralised full fresh air
Office infiltration	ach	Summer: 0.05 Winter: 0.10
Office Mechanical Ventilation	l/s/p	15
Central AHU SFP	W/l/s	1.6
Heat Recovery Efficiency	%	85%
Vent. Control	-	Valves on floor, temp and CO2 sensors on floor
Ventilation strategy	-	Hybrid ventilation strategy

Table 3

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Summary table – Operational Energy Savings with Hybrid Ventilation of a typical open plan office

Table 8

Representative open plan office – Bastion House (Level 06)				
Scenario	**Indicative annual electrical consumption typical floor (MWh)**	**Annual energy savings (%)**	**Improvement**	**Comments**
Base case – (Façade with no openings)	26.2 MWh	-	-	Fully sealed façade as worst case scenario in terms of higher comfort cooling and fan energy
Scenario 1 (pink vents above the door)	22.8 MWh	**13%** (energy reduction from base scenario)	Moderate	*Internal or external balustrade in terms of energy calculations has a negligible impact.*
Scenario 2 (Orange side-hung doors)	22.4 MWh	**15%** (energy reduction from base scenario)	Moderate	*Internal or external balustrade in terms of energy calculations has a negligible impact.*
Scenario 3 (façade with green openings and fins)	24.3 MWh	**7%** (energy reduction from base scenario)	Low	The result demonstrated low saving with introducing the narrow 32 vents. The study demonstrated the air flow entering in the room is limited due to external fins and due to a constrained front clearance free ventilation area also obstructed by the fins. 

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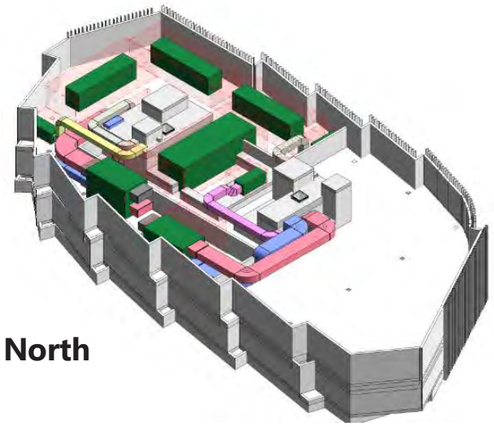
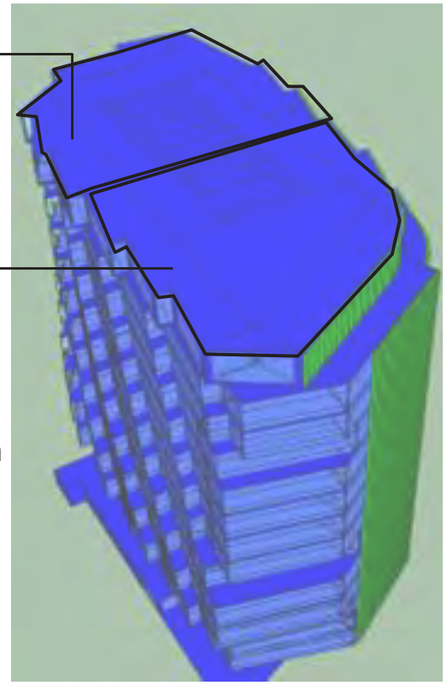
HVAC model assumptions – Bastion House and Rotunda

Full load ASHP and centralised ventilation



AHU 1 North offices



AHU 2 South offices

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SEER Chiller 5.5

SFP < 0.15

SFP 1.2

	Units	System (Bastion House)	System (Rotunda building)
NCM System	-	Centralised full fresh air (15 l/s/p)	Centralised full fresh air (15 l/s/p)
Heating			
Fuel	-	electricity	electricity
Generator	-	ASHP	ASHP
Emitter	-	Trench heaters/Supply Air diffuser/Rads BoH	Trench heaters/Supply Air diffuser/Rads BoH
Heating SCOP	Kw/Kw	SCOP 3.2	SCOP 3.2
LTHW Pumping	-	Variable pumping flow rate	Variable pumping flow rate
Cooling			
Fuel	-	electricity	electricity
Generator	-	Chillers	Chillers
Emitter	-	Supply air diffuser	Supply air diffuser
Cooling Seasonal Efficiency	Kw/Kw	**SEER 4.6 (only cooling mode)**	**SEER 4.6**
Terminal Unit SFP	W/l/s	**0.25 for fan coil units**	**0.25 for fan coil units**
System control	-	Central Time control	Central Time control
		Optimum start/stop control	Optimum start/stop control
		Local temperature control	Local temperature control
		Weather Compensation Control	Weather Compensation Control
System metering	-	Extensive to meet BREEAM outstanding credits, all mech plant, and all floors for tenants anyway.	
Ventilation			
AHU system		centralised system	centralised system
Local extract rate	ACH	4 ach for BoH and 6 ach for WC	4 ach for BoH and 6 ach for WC
Central AHU SFP	W/l/s	**1.6**	**1.6**
Heat Recovery Efficiency	%	85% typically, we can push for even higher from good manufacturers	
Duct air leakage standard	-	DW 144 < 3%	
AHU air leakage standard	-	DW 144 < 3%	
Vent. control	-	temp and CO_2 sensors on floor	
	-		

New-build operational energy prediction – interim results

Summary table

Bastion House and Rotunda	
Energy End Use	New-build kWh/m2
Chilled Water Production	9.8
Hot Water: Energy used by heat generators for space heating or imported hot water for space heating	30.6
Domestic Hot Water (heating, trace heating, and pumping)	4.6
Fan & pumps energy	4.1
Landlord and tenant area lighting (exclude car parks)	11.1
Landlord and tenant area power	33.4
Lifts (excluding lift motor room ventilation and cooling)	5.2
Total Energy all end uses	**99**

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CLIMATE RESILIENCE

BURO HAPPOLD

Climate Change Resilience and Adaptation in EIA Workshop

London Wall West

046325

24th November 2021

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Purpose of workshop

The purpose of this workshop is to:

- Summarise guidance relating to climate change resilience and adaptation in EIA;
- Outline the approach being used for the inclusion of climate change resilience and adaptation in the London Wall West EIA.
- Provide details of the UKCP18 climate change projections for the proposed development;
- Identify key climate change hazards and risks for the project; and
- Identify and develop appropriate mitigation measures to increase climate change resilience of the project.

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Town and Country Planning (Environmental Impact Assessment) Regulations 2017

The 2017 EIA Regulations introduced a requirement to consider climate change within the EIA process for the first time, stating the following in Schedule 4:

"A description of the likely significant effects of the development on the environment resulting from, inter alia… the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and ***the vulnerability of the project to climate change"****.*

STATUTORY INSTRUMENTS

2017 No. 571

TOWN AND COUNTRY PLANNING

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Made - - - - 18th April 2017
Laid before Parliament 19th April 2017
Coming into force - - 16th May 2017

CONTENTS

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Environmental Impact Assessment Guide to Climate Change Resilience and Adaptation (IEMA, 2020)

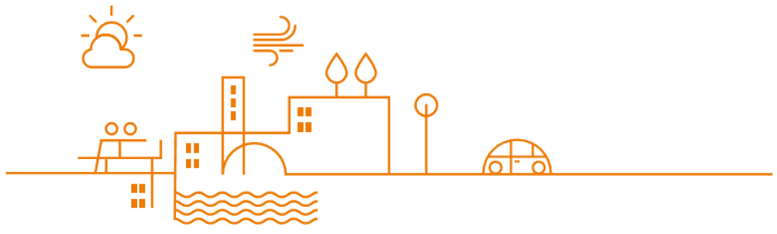
IEMA released an updated version of their guidance on the inclusion of climate change resilience and adaptation in EIA in June 2020.

This guidance suggests that there are two strands that need separate treatment:

- **Climate change resilience –** the risks of changes in the climate to the project. This needs to be assessed as part of the design and is best reported in the analysis of alternatives section of the ES. It is also better suited to a risk assessment rather than a traditional EIA 'determination of significance'
- **In-combination climate effects –** the extent to which climate change exacerbates or ameliorates the effects of the project on the environment. This is best analysed in the existing chapters and is suited to using traditional significance criteria from the respective chapter.

IEMA Transforming the world to sustainability

Environmental Impact Assessment Guide to:
Climate Change Resilience & Adaptation



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In-combination climate effects

- In-combination climate effects should be including within each ES technical chapter;
- The assessment of these effects should be completed by each technical specialist;
- The chapter template will include a section on these ‘in-combination’ climate change impacts; and
- Appropriate Met Office UKCP18 climate projections should be used to inform this section of the ES chapter.

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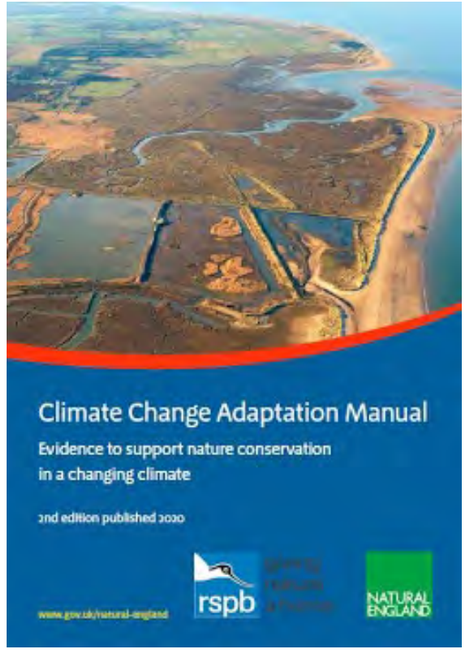
Potential sources of information

There are various pieces of specialist topic-specific climate change resilience and/or adaptation guidance available, including the following:

- Natural England and RSPB Climate Change Adaptation Manual (NE751);
- Environment Agency Climate change impacts and adaptation;
- Historic England Climate Change Adaptation Report;
- Historic Environment Scotland A Guide To Climate Change Impacts;
- Landscape Institute Climate and Biodiversity Action Plan; and
- UK Climate Change Risk Assessment 2017.



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Climate change resilience risk assessment

- In line with the IEMA (2020) guidance, a climate change resilience risk assessment shall be developed for the proposed development;
- This should be appended to the 'Alternatives and Design Evolution' chapter of the ES;
- The aims of the risk assessment are to:
  - Identify the key risks to the proposed development as a result of climate change; and
  - Put into place mitigation measures to improve the resilience of the proposed development.

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Probability of a risk occurring

- The assessment of the probability of a risk occurring should include consideration of available climate projections data for the project.
- The following probability criteria have been adapted from the criteria used in Highways England EIA developments.

Score	Description (probability and frequency of occurrence)
1	The event occurs very rarely during the lifetime of the projects (60 years). For example, once every 60 years (1 event).
2	The event occurs limited number of times during the lifetime of the project (60 years). For example, once every 20 years (3 events).
3	The event occurs a moderate number of times during the lifetime of the project (60 years) For example, once every 5 years (12 events).
4	The event occurs several times during the lifetime of the project (60 years). For example, once every two years (30 events).
5	The event occurs multiple times during the lifetime of the project (60 years). For example, annually (60 events).

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Consequence of a risk occurring

- The consequence rating should take into account the following:
  - The acceptability of any disruption in use if the project fails;
  - Its capital value if it had to be replaced;
  - Its impact on neighbours;
  - The vulnerability of the project element or receptor; and
  - If there are dependencies within any interconnected network of nationally important assets on the new development.
- The following consequence criteria have been adapted from the Canadian Public Infrastructure Engineering Vulnerability Committee (PIEVC) climate change risk assessment methodology.

Score	Description
1	Very low/unlikely/rare/measurable change
2	Low/seldom/marginal/change in serviceability
3	Occasional loss of some capacity
4	Moderate loss of some capacity
5	Likely regular/loss of capacity and loss of some function
6	Major/likely/critical loss of function
7	Extreme/frequent/continuous/loss of asset

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Risk rating

The risk rating is determined by multiplying the probability rating by the consequence rating.

- Ratings between 1-6 are deemed low risk.
- Ratings between 7-20 are deemed to be medium risk.
- Ratings between 21-35 are deemed to be high risk.

		Probability				
Consequence		**1**	**2**	**3**	**4**	**5**
	1	1	2	3	4	5
	2	2	4	6	8	10
	3	3	6	9	12	15
	4	4	8	12	16	18
	5	5	10	15	20	25
	6	6	12	18	24	30
	7	7	14	21	28	35

	Low risk
	Medium risk
	High risk

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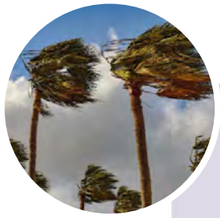
Potential climate change risks (adapted from C40 Cities)

Extreme precipitation



Storm and wind

Extreme cold temperatures

Extreme hot temperatures

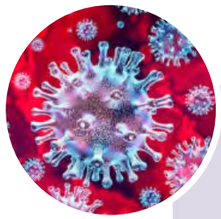
Water scarcity

Wild fire

Flood and sea level rise

Chemical change

Mass movement



Biological hazards

Insect infestation

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Baseline climate data - 1981-2010 averages (Hampstead)

Month	Maximum temperature (°C)	Minimum temperature (°C)	Days of air frost (days)	Sunshine (hours)	Rainfall (mm)	Days of rainfall ≥1 mm (days)	Monthly mean wind speed at 10 m (knots)
January	7.12	1.96	8.57	57.54	64.66	12.01	–
February	7.44	1.72	9.5	76.42	46.61	9.68	–
March	10.52	3.52	3.97	107.13	48.89	10.19	–
April	13.33	5	1.47	151.59	51.47	9.87	–
May	16.8	8	0.07	192.23	58.04	9.48	–
June	19.88	10.91	0	190.98	54.17	8.98	–
July	22.36	13.18	0	199.87	50.35	8.49	–
August	22.02	13.12	0	192.95	64.43	8.87	–
September	18.79	11.02	0	140.75	56.94	8.76	–
October	14.59	8.1	0.33	109.94	77.68	10.97	–
November	10.28	4.75	2.93	69.41	68.32	11.42	–
December	7.38	2.5	7.73	51.61	62.92	11.41	–
Annual	14.25	7.01	34.57	1540.42	704.48	120.13	–

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Baseline risks

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating
Rain storm	Yes	5	1	5
Monsoon	No – not relevant to the UK	N/A	N/A	N/A
Heavy snow	Yes	2	2	4
Fog	Yes	5	1	5
Hail	Yes	4	1	4
Severe wind	Yes	4	3	12
Tornado	No – not relevant to the UK	N/A	N/A	N/A
Hurricane	No – not relevant to the UK	N/A	N/A	N/A
Extra tropical storm	Yes	3	4	12
Tropical storm	No – not relevant to the UK	N/A	N/A	N/A
Storm surge	No – not relevant to the UK	N/A	N/A	N/A
Lightning	Yes	4	1	4

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Baseline risks

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating
Extreme winter conditions	Yes	4	3	12
Cold wave	Yes	4	3	12
Extreme cold days	Yes	4	3	12
Heat waves	Yes	3	5	15
Extreme hot days	Yes	3	4	12
Drought	Yes	3	4	12
Forest fires	No – Unlikely as the site does not have heavy tree cover	N/A	N/A	N/A
Land fires	Yes	1	6	6

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Baseline risks

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating
Flash / surface flood	Yes	2	6	12
River flood	Yes	1	6	6
Coastal flood	Yes	1	6	6
Groundwater flood	Yes	2	6	12
Permanent inundation	Yes	1	6	6
Salt water intrusion	No – The site is located away from the coast	N/A	N/A	N/A
Ocean acidification	No – The site is located away from the coast	N/A	N/A	N/A
Landslide	No – Not likely given the terrain of the site	N/A	N/A	N/A
Avalanche	No – Not likely given the terrain of the site	N/A	N/A	N/A
Rock fall	No – Not likely given the terrain of the site	N/A	N/A	N/A
Subsidence	Yes	1	6	6

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Baseline risks

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating
Water-borne disease	Yes	1	3	3
Vector borne disease	Yes	1	4	4
Air-borne disease	Yes	1	3	3
Insect infestation	Yes	1	3	3

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UKCP18 climate projections - general trends

- A move towards warmer, wetter winters and hotter, drier summers. However, natural variations mean that some cold winters, some dry winters, some cool summers and some wet summers will still occur;
- UKCP18 projections show that there is more warming in the summer than in the winter;
- A decrease in both falling and lying snow across the UK relative to the 1981-2000 baseline;
- An increase in near surface wind speeds over the UK for the second half of the 21st century for the winter season when more significant effects of wind are experienced. This is accompanied by an increase in frequency of winter storms over the UK. However, the increase in wind speeds is modest compared to interannual variability; and
- Global sea level has risen over the 20th century and will continue to rise over the coming centuries. The amount of sea level rise depends on the location around the UK and increases with higher emissions scenarios.

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UKCP18 climate projections

- The following UKCP18 climate projections have been identified for the proposed development. As per the IEMA (2020) guidance, the RCP8.5 scenario has been selected as the worst case scenario.

Season	Variable	Time Period	Projected Change At		
			10th percentile	50th percentile	90th percentile
Winter	Mean temperature (ºC)	2020s (2020 -2039)	-1 to 0	0 to 1	1 to 2
		2040s (2040 – 2059)	0 to 1	1 to 2	2 to 3
		2060s (2060 - 2079	0 to 1	2 to 3	4 to 5
		2080s (2080 – 2099)	1 to 2	3 to 4	5 to 6
	Mean precipitation change (%)	2020s (2020 -2039)	-10 to 0	0 to 10	20 to 30
		2040s (2040 – 2059)	-10 to 0	10 to 20	20 to 30
		2060s (2060 - 2079	-10 to 0	10 to 20	30 to 40
		2080s (2080 – 2099)	0 to 10	20 to 30	40 to 50
Summer	Mean temperature (ºC)	2020s (2020 -2039)	0 to 1	1 to 2	2 to 3
		2040s (2040 – 2059)	0 to 1	2 to 3	4 to 5
		2060s (2060 - 2079	1 to 2	3 to 4	6 to 7
		2080s (2080 – 2099)	2 to 3	5 to 6	8+
	Mean precipitation change (%)	2020s (2020 -2039)	-40 to -30	-10 to 0	10 to 20
		2040s (2040 – 2059)	-50 to -40	-30 to -20	0 to 10
		2060s (2060 – 2079	-50 to -40	-30 to -20	0 to 10
		2080s (2080 – 2099)	-80 to -70	-40 to -30	-10 to 0

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Identification and evaluation of risks – Extreme precipitation

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Rain storm	Yes	5	1	5	No
Monsoon	No – not relevant to the UK	N/A	N/A	N/A	N/A
Heavy snow	Yes	2	2	4	No
Fog	Yes	5	1	5	No
Hail	Yes	5	1	5	No

Mitigation measures

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Identification and evaluation of risks – Storm and wind

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Severe wind	Yes	4	3	12	Yes
Tornado	No – not relevant to the UK	N/A	N/A	N/A	N/A
Hurricane	No – not relevant to the UK	N/A	N/A	N/A	N/A
Extra tropical storm	Yes	3	4	12	Yes
Tropical storm	No – not relevant to the UK	N/A	N/A	N/A	N/A
Storm surge	No – not relevant to the UK	N/A	N/A	N/A	N/A
Lightning	Yes	4	1	4	No

Mitigation measures
Wind microclimate chapter of the ES – specific mitigation measures picked up through this.

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Identification and evaluation of risks – Extreme cold temperature

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Extreme winter conditions	Yes	3	3	9	Yes
Cold wave	Yes	3	3	9	Yes
Extreme cold days	Yes	3	3	9	Yes

Mitigation measures
Insulation - U values provided by BH

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Identification and evaluation of risks – Extreme hot temperatures

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Heat waves	Yes	4	5	20	Yes
Extreme hot days	Yes	4	4	16	Yes

Mitigation measures
Overheating analysis being undertaken – 2050 - Solar shading - Solar coating

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Identification and evaluation of risks – Water scarcity

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Drought	Yes	4	4	16	Yes

Mitigation measures
Low flow sanitaryware – target dictated by BREEAM Green biodiverse rooves – planting spec to try and reduce drought risk (drought resilient species) (may be a need for irrigation to reduce risk of fire) – drip fed system? Rainwater harvesting Rain gardens along the edge of the street to pick up rain water

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Identification and evaluation of risks – Wild fire

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Forest fire	No – Unlikely as the site does not have heavy tree cover	N/A	N/A	N/A	N/A
Land fire	Yes	1	6	6	N/A

Mitigation measures

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Identification and evaluation of risks – Flood and sea level rise

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Flash / surface flood	Yes	3	6	18	Yes
River flood	Yes	2	6	12	Yes
Coastal flood	Yes	2	6	12	Yes
Groundwater flood	Yes	2	6	12	Yes
Permanent inundation	Yes	1	6	6	No

Mitigation measures
Flood risk assessment Attenuation to restrict surface water to equivalent greenfield, with allowance for increased rainfall – through drainage strategy

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Identification and evaluation of risks – Chemical change

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Salt water intrusion	No – The site is located away from the coast	N/A	N/A	N/A	N/A
Ocean acidification	No – The site is located away from the coast	N/A	N/A	N/A	N/A

Mitigation measures

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Identification and evaluation of risks – Mass movement

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Landslide	No – Not likely given the terrain of the site	N/A	N/A	N/A	N/A
Avalanche	No – Not likely given the terrain of the site	N/A	N/A	N/A	N/A
Rock fall	No – Not likely given the terrain of the site	N/A	N/A	N/A	N/A
Subsidence	Yes	1	6	6	No

Mitigation measures

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Identification and evaluation of risks – Biological hazards

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Water-borne disease	Yes	2	3	6	No
Vector borne disease	Yes	1	4	4	No
Air-borne disease	Yes	3	3	9	Yes

Mitigation measures
Air-borne disease – appropriate ventilation Indoor air quality monitoring

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Identification and evaluation of risks – Insect infestation

Risk	Is it relevant for the proposed development?	Probability rating (1-5)	Consequence rating (1-7)	Risk rating	Mitigation needed?
Insect infestation	Yes	2	3	6	No

Mitigation measures

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[redacted]

From: [redacted] <[redacted]geraldeve.com>
Sent: 15 June 2022 14:58
To: [redacted]
Cc: [redacted]
Subject: RE: London Wall West

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From: [redacted] <[redacted]london.gov.uk>
Sent: 15 June 2022 14:01
To: [redacted] <[redacted]geraldeve.com>; [redacted] <[redacted]london.gov.uk>
Cc: [redacted] <[redacted]geraldeve.com>
Subject: RE: London Wall West

CAUTION: This email originated from a sender outside the Firm. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi all
Please accept my apologies for the delay here. I will chase down now and update.
Sincerely

[redacted]
Principal Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
169 Union Street, London SE1 0LL
077[redacted]
london.gov.uk

[redacted] london.gov.uk

From: [redacted] <[redacted] geraldeve.com>
Sent: 13 June 2022 12:01
To: [redacted] <[redacted] london.gov.uk>; [redacted]
<[redacted] london.gov.uk>
Cc: [redacted] <[redacted] geraldeve.com>
Subject: London Wall West

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[redacted]
When can we expect pre-application feedback on this project.
The meeting was almost 5 months ago.
Many thanks,
[redacted]

[redacted]
Partner

Tel. +44 207 333 [redacted]
Mobile. +44 776 [redacted]
[redacted] geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London W1G 0AY
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GERALDEVE

-----Original Appointment-----
From: Pre-applications <Pre-applications@london.gov.uk>
Sent: 21 December 2021 17:16
To: Pre-applications; [redacted] Energy Officers; Urban Design Team; Spatial Planning; [redacted]
Cc: [redacted]
Subject: 2pm Confirmed: London Wall West
When: 21 January 2022 14:00-16:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.
Where: Microsoft Teams Meeting

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Hi all,
This meeting has been confirmed by the agent. Please contact your case officer, [redacted], if you have any queries.

GLA reference number: 2021/1224/P2I
Site name: London Wall West
Address: 140-150 London Wall
Local Planning Authority: City of London
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 (the north

block, new Bastion House and the Rotunda Building) alongside public realm improvements at podium, high walk and ground floor levels, 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

Case officer: [redacted] [redacted]

Kind regards

[redacted]

[redacted]

From: [redacted] <[redacted]geraldeve.com>
Sent: 10 June 2022 11:26
To: [redacted]
Cc: [redacted]
Subject: RE: Confirmed: London Wall West

CAUTION: This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [redacted]
Any update on this?

Kind regards

[redacted]

[redacted]
Senior Planning Consultant

[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London W1G 0AY
www.geraldeve.com

GERALDEVE

From: [redacted] <[redacted]london.gov.uk>
Sent: 24 May 2022 17:29
To: [redacted] <[redacted]geraldeve.com>
Cc: [redacted] <[redacted]london.gov.uk>
Subject: RE: Confirmed: London Wall West

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Hi [redacted]
Apologies for the delay on this. The report will be circulated for clearing this week. I will be in touch with an update once it has been cleared.
Sincerely

[redacted]
Principal Strategic Planner, Development Management

GREATER**LONDON**AUTHORITY
169 Union Street, London SE1 0LL
077 [redacted]
london.gov.uk
[redacted]london.gov.uk

From: [redacted] <[redacted]geraldeve.com>
Sent: 12 May 2022 12:04
To: [redacted] <[redacted]london.gov.uk>
Cc: [redacted] <[redacted]london.gov.uk>
Subject: RE: Confirmed: London Wall West

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Hi [redacted]
Are you able to advise on when we expect written advice for this? The meeting was over three months ago and it would be really useful for us to see it.
Kind regards

[redacted]

[redacted]
Senior Planning Consultant

[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London W1G 0AY
www.geraldeve.com

From: [redacted]
Sent: 20 April 2022 16:33
To: [redacted] <[redacted]london.gov.uk>
Subject: RE: Confirmed: London Wall West
Hi [redacted]
Hope you're well. Is there any update on the written response for this?

Thanks

[redacted]

[redacted]
Senior Planning Consultant

[redacted]

[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London W1G 0AY
www.geraldeve.com

From: [redacted] <[redacted]london.gov.uk>
Sent: 05 April 2022 11:05
To: [redacted] <[redacted]geraldeve.com>
Cc: [redacted] <[redacted]geraldeve.com>
Subject: RE: Confirmed: London Wall West

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Hi [redacted]
Apologies for my delayed response I have been on a period of annual leave. The report is now in clearing process so hope to be able to issue shortly.
I will keep you updated.
Sincerely

[redacted]
Principal Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
169 Union Street, London SE1 0LL
077 [redacted]
london.gov.uk
[redacted]london.gov.uk

From: [redacted] <[redacted]geraldeve.com>
Sent: 21 March 2022 12:05
To: [redacted] <[redacted]london.gov.uk>
Cc: [redacted] <[redacted]geraldeve.com>; [redacted] <[redacted]london.gov.uk>; [redacted]@london.gov.uk>
Subject: RE: Confirmed: London Wall West

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Hi [redacted]
Hope all is well. Could you please let me know when we can expect your written response on London Wall West?

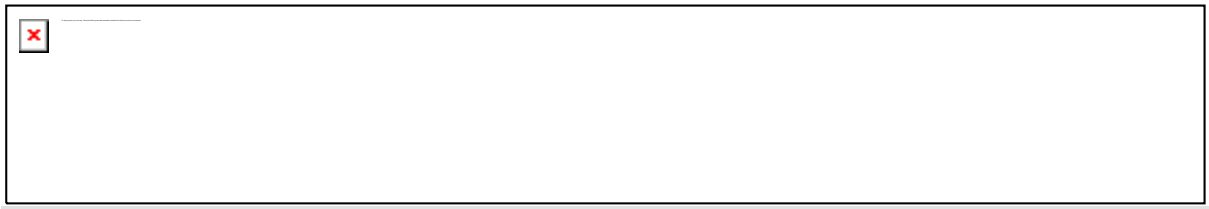
Thanks

[redacted]

[redacted]
Senior Planning Consultant

[redacted]
[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London,W1G 0AY
www.geraldeve.com



From: [redacted]
Sent: 22 February 2022 09:00
To: [redacted] <[redacted]london.gov.uk>
Cc: [redacted] <[redacted]london.gov.uk>; [redacted]
[redacted]@london.gov.uk>
Subject: RE: Confirmed: London Wall West

Hi [redacted]
The architects have put together an updated pack for your consideration in preparing your written advice.
This is available to download here: https://we.tl/t-CLU59d6XIR
It includes the presentation as shown and additional material on:-
1. Cultural spaces & potential use types
2. Landscape concept presentation
3. Public realm/highway designations
4. Public space sunlight & shadow studies
5. Design progress updates

I hope this is helpful and look forward to hearing from you.
Kind regards

[redacted]

[redacted]
Senior Planning Consultant

[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London,W1G 0AY
www.geraldeve.com

From: [redacted]
Sent: 31 January 2022 09:24
To: [redacted] <[redacted]london.gov.uk>
Cc: [redacted] <[redacted]london.gov.uk>; [redacted]@london.gov.uk>
Subject: RE: Confirmed: London Wall West

Hi [redacted]
Hope all is well, I was wondering whether you have had a chance to review my email below? The Architects are ready to package up the document to send back to you, please could you confirm you're happy with the additional information we propose to send?

Kind regards
[redacted]

[redacted]
Senior Planning Consultant

[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London,W1G 0AY
www.geraldeve.com

From: [redacted]
Sent: 21 January 2022 16:36
To: [redacted] <[redacted]london.gov.uk>
Cc: [redacted] <[redacted]london.gov.uk>; [redacted]@london.gov.uk>
Subject: RE: Confirmed: London Wall West

Hi [redacted]
Thanks again for your time earlier and great to meet you. I hope you found the meeting useful.
We will ask the architects to package up the presentation and sent it on, I just wanted to put down the additional information that we propose to add in following your queries, if you could confirm we will get that over to you early next week hopefully to inform your written response:-

- Public realm/highway figures (changes in pedestrian space, cycle space and roadway space)
- Brief overview of types of cultural spaces and evidence of need in the development;
- Sunlight/overshadowing diagrams
- Landscape detail

Have a lovely weekend when it arrives.

Kind regards

[redacted]

[redacted]
Senior Planning Consultant

[redacted]
[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London W1G 0AY
www.geraldeve.com

GERALDEVE

From: [redacted] <[redacted]london.gov.uk>
Sent: 21 January 2022 12:28
To: [redacted] <[redacted]geraldeve.com>; [redacted] <[redacted]cityoflondon.gov.uk>
Cc: [redacted] <[redacted]london.gov.uk>; [redacted]
[redacted]@london.gov.uk>
Subject: RE: Confirmed: London Wall West

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Good afternoon all
Please find attached the pre-application meeting agenda for this afternoon.
Sincerely

[redacted]

Principal Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
169 Union Street, London SE1 0LL
077[redacted]
london.gov.uk
[redacted]london.gov.uk

From: [redacted] <[redacted]geraldeve.com>
Sent: 21 January 2022 11:47
To: [redacted] <[redacted]london.gov.uk>
Subject: RE: Confirmed: London Wall West

Hi [redacted]
Thanks for the email – our attendees are:-

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

- [redacted] and [redacted] – Gerald Eve
That's everyone we have on our list, but as always I suspect it may have been forwarded onto others in the architectural team who may just sit and watch if that's okay?
See you later

[redacted]

[redacted]
Senior Planning Consultant

[redacted]
[redacted]geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London,W1G 0AY
www.geraldeve.com

GERALDEVE

From: [redacted] <[redacted]london.gov.uk>
Sent: 21 January 2022 11:29
To: [redacted] <[redacted]geraldeve.com>
Subject: RE: Confirmed: London Wall West

CAUTION: This email originated from a sender outside the Firm. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Thanks for this [redacted]
Could you please confirm the list of attendees from your side and I will circulate an agenda.
Sincerely
[redacted]

Principal Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
169 Union Street, London SE1 0LL
077 [redacted]
london.gov.uk
[redacted]london.gov.uk

From: [redacted] <[redacted]geraldeve.com>
Sent: 17 January 2022 10:14
To: [redacted] <[redacted]london.gov.uk>
Cc: [redacted] <[redacted]tfl.gov.uk>; [redacted] <[redacted]geraldeve.com>; Spatial Planning <SpatialPlanning@tfl.gov.uk>; Pre-applications <Pre-applications@london.gov.uk>; [redacted] <[redacted]cityoflondon.gov.uk>; [redacted] <[redacted]geraldeve.com>; [redacted] <[redacted]london.gov.uk>
Subject: RE: Confirmed: London Wall West
Hi [redacted]
We're looking forward to seeing you on Friday to discuss London Wall West. I just wanted to confirm that we will not have any material to discuss with TFL at this stage and plan to engage separately with [redacted] on this. There has been

some strategic conversations with TfL but we're not at a stage where we have developed the detail of the proposals to have meaningful engagement yet.
Kind regards

[redacted]

[redacted]
Senior Planning Consultant

Tel. +44 203 [redacted]
Mobile. +44 [redacted]
[redacted]com

Gerald Eve LLP
72 Welbeck Street
London,W1G 0AY
www.geraldeve.com

GERALDEVE

-----Original Appointment-----
From: Pre-applications <Pre-applications@london.gov.uk>
Sent: 21 December 2021 12:07
To: Pre-applications; [redacted]; Energy Officers; Urban Design Team; Spatial Planning; [redacted]
Cc: [redacted]
Subject: Confirmed: London Wall West
When: 21 January 2022 14:00-16:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.
Where: Microsoft Teams Meeting

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Hi all,
This meeting has been confirmed by the agent. Please contact your case officer, [redacted] if you have any queries.

GLA reference number: 2021/1224/P2I
Site name: London Wall West
Address: 140-150 London Wall
Local Planning Authority: City of London
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 (the north block, new Bastion House and the Rotunda Building) alongside public realm improvements at podium, high walk and ground floor levels, 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
Case officer: [redacted]
Kind regards
[redacted]

GREATER**LONDON**AUTHORITY

Pre-application meeting agenda GLA/2023/0017/P2F

London Wall West

in the City of London

meeting date: *16 February 2023*

meeting time: *15:30-17:00*

location: *Online via Microsoft Teams*

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 architects are **Diller Scofidio + Renfro** and **Sheppard Robson,** and the agent is **Gerald Eve.**

Key issues for consideration and discussion at the meeting

Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion:

1. **Introductions (10 minutes)**
2. **Presentation of the scheme by applicant team (30 minutes)**
3. **Energy strategy (15 minutes)**
4. **Design update (15 minutes)**
5. **Transport (15 minutes)**
6. **Summary, timetable for application, and next steps (5 minutes)**

Attendees

GLA/TfL

- [redacted] – Senior Strategic Planner
- [redacted] – Team Leader
- [redacted] – Design Officer
- [redacted] – TfL
- [redacted], Energy Officer
- [redacted], Energy Officer

Applicant team

- [redacted]
- [redacted], Diller, Scofidio + Renfro
- [redacted], Diller, Scofidio + Renfro
- [redacted], Sheppard Robson
- [redacted] Sheppard Robson
- [redacted], Buro Happold
- [redacted], Buro Happold
- [redacted], Buro Happold
- D[redacted] Gross Max
- [redacted], Tavernor Consultancy
- [redacted] Gerald Eve
- [redacted] Gerald Eve
- [redacted], Gerald Eve
- [redacted] Gerald Eve

GREATERLONDONAUTHORITY		*Pre-App Comments*	*Useful References/Links*
1	**London Plan**: The Mayor has published his London Plan 2021 which includes new carbon, energy and heat risk policies (See Policies SI 2, SI 3 and SI 4) which applicants are expected to follow. This can be found here: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021		https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021
2	Part L 2021 of national building regulations took effect on 15 June 2022. Now that the accompanying Part L software is available and functional, all planning applicants are encouraged to follow the 2022 Energy Assessment guidance and use the 2022 Carbon Emissions Reporting Spreadsheet (version 2). As of 1 January 2023 all planning applications submitted on or after this date will be required to follow the 2022 guidance and spreadsheet. If you have any questions about the guidance or the spreadsheet, please contact: ZeroCarbonPlanning@london.gov.uk	The scope of all renovation and refurbishment work should be clearly outlined, and the applicant is required to maximise the potential for reducing the building carbon emissions in line with the energy hierarchy. The carbon emission figures should be reported against a Part L 2021 baseline. For a major refurbishment to newbuild standards, a newbuild baseline should be used. Where there are significant constraints to achieving newbuild standards, the baseline should assume the notional specification for existing buildings, from GLA's Energy Assessment Guidance April 2022, Appendix 3.	https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0
3	The following comments summarise key points for you to be aware of in progressing your energy strategy, but you should refer to the guidance for full details. A Technical FAQ has been developed which applicants should refer to. This will be updated regularly.		
Net zero carbon target			
4	The Mayor's London Plan 2021 requires all major developments (residential and non-residential) to meet his **net-zero carbon target**. This should be met with a minimum on-site 35% reduction in carbon emissions beyond Part L of 2021 Building Regulations with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price .		
5	Applicants should submit a completed **Carbon Emissions Reporting spreadsheet** (https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0) alongside their Stage 1 application to confirm the anticipated carbon performance of the development.		https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0
6	The carbon emission figures should be reported against a Part L 2021 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 **Demand Reduction**			
9	Applicants are expected to meet the London Plan 2021 energy efficiency targets: • **Residential** – at least a 10% improvement on 2021 Building Regulations from energy efficiency • **Non-residential** – at least a 15% improvement on 2021 Building Regulations from energy efficiency		
10	Applicants are expected to design buildings to be able to meet all energy policy areas. They should consider how building form is contributing to the meeting of energy policy targets. Applicant are required to consider the suitability of other design areas which may be negatively impacting the energy consumption and overheating risk of the proposed development.		
11	Applicants 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			
12	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 Energy Assessment Guidance for further details.		
Cooling and Overheating			
13	The Good Homes Alliance (GHA) Early Stage Overheating Risk Tool (https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance-Tool-only.pdf) should be submitted to the GLA alongside the Stage 1 application, if this was not submitted at pre-application stage, to identify potential overheating risk and passive responses early in the design process.		https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance-Tool-only.pdf
14	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 taking into account the associated Approved Document O requirements and TM52 for non-residential) for all TM49 weather scenarios. It is expected that external shading will form part of major proposals. All applications are expected to comply with the DSY1 and maximise compliance with DSY2 & DSY3 by enhancing passive measures.	It is welcomed that external shading and hybrid ventilation are being considered to minimise the cooling demand for the Proposed Development. The applicant has provided additional information and analysis on the heat gains/losses, passive solar shading, external shading and mixed ventilation impact under different scenarios. This is welcomed and supported. The applicant should continue the analysis and should include within the planning submission Energy Statement the final design to clearly outline how energy use has been reduced through calculations for the selected scenario.	
15	The area weighted average (MJ/m^2) 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 **Heating Infrastructure**			

16	The applicant should investigate opportunities for connection to nearby existing or planned district heating networks (DHNs) using the London Heat Map (https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map). Where such opportunities exist, this should be the priority for supplying heat to the site in line with the London Plan 2021 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 that should be provided.	It is welcomed that the applicant is proposing to connect to the Citigen Heating and Cooling network to both import and export while decarbonising the existing network. This solution should continue to be prioritised and evidence of correspondence between the applicant and network operator should be provided. Full details on the proposed strategy for both the site and the decarbonisation of the existing network should be provided.	https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map
17	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. The heat loads that are connected to the site-wide heat network should be maximised. Relevant drawings/schematics demonstrating the above should be provided.		
18	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.		
19	Where a DHN connection is not available, either now or in the future, applicants should follow the London Plan 2021 heating hierarchy to identify a suitable communal heating system for the site.		
20	The London Plan 2021 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 **Renewable Energy**			
21	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.		
22	Solar PV should be maximised. Applicants should submit the total PV system output (kWp) and a detailed roof plan showing that the proposed installation has been maximised for the available roof area and clearly outlining any constraints to further PV. The applicant is expected to situate PVs on green/brown roofs and explore integration with amenity areas.	It is welcomed that the applicant is proposing PV for the site. They should ensure PV is maximised as far as possible and clearly outline any constraints.	
23	Should heat pumps be proposed, applicants 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. The applicant will be required to demonstrate how the heat fraction from heat pump technologies will be maximised. 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.	It is welcomed that heat recovery is proposed for the heat pump system proposed. The applicant should provide the detailed calculations to show how the SCOP and SEER have been determined. They should clearly outline any areas that are not proposed to connected to the centralised network and provide robust justification for this. Loads connected to the centralised system should be maximised.	
24	Should an ambient loop heat network be proposed, the applicant will be required to engage with local DHN stakeholders and demonstrate that proposals will be compatible and commercially viable for future connection to district heating.		
Carbon Offsetting			
25	Applicants should maximise carbon emission reductions on-site. Where it is clearly demonstrated that no further carbon savings can be achieved, but the site falls short of the net-zero carbon reduction targets, applicants are required to make a cash-in-lieu contribution to the relevant borough's carbon offset fund using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price.		
26	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			
27	Applicants will be expected to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint. Applicants should submit a whole life-cycle carbon assessment to the GLA at pre-application stage, as part of the Stage 1 application submission and post-construction, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA's reporting template (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance). Applicants will be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions.		https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance
Be Seen **Energy Monitoring**			
	Applicants will be expected to monitor their development's energy performance and report on it through the GLA's online monitoring portal. Applicants 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 (https://www.london.gov.uk/sites/default/files/be_seen_energy_monitoring_london_plan_guidance_2021.pdft). A commitment should be provided 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		https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance

28	portal at the appropriate reporting stages. This will be secured through suitable legal wording. The first submission of the planning stage data should be provided to the GLA through the 'Be Seen' planning stage webform (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform) at the planning submission stage, alongside the energy statement. The 'Be Seen' reporting spreadsheet has been developed to enable development teams to capture all data offline before this is submitted via the webform. Should there be any issues with the webform, the reporting spreadsheet can also be submitted directly over email.		https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform
Energy Use Intensity and Space Heating Demand Reporting			
29	Applicants should report the EUI and space heating demand of the development. Applicants are encouraged to improve performance where possible against the demand values reported in Table 4 of the Energy Assessment Guidance. Applicants can use the 'be seen' methodology or an alternative predictive energy modelling methodology. Reported values should exclude any renewable energy contribution.	The applicant has shared an operational energy prediction with interim results. This is welcomed and they should continue looking into ways to improve this. It is also welcomed that the applicant will undertake a CIBSE TM54 assessment. They should ensure any differences between the target values in Table 4 of the Energy Assessment Guidance are justified.	

GREATERLONDONAUTHORITY

Energy Memo: GLA Consultation

Case details

Date of first review:	16/02/2023
Case Name:	London Wall West
Case Number:	2023/0017
Case Officer:	[redacted]
London Borough:	City of London
Application Type (Outline/Hybrid/Detailed):	Pre-App
Applicant:	
Energy Consultant:	
Document Title:	
Document Date:	

Development proposals

Use	Floorspace/Number of units

GREATER**LONDON**AUTHORITY

Good Growth

Our ref: 2023/0017/P2F

Date: 21 July 2023

By email

Dear

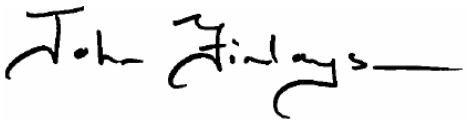
Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: London Wall West, 140-150 London Wall
LPA: City of London
Our reference: 2023/0017/P2F

Further to the pre-planning application meeting held on 16 February 2023, 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



John Finlayson

Head of Development Management

cc [redacted] Deputy Head of Development Management
TfL

GREATER**LONDON**AUTHORITY

pre-application report 2023/0017/P2F

21 July 2023

London Wall West, 140-150 London Wall

Local Planning Authority: City of London

The proposal Redevelopment of the existing buildings 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.
The applicant The applicant is **City of London Corporation**, the architects are **Diller Scofidio + Renfro** and **Sheppard Robson**, and the agent is **Gerald Eve.**
Assessment summary GLA officers welcome the opportunity to further engage with the applicant on the emerging proposals for this site. The principle of development is supported by GLA officers, subject to addressing the issues raised in this report.
Key next steps Any future application will need to address the issues raised in this report with respect to urban design, heritage impacts, transport, and energy.

Context

1. On 16 February 2023 a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held on MS Teams with the following attendees:

GLA group

- [redacted] Senior Strategic Planner
- [redacted], Team Leader
- [redacted], Design Officer
- [redacted] TfL
- [redacted], Energy Officer
- [redacted], Energy Officer

Applicant

- [redacted]
- [redacted] Diller, Scofidio + Renfro

- [redacted], Sheppard Robson
- [redacted], Buro Happold
- [redacted], Buro Happold
- [redacted], Buro Happold
- [redacted] [redacted] Gross Max
- [redacted], Tavernor Consultancy
- [redacted] [redacted] Gerald Eve
- [redacted], Gerald Eve
- [redacted] [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.

3. This follow-up GLA pre-application response should be read alongside the more detailed pre-application response dated 29 June 2022, which followed a pre-application meeting held on 21 January 2022 (GLA ref: 2021/1224/P2I).

Details of this proposal

4. 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 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.

5. The future application may be referable to the Mayor under the following category of the Mayor of London Order 2008:

   - 3E: *"Development 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 floorspace for a use falling within any of the following classes A1-C2 and D1-D2 of the Use Classes Order."*

Strategic planning issues and relevant policies and guidance

6. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London's Local Plan (2015); and, the London Plan 2021.

7. The following are relevant material considerations:

   - The National Planning Policy Framework and National Planning Practice Guidance;
   - The National Design Guide;
   - Draft City Plan 2036 (2021);
   - City of London Protected Views SPD (2012);
   - City of London Freight and Servicing SPD (2018).

8. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

• Good Growth	*London Plan*;
• World City role	*London Plan*;
• Economic development	*London Plan; the Mayor's Economic Development Strategy; Employment Action Plan*;
• Central Activities Zone	*London Plan*;
• Retail / Office	*London Plan*;
• Urban design	*London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity: A Design-Led Approach LPG;*
• Fire Safety	*London Plan; Fire Safety draft LPG*;
• Strategic views	*London Plan, London View Management Framework SPG*;
• Heritage	*London Plan;*
• Inclusive access	*London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG*;
• Sustainable development	*London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; London Environment Strategy*;
• Air quality	*London Plan; the London Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality neutral LPG*;
• Transport and parking	*London Plan; the Mayor's Transport Strategy*; Sustainable Transport, Walking and Cycling LPG;
• Culture/tourism/leisure	*London Plan; Mayor's Cultural Strategy*;
• Green Infrastructure	*London Plan; the London Environment Strategy; All London Green Grid SPG; Urban greening factor LPG*;

Summary of meeting discussion

9. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to urban design, and

transport. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Urban design

10. Policy D4 sets out that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny. This must be demonstrated as part of any future planning application.

11. In this instance, where the City of London does not have an established Design Review Panel, GLA officers would strongly encourage the applicant to present the scheme to the London Review Panel.

Scale and massing

12. The height and massing of the two proposed towers has improved significantly from the scheme's previous iteration. The resulting slightly lower and more slender elevations contribute to improved outcomes in respect to townscape, both in terms of strategic views (LVMF) and local views (in particular from St Martins Le Grand and Postman's Park).

13. While the proposal has improved significantly on height and massing when considered at a distance, it should be noted that it adds significant mass when considered from the public realm immediately surrounding the site. In particular the "boxes" protruding horizontally from the top floor appear very heavy onto the public realm below. This is particularly visible in the views taken from Postman's Park. The taller elevations and top floors should carefully consider their visibility and appearance from the public realm below.

14. The previous pre-application response included the need for sunlight and micro-climate studies due to the height and massing of the proposed buildings. It is unclear whether this has been undertaken but must accompany any formal application.

Development layout

15. The proposal has evolved positively from the previous iteration. The revised height, angle and material palette of the proposed buildings effectively help to respond more positively to the sensitive surrounding context. The applicant is encouraged to revisit the top floors of the building in line with the advice above.

16. The proposal strongly emphasises the north-south axis running through the centre of the site, making it appear very inward-facing. The treatment of the outer boundaries requires further detailing, in terms of design, materials and uses. In particular, the articulation with the public green space along the London City Wall to the east, and Aldersgate Street to the west, should be carefully considered in future iterations of the proposal.

17. The improvements to the overall pedestrian and cycling experience at street level are very positive in design terms. Further attention should be paid to opening up the site to the street, in particular Aldersgate Street, to increase accessibility and legibility of the site from the street. This is further discussed within paragraphs 39-42 of this report.

Public realm

18. The large quantum of publicly accessible green space is positive, and drastically increases the accessibility and legibility of the connections between the street and the Barbican. It is important that through its design and management the proposal delivers public realm which is accessible to the public 24-hours a day, inclusive, and meaningful to all Londoners and visitors in accordance with the London Plan and Public London Charter LPG.

19. The site sits between varying public space typologies: the fine-grained historic public space such as Postman's Park on the one hand, and the more rigid and open public space of the Barbican. The transition between these typologies should be carefully considered in the design and characterisation of the public realm delivered as part of the proposal, and a clear public realm characterisation should ensure the proposal delivers formal as well as more informal dwell spaces.

Architectural quality

20. While the inward facing elevations are very detailed and form an integral part of the experience of the proposal, further detail should be provided on the design and materials of the east and west elevations facing outward of the site. Consideration should be given to treating these elevations with the same level of ambition, to avoid a perceived 'backside' of the buildings.

Heritage

21. As set out within the initial pre-application response, 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.

22. Additionally, the site is within the immediate setting of the following designated heritage assets:

- St Paul's Cathedral, listed Grade I and associated assets;
- Church of St Botolph, listed Grade I and associated gate and railings, listed Grade II (to the south);
- London Wall: site of the Roman and medieval gateway of Cripple Gate, Scheduled Monument;
- London Wall: section of Roman and medieval wall at St Alphage Garden, incorporating remains of St Alphage's Church, Scheduled Monument;
- London Wall: section of Roman and medieval wall and bastion at Noble Street, Scheduled Monument;
- London Wall: section of Roman wall and Roman, medieval and post-medieval gateway at Aldersgate, Scheduled Monument; and,
- London Wall: section of Roman wall and medieval bastion in Postman's Park and King Edward Street, Scheduled Monument and associated Memorial to Heroic Self Sacrifice, listed Grade II*.

23. The buildings on the site consist of the former Museum of London (150 London Wall) and Bastion House (140 London Wall). The former Museum of London is a purpose-built museum which is understood to date from the middle 1970s. Bastion House is purpose-built office block of similar date. The Museum of London on this site closed in December 2022 and is to relocate to West Smithfield in 2026. The building is now redundant. It is noted that both buildings benefit from a Certificate of Immunity from Listing (expiring 20th August 2024).

24. As set out within the initial pre-application response, the site sits above two Scheduled Monuments: "London Wall: section of Roman and medieval wall and bastions, west and north of Monkwell Square"; and, "London Wall: the west gate of Cripplegate fort and a section of Roman wall in London Wall underground car park, adjacent to Noble Street".

25. Within the site, but not included in the red line boundary is the Ironmongers' Hall. This building is regarded as a Non-Designated Heritage Asset of some significance.

Direct benefits and impacts

26. The extent of demolition (particularly at lower levels) should be made clear as part of any future planning application, given the levels are complex and relate to known and potential archaeology. Bastion House is proposed to be replaced with a new 13-storey office tower with the same name, and the former museum with a 17-storey office tower (86.65 AOD) to be known as the Rotunda. The towers are designed to appear as a pair and an iterative design process has resulted in massing reduction, set-ins, and rotation through 7 degrees to improve views towards the Barbican (to the north) and St Paul's Cathedral (to the south). The scheme also includes much needed access and highways improvements at the lower level, new arrangements for known archaeology, and a multi-use event and learning space.

27. If not already undertaken, discussions should be had at an early stage with Historic England's GLAAS and the Inspector of Ancient Monuments, since it is likely that Scheduled Monument Consent may be needed in relation to the works, particularly the foundation design of Bastion House. Subject to an appropriate response from these authorities, there may be a useful heritage-related public benefit in better and more accessible public display of the remains of London Wall and associated assets.

28. The proposals include a scheme of improved access to and interpretation of the London Wall (including the upstanding remains); this is welcomed and may form another heritage-related public benefit.

29. The setting of the Ironmonger's Hall at ground level appears to be improved with greater separation and new planting. Clarification of the nature and function of the southern link would be helpful for GLA officers.

Image 1: CGI of proposed development in front of Ironmonger's Hall

Indirect benefits and impacts

30. The applicant has provided a series of draft views from the surrounding area which demonstrate the potential visual impact of the proposed development from a series of viewpoints agreed with the City Corporation. The selection of viewpoints appear satisfactory to GLA officers at this stage. GLA officer comments on the current proposals in the views provided are offered below:

- The view from Bankside opposite Tate Modern – at the viewing plaque. The proposed development is just breaking the parapet of St Paul's Cathedral. It is suggested that a minor reduction be made in the height of the building to remove this potentially harmful effect.

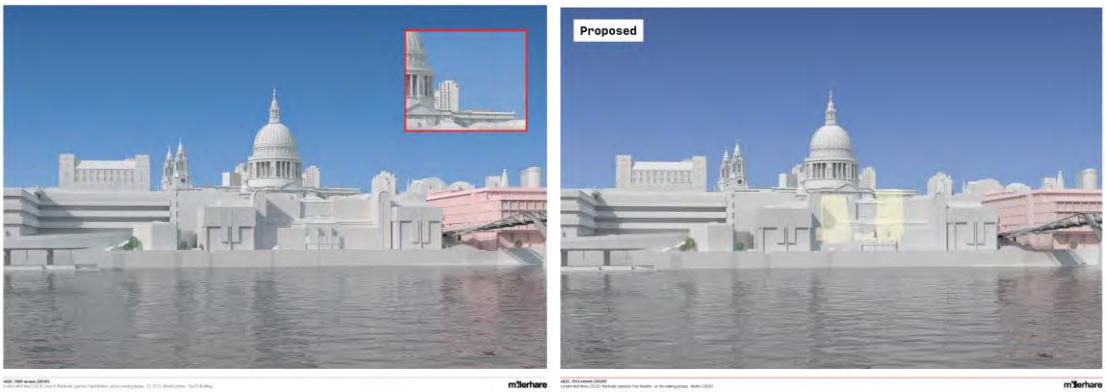


Image 2: Existing and proposed development from Bankside opposite Tate Modern

- The view north along St Martin's-le-Grand shows the Rotunda in the context of the Church of St Botolph. There is an increase in height relative to the existing condition, however, the proposed building appears appropriate in this view, in the context of the cumulative impact on the setting of this building by existing taller buildings.

Image 3: Bankside opposite Tate Modern with Bastion House Roof Update

- The LVMF 17B.1 Golden Jubilee/Hungerford Footbridges view shows the proposed development appearing in the view behind and to the left of the Church of St Bride (listed Grade I), tending to block views through the openings in the base of the tiered spire. This is likely to be considered harmful.

Image 4: LVMF 17B.1 Golden Jubilee/Hungerford Footbridges: downstream – crossing the Westminster bank

- The LVMF 13A.1 Millennium Bridge view shows the proposed development appearing in the view to the left of St Paul's Cathedral and partially blocking views of the Grade II listed Cromwell Tower. This is likely to be considered harmful, although at a low level.

Image 5: LVMF 13A.1 Millennium Bridge – close to the Southwark landing

- The view from Postman's Park outside Memorial to Heroic Self Sacrifice is considered to have a neutral effect compared with the existing condition.

Image 6: Postman's Park outside Memorial to Heroic Self Sacrifice

- The view from the Barbican Estate: Lakeside Terrace, east side towards café appears to show a slight increase in harm to the setting of St Giles Cripplegate because the proposed building is slightly taller and more complex in form and may therefore be more visually distracting from the church tower.

Image 7: Barbican Estate Lakeside Terrace, looking directly at St Giles Cripplegate Church

- The view from the Barbican Estate: Thomas More Highwalk terrace, west end, overlooking tennis courts (page 129) shows a dramatic change in the local skyscape, but this is unlikely to be harmful to the setting of the Barbican.

Image 8: Barbican Estate Thomas More Highwalk terrace, west end, overlooking tennis courts

- Other views submitted at this stage do not appear likely to show harm to the setting of heritage assets.

31. Given the proposals include taller buildings, any future application should be accompanied by a Heritage Townscape and Visual Impact Assessment (HTVIA) based on viewpoints agreed with the Council. The HTVIA should include a full Heritage Impact Assessment with a clear discussion of the impacts on the settings of heritage assets in line with the methodology in Historic England's The Setting of Heritage Assets Historic Environment: Good Practice Advice in Planning: 3 (Second Edition, 22nd December 2017).

32. All accurate visual representations should be winter views, with the trees out of leaf.

Transport

Site context

33. The site borders an access route to Barbican residents' car parks to the north, Aldersgate Street (A1) to the west, the Museum of London rotunda to the southwest, and the London Wall (A1211), which is under City of London highway authority but connects with the Transport for London Road Network (TLRN) at Bishopsgate (A10) approximately 1.1 kilometres east.

34. The site is itself a junction between London Wall (A1211) and Aldersgate Street (A1), with a roundabout road configuration at the southwest corner. The roundabout is part of a gyratory system including Newgate Street, Cheapside, King Edward Street, and St Martin's Le Grand.

35. As noted at paragraph 5 of this report, the site has an excellent PTAL of 6b. The nearest London Underground (LU) stations are St Paul's and Barbican both around 300 metres away. St Paul's serves the Central line, while Barbican provides access to the Circle, Hammersmith & City, and Metropolitan lines. Farringdon, City Thameslink, Bank, Moorgate, and Liverpool St stations are also within walking distance including the Elizabeth line at Moorgate and Liverpool St.

36. There are 11 bus routes within a short walk, as well as cycle hire docking stations including one, Museum of London, within the proposed application boundary. The nearest Cycle Superhighway is CS3 along Upper Thames Street, approximately 1.6 kilometres south. Quietway 11 is immediately north of the site. Highway works to improve the adjacent cycle network along Upper Thames Street are part of the development proposal, as discussed further below.

Highway impacts

37. The proposed development aligns with the City Corporation's plans for changes to the St Paul's gyratory system. This includes closing the northeast side of the Rotunda roundabout, which would allow street-level access to the development while maintaining connections to the podium. Pedestrian access would be enhanced with multiple entry points and a central plaza. Additionally, the podium routes would establish a new connection to Mountjoy House, completing a previously unfinished section of the 'Highwalk' network.

38. The removal of the northeast section of the Rotunda would also enable two-way traffic on the current southwestern part of the gyratory. Existing zebra crossings near the site would be replaced with signal-controlled crossings, enhancing pedestrian safety.

39. Cyclists would have access through wheeling ramps and lifts specifically designed for their use, granting them access to the ample long-stay cycle parking located in the basement.

40. Officers would support the proposal in principle as it would significantly improve pedestrian and cyclist access, enhancing the site's overall accessibility. Officers expect that the opening hours of access points and rights would be secured through appropriate planning obligations or conditions as part of any planning permission.

41. No new vehicular access points are proposed. The existing ramp on Aldersgate Street would be the main access for servicing. Two ramps in the London Wall car park would be altered: one would be closed to motor vehicles, and the other (east of Wood Street) would be reconfigured as an entrance for eastbound vehicles instead of an exit. Local modifications would be made to the ramp and car park structure to accommodate these changes.

42. In any application submission, these highway works proposals should be assessed using the Healthy Streets Check for Designers and where relevant the TfL Cycle Route Quality Criteria. TfL officers should audit and approve these checks for the City Corporation prior to determination.

Healthy Streets and Vision Zero

43. The Mayor's Healthy Streets Approach aims to improve air quality, reduce congestion, and create attractive places for people to live, work, and do business. On-site public realm should be designed as high quality in line with Healthy Streets principles, promoting sustainable travel, walking, and cycling. High-quality signage and wayfinding are crucial, as well as collision prevention measures aligned with the Mayor's Transport Strategy (MTS) Vision Zero Action Plan.

Car parking

44. The proposal would result in a significant overall decrease in car parking spaces, aligning with the goal of reducing private vehicle travel in favour of sustainable transportation options which is welcomed. The existing parking for Bastion House would be demolished as part of the development. Additionally, the London Wall car park would undergo modifications that should reduce the number of parking spaces in favour of cycle parking.

45. While officers support the reduction in parking, the applicant is urged to consider eliminating all general car parking on the site to further discourage car use in the City and encourage sustainable travel behaviour. The applicant should therefore provide clarification regarding the residual car parking spaces resulting from the proposal.

Cycle parking

46. Cycle parking would be located in the basement, accessible through lifts, meeting London Plan standards. The applicant must follow London Cycle

Design Standards (LCDS) guidelines for convenient and varied cycle parking provision. Vertical stacking spaces should be avoided, and 5% of spaces should accommodate wider/adopted cycles. The cycle ramp/access slope gradient must be adequate. A planning condition would be required as part of any planning permission to secure approval of cycle parking details.

Cycle hire

47. The Museum of London Cycle Hire docking station within the site boundary would require relocation. The applicant must engage further with TfL to find an acceptable location nearby. The development proposal is also expected to increase cycle hire usage, necessitating expansion and service enhancements of cycle hire infrastructure, maintenance and operations. A S106 contribution to mitigate the proposed development's cycle hire impact should therefore be secured in any planning permission.

Buses

48. The existing bus stop on the western side of the Rotunda roundabout is proposed to be removed as part of the highway remodelling. The applicant must engage further with TfL Buses prior to the submission of any future planning application to discuss acceptable relocation options. Removal and reprovisioning would require a S106 obligation defined by TfL Buses and a Section 278 (S278) agreement with the City of London.

Travel planning

49. The City of London does not require a Travel Plan but has requested a cycle promotion plan, to be secured by a S106 agreement. This is supported in principle.

Deliveries and servicing

50. The existing below-ground service road is proposed to be removed, and two off-street service yards are proposed to be created at basement level to serve the development. A consolidation centre would be required for controlled delivery. The yards would accommodate 9 service vehicles simultaneously, with an estimated forecast of 15 vehicles per hour and approximately 140 vehicles per day. Targeting consolidated servicing and promoting cargo bike use is encouraged. Off-peak servicing hours should be discussed with the City Corporation. All servicing arrangements would be secured through a Delivery & Servicing Plan (DSP) by planning condition as part of any planning permission.

Construction logistics

51. A framework Construction Logistics Plan (CLP) should be included as part of any future planning application, with a detailed CLP secured by pre-commencement condition as part of any planning permission. The plans should adhere to TfL guidance, considering the local environment, consolidation potential, and maintaining safe walking, cycling routes, and bus lanes throughout construction.

Transport next steps

52. As part of any future planning application, the applicant should:

- Provide high quality cycle facilities and parking in line with LCDS and London Plan cycle parking standards;
- Revise mode share in trip generation analysis to reflect more expected growth in cycle use in the City of London and continue to engage with TfL on appropriate modelling for the proposed highway changes;
- Engage with TfL Cycle Hire prior to submission on relocation of the Museum of London Cycle Hire docking station;
- Engage with TfL Buses prior to submission to discuss the proposal to remove bus stand on the western side of the Rotunda; and,
- Undertake:

  - an ATZ assessment to identify local walking and cycling improvement opportunities;

  - pedestrian comfort level assessment for all local footway impacts expected due to the development;

  - a Stage 1 Road Safety Audit (RSA) with Design's Response and Healthy Streets Check for Designers for all proposed highway works;

  - a TfL Cycle Route Quality Criteria assessment for new cycle routes and infrastructure proposed; and

  - framework Travel, Delivery & Servicing and Construction Logistics Plans at submission stage.

Sustainable development

Energy strategy

53. Applicants should follow the GLA Energy Assessment Guidance 2022[1] rather than the GLA Energy Assessment Guidance 2020 as per the initial pre-application response, which sets out the information that should be provided within the energy assessment to be submitted with a planning application.

54. Important – the omission of required information from energy assessments commonly delays the assessment of planning applications. To avoid delay, applicants must ensure that all the information set out below, particularly where there are cross-references to the guidance, is fully included in the energy assessment submitted with the application.

55. The energy strategy submitted at this stage is generally positive, and looking to connect to the Citigen network and decarbonise it. This should be prioritised. Additional comments have been provided under separate cover.

Net zero carbon target

56. As per the initial pre-application response, the London Plan requires all major developments to meet the Mayor's net-zero carbon target, and so carbon savings must be maximised on site. At the very minimum, an on-site 35% reduction in carbon emissions beyond Part L of 2021 Building Regulations must

[1] https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_june_2022_0.pdf

be met, rather than Part L of 2013 Building Regulations as previously reported within the initial pre-application response.

Be Lean demand reduction

57. As per the initial pre-application response, London Plan Policy SI2 requires applicants to meet the London Plan energy efficiency targets. The applicant must note that this now requires at least a 15% improvement on Part L of 2021 Building Regulations from energy efficiency measures alone, rather than on 2013 Building Regulations.

Be Green renewable energy

58. Developments are expected to maximise opportunities for on-site electricity production including potentially through the provision of biosolar roofs where green roofs are proposed. As set out on page 48 of the guidance, applicants must provide a high resolution plan for the whole development that shows the available roof area for PV, any constraints to further PV and the total PV system output (kWp).

59. The applicant would be required to demonstrate how the heat fraction from heat pump technologies will be maximised.

60. Should an ambient loop heat network be proposed, the applicant would be required to engage with local DHN stakeholders and demonstrate that proposals will be compatible and commercially viable for future connection to district heating.

Be Seen energy monitoring

61. The development's energy performance should be monitored and reported on through an online monitoring portal. Guidance to support this monitoring is available here: (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance/be-seen-energy-monitoring-guidance-pre-consultation-draft). The development must be designed to enable post construction monitoring and the information set out in the 'Be Seen' guidance should be submitted to the GLA's portal at the appropriate reporting stages via the online webforms.[2]. This would be secured through the S106 agreement using the GLA's suggested legal wording.[3]

Cooling and overheating

62. In line with London Plan Policy SI4, the cooling hierarchy should be followed to reduce the potential for internal overheating. At the top of the hierarchy, measures to reduce the amount of heat entering the building should be considered, followed by measures to minimise internal heat generation and manage heat within the building.

63. It is expected that external shading will form part of major proposals.

Digital connectivity

64. As part of any planning permission, a planning condition should be secured requiring the submission of detailed plans demonstrating the provision of

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance
[3] https://www.london.gov.uk/sites/default/files/be_seen_draft_legal_wording_may_22.pdf

sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Environmental issues

Biodiversity

65. Policy G6 of the London Plan makes clear that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain, informed by the best available ecological information and addressed from the start of the development process. The formal application should set out the development's biodiversity net gain.

Conclusion

66. GLA officers welcome the opportunity to further engage with the applicant on the emerging proposals for this site. The principle of development is supported by GLA officers, subject to addressing the issues raised in this report.

67. Any future application will need to address the issues raised in this report with respect to urban design, heritage impacts, transport, and energy.

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for further information, contact GLA Planning Unit (Development Management Team):
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email: [redacted]london.gov.uk
[redacted]**, Team Leader – Development Management**
email: [redacted]london.gov.uk
[redacted] **Deputy Head of Development Management**
email: [redacted]london.gov.uk
John Finlayson, Head of Development Management
email: [redacted]@london.gov.uk
Lucinda Turner, Assistant Director of Planning
email: [redacted]@london.gov.uk

[redacted]

From: [redacted]
Sent: 08 August 2023 00:25
To: [redacted]
Cc: [redacted]
Subject: RE: London Wall West
Attachments: GLA.1224 - London Wall West - pre-app report.pdf

Hi [redacted]

Thanks for your email. This was also included in the initial pre-app response from us on 29 June 2022 (attached). We're not clear at this time whether the application would be referrable or not, but if it is referrable, it might fall under that category. For example, if an application were to breach St Paul's grid heights, as that is a City of London policy, it would be referrable under Category 3E.

During the meeting we had asked on what grounds they believed the case might be referrable and we were advised that they were still unclear. So as we're unclear, we have said that it may be referrable under that category, with may being the key word.

Hope that helps.

Thanks,
[redacted]

[redacted]

Senior Strategic Planner, Development Management
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My pronouns are: [redacted]

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From: [redacted] <[redacted]cityoflondon.gov.uk>
Sent: 07 August 2023 06:58
To: [redacted] <[redacted]london.gov.uk>
Cc: [redacted] <[redacted]cityoflondon.gov.uk>
Subject: London Wall West

Hi [redacted]

I hope that you are well. The City as LPA has been given sight of your pre-app response for the London Wall West site (Museum of London and Bastion House site, attached for ease of reference). Please could you just expand on the thinking behind paragraph 5 (see below) of the letter and the grounds on which the case would be referrable to the GLA?

5. The future application may be referable to the Mayor under the following category of the Mayor of London Order 2008:

• 3E: *"Development 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 floorspace for a use falling within any of the following classes A1-C2 and D1-D2 of the Use Classes Order."*

If you could come back to us at the earliest opportunity that would be extremely helpful.

Thank you

[redacted]

[redacted] | **Principal Planning Officer**
Environment Department | City of London | Guildhall | London EC2V 7HH
[redacted]
E: [redacted] cityoflondon.gov.uk | www.cityoflondon.gov.uk

[redacted]

From: [redacted]
Sent: 28 January 2024 21:50
To: [redacted]
Cc: [redacted]
Subject: GLA 2023/0837 - CoL 23/01304/FULEIA London Wall West Stage 1
Attachments: C-15607_GLA CE Memo_Stage 0_18.01.24 v2.xlsx; 20230837 London Wall West (Stage 1) GLA Consultation - Energy Memo 2023.xlsx; 2023. 0837_Stage_1_GLA WLC Memo_18.01.24.xlsx

Hi [redacted]

I am just writing to let you know that this Stage 1 was previously allocated to my colleague in error, but has now been re-allocated to me given my previous involvement on the case at pre-app stage.

I note the 6-week deadline is 31 January due to it being referred just before Christmas on 21 December. I won't be able to meet this deadline, but will do my best to look at it as soon as possible. At this stage, I estimate it may be able to go to the Mayor on 19 February however, I will keep you informed if this changes. Apologies for the delay.

What I can do at this stage to help the applicant resolve any issues we will raise ahead of you finalising your assessment is share some technical feedback with you for the applicant team to get started on.

I hope that's helpful.

Kind Regards,

[redacted]

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Circular Economy: GLA Consultation

Case Details

1	Development Name	London Wall West
2	Applicant	City of London Corporation
3	London Borough	City of London
4	Case Officer	[redacted]

Planning Application: Proposal

Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and

Planning Application: Uses - Floorspace

1	Office (Class E(g(i)))	56211	m^2
2	Retail/Restaurant (Class E(b))	1112.4	m^2
3	Cultural (Sui Generis)	8182.9	m^2
4	Livery Hall (Sui Generis)	480	m^2
5	Public Car Park (Sui Generis)	594.2	m^2
6	Cycle Hub (Sui Generis)	703	m^2
7			m^2
8			m^2
9			m^2
10			m^2
11			m^2
12			m^2
13			m^2
14			m^2
15			m^2
	TOTAL	**67283.5**	**m^2**

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Full Application - Circular Economy Statement

GLA STAGE 1

Document Information

1	Date of Review	18.01.24
	Document Title	London Wall West at 140 – 150 London Wall Detailed Circular Economy Statement
2		
3	Author	Buro Happold
4	Document Date	17 November 2023 Revision P01
5	Template Submitted (Y/N)	Yes

Additional Information

Operational waste management strategy, Site waste management plan, town planning statement, circular economy statement in 3 parts, circular economy template

Date of Applicant's Response Please fill in.

Date of GLA Response

GLA POST STAGE 1

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Full Application - Circular Economy Statement

Date of Applicant's Response

GLA Stage 1 Comments

No	Title	Description	Action Required	Applicant's Stage 1 Response	GLA Post Stage 1 Response	Applicant's Post Stage 1 Response
		Please provide a revised version of the Circular Economy Statement (written report and/or GLA CE template) that incorporates the additional required information, according to the comments below.		Please respond here.		
0	**Policy and Guidance**	London Plan Policy SI7 requires development applications that are referrable 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. Applicants should follow the London Plan Guidance: Circular Economy Statements (March 2022) to produce a written Circular Economy Statement and populate the template. Applicants should complete the template in full in line with the GLA guidance and submit this as an Excel document with the written report. Applicants should ensure they are familiar with the guidance in preparation for submitting their planning application. The following comments set out how the Applicant's planning application stage Circular Economy Statement submission complies with the policy and guidance. The Applicant has submitted: 1. CE Statement compliant with the GLA Guidance 2. CE Tool 3. Operational waste management strategy 4. Site waste management plan	Whilst it is welcomed that the Applicant has provided a Circular Economy Statement and the CE Template, the Applicant should submit a revised Circular Economy Statement and CE Template to address the comments below.	Please respond here.		
1	**Development Details**	The Applicant has provided description of the development.	The Applicant has provided a detailed description of the development proposal to convey scale and massing, including at least one image and typical plans. No action required.			
1	**Development Details**	The Applicant has provided details of the proposed development in the template, including gross internal floor area (GIA).	The Applicant has provided details of the proposed per the template, including GIA by use type. No action required.			
2	**Design Approach**	The Applicant has defined the design approach for the existing site.	The Applicant has provided a response to the Decision Tree prompts in the template and corresponding guidance for the existing site. No action required.			
2	**Design Approach**	The Applicant has partially defined the design approach for the new buildings, infrastructure and layers over the lifetime of the development.	The Applicant has provided information on the design approach for the new buildings and layers of the proposal, however please provide more detail on the approach for infrastructure over the lifetime of the development within Table 3.2 of the CE statement part 1.	Please respond here.		
3	**Pre-Redevelopment Audit**	The Applicant has provided a Pre-Redevelopment Audit assessing the existing site, including any buildings, structures and materials.	The Applicant has provided a Pre-Redevelopment Audit assessing the existing site, meeting GLA requirements. No further action is required.			
3	**Pre-Demolition Audit**	The Applicant has partially provided a Pre-Demolition Audit to define an inventory of the materials in the building to be managed upon demolition and identify components of the building which can be reused or recycled. The Applicant has partially included: • A robust justification for why the building(s) is/are being demolished. • Assessment of the embodied carbon impacts of demolition and explained how any negative impacts will be mitigated and offset. • A summary of the key components and materials present in the existing buildings, with an estimate of the quantities and associated embodied carbon and whether they are suitable for reclamation. • A description of the proposed extent of demolition and whether any parts of the building are being considered for retention, including supporting drawings. • Opportunities for reuse and recycling either within the proposed development or off-site nearby/locally or further afield. • How the value of existing building elements or materials can be recovered. • The estimated quantities of demolition waste arising. • A schedule of practical and realistic providers who can act as brokers for each of the reclaimed items. • Target reuse and reclamation rates.	The Applicant should: • Provide an assessment of the embodied carbon impacts of demolition and explain how any negative impacts will be mitigated and offset. • Provide an estimate of the quantities and associated embodied carbon alongside the summary of the key components and materials and whether they are suitable for reclamation. • Provide a description of the proposed extent of demolition and whether any parts of the building are being considered for retention, including supporting drawings to illustrate. • Provide target reuse and reclamation rates. • Note - a justification for building demolition has been provided but not as part of the pre-demolition audit.	Please respond here.		
4	**Design Principles**	The Applicant has summarised the key commitments in the Circular Economy Design Principles by Building Layer.	The Applicant has summarised the key commitments in the Circular Economy Design Principles by Building Layer in the template.			
4	**Design Principles**	Many of the commitments are considered standard practice. The template states that the response should consider where the Applicant seeks to go beyond standard practice.	The Applicant should consider key circular economy commitments that go beyond standard practice. Please provide specific targets where possible.	Please respond here.		
5	**Bill of Materials**	The Applicant has partially completed the Bill of Materials including metrics through module stages A to D.	The Applicant should populate column L 'Recycled content by value (%)' in the bill of materials table.	Please respond here.		
5	**Bill of Materials**	The Applicant has partially confirmed that reused or recycled content will be 20 per cent by value for the whole building and provided supporting calculations.	It is not clear how the target for 20% of building material elements to comprise recycled or reused content will be achieved. The Applicant should provide further details of how this will be met as well as supporting calculations in line with GLA guidance.	Please respond here.		
6	**Recycling and Waste Reporting**	The Applicant has partially provided overall waste estimates and relevant cross references in the Recycling and Waste Reporting table.	The demolition waste cited in the pre-demolition audit by BRE (CE report part 2, page 36), states 73,619 tonnes whereas the CE template states 73,853 tonnes - please clarify. The Applicant should confirm the exact location of the estimated municipal waste within Buro Happold's Operational Waste Management Strategy.	Please respond here.		
6	**Recycling and Waste Reporting**	The Applicant has provided a breakdown of waste management routes in the Recycling and Waste Reporting table which demonstrates compliance with London Plan Policy SI 7 targets for diversion of 95% (by weight/tonnage) construction and demolition waste from landfill and 95% (by weight/tonnage) beneficial reuse of excavation waste.	The Applicant has provided a breakdown of the expected waste management routes for each of the waste streams. No further action required.			
7	**Operational Waste**	The Applicant has provided an Operational Waste Management Plan to demonstrate how the proposed development will achieve the relevant targets and meet requirements of London Plan Policies D3, SI 7 and D6. The Applicant has partially demonstrated: (delete as appropriate) • How much operational and municipal waste the proposed development is expected to generate. • How and where operational waste will be managed in accordance with the hierarchy. • That the proposed development has adequate, flexible, easily accessible and shared storage space and collection systems. • That the proposed development supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metal and glass), food waste and other waste. • How operational performance will be monitored and reported. • That measures such as consolidated, smart logistics and community-led waste minimisation schemes have been explored.	The Applicant has provided an Operational Waste Management Plan demonstrating how the proposed development will achieve the relevant targets and meet requirements of London Plan Policies D3, SI 7 and D6. However please find further comments below. • Please confirm where the calculations for the municipal waste values are located in the operational waste management plan and therefore the total values shown in the CE template. • Provide evidence to demonstrate how operational performance will be monitored and reported. • Provide evidence that the application of consolidated, smart logistics and community-led waste minimisation schemes has been explored.	Please respond here.		
7	**Operational Waste**	The Applicant has partially included a commitment to meet or exceed the London Plan Policy SI7 municipal waste recycling target of 65% (by weight/tonnage) by 2030 or business waste recycling target of 75% (by weight/tonnage) by 2030.	The Applicant has provided reference to the London Plan Policy SI 7 municipal waste recycling target of 65% (by weight/tonnage) by 2030 as part of planning context but has not provided clarity as to how this will be achieved for the scheme.	Please respond here.		
8	**Circular Economy Targets**	The Applicant has provided a commitment to targets for demolition waste, excavation waste, construction waste, municipal waste and reused/recycled content in line with GLA policy.	The Applicant has provided commitments to achieving GLA policy targets as a minimum.			
8	**Circular Economy Targets**	The Applicant has provided a brief explanation of how performance against each of the key policy targets will be secured through design, implementation and monitoring.	The Applicant has provided a brief explanation of how performance against each of the key policy targets will be secured, no further action required.			
9	**Post-Construction Report**	The Applicant has partially acknowledged acceptance for a Planning Condition to submit a Post-Construction Report to the relevant local authority and the GLA at circulareconomystatements@london.gov.uk	The Applicant has acknowledged acceptance for a Planning Condition and set out an indicative timescale, however please confirm the party responsible for the provision of this information.	Please respond here.		
10	**End-of-life strategy**	The Applicant has partially provided an End-of-Life Strategy, including how this will be communicated to future building owners, managers and occupiers and how the building information will be stored.	The Applicant should clarify in section 4.6 of CE statement part 1 how the strategy will be communicated to future building owners, managers and occupiers, and how the building information will be stored.	Please respond here.		
11	**Supporting Documentation**	The Applicant has provided the following supporting information as an appendix to the written report: • Site Waste / Resource Management Plan • Cut and fill calculations and/or Excavated - Materials Options Assessment • Circular Economy workshop/ meeting notes	The provision of this information is welcomed. It is strongly encouraged that the Applicant provides the following additional information as a minimum: • Reused or recycled content calculations	Please respond here.		

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Energy Memo: GLA Consultation

Case details

Date of first review:	11/01/2024
Case Name:	London Wall West
Case Number:	2023/0837
Case Officer:	[redacted]
London Borough:	City of London
Application Type (Outline/Hybrid/Detailed):	Detailed
Applicant:	City of London Cooperation
Energy Consultant:	Buro Happold
Document Title:	Energy Strategy Report
Document Date:	17/11/2023

Development proposals

Use	Floorspace/Number of units		
Office (Class E(g(i)))	56,211	m²	(GIA)
Retail / Restaurant (Class E(b))	1,112	m²	
Cultural (Sui Generis)	8,183	m²	
Livery Hall (Sui Generis)	480	m²	

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1	**London Plan**: The Mayor has published his London Plan 2021 which includes new carbon, energy and heat risk policies (See Policies SI 2, SI 3 and SI 4) which applicants are expected to follow. This can be found here: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021		https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021
2	Part L 2021 of national building regulations took effect on 15 June 2022. Now that the accompanying Part L software is available and functional, all planning applicants are encouraged to follow the 2022 Energy Assessment guidance and use the 2022 Carbon Emissions Reporting Spreadsheet (version 2). As of 1 January 2023 all planning applications submitted on or after this date will be required to follow the 2022 guidance and spreadsheet. If you have any questions about the guidance or the spreadsheet, please contact: ZeroCarbonPlanning@london.gov.uk	The scope of all renovation and refurbishment work should be clearly outlined, and the applicant is required to maximise the potential for reducing the building carbon emissions in line with the energy hierarchy. The carbon emission figures should be reported against a Part L 2021 baseline. For a major refurbishment to newbuild standards, a newbuild baseline should be used. Where there are significant constraints to achieving newbuild standards, the baseline should assume the notional specification for existing buildings, from GLA's Energy Assessment Guidance April 2022, Appendix 3.	https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0
3	The following comments summarise key points for you to be aware of in progressing your energy strategy, but you should refer to the guidance for full details. A Technical FAQ has been developed which applicants should refer to. This will be updated regularly.		
Net zero carbon target			
4	The Mayor's London Plan 2021 requires all major developments (residential and non-residential) to meet his **net-zero carbon target**. This should be met with a minimum on-site 35% reduction in carbon emissions beyond Part L of 2021 Building Regulations with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price .		
5	Applicants should submit a completed **Carbon Emissions Reporting spreadsheet** (https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0) alongside their Stage 1 application to confirm the anticipated carbon performance of the development.		https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0
6	The carbon emission figures should be reported against a Part L 2021 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 **Demand Reduction**			
9	Applicants are expected to meet the London Plan 2021 energy efficiency targets: • **Residential** – at least a 10% improvement on 2021 Building Regulations from energy efficiency • **Non-residential** – at least a 15% improvement on 2021 Building Regulations from energy efficiency		
10	Applicants are expected to design buildings to be able to meet all energy policy areas. They should consider how building form is contributing to the meeting of energy policy targets. Applicant are required to consider the suitability of other design areas which may be negatively impacting the energy consumption and overheating risk of the proposed development.		
11	Applicants 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			
12	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 Energy Assessment Guidance for further details.		
Cooling and Overheating			
13	The Good Homes Alliance (GHA) Early Stage Overheating Risk Tool (https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance-Tool-only.pdf) should be submitted to the GLA alongside the Stage 1 application, if this was not submitted at pre-application stage, to identify potential overheating risk and passive responses early in the design process.		https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance-Tool-only.pdf
14	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 taking into account the associated Approved Document O requirements and TM52 for non-residential) for all TM49 weather scenarios. It is expected that external shading will form part of major proposals. All applications are expected to comply with the DSY1 and maximise compliance with DSY2 & DSY3 by enhancing passive measures.	It is welcomed that external shading and hybrid ventilation are being considered to minimise the cooling demand for the Proposed Development. The applicant has provided additional information and analysis on the heat gains/losses, passive solar shading, external shading and mixed ventilation impact under different scenarios. This is welcomed and supported. The applicant should continue the analysis and should include within the planning submission Energy Statement the final design to clearly outline how energy use has been reduced through calculations for the selected scenario.	
15	The area weighted average (MJ/m^2) 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 **Heating Infrastructure**			

16	The applicant should investigate opportunities for connection to nearby existing or planned district heating networks (DHNs) using the London Heat Map (https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map). Where such opportunities exist, this should be the priority for supplying heat to the site in line with the London Plan 2021 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 that should be provided.	It is welcomed that the applicant is proposing to connect to the Citigen Heating and Cooling network to both import and export while decarbonising the existing network. This solution should continue to be prioritised and evidence of correspondence between the applicant and network operator should be provided. Full details on the proposed strategy for both the site and the decarbonisation of the existing network should be provided.	https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map
17	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. The heat loads that are connected to the site-wide heat network should be maximised. Relevant drawings/schematics demonstrating the above should be provided.		
18	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.		
19	Where a DHN connection is not available, either now or in the future, applicants should follow the London Plan 2021 heating hierarchy to identify a suitable communal heating system for the site.		
20	The London Plan 2021 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 **Renewable Energy**			
21	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.		
22	Solar PV should be maximised. Applicants should submit the total PV system output (kWp) and a detailed roof plan showing that the proposed installation has been maximised for the available roof area and clearly outlining any constraints to further PV. The applicant is expected to situate PVs on green/brown roofs and explore integration with amenity areas.	It is welcomed that the applicant is proposing PV for the site. They should ensure PV is maximised as far as possible and clearly outline any constraints.	
23	Should heat pumps be proposed, applicants 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. The applicant will be required to demonstrate how the heat fraction from heat pump technologies will be maximised. 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.	It is welcomed that heat recovery is proposed for the heat pump system proposed. The applicant should provide the detailed calculations to show how the SCOP and SEER have been determined. They should clearly outline any areas that are not proposed to connected to the centralised network and provide robust justification for this. Loads connected to the centralised system should be maximised.	
24	Should an ambient loop heat network be proposed, the applicant will be required to engage with local DHN stakeholders and demonstrate that proposals will be compatible and commercially viable for future connection to district heating.		
Carbon Offsetting			
25	Applicants should maximise carbon emission reductions on-site. Where it is clearly demonstrated that no further carbon savings can be achieved, but the site falls short of the net-zero carbon reduction targets, applicants are required to make a cash-in-lieu contribution to the relevant borough's carbon offset fund using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price.		
26	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			
27	Applicants will be expected to calculate and reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint. Applicants should submit a whole life-cycle carbon assessment to the GLA at pre-application stage, as part of the Stage 1 application submission and post-construction, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA's reporting template (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance). Applicants will be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions.		https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance
Be Seen **Energy Monitoring**			
	Applicants will be expected to monitor their development's energy performance and report on it through the GLA's online monitoring portal. Applicants 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 (https://www.london.gov.uk/sites/default/files/be_seen_energy_monitoring_london_plan_guidance_2021.pdft). A commitment should be provided 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		https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance

28	portal at the appropriate reporting stages. This will be secured through suitable legal wording. The first submission of the planning stage data should be provided to the GLA through the 'Be Seen' planning stage webform (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform) at the planning submission stage, alongside the energy statement. The 'Be Seen' reporting spreadsheet has been developed to enable development teams to capture all data offline before this is submitted via the webform. Should there be any issues with the webform, the reporting spreadsheet can also be submitted directly over email.		https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/be-seen-energy-monitoring-guidance/be-seen-planning-stage-webform
Energy Use Intensity and Space Heating Demand Reporting			
29	Applicants should report the EUI and space heating demand of the development. Applicants are encouraged to improve performance where possible against the demand values reported in Table 4 of the Energy Assessment Guidance. Applicants can use the 'be seen' methodology or an alternative predictive energy modelling methodology. Reported values should exclude any renewable energy contribution.	The applicant has shared an operational energy prediction with interim results. This is welcomed and they should continue looking into ways to improve this. It is also welcomed that the applicant will undertake a CIBSE TM54 assessment. They should ensure any differences between the target values in Table 4 of the Energy Assessment Guidance are justified.	

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Compliance Schedule - To be completed by the GLA Energy Officer

Policy	Policy Sub-Area	Required Data (In line with EAG)	Status	Policy Compliance	GLA Comment Reference
SI 1 - Improving Air Quality **(relating only to air quality impacts of energy systems; separate air quality officer consultation required)**	Measures/design features to reduce exposure to air pollution	Measures to minimise NOx emissions from energy systems	N/A	**Compliant**	
SI 2 - Minimising Greenhouse Gas Emissions **(excluding SI-2-F- WLC; separate WLC consultation required)**	Be Lean emissions reduction	Details of energy efficiency measures	Received but items still outstanding	**Potential Compliance-Pending Information**	**,3**
		Alignment with Cooling and Overheating	Received and nothing further required		**,4**
		Be Lean 10% and/or 15% reduction achieved	Received but items still outstanding		**,3**
		EUI and space heating demands provided	Received and nothing further required		**11**
	Be Clean	SI 3 - Energy Infrastructure data provided (see below)	Received but items still outstanding		**5,6**
	Be Green Renewable generation maximisation	Roof Layout detailing maximised PV proposal	Received but items still outstanding		**7**
		PV array metrics provided	Received but items still outstanding		**7**
		Heat Pump arrangement confirmed	N/A		**8**
	Total carbon reduction on-site	Confirmation of carbon emission factors used	Received; SAP 10.2 proposed and nothing further required		
		GLA carbon emission reporting spreadsheet v2.0	Received but items still outstanding		**2**
		Supporting Modelling Outputs (BRUKLs/DER Worksheets)	Received but items still outstanding		
		On-site minimum met	Not yet received - applicant to submit and provide reference --->		**12**
	Carbon offset payment confirmed	Draft S106 wording of carbon offset (from borough)	Not yet received - applicant to submit and provide reference --->		**13**
	Be Seen commitment provided	Written confirmation/understanding of data requirements	Received and nothing further required		**10**
		Confirmation of Planning Stage 1 submission	Received but items still outstanding		**10**
SI 3 - Energy Infrastructure	Aligned with heating hierarchy	Applicant/Heat Network Stakeholder correspondence	Received but items still outstanding	**Potential Compliance-Pending Information**	**5**
		Heating system details provided	N/A		**6**
	Acceptable Design	Futureproofed DHN connection drawings	Not yet received - applicant to submit and provide reference --->		**6**
		Site heat network drawings	Received and nothing further required		**6**
		Details of management measures proposed	N/A		
SI 4 - Managing Heat Risk	Aligned with cooling hierarchy	Completed GHA overheating tool	N/A	**Compliant**	
		CIBSE dynamic overheating analysis	Received and nothing further required		**,4**
		Confirmation that cooling criteria have been met	Received and nothing further required		**4**

Application Metrics	Outline Value (if applicable)	Detailed Stage 1 Value	Detailed Final Value
Domestic carbon emissions		N/A	
Non-domestic carbon emissions		1%	
Carbon offset payment amount		£915,660	
kWp renewable generation capacity		97	
kWh annual renewable energy generation		85,137	
Sqm of proposed PV array		445	
Calculated SCOP of heat pumps		N/A	
Heat fraction provided by heat pumps		**TBC**	
Flow/Return temperatures proposed		45 / 40	
Distribution loss assumption		**TBC**	
Energy Use Intensity		119.5	
Space Heating Demand		28.2	
Whole Life Carbon Assessment		Received and Under Separate Consultation	
Innovative Features			

Detailed Comments - Applicant MUST provide detailed responses to the below items

Comment No.	GLA Stage I Date: 11/01/24	Applicant's Stage I response Date:	GLA Post Stage I response Date:	Applicant's Post Stage I response Date:
Documents to be secured				
	Energy Strategy Report (17/11/2023)			
General compliance comments				
1	The energy strategy could be compliant with the London Plan 2021 policies however, the applicant is required to submit the additional information to demonstrate policy compliance which has been requested below. The applicant's response to GLA's energy comments should be provided directly within this Energy Memo. Any wider supporting material submitted should be referenced within the applicant's memo response.			
2	The applicant has submitted the GLA's Carbon Emission Reporting spreadsheet in excel format, which appears to align with the supporting modelling however the applicant appears to have used a different methodology than the Energy Assessment Guidance June 2022 paragraphs 7.9-7.11 that requires in the 'be lean' stage of the energy hierarchy to use the notional building system type and performance values specified in the Part L 2021 baseline as determined by the final proposed building specification. the applicant should clarify and amend accordingly as per comments below.			
Be Lean				
3	Based on the information provided, the non-domestic element of the proposed development is estimated to achieve a reduction of 42.9 tonnes per annum (16%) in regulated CO_2 emissions compared to a 2021 Building Regulations compliant development. However, this Be lean stage have been modelled with ASHPs rather than connection to an existing DHN. The applicant should amend as per comment above. It appears that if the correct methodology is used that the Be Lean reduction will be 2%. The applicant should explain the reasons why this is happening as when a building is proposed to be connected to an existing district heating network, the notional building will use the same emission and primary energy factors of heat delivered. It appears that the heating energy consumption and demand is significantly higher than the notional. The applicant should clarify. The applicant should note that the London Plan includes a target of a minimum 15% improvement on 2021 Building Regulations from energy efficiency which applicants should target. The applicant should therefore consider modelling additional energy efficiency measures to meet the EE target.			
Overheating				

4	The area weighted average (MJ/m2) and total (MJ/year) cooling demand for the actual and notional building has been provided and the applicant has demonstrated that the actual building's cooling demand is lower than the notional. The applicant has submitted a detailed internal thermal comfort report with additional information and analysis on the facade optimisation, heat gains/losses, passive solar shading, external shading and mixed ventilation impact under different scenarios. A hybrid/ mixed mode approach for the office has been presented in the report and the peak solar gain has been reduced to 40W/m². This is much welcomed and supported.
Be Clean	
5	The applicant has identified the Citigen Heating and Cooling district heating network within the vicinity of the development and is proposing to connect to the network. Connection to the network should continue to be prioritised and evidence of active two-way correspondence with the network operator should be provided. This must include confirmation or otherwise from the network operator that the network has the capacity to serve the new development, of the CO2 emission factor and primary energy factor to meet the limit set out in Part L 2021, installation cost and timescales for connection. At the moment this is outlined in the energy statement however the applicant has to submit evidence from the network operator to confirm this. A decarbonisation strategy has been previously agreed in principle between the GLA and Eon, however, Eon should follow up with the final clarifications and have follow up meeting update with GLA. It appears that the applicant is proposing to provide additional plant space for ASHPs (to be operated by Citigen) and further balance the load on the network, making spatial allowances. It has been estimated by BHE that this improvement will lead to a further 4.2% reduction to the carbon factor and primary energy usage from Citigen. This is much welcomed and supported and the applicant is encouraged to explore with the involvement of GLA the sleeving approach as per Energy Assessment Guidance paragraph 9.18 that will allow them to use the carbon factor associated with the low carbon heat source only, rather than the entire network and can provide reduction in the reported CO2 emissions. The applicant should outline whether the low carbon heat generation capacity will match the site's heat and DHW demand. This connection is to be secured through **a suitable condition or legal wording**.
6	The applicant is proposing a site-wide heat network supplied by a centralised DH energy centre. It should be confirmed that all non-domestic building uses will be connected to the heat network. They should clearly outline any areas that are not proposed to connected to the centralised network and provide robust justification for this. They should maximise the heat loads that are connected to the site-wide heat network and any divergences from policy should be robustly justified. A schematic showing the route of the heat network linking all buildings/uses on the site has been provided alongside a drawing indicating the floor area, internal layout and location of the energy centre/centres. The applicant has provided a commitment that the development is designed to allow connection to a district heating network. This should include a single point of connection to the district heating network. Drawings should be provided demonstrating space for heat exchangers in the energy centre/centres, and a safe-guarded pipe route to the site boundary, and sufficient space in cross section for primary district heating pipes where proposed routes are through utility corridors. This requirement is to be secured through a **suitable condition or legal wording.**
Be Green	
7	The applicant is proposing to install 97 kWp of PV. A roof layout has been provided, however, it is unclear whether there is additional space for PV as the constraints are not clear as not all roof spaces have been included and drawings with better resolution should be provided. A detailed roof layout should be provided demonstrating that the roof's potential for a PV installation has been maximised for all levels roof areas and clearly outlining any constraints to the provision of further PV, such as plant space or solar insolation levels. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.
8	Heat pumps are being proposed in the form of ASHP system to be operated by Eon for Citigen DHN.
Whole Life-Cycle Carbon Assessment	
9	The applicant has submitted a WLC assessment which will be reviewed separately; comments will be provided. The WLC assessment should be presented separately in excel using the GLA's WLC assessment template and should follow the GLA WLC guidance. The template and guidance are available here: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance. Applicants will also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions.
Be Seen Energy Monitoring	
10	A commitment has been provided 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.** The 'Be Seen' reporting spreadsheet has been developed to enable development teams to capture all data offline before this is submitted via the webform. Once the planning stage CO2 emissions have been agreed with GLA, the applicant should confirm that the planning stage data has been submitted to GLA via the webform. It is noted that the applicant has currently included the Be Seen planning stage as an Appendix.
Energy Use Intensity and Space Heating Demand Reporting	
11	EUI and space heating demands has been provided. The applicant has used the CIBSE TM54 methodology for these calculations. The applicant has reported the EUI and space heating demand against the reference values in Table 4 of GLA guidance and commentary has been provided.
Other points	
12	The carbon dioxide savings fall short of the on-site target within the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions.
13	The applicant has confirmed the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough. The **draft s106 agreement** should be submitted when available to evidence the carbon offset agreement with the borough.
Move resolved comments under this section	

Received; SAP 10.2 proposed and nothing further required
Received; SAP 10 proposed and nothing further required
Received; SAP 2012 proposed and nothing further required
Received; SAP 10.2 proposed but items still outstanding
Received; SAP 10 proposed but items still outstanding
Received; SAP 2012 proposed but items still outstanding
Not yet received - applicant to submit and provide reference --->
N/A

Non-domestic (detailed)

SAP 10.2	Total residual regulated CO_2 emissions (tonnes per annum)	Regulated CO_2 em (tonnes per annum)
Baseline i.e. 2021 Building Regulations	325.5	
Energy Efficiency	210.6	114.9
CHP	319.3	-108.7
Renewable energy	321.3	-2.0
Total		4.2

Carbon offsetting (detailed)

	Shortfall (tonnes per annum)	Shortfall (£)
Non-domestic	321.3	£915,660
Total	321.3	£915,660

Unhide Column F-I if Hybrid Application

issions reductions
(per cent)
35%
-33%
-1%
1%

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WLC Memo: GLA Consultation

Case details

Date of first review:	18/01/2024
Case Name:	London Wall West
Case Number:	2023/0837
Case Officer:	[redacted]
London Borough:	City of London
Application Type (Outline/Hybrid/Detailed):	
Applicant:	City of London Corporation
WLC Consultant:	Buro Happold
Document Title:	23_01304_FULEIA-WHOLE_LIFE-CYCLE_CARBON_ASSESSMENT-1476129
Document Date:	Nov-23

Development proposals

Use	Floorspace/Number of units
Class E(G(i))	56211.0 m^2
Class E(B)	1112.4 m^2
Sui Generis (Cultural)	8182.9 m^2
Sui Generis (Livery Hall)	480.0 m^2
Sui Generis (Public Car Park)	594.4 m^2
Sui Generis (Cycle Hub)	703.0 m^2
Total	67,283.7 m^2

	London Plan: Policy SI 2 of the London Plan requires planning applicants to submit a Whole Life-Cycle Carbon (WLC) assessment: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf	The applicant has submitted a WLC report with a GLA WLC template which appears to cover much of the assessment requirements
	Guidance and assessment template: Applicants should follow the GLA 'Whole Life-Cycle Carbon Assessments Guidance - March 2022 and the GLA WLC assessment template (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance) which should be completed in full and submitted as an Excel document. Applicants should ensure they are familiar with the guidance in preparation for submitting their planning application.	The applicant has submitted a WLC report and a GLA template, for the London Wall West Development.
	The following comments set out how the applicant's planning application stage WLC assessment complies with the policy and guidance.	The applicant has submitted a WLC report which appears to cover much of the assessment requirements. The applicant needs to respond to the comments in this memo and update the WLC Template accordingly.
GLA Review_18/01/24		**Applicant's response**
General compliance comments		
1	The applicant has provided all information within the project details section of the template under the Detailed planning stage tab, in line with the GLA Whole Life-Cycle Carbon Assessment guidance document.	
2	The assessment method stated does conform with BS EN 15978 and 'RICS Professional Statement and guidance, Whole Life carbon assessment for the built environment' (RICS PS) as set out in the GLA Whole Life-Cycle Carbon Assessment guidance document.	
3	The applicant has confirmed that the operational modelling methodology for Module B6 results follows CIBSE TM54.	
4	The assessment has been completed with a reference study period of 60 years.	
5	The software tool used is listed in Appendix 1 of the GLA Whole Life-Cycle Carbon Assessment guidance document. The applicant has provided confirmation that the tool used follows BS EN 15978 and covers modules A-C as a minimum.	
6	The source of carbon data for materials and products, and EPD database stated within the assessment does come from acceptable sources as set out in the GLA Whole Life-Cycle Carbon Assessment guidance document.	
7	The applicant has confirmed that 95% of the cost allocated to each building element category has been accounted for in the assessment.	
8	The applicant has provided an explanation of the third-party verification mechanisms that have been adopted to quality assure the assessment.	
9	The applicant has given permission for the GLA to submit the assessment to the Built Environment Carbon Database.	
Estimated WLC emissions		
10	The applicant has provided results that cover all of the life-cycle modules (A1-A5, B1-B5, B6-B7, C1-C4 and D).	
11	The applicant has not provided results that fall within the GLA's WLC benchmarks. Whilst the applicant is compliant with the office GLA benchmarks, they have stated that their Module B-C emissions of 248.179kg CO2e/m2 GIA are compliant with the GLA retail benchmarks. However, the GLA retail benchmark for module B-C is 200kg CO_{2e}/m^2. Can the applicant confirm if any retail space will meet the GLA benchmarks? Additionally, the WLC report Figure 1 appears to show Module A-C emissions are 809kg CO2e/m2 whereas the GLA WLC template shows a value of 795.175. Can the applicant confirm the correct figure and update the WLC template or report accordingly?	Please respond here
Retention of existing buildings and structures		
12	The applicant has confirmed that options for retaining the existing buildings and structures have been fully explored before considering substantial demolition.	

13	The applicant has provided the pre-construction demolition carbon related emissions. Whilst the applicant has provided the figure of 1,685,800kg CO2e/m2 GIA in the GLA template, the assessment report has stated the demolition emissions in GEA. As such a comparison of figures cannot be made. Can the applicant confirm the area demolished by GIA in the WLCA?	Please respond here
14	The applicant should provide the percentage estimates of the new building development which will be made up of existing elements.	Please respond here
Key actions and further opportunities to reduce whole life-cycle carbon emissions		
15	The applicant has provided details of the main actions with the biggest impacts which have informed this stage of the assessment. However, the applicant has counted an emissions reduction of 60kgCO2e/m2 GIA for not using a heat pump. Can the applicant confirm the rationale for listing this as an emissions reduction? Did the scheme originally specify heat pumps?	Please respond here
16	The applicant has provided details of further potential opportunities to reduce whole life-cycle carbon emissions which could be investigated as the design progresses, but which don't currently contribute towards the emissions reported in this WLC assessment.	
17	The applicant has provided an estimation of the WLC reduction (in $kgCO_2e/m^2$ GIA) for all actions and further potential opportunities stated within the template.	
Material quantity, assumptions and end of life scenarios		
18	The applicant should complete the material quantity and end of life scenarios table in full. Several Module 'C' end of life assumptions are missing and should be provided.	Please respond here
19	All material types and quantities have been provided for all the applicable building element categories and align with the Assessment table.	
20	Assumptions made with respect to maintenance, repair and replacement cycles (Module B) have been stated.	
21	Material 'end of life' scenarios (Module C) should be filled out for all applicable significant materials and should align with the project's separate Circular Economy Statement. Several Module C end of life assumptions are missing and should be provided and align with the separate Circular Economy Statement. The end of life scenarios do not always match the Circular Economy Statement, for instance 'ready mix concrete C16/20' has an end of life scenario of 'concrete crushed to aggregate' in the CE Statement but no end of life scenario in the WLC template.	Please respond here
22	The applicant has provided an estimated mass (kg) of reusable and recyclable materials for each building element category.	
23	The applicant has not provided details of the refrigerants (name, charge, annual leakage rate, GWP, end of life recovery rate). Whilst the applicant states they are connecting to an external heat network, an electric heat pump is specified within this WLC template. As such can the applicant clarify why no refrigerants have been specified in relation to the electric heat pump?	Please respond here
GWP potential for all life-cycle modules		
24	The applicant has completed the template table completely and all results do seem within a reasonable range. The applicant should clarify the following: - Can the applicant clarify why the GLA benchmark was compared to the retail benchmarks and if any actions will be provided to reduce this to 200kg CO2e/m2 GIA? - Can the applicant confirm the demolished areas' GIA? - Can the applicant confirm the rationale for listing not using a heat pump as an action completed to reduce emissions? - Can the applicant ensure all end of life scenarios have been filled in in the WLC template and that they align with the circular economy statement? - Can the applicant clarify if the correct Module A-C emissions is 809kg CO2e/m2 GIA, as in the WLC report figure 1 or 795kg CO2e/m2 as in the WLC template?	Please respond here

From: [redacted] <[redacted]cityoflondon.gov.uk>
Sent: Monday, January 29, 2024 9:00 AM
To: John Finlayson [redacted]@london.gov.uk>
Subject: Fwd: GLA 2023/0837 - CoL 23/01304/FULEIA London Wall West Stage 1

Could we chat John please

Sent from Outlook for iOS

From: [redacted] <[redacted]cityoflondon.gov.uk>
Sent: Monday, January 29, 2024 8:58 am
To: [redacted] <[redacted]cityoflondon.gov.uk>
Cc: [redacted] <[redacted]cityoflondon.gov.uk>; [redacted] <[redacted]cityoflondon.gov.uk>
Subject: Fw: GLA 2023/0837 - CoL 23/01304/FULEIA London Wall West Stage 1

[redacted] see below from GLA on LWW. FYI. [redacted] did email John directly when it was submitted.

[redacted]

From: [redacted] <[redacted]london.gov.uk>
Sent: Sunday, January 28, 2024 9:49 PM
To: [redacted] <[redacted]cityoflondon.gov.uk>
Cc: [redacted] <[redacted]geraldeve.com>; [redacted] <[redacted]geraldeve.com>
Subject: GLA 2023/0837 - CoL 23/01304/FULEIA London Wall West Stage 1

THIS IS AN EXTERNAL EMAIL

Hi [redacted]

I am just writing to let you know that this Stage 1 was previously allocated to my colleague in error, but has now been re-allocated to me given my previous involvement on the case at pre-app stage.

I note the 6-week deadline is 31 January due to it being referred just before Christmas on 21 December. I won't be able to meet this deadline, but will do my best to look at it as soon as possible. At this stage, I estimate it may be able to go to the Mayor on 19 February however, I will keep you informed if this changes. Apologies for the delay.

What I can do at this stage to help the applicant resolve any issues we will raise ahead of you finalising your assessment is share some technical feedback with you for the applicant team to get started on.

I hope that's helpful.

Kind Regards,

[redacted]

[redacted]

Senior Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
Union Street, London SE1 0LL

london.gov.uk
[redacted]london.gov.uk

[redacted] [redacted]

From: [redacted] <[redacted]geraldeve.com>
Sent: 29 January 2024 17:39
To:
Subject: RE: GLA 2023/0837 - CoL 23/01304/FULEIA London Wall West Stage 1

CAUTION: This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Noted, thanks [redacted]

[redacted] [redacted]
Partner

Tel. +44 207 333[redacted]
Mobile. +44 776[redacted]
[redacted]geraldeve.com

Gerald Eve LLP
Bow Bells House,1 Bread Street
London, EC4M 9BE
www.geraldeve.com

From: [redacted] [redacted] <[redacted]london.gov.uk>
Sent: Monday, January 29, 2024 5:26 PM
To: [redacted] [redacted] <[redacted]geraldeve.com>
Cc: [redacted]@geraldeve.com>; [redacted]@geraldeve.com>; [redacted] [redacted] <[redacted]geraldeve.com>
Subject: RE: GLA 2023/0837 - CoL 23/01304/FULEIA London Wall West Stage 1

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Hi [redacted]

Thanks for letting me know.

On closer review, we have actually determined that this case raises no strategic issues for the GLA, so we will be sending a letter to the City tomorrow. Therefore, no need to get back to me on the feedback shared.

Apologies for this.

Kind Regards,
[redacted]

[redacted]

Senior Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
Union Street, London SE1 0LL

london.gov.uk
[redacted]london.gov.uk

My pronouns are: [redacted]

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From: [redacted] <[redacted]geraldeve.com>
Sent: Monday, January 29, 2024 7:23 AM
To: [redacted] <[redacted]london.gov.uk>
Cc: [redacted]@geraldeve.com>; [redacted]@geraldeve.com>; [redacted] <[redacted]geraldeve.com>
Subject: RE: GLA 2023/0837 - CoL 23/01304/FULEIA London Wall West Stage 1

CAUTION: This email originated from outside this organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [redacted]

Many thanks for the update.

Please note [redacted] no longer works at GE. I have copied in my colleagues who are also working on this project.

We will share the technical feedback with Buro Happold and look to respond asap.

Kind regards,

[redacted]

[redacted]
Partner

Tel. +44 207 333[redacted]
Mobile. +44 776[redacted]
[redacted]geraldeve.com

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London, EC4M 9BE
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A NEWMARK COMPANY

From: [redacted] <[redacted]london.gov.uk>
Sent: Sunday, January 28, 2024 9:50 PM
To: [redacted] <[redacted]cityoflondon.gov.uk>
Cc: [redacted] <[redacted]geraldeve.com>; [redacted] <[redacted]geraldeve.com>
Subject: GLA 2023/0837 - CoL 23/01304/FULEIA London Wall West Stage 1

CAUTION: This email originated from a sender outside the Firm. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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What I can do at this stage to help the applicant resolve any issues we will raise ahead of you finalising your assessment is share some technical feedback with you for the applicant team to get started on.

I hope that's helpful.

Kind Regards,
[redacted]

[redacted]

Senior Strategic Planner, Development Management
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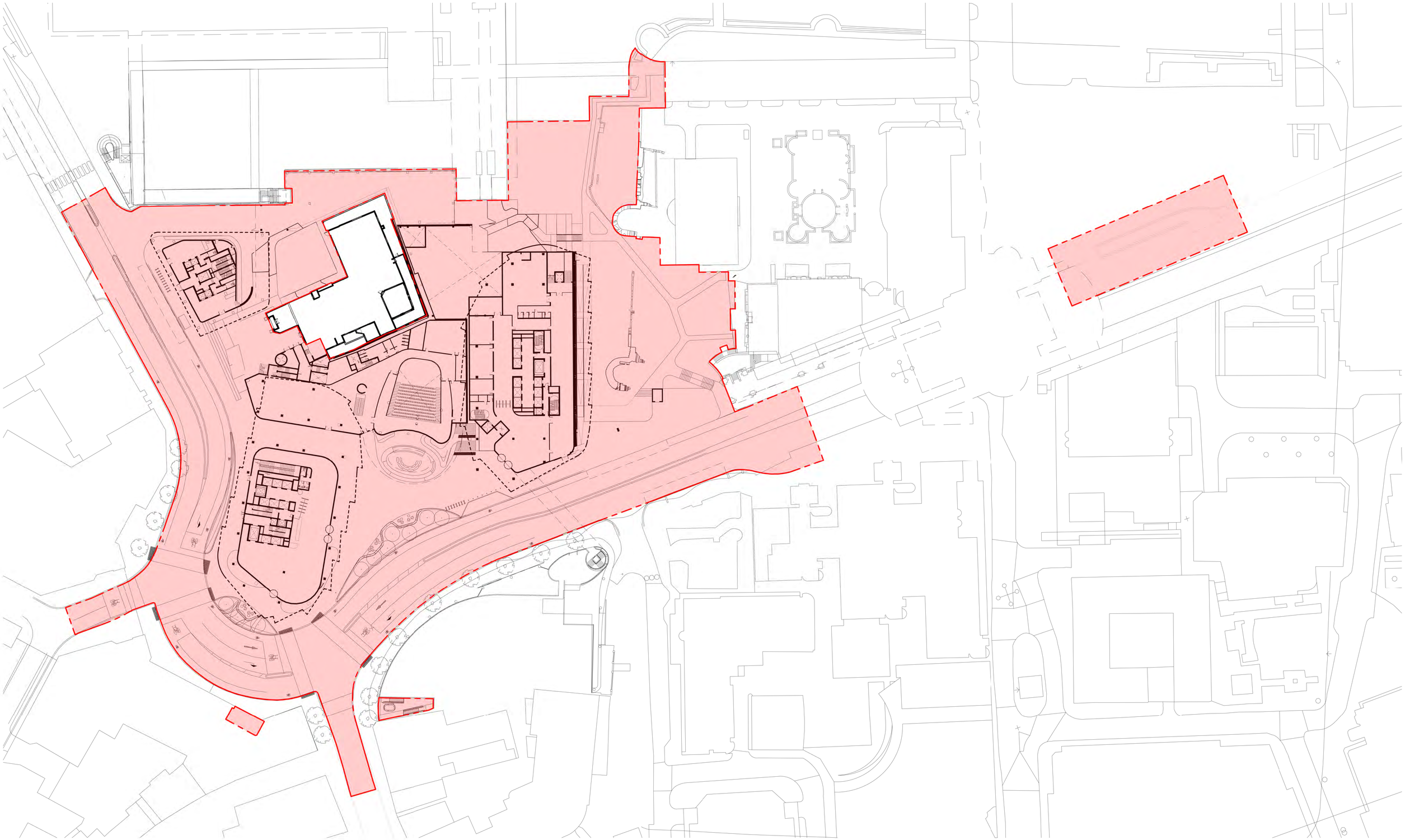
[redacted]london.gov.uk



KEY

- AREAS WITHIN SITE BOUNDARY
- OUTLINE OF BUILDING ABOVE

LWW-SR-SK-321 28/11/22

Diller Scofidio + Renfro / Sheppard Robson

6594 London Wall West

3D Boundary Line Plan - Proposed Ground Floor Level

Scale 1:500@A1