



## Planning Applications Sub-Committee

### Addendum

**Date:** WEDNESDAY, 17 APRIL 2024  
**Time:** 9.00 am  
**Venue:** LIVERY HALL - GUILDHALL

#### 3. DEMOLITION OF 140 AND 150 LONDON WALL

- a) Comments on planning applications  
- Combined (External) Statutory Comments  
- Complete Comments – Internal Consultees (to be read in conjunction with Item 4)

**For Decision**  
(Pages 3 - 296)

#### 4. LISTED BUILDING CONSENT REQUESTS

- Combined (External) Statutory Comments  
(Complete Comments – Internal Consultees are the same as included under Item 3a above)

**For Decision**  
(Pages 297 - 674)

**Ian Thomas CBE**  
Town Clerk and Chief Executive

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From:   
To:   
Subject: LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response  
Date: 13 December 2023 16:29:18

THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ ref:a0zTw0000000gvJIAQ;1645970a932a10efb55221c697112dee:ref ]

Gemma Delves  
Corporation Of London  
Development Plan  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2023/136521/01  
**Your ref:** 23/01304/FULEIA  
**Date:** 18 December 2023

Dear Gemma,

**London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (Including Void, Lifts and Stairs at 200 Aldersgate Street and One London Wall) London EC2Y 5DN.**

**Demolition of 140 & 150 London Wall to Provide a Phased Development Comprising: The Construction of New Buildings for a Mix of Office (Class E(G)), Cultural Uses (Sui Generis) and Food And Beverage/Cafe (Class E(B)), Access, Car Parking, Cycle Parking and Highway Works Including Reconfiguration of the Rotunda Roundabout, Part Demolition and Reconfiguring of the Ironmongers Hall (Sui Generis), Creation of a New Scheduled Monument Viewing Area, Public Realm Alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; Removal of Two Highwalks Known as Falcon Highwalk and Nettleton Court; Alterations to the Void, Lifts and Stairs at 200 Aldersgate Street and One London Wall, Introduction Of New City Walkway.**

Thank you for consulting us on the above planning application. There are no constraints within our remit at this site and therefore we have **no objection** to the proposal and offer the following advice.

### **Advice to LPA**

#### **Use of Sustainable Drainage Systems (SuDS)**

Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 167 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any

Cont/d..

development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

### **Advice to applicant**

#### **Water Resources**

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

#### **Commercial/Industrial developments**

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

#### **Final comments**

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Yours sincerely,

**Harry Scott**  
**Planning Advisor**

E-mail: [HNL Sustainable Places@environment-agency.gov.uk](mailto:HNL Sustainable Places@environment-agency.gov.uk)



**From:** [Location Enquiries](#)  
**To:** [lpalondonwallwest](#)  
**Subject:** RE: Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 20 December 2023 16:55:38  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



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**From:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>

**Sent:** 12 December 2023 16:25

**Subject:** Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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Phone: (+44/0) 207 608 2409  
Email: [enquiries@thegardenstrust.org](mailto:enquiries@thegardenstrust.org)  
[www.thegardenstrust.org](http://www.thegardenstrust.org)

22<sup>nd</sup> December 2023

Research - Conserve - Campaign

The City of London Corporation  
Guildhall  
PO Box 270  
London EC2P 2EK  
[plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk)

Dear Sir or Madam,

Ref : 23/01276/LBC - Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y); Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

23/01277/LBC - External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y); 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

23/01304/FULEIA - Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway; London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

Thank you for consulting The Gardens Trust (GT), in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. We have liaised with our colleagues in the London Parks & Gardens Trust (LPG) and their local knowledge informs this joint response.

We are considering all three of the above applications together and it is apparent that care has been taken to delineate the new landscape from the Barbican, whilst using an existing architectural feature to connect the walkway to Mount Joy House which is in line with the original design ethos of the estate, connecting walkways and social spaces.

We are supportive of the proposal to mediate between the Barbican Estate and the new environment, both being respectful to each other, but not perpetuating undesirable conditions; in particular the proposals at Highwalk and garden levels, where the uses and design are more focused on quiet activities, contemplation, and the enjoyment of the landscape itself. We are also supportive of the

proposal to create a continuous garden connector which both creates new garden spaces, and stitches together existing green space with enhanced accessibility between all public levels of the site.

Finally, we would like to endorse the landscape proposals by Nigel Dunnet, even though the landscape planting character has clearly changed over the decades since its inception. One thing we would like to suggest, however, is the creation of a garden maintenance plan for the Estate as there is a lot of new planting. Introducing a new set of 'gardens' comes with responsibility and its ultimate success lies with careful maintenance in the future.

Yours sincerely,

Margie Hoffnung  
Conservation Officer

# SOUTHWARK COUNCIL

LBS Registered Number: 23/OB/0074

Date of issue of this decision: 08/01/2024



www.southwark.gov.uk

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LBS Reg. No.: 23/OB/0074

Date of Issue of Decision: 08/01/2024

Your Ref No.:

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Applicant Gemma Delves  
City of London

## **NO COMMENTS made in reference to your consultation on the following development:**

Planning permission for the following (ref. 23/01304/FULEIA): Demolition of 140 and 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 Plaisterer's 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 and hard and soft landscaping; and associated and ancillary works, structures and highways works.

Listed Building Consent for the following (23/01277/LBC): External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Listed Building Consent for the following (23/01276/LBC): Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

At London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One

## DECISION NOTICE

**LBS Registered Number:** 23/OB/0074

**Date of issue of this decision:** 08/01/2024



[www.southwark.gov.uk](http://www.southwark.gov.uk)

London Wall).

In accordance with your letter received on 19 December 2023 and supporting documents.

Signed: *Stephen Platts*

Director of Planning and Growth

Date: 09 January 2024  
Our ref: 461619  
Your ref: 23/01304/FULEIA



lpalondonwallwest@cityoflondon.gov.uk

**BY EMAIL ONLY**

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

**Planning consultation:** 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 Plaisterer's 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 and hard and soft landscaping; and associated and ancillary works, structures and highways works

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

Thank you for your consultation on the above dated 12 December 2023 which was received by Natural England on 12 December 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**SUMMARY OF NATURAL ENGLAND'S ADVICE**

**NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

**Sites of Special Scientific Interest Impact Risk Zones**

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the [data.gov.uk](https://data.gov.uk) website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully,

Tina Kerr  
Consultations Team



# וועד להצלת בתי עלמין באירופה



## The Committee for the Preservation of Jewish Cemeteries in Europe

140 Kyverdale Rd, London N16 6PU | email: cpjcevaad@gmail.com

USA Office: 90 Parklane, Monsey, N.Y. 10952 | email: moshe@heritageabroad.com

**Rabbinical board:**

Rabbi E. Schlesinger

Rabbi Y. Padwa

Rabbi A. D. Dunner

Rabbi Z. Feldman

Rabbi S. Low

Rabbi B. Z. Bloom

Rabbi H. Gluck

To- Ms Gemma Delves  
Environment Department  
City of London Corporation  
Date- 15/01/2024

Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Site of the Ancient Medieval Jewish Cemetery of The Jews of Medieval London and England-Opened in Year 1066 and Closed in Year 1290 Upon all of English Jewry having been Expelled by the then Crown with all Jewish Owned Land, Assets, Money and Synagogues throughout the Kingdom having been Seized by Force.

**Patron:**

Rabbi B. Z.  
Freshwater

Dear Ms Delves

Sent by Email

Thank you for consulting us concerning the above.

The background to this important matter, which pertains to the second oldest known Jewish Cemetery in all of Europe is that we at CPJCE have in fact had a number of face-to-face meetings with yourselves encompassing this issue.

It must be said at this point that although there are certain factors where we were able to reach agreements with all parties, their remain outstanding differences.

Parties have already been sent MOLA's 7-page Report dated 03/03/2023 entitled-London Wall West-The Jewish Cemetery.

CPJCE however in consultation with other partner groups as well as having looked through our own archives, asked our own Honorary Archivist to prepare our own report concerning the same. This 12 page Report Entitled-Cripplegate Medieval Jewish Cemetery-City of London-dated 27/03/2023 was also sent out to all parties concerned. Our Report was well received by many academics and Historic England found it of great interest.

One of the results of the above was that there remained and still remain clear disagreements between CPJCE and MOLA over many of the Historical factors that concern themselves with this Medieval Jewish Cemetery containing the hallowed remains of members of Britain's oldest religious Minority Community. It must be clearly pointed out that these differences are not merely academic in nature but importantly pertain to the present development proposals here, We again here feel it is prudent for all concerned that we attach here both of the Reports spoken of and we

respectfully request that Ms Delves as the appointed Planning Officer as well as both the City of London Corporation Senior Planning Engineer together with the City of London Corporation Senior Planning Surveyor kindly acquaint themselves with both reports so as to gain a thorough understanding of what the above remaining differences and points of disagreements are.

### The Present Consultation

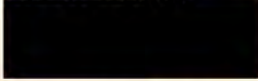
In order to simplify matters we attach 2 pictures of the immediate area of concern which are taken from your own Plans.

We now comment as follows.

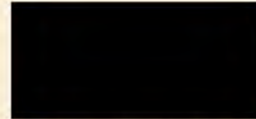
1. There must be no digging in and throughout the area you label within your picture attached named The Barbers Surgeons Hall Garden
2. We have serious concerns over the apparent proposal as set out within your picture for the placing of pathways within the area referred to as The Barbers Surgeons Hall Garden. We propose that this matter should be further discussed with us in more detail, as should any proposal for the building of staircases within this area.
3. As by law this entire area will be fenced off as a designated and active Building Site during proposed construction, CPJCE would insist that its own experts and Rabbis be allowed to carry out unannounced periodical inspections on site to underscore the keeping of all and any agreements made between all Parties concerned and ourselves.
4. With regard to the basement level of Bastion House: no works which encroach on sub existing structure base level are to be carried without a CPJCE Supervisor and preferably also in the presence of an archaeologist to ensure that no graves or human remains/ remnants of previous constructions are disturbed.
5. That strictly prior to the commencement of any works, official recognition of this Medieval Cemetery of the Jews of London and England by City of London Corporation is given in the form of the placing of a Monument, the design and structure of which has already been suggested by J-Trails but yet to be finally agreed upon in conjunction with ourselves at CPJCE.
6. That due to the sensitivity and complexity of the site, CPJCE requests a further on-site meeting with The Senior Planning Engineer. It is hoped that the proposed meeting will enable the Parties to successfully iron out any difficulties by way of mutual trust and agreement.
7. That the Developers recognize CPJCE as having the status of an “Adjoining Owner” as defined within The Party Wall Act in so far as they will agree to serve notice, appoint a surveyor and seek initial approval for all and any relevant construction proposals to CPJCE, and that both prior to and/or during construction they agree to fully disclose any variations to such proposals through their Party Wall Surveyor and obtain written approval from CPJCE.
8. That it is agreed between the Parties that the Developers work together with CPJCE in assuring that the Annual Pilgrimage to the site by members of the UK Jewish Community which is held on the Hebrew Calendar date of the murder of the Senior Rabbi of Medieval London Rabbi Jacob of Orleans be accommodated in a safe manner, and that the Pilgrims within those 24 hours be allowed to conduct their Annual Memorial Prayer Service at the site as well as their lighting of the memorial candles at the site as has been their custom and practice for decades.



Yours Sincerely



**Rabbi Y Schlesinger**  
**Chairman of the Rabbinical Board**  
**Committee for the Preservation of Jewish Cemeteries in Europe-(CPJCE)**  
**140 Kyverdale Road**  
**London N16 6PU-UK**  
**E-Mail: cpjcevaad@gmail.com**  
**Registered Charity Number 1073225**



**Rabbi H. Gluck OBE-(CPJCE)**

### **Jewish Cemeteries in Jewish Law**

In Jewish law a Jewish Cemetery possesses an even greater sanctity and holiness than that of a synagogue. In Judaism once a grave is sealed closed it may never be opened, tampered or interfered with in any way, this includes for Archaeological purposes.

Any tampering or interference in any way with a Jewish Grave or Cemetery is considered the worst form of Sacrilege possible in the Jewish religion. For this amongst other reasons the vast majority of Jewish Cemeteries are situated on privately owned land where land has been specifically purchased by members of the Jewish Community to be set aside for Jewish Burials. This has been the case since ancient times. It is because Jewish Cemeteries are completely privately owned and funded that you will find that Burial Fees amongst the Jewish Community are significantly higher than those of Government or Local Council run Cemeteries. In Jewish law graves within a Jewish Cemetery are bought for perpetuity. Furthermore, in Jewish Law no part of a Cemetery may be used for anything other than Burials. As in Jewish Law, as said above, a Jewish Cemetery possesses an even greater sanctity and holiness than that of a synagogue, Judaism requires the utmost respect and behaviour when visiting a Cemetery.

Perhaps most importantly, in Jewish Law a Jewish Cemetery always remains a Cemetery. The fact that it may no longer have any memorial stones on it, or its Cemetery Walls are no longer extant, or buildings have been wrongly built over it or over part of it is utterly irrelevant. All of the above religious laws and requirements still apply in full. The passage of time, even extensive periods of time, does nothing to change this at all.

### **About Us**

The Committee for the Preservation of Jewish Cemeteries in Europe was set up around 30 years ago. Its Head Office is in London UK.

The Committee was set up at the request of Holocaust Survivors to deal with all and any issues concerning Jewish Cemeteries and specifically with their preservation.

Primarily the Committee deals with European Jewish Cemeteries that after the Holocaust of European Jewry during WW2 were left with nobody alive to take care of them. These Jewish Cemeteries number in their thousands (around 10,000) and span across many countries. We are also charged with the preservation of the thousands of Mass Pits-Sites of Execution of our murdered

brethren carried out by the Nazi Regime that exist across what was Nazi Occupied Europe during WW2.

We also deal extensively with Jewish Cemeteries located in the UK, with particular interest in Historic and closed Jewish Cemeteries.

We are the only such Committee in Europe and are completely independent of any other Jewish organization or Synagogue Body. We have a Sub Committee of Rabbinical Experts on Jewish Burial Law and advise at both National and Local Government Level both here in the UK and across Europe on all issues concerning Jewish Burial Law and Jewish Cemeteries.

We are proud to have also worked over a period of many years with both colleagues at the Council of Europe (of which the United Kingdom is still a full member) and with the European Union. Indeed, our committee was instrumental in helping to draft and pass Council of Europe Resolutions 1883 (2012) and 379 (2015) which deal with the protection of Jewish cemeteries throughout Europe by Regional and Local Authorities. You may find copies of these Council of Europe Resolutions online. CPJCE is also regarded by Historic England as; "A key National organization to engage in any (Jewish Cemetery) Heritage Programmes" - See Jewish Burial Grounds- Understanding Values- Historic England with Barker Langham.





# וועד להצלת בתי עלמין באירופה

The Committee for the Preservation  
of  
Jewish Cemeteries in Europe



140 Kyverdale Rd, London N16 6PU | email: cpjcevaad@gmail.com

USA Office: 90 Parklane, Monsey, N.Y. 10952 | email: moshe@heritageabroad.com

**Rabbinical board:**

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Rabbi A. D. Dunner

Rabbi Z. Feldman

Rabbi S. Low

Rabbi B. Z. Bloom

Rabbi H. Gluck

**Patron:**

Rabbi B. Z.

Freshwater

**Cripplegate Medieval Jewish Cemetery-City of London**

Date- 27/03/2023

**To whom it may concern,**

**I have been sent a Report signed by Mr David Divers of MOLA that concerns itself with the above.**

**As the Honorary Archivist for The Committee for the Preservation of Jewish Cemeteries in Europe-CPJCE, I have been asked by my colleagues within CPJCE to look over the Report and provide some of my own observations to the points raised therein.**

**The Cemetery**

**The MOLA Report that I have been asked to comment on seems to me to raise 5 questions. It appears to me that these are;**

- 1.The actual Age of this Cemetery.**
- 2. The continuous placing, over a period of many centuries of buildings over the cemetery.**
- 3. The assumption that upon the late Archaeologist W. F Grimes having found 7 graves within the Cemetery that were empty, that the Cemetery may have been desecrated.**
- 4. That in strict contravention of Jewish Law the JHSE- Jewish Historical Society of England did in 1947/48 “partially fund” this specific part of Grimes Excavation of a small portion of this Cemetery.**
- 5. The Mapping of the boundaries’ and therefore the size of the Cemetery**

**1.The Age of the Cemetery**

The MOLA report states that the Cemetery; “Dates back to at least the 12<sup>th</sup> Century”.

Multiple statements throughout Jewish Law require, that upon a newly established Jewish Community being set up, that the first priority for that community is to establish a place for burial. This in Jewish Law takes precedence even over the building of a Synagogue. This stems from the fact that in Jewish Law the deceased must be buried as soon as possible after death, and that the burial must not be delayed even

even for one night. - see **Talmud-Sanhedrin Chapter 6 and Maimonides- The Book of Commandments-Positive Commandment 231.**

The great 12<sup>th</sup> Century Historian of England William of Malmesbury- see **Gesta Rerum Anglorum," ed. Duffy, p. 500** records that William the Conqueror brought Jews from Rouen -France to England in about the year 1070.- See also **Jacobs J.-1889.** Prior to this period there is no evidence of any Jewish presence in England. As noted by Jacobs- "The Conquerors' objective can easily be guessed. From Domesday it is clear that his policy was to get the feudal dues paid to the royal treasury in coin rather than in kind, and for this purpose it was necessary to have a body of men scattered through the country that would supply quantities of coin".

Additional details and Primary Sources can be found in **Normal Golb, *The Jews in Medieval Normandy: A Social and Intellectual History (1998) pp.112-13.*** According to Golb; "soon after 1066 Jews of the capital [Rouen] were transferred to England, apparently by William's order. William of Malmesbury relates this fact in one version of his monarchic history, explaining that "the Jews who lived in London, whom [William Rufus's] father had brought from Rouen, approached Rufus on a certain solemn occasion, bringing him gifts."

Perhaps the greatest authority on the Jews of Rouen that William the Conqueror brought to England was the Orientalist Isaac Broyde-1867-1922. Broyde a keen Historian, had studied at the Sorbonne in Paris and had a particular interest in medieval French Jewry and old Jewish Manuscripts of which the National Library of France founded in 1354 in Paris had a selection of French -Jewish documents and Manuscripts which was one of the largest in the world.. In 1895 Broyde was appointed the official librarian of the Alliance Israelite Universelle in Paris. This library also contained a colossal number of old Jewish- French Manuscripts of which Broyde, as official Librarian, had unfettered access to. Broyde regularly contributed articles to the *Revue des etudes Juives*. This Journal often printed articles concerning the history of French Jewry of which Broyde had a lifelong fascination.

Later in life Broyde emigrated to New York and Joined the Editorial Staff of the Jewish Encyclopedia.

It was whilst in New York, later in his life that he was asked to write a short article for the Jewish Encyclopedia on the Jews of Rouen-France. In this article Broyde states; "In 1066 numerous Jews of Rouen emigrated to England having been induced to settle there by William the Conqueror".

The Mortality Rate outside of the Aristocracy in Medieval England was very high and at that time in Europe one third of Children died in their first year-see **Jonker MA. Estimation of life expectancy in the Middle Ages.**

Furthermore, Church Law at that time expressly forbade the burial of a Jew in a Christian Burial Ground.

An additional point to note here is that there is no evidence whatsoever that other than this Cripplegate Jewish Medieval Cemetery of London, that there ever existed any other Jewish Burial Ground for the Medieval Jewish Community of London.

What can be established from all of the above is the following. That the Jews of Rouen whom William the Conqueror brought to England lived in London. That Jewish Law requires that upon death the deceased is buried as soon as possible with a strict proviso that this time period not exceed a day, ie overnight as above. That in Jewish Law the establishing of a place for burial takes precedence even over the establishing of a Synagogue. That the Jews whom William the Conqueror brought to London were brought here in the year 1066 and that those Jews were numerous in

number. They were brought here as they were wealthy and had use as such for William the Conquerors Economic Plans for England and as such buying a piece of land to be set aside as a Jewish Cemetery in London was well within their financial capacity. That due to a high mortality rate, particularly among children, burial facilities would have been needed very soon after their arrival in London. That both Jewish Law and Church Law expressly forbade the burying of a Jew in a Christian Burial Ground. That there is no evidence whatsoever that other than this Cripplegate Jewish Medieval Cemetery of London, that there ever existed any other Jewish Burial Ground for the Medieval Jewish Community of London

My Conclusion therefore, when taking all of the above into consideration is that the Cripplegate Medieval Jewish Cemetery of London was bought by the Jews of London and was functioning as a Jewish Cemetery in the year 1066.

As such I conclude that MOLAs statement in their Report that this Cemetery “dates back to at least the 12<sup>th</sup> Century” has no valid historical basis and indeed is factually wrong. The Cemetery dates back to just past the mid-11<sup>th</sup> Century.

This point is not merely academic in exercise but is very important in establishing the fact that this Jewish Cemetery, when compared to other medieval Jewish Cemeteries of major European Cities/Towns was particularly large in size. It functioned as a Jewish Cemetery from year 1066 right up until the collective expulsion of all of English and Welsh Jewry in 1290. Subtracting 34 years from its two hundred- and twenty-four-year existence as the fully functioning Medieval Jewish Cemetery of London may be seen by some, even if unintended, as an effort to seek to diminish the number of burials carried out within its grounds and therefore to diminish it in both burial capacity and therefore physical size.

## **2. The continuous placing, over a period of many centuries, of buildings over parts of this cemetery.**

The above issue is one that this Committee-CPJCE has dealt with almost continually throughout its existence.

The placing of buildings over part of an older Jewish Cemetery, has, unless clearly shown otherwise, little relevance to the continued protection of the site. This is because what is necessary to determine is whether there is a high probability that, in the main, most of the burials/graves within the said Jewish Cemetery remain in situ despite the continuous placing of houses/buildings over the site. It is therefore not the buildings we are particularly interested in, but rather the foundations of those buildings and in particular their depths. ( I note that in MOLAs letter to CPJCE, the Maps they provide up until and including the 1553 Map would appear to concur with Honeybourne’s finding based on Stow in his famous survey- 1603, ie that-“ The bulk of the Cemetery was still open in Stows time”).

The building foundations of Residential Houses within the specific area concerned from 1600 until the late 1800s were particularly shallow. Indeed, it wasn’t until the 1870s that the Government first began to regulate the depth of Building Foundations.

The London County Council was created in 1889, and sponsored the **London Building Act of 1894** which amended the rules relating to foundations and the thickness of external and party walls. By today's standards the foundations the then new regulations created seem very shallow; in fact, many text books from the time suggest that foundations should never be less than “12 inches (300mm)” deep. These standards were generally higher than those adopted by provincial towns and cities.

During the 1920s and 1930s building foundations remained much the same. Text books from the 1930s suggest that in clay soils, foundations should be "3 feet deep (900mm)". London Building Acts and Model Bye-laws introduced a number of minor amendments. - **(see further-Evolution of Building Elements- University of West England)**.

The argument that from 1600 onwards the houses or smaller buildings in the area that concern us were all built with deep underground cellars or basements is a myth. Whilst some of the housing and smaller buildings in the area of this cemetery were built with cellars, this was not always the case and for a very obvious reason. To build a real underground cellar would have required the builder to firstly dig without the aid of today's heavy building machinery. This task was difficult, particularly if building in the winter when the clay was (and is still) hardened. All of the clay that was dug up then had to be removed and transported, often for long distances to be dumped. The main problem here of course was cost. The workers who were to dig these deep foundations had to be paid and it could take many weeks to dig such deep foundations. Then transporting the dug-out clay to a place where it could be deposited was also both expensive and very time consuming.

What often happened was that cellars in this specific area of London were built at street level or just below it, with steps then constructed that led to the front door of the building. This method of building thus had the advantage of being far cheaper to construct, and also allowed some air and light to penetrate into "the Cellar".

Honeybourne notes in her survey-(see MOLAs letter to CPJCE) that the graves that were located by W. F Grimes in 1948/49 were in fact 9 Feet down from street level. As to why the Medieval Jews of London would have felt it necessary to dig graves to such a depth, especially during the 13<sup>th</sup> Century when both Norman and Plantagenet era non-Jewish graves were dug to just below 3 Feet, becomes clearer when one considers that the ransacking of Jewish Cemeteries had become so common place in 12<sup>th</sup> Century Europe that in 1199 Pope Innocent the Third issued a proclamation regarding the Jews of Europe and stated that people were," to prevent the baseness and avarice of wicked men we forbid anyone to deface or damage their cemeteries or to extort money from them by threatening to exhume the bodies of their dead"- **see -Thatcher-O.- A Sourcebook for Medieval History -1905**. The matter does not end there, For In 1215 the barons opposing King John sacked the Jewish quarter and used the tombstones of the Jewish cemetery of London to repair Ludgate (**Stow, "Survey of London," ed. Thoms, p. 15**). Suffice to say that we have documented other Medieval Jewish Cemeteries such as the Medieval Jewish Cemetery of 13<sup>th</sup> Century Toledo in Spain where all of the graves were located at a minimum depth of 9 Feet deep but many were actually deeper than this. It must be clearly pointed out here that the Toledo Medieval Jewish Cemetery was first located during works carried out under a school and the Archaeologists that were brought in failed initially to contact the Jewish Community. Once the Jewish Community was alerted to the fact that Jewish graves had been disturbed, which is most strictly prohibited in Jewish Law, all archaeological excavation was immediately halted.

Taking all of the above into consideration I see no reason at all why all of the graves that are today under open ground anywhere within the original boundaries of the Medieval City of London Jewish Cemetery should not still be there. (I accept that the graves that were located within the cemetery grounds during the building up of the area in the 1960s/70s have for the most part had all of their human remains removed, as the building foundations dug at that time in and around the Barbican were for the most part very deep).

As to why it was that in all of the deep building foundations dug in and around the Barbican and beyond during the putting up of new buildings during the 1960s/1970s on areas that are located within the Medieval Jewish Cemetery of London, that not a single piece or fragment of a human

remain found has ever been returned to the Jewish Community for reburial in a Consecrated Jewish Cemetery is an enduring mystery and one that has never sat at all well with the Jewish Community in this country or elsewhere. It is beyond the remit of this report that I write as the Honorary Archivist at CPJCE to go into this specific matter in greater detail. Suffice to say that this specific issue deserves far more scrutiny.

### **3. The assumption that upon the late W. F Grimes having found 7 graves within the Cemetery that were empty, that the Cemetery may have been desecrated.**

During The Blitz carried out by the German Airforce on London during WW2, the City of London was heavily bombed in 1940 for 57 nights in a row. This, and further German Air Force bombing raids during WW2 on the City of London reduced the Square Mile and its surrounding area to rubble. At the end of WW2, it was felt that if there was ever a time to carry out a full Archaeological study of the entire area, then this was it. The task facing The Excavation Council was vast. There were 103 acres available for Archaeological research in total, and although due to the high level of projected costs for the entire project the Excavations were tailored down, the project was vast. -**See Further-Archaeology after the Blitz by Gustave Milne.**

W.F Grimes, in the 1960s began cataloguing and putting his findings concerning the above project into words. This consisted of multiple volumes of which only one has been published to date. Even this one volume is large and goes into many pages. Of this, Grimes gives only 2 pages to the issue at hand, namely the Medieval Jewish Cemetery. Grimes states that 7 Graves were opened and that no human remains were found in these 7 graves, although human remains were located at what would have been other areas of the Medieval Jewish Cemetery-**See further Honeybourne.**

These findings, (or lack of them), have created over time a long list of theories, with, as Honeybourne writes in her notes, Roth. C. - going as far as saying that the Jews of London may have carried all of the bones and remains from the cemetery out with them at the time of expulsion and into exile. For the reasons I write below, Roth's theory has no basis whatsoever and is entirely wrong.

In looking at the number of burials that would have taken place at this Cemetery during its Two Hundred- and Thirty-Four-year existence we find the following;

1. That besides the Medieval London Jewish Community, which throughout the time period Jews lived in Medieval England was always the largest in number, no Jewish Community in Medieval England was allowed to have a Jewish Cemetery until 1177-**see Benedict of Peterborough's Chronicle-1169- 1192.** This meant that for over a hundred years , all Jews, wherever they resided in England, had to bring their dead to this London Cripplegate Cemetery for burial.

2. That there were a number of documented massacres of the Jews in London in Medieval times.

On the 3<sup>rd</sup> of September 1189 at least 30 Jews were massacred just outside of Westminster Abbey during the Coronation of King Richard the Lionheart. Included in this number was the greatest Rabbinical Sage in England at that time Rabbi Jacob of Orleans. (Rabbi Jacob of Orleans writings in Jewish law are still very much studied even today by students of the Talmud wherein Rabbi Jacob's 'Commentaries are today printed in every edition). On Palm Sunday 1263 festivities in London turned into a riot during which 400 Jews were murdered- **see-. The King's Jews: Money, Massacre and Exodus in Medieval England, by Robin R Mundill.** The following year a massacre took place in the city when a further one thousand five hundred Jews were massacred- **see Marks K. A Brief**



**Summary of Anglo Jewry Chap.2-2010.** The new partially published records of “**The Jews of the Tower**” (published by Historic Royal Palaces) inform us that in 1267, during a baronial attack upon the city, many Jews hid in the Tower and were even given a section of the wall to defend. Eleven years later in 1277, 600 Jews were then held prisoner in the same castle that they had helped to protect. The Jews, in the main by this time, had been banned from lending money on interest and had been barred from most professions- **see- the Statute of Jewry- 1275**. Some, it seems, had resorted to the capital offence of Coin Clipping in order to avoid starvation. The Towers Records inform us that in the year 1282 alone, 293 Jews were executed at the Tower of London for this offence. The Newly published Records of The Jews at The Tower inform us that amongst what we would refer to today as the Prison Wardens of The Tower, there was a Full time Prison Warden who was a Jew. It is presumed by the compilers of the above newly published Records, that part of this Jewish Prison Wardens work was to take the many bodies of the executed Jews from The Tower of London to the nearby Cripplegate Jewish Cemetery for burial. In addition there were Jews whom were executed at the Tower both prior to and post 1282 and the figure is of a considerable number. It should be noted that many of these prisoners executed at the Tower of London were not London residents but were brought to the Tower from all over England, with some listed as coming from as far as Germany.

3. That as already stated, the Mortality Rate at the time was high with a third of all children born dying within their first year, and life expectancy particularly in the years leading up to the year of expulsion in 1290 where many Jews had been reduced to poverty was perhaps aged 40.

Before however we answer the 2 questions raised-a. Why did W.F Grimes find 7 empty graves, and b. the Theory of Roth.C. that the Jews may have taken all of the deceased with them upon expulsion in 1290, we must study another aspect of this Jewish Medieval Cemetery of Cripplegate London.

It must be remembered English Jewry began with William the Conqueror bringing a numerous group of French Jews to London in 1066. Through a plethora of both Historical and Religious writings of the Medieval Period it becomes clear that the Jews of England maintained a very close relationship with the Jews of France and particularly the Jews of Northern France. (Indeed with regard to certain religious matters which are beyond the remit of this Report to go into, the unchallenged Rabbinic leader of all of western European Jewry in the 13<sup>th</sup> Century Rabbi Meir of Rotenberg ruled that in certain legal matters we divide Western European Jewry into three parts- The Jews of the Slavic Lands are one, the Jews of Germany or Ashkenaz as it was then referred to by Jews are one, and then the Jews of both France together with England should be counted as a single entity.- **see- Meir ben Baruch, Responsa (Cremona: Vincenzo Conti, 1657), no. 117.**

In 1182 The King of France Phillip Augustus expelled all Jews from the Royal Domains of the Kingdom. (This Expulsion however did not apply to the Jews of the rest of France.)

There is no doubt that the Jews of England were well aware of these expulsions in France and many Jews in England by then realized that as far as English Jewry was then concerned, the writing was on the wall, and indeed had been from the 1260s onwards.

In the year 1287, three years before the year of Expulsion of all of English and Welsh Jewry, a Senior Rabbi in London, Rabbi Jacob Chazan decided that he would write an Encyclopaedic Work of Jewish Law that would cover the entire corpus of Jewish Law giving emphasis in many chapters in this magnificent work on recording the religious customs of the then Jews of England. He called this Work “Eitz Chaim” or The Tree of Life. In this work his foresight of the pending gloom that would soon befall all of England’s Jewish population is almost palpable. In his introduction to the work he



writes that he is writing this work so that “his people will be able to carry it with them wherever they go”.

We find some very interesting legal rulings and customs of English Medieval Jewry in this work as listed by Rabbi Jacob Chazan of London.

In his book, **Eitz Chaim- The Laws of Mourning** we find a statement that translates as follows; “It is forbidden to move Human Remains from any grave”. “This applies”, continues Rabbi Jacob Chazan; “Even in a case where one wants to move the buried deceased from a pauper grave to a nicer and larger grave”. He adds, “We do not bury two people together in the same grave”.

There are other telling signs within this great work, such as the listing of the specific custom and recitation of English Jewry’s daily prayers, prayers which even a small child would have been taught at an early age to know off by heart, that point to Rabbi Jacob Chazan of London’s wish that this massive work act not only as a religious book of instruction, but also as an Historical Reference and guide to London Jewry in the very final years before the coming expulsion and the coming years of exile of English Jewry.

What comes out from all of the above is that excluding what we know about this cemetery’s physical boundaries, that this Cemetery, very tragically, had an extraordinary number of burials contained within it. That despite the huge amount of Jewish victims of Massacres in the last part of the 13<sup>th</sup> Century within London that there were no mass graves dug within the Cemetery as Jewish Custom at the time did not even allow 2 people to share the same grave. That with the dead coming in to the cemetery in the later part of the 13<sup>th</sup> Century as a result of mass murder and mass execution in their hundreds at a time, that it would have been almost impossible to dig a separate grave, at a depth of 9 Feet for each victim, all within the Biblically mandated time allowance for burial from time of death of a maximum of under a full day. And that once buried, as Rabbi Jacob Chazan of London writes in the year 1287, 3 years before the expulsion, no grave may ever be moved, thus putting an end to Roth’s theory which infers that the Jews of London took their dead with them into exile after having been expelled. Furthermore, we now know that the Medieval Jewish Cemeteries of Winchester and York all remained untouched with the human remains in situ after the expulsion. Thus, the idea that any of these English or Welsh pre–Expulsion Medieval Jewish Communities exhumed and took all or any of their dead with them into exile upon expulsion, has absolutely no basis or credibility whatsoever.

Hence it seems to me that in the last 40 bitter years of Medieval London Jewry, the only way to keep continually supplying individually dug graves at a depth of 9 Feet for all eventualities as listed above ,(mass Execution, mass murder etc) was to maintain at all times a great abundance of pre dug graves that were kept open within the London Jewish Cemetery and possibly placed nearer to the centre of the available space left within the cemetery to avoid any accidents, although these open graves were probably covered with beams or the like for safety purposes.

Why W.F Grimes came to find seven empty graves in his Excavations of a very small part of this Cemetery in 1948/49 thus becomes abundantly clear. It also clearly explains why both Grimes and Honeybourne correctly felt that the earth from these 7 graves had at one time been dug out and then carefully put back in- the graves having been refilled no doubt sometime after the expulsion when the Cemetery was given to others by King Edward the First for keeping.

**4. That in strict contravention of Jewish Law the JHSE- Jewish Historical Society of England did in 1947/48 “partially fund” this specific part of Grimes Excavation of a small portion of this Cemetery.**

It has been confirmed to me by Mr David Jacobs of The JHSE that there is no evidence to support the above claim. Mr Jacobs, who kindly went through the JHSE Financial Records held at the London Metropolitan Archives, confirms to me that no such financial transaction/payment was ever made by JHSE towards the Excavation of this small part of the Cripplegate Medieval Jewish Cemetery that was carried out by W. F Grimes.

What may have happened is that certain secular persons who happened to be members of the JHSE at the time, chose, in a private capacity, and contrary to basic Jewish Law, to contribute of their own private funds to this Excavation. This is alluded to by Honeybourne herself in her 1959 article where she refers to “the members of this Society” having contributed Funds towards this Excavation.

The statement by MOLA in their letter to us that, “The excavations undertaken by the Roman and Medieval London Archaeological Committee (RMLEC) under the direction of Professor Grimes were partially funded by the JHSE”, is thus simply not true.

**5. The Mapping of the boundaries’ and therefore the size of the Cemetery.**

Before dealing with this issue a few words are necessary here to clearly outline what our organisation CPJCE does.

After the Holocaust of European Jewry carried out by the Nazi regime during and prior to WW2, a vacuum with regard to Jewish Cemeteries was left across every country that the Germans had occupied during this period. What the surviving Jewish people were left with was a situation where around ten thousand Jewish Cemeteries across the European Continent were now left “orphaned”, in that due to the Holocaust of European Jewry there were no surviving Jews in the countries that fell under Nazi occupation to take care of, or even visit the Cemeteries that had served all of these Jewish Communities since ancient times across the continent.

Thus began the struggle for the Surviving Jewish Communities located mainly in the USA, Britain and Israel to seek to protect the “orphaned” Jewish Cemeteries of an entire continent many of which were ancient. At first unofficial organisations were formed for this task, some of which proved very successful in their endeavours. The Committee for the Preservation of Jewish Cemeteries in Europe-CPJCE was later formed to centralise all of these unofficial organisations into one single working unit.

I would say that of all of the different and complex scenarios CPJCE has had to face, the most common one is arriving at a Jewish Cemetery site in Europe having been contacted usually via the Local Government, and finding that the original Cemetery Walls or Boundaries have been breached with either outhouses, residential houses and even offices having been built over what was very obviously part of the original Jewish Cemetery. Another regular finding is when arriving at such a Jewish Cemetery we often find that after careful examination of all the facts, that neighbouring garden fences and walls that once bordered the cemetery, are found to “mysteriously” now be well within the cemetery’s grounds.

Thus defining, or Mapping, the true boundaries of a Jewish Cemetery, has due to the circumstances described above, become part and parcel of our work, and we have over 30 years of experience in dealing with it.

One of the major points we have learned over the years in this specific regard is that Historical Maps, Historical Title Deeds or Cartularies have limited value for these purposes if in conjunction with studying them, a thorough inventory of the local and particularly the Jewish History of the location in which the Jewish Cemetery is located, is not carefully studied.

In dealing with Mapping the Cemetery Boundaries at this Cripplegate Jewish Cemetery of Medieval London a number of factors must therefore be noted.

1.No Tombstones were ever located at any time within the general area of this Cemetery Site. We note above that In 1215 the barons opposing King John sacked the Jewish quarter and used the tombstones of the Jewish cemetery of London to repair Ludgate (Stow, "Survey of London," ed. Thoms, p. 15). Honeybourne notes in her survey that a number of Tombstones from this Cemetery were located at Ludgate (1586), and found embedded face down in the London Wall (1753). It is very doubtful if after the events of 1215, described above, that the Jews of London placed any Tombstones over the graves within this Cemetery at all. Aside from the fact that there was the obvious fear that the placing of new Tombstones over graves after the events in 1215 would result in them being removed/destroyed again, the poverty that the Jewish Community suffered during the mid to later 13<sup>th</sup> Century meant that it was, in all probability, beyond their financial means to afford such an expense.

It must also be noted that in other European countries of the Medieval era where the Jewish Communities saw that expulsion was written of the wall as it were, the Jewish communities themselves, just prior to their expulsion, removed all of the tombstones from their Jewish Cemetery themselves. This was done so that the remains of the deceased and their individual graves could only be dishonoured and exhumed after the Jews' Expulsion with great difficulty, as without the Tombstones as Markers it would not be known with any precision where the actual graves were located. The Jews of Toledo- Medieval Spain is just one example of where this practice took place just prior to the Expulsion of all of the Jews of Spain. The Jews of Toledo however did, prior to taking this action, make a thorough record of all of the Tombstones, and the manuscript containing these records later surfaced in Turin- **see further the Work- Avnei Zikaron- by S.D Luzzato.**

All of the evidence thus seems to point to fact that when the Jews of London were expelled, the Jewish Cemetery of Cripplegate had perhaps a few, but probably no tombstones left standing within it.

What was left therefore after the Jews had left London, which on pain of death and by Royal Decree was to take place by the very latest November the 1<sup>st</sup> 1290, was a particularly large cemetery in the form of a flat piece of land in the heart of the Medieval City of London that with the exception of its South-East Side- (City Wall and Ditch), was surrounded by privately owned gardens and houses- (I include Church owned Houses and Gardens).

2. The City of London in the middle to late 13<sup>th</sup> Century was already becoming overcrowded in terms of buildings. We find in the records of the early 1320's multiple property boundary disputes in the area concerned- **See-Chew and Kellaway-1973.** To that we can also add the multiple companies and company halls that were established in the area concerned from the 1290's onwards. -**see- Milne-Excavations at Cripplegate-p.6.**

Furthermore, we find that even as late as the 1240s conducting building works that encroached even out into the street of this Cripplegate area was met with a mere reprimand-**See- Chew and Weinbaum-1970.**

Suffice to say that in 1290 justling for property extensions and land rights was not uncommon in the Cripplegate area.

Honeyborne notes in her Survey of the Cemetery that the Contemporary descriptions of the outskirts of the cemetery are, in her words, “not sufficient to give the exact boundaries”. Indeed, even when drawing her Map of the Cemetery contained within her survey, she places next to her map the words, “Conjectural Boundaries” next to her 1950 drawing. She states that what she refers to as “the missing links” are provided by “the grants of the site after 1290”- i.e. after all of the Jews had left England. Honeybourne goes on to base the Boundaries of this Cemetery on a Cartulary taken over four years after the expulsion between 1294-1295. She also notes that for 8 months from the very last day the Jews were allowed to be present in England, November the 1<sup>st</sup> 1290-(the penalty for a Jew being located in England or Wales after this date was death), King Edward the First did absolutely nothing with this piece of land, and it was only in July 1291 that he granted the cemetery to William de Montford- Dean of St Pauls, (St Pauls owned both Gardens and Housing to the immediate North of the Cemetery- “North” is defined using Honeybournes’ hand- drawn map within her survey.).

It goes without saying that it is not being suggested that by the time the King gave the Cemetery to the Dean in July 1291 that there was nothing left to give. Edward the First was a ruthless King, and the owners of all the cemeteries’ bordering land, knowing that all of the Jews’ Land and property within England and Wales upon the Jews expulsion fell to the King, would definitely have been far more subtle. And whilst an Historian or Topographer writing on these matters may think that without evidence to proof, that such smaller are subtler land excursions into this Jewish Cemeteries Land during the 8 months spoken of here are without foundation, 30 years working in this specific area with CPJCE on the ground is more than enough evidence, if indeed any were needed, that in all probability, by the time the King gifted the land to the Dean in July 1291, neighbouring land has “mysteriously” managed to carefully and subtly both breach small parts of the Cemetery walls and extend themselves. The land excursions all happening to all go one way, inwards, of course.

I would say, and with the greatest respect to the late Ms Honeybourne, that it was naïve to base, even conjecturally, the boundaries of this cemetery upon a cartulary taken over 4 years after the Jews had left England. This is even more apparent when one takes into consideration all of the other points listed above. In all probability all of the Cemetery boundaries, with the possible exclusion of its south-east boundary- (South East as defined on Honeybourne’s Map- London Ditch and Wall), were broader than Honeybourne conjectures, and perhaps significantly so.

There also seems to be no doubt from all of the evidence available, that the Southern end of the cemetery, (“Southern” as defined on Honeybourne’s hand drawn Map found within her survey) extends down to Aldersgate Street, at least to its junction with Little Britain – i.e. the Postman’s Park end.

It is therefore most unclear why on the Mapping provided to CPJCE by MOLA the boundary in this regard seems to stop at the Museum of London Building Barbican?

Thus, with regard to the specific question of Mapping the boundaries of The Cripplegate Medieval Jewish Cemetery of the City of London I would conclude that the Maps provided to CPJCE by MOLA are not to be relied upon.

Menashe Z. Goldmeier- (March-2023)

Honorary Archivist

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### **Jewish Cemeteries in Jewish Law**

In Jewish law a Jewish Cemetery possesses an even greater sanctity and holiness than that of a synagogue. In Judaism once a grave is sealed closed it may never be opened, tampered or interfered with in any way, this includes for Archaeological purposes.

Any tampering or interference in any way with a Jewish Grave or Cemetery is considered the worst form of Sacrilege possible in the Jewish religion. For this amongst other reasons the vast majority of Jewish Cemeteries are situated on privately owned land where land has been specifically purchased by members of the Jewish Community to be set aside for Jewish Burials. This has been the case since ancient times. It is because Jewish Cemeteries are completely privately owned and funded that you will find that Burial Fees amongst the Jewish Community are significantly higher than those of Government or Local Council run Cemeteries. In Jewish law graves within a Jewish Cemetery are bought for perpetuity. Furthermore, in Jewish Law no part of a Cemetery may be used for anything other than Burials. As in Jewish Law, as said above, a Jewish Cemetery possesses an even greater sanctity and holiness than that of a synagogue, Judaism requires the utmost respect and behaviour when visiting a Cemetery.

Perhaps most importantly, in Jewish Law a Jewish Cemetery always remains a Cemetery. The fact that it may no longer have any memorial stones on it, or its Cemetery Walls are no longer extant, or buildings have been wrongly built over it or over part of it is utterly irrelevant. All of the above religious laws and requirements still apply in full. The passage of time, even extensive periods of time, does nothing to change this at all.

### **About Us**

The Committee for the Preservation of Jewish Cemeteries in Europe was set up around 30 years ago. Its Head Office is in London UK.

The Committee was set up at the request of Holocaust Survivors to deal with all and any issues concerning Jewish Cemeteries and specifically with their preservation. Primarily the Committee deals with European Jewish Cemeteries that after the Holocaust of European Jewry during WW2 were left with nobody alive to take care of them. These Jewish Cemeteries number in their thousands (around 10,000) and span across many countries. We are also charged with the preservation of the thousands of Mass Pits-Sites of Execution of our murdered brethren carried out by the Nazi Regime that exist across what was Nazi Occupied Europe during WW2.

We also deal extensively with Jewish Cemeteries located in the UK, with particular interest in Historic and closed Jewish Cemeteries.

We are the only such Committee in Europe and are completely independent of any other Jewish organization or Synagogue Body. We have a Sub Committee of Rabbinical Experts on Jewish Burial Law and advise at both National and Local Government Level both here in the UK and across Europe on all issues concerning Jewish Burial Law and Jewish Cemeteries.

We are proud to have also worked over a period of many years with both colleagues at the Council of Europe (of which the United Kingdom is still a full member) and with the European Union. Indeed,

our committee was instrumental in helping to draft and pass **Council of Europe Resolutions 1883 (2012)** and **379 (2015)** which deal with the protection of Jewish cemeteries throughout Europe by Regional and Local Authorities. You may find copies of these Council of Europe Resolutions online.

**CPJCE is also regarded by Historic England as; “A key National organization to engage in any (Jewish Cemetery) Heritage Programmes”- See Jewish Burial Grounds- Understanding Values- Historic England with Barker Langham.**





# וועד להצלת בתי עלמין באירופה



## The Committee for the Preservation of Jewish Cemeteries in Europe

140 Kyverdale Rd, London N16 6PU | email: cpjcevaad@gmail.com

USA Office: 90 Parklane, Monsey, N.Y. 10952 | email: moshe@heritageabroad.com

**Rabbinical board:**

Rabbi E. Schlesinger

Rabbi Y. Padwa

Rabbi A. D. Dunner

Rabbi Z. Feldman

Rabbi S. Low

Rabbi B. Z. Bloom

Rabbi H. Gluck

To- Ms Gemma Delves  
Environment Department  
City of London Corporation  
Date- 15/01/2024

Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Site of the Ancient Medieval Jewish Cemetery of The Jews of Medieval London and England-Opened in Year 1066 and Closed in Year 1290 Upon all of English Jewry having been Expelled by the then Crown with all Jewish Owned Land, Assets, Money and Synagogues throughout the Kingdom having been Seized by Force.

**Patron:**

Rabbi B. Z.  
Freshwater

Dear Ms Delves

Sent by Email

Thank you for consulting us concerning the above.

The background to this important matter, which pertains to the second oldest known Jewish Cemetery in all of Europe is that we at CPJCE have in fact had a number of face-to-face meetings with yourselves encompassing this issue.

It must be said at this point that although there are certain factors where we were able to reach agreements with all parties, their remain outstanding differences.

Parties have already been sent MOLA's 7-page Report dated 03/03/2023 entitled-London Wall West-The Jewish Cemetery.

CPJCE however in consultation with other partner groups as well as having looked through our own archives, asked our own Honorary Archivist to prepare our own report concerning the same. This 12 page Report Entitled-Cripplegate Medieval Jewish Cemetery-City of London-dated 27/03/2023 was also sent out to all parties concerned. Our Report was well received by many academics and Historic England found it of great interest.

One of the results of the above was that there remained and still remain clear disagreements between CPJCE and MOLA over many of the Historical factors that concern themselves with this Medieval Jewish Cemetery containing the hallowed remains of members of Britain's oldest religious Minority Community. It must be clearly pointed out that these differences are not merely academic in nature but importantly pertain to the present development proposals here, We again here feel it is prudent for all concerned that we attach here both of the Reports spoken of and we

respectfully request that Ms Delves as the appointed Planning Officer as well as both the City of London Corporation Senior Planning Engineer together with the City of London Corporation Senior Planning Surveyor kindly acquaint themselves with both reports so as to gain a thorough understanding of what the above remaining differences and points of disagreements are.

### The Present Consultation

In order to simplify matters we attach 2 pictures of the immediate area of concern which are taken from your own Plans.

We now comment as follows.

1. There must be no digging in and throughout the area you label within your picture attached named The Barbers Surgeons Hall Garden
2. We have serious concerns over the apparent proposal as set out within your picture for the placing of pathways within the area referred to as The Barbers Surgeons Hall Garden. We propose that this matter should be further discussed with us in more detail, as should any proposal for the building of staircases within this area.
3. As by law this entire area will be fenced off as a designated and active Building Site during proposed construction, CPJCE would insist that its own experts and Rabbis be allowed to carry out unannounced periodical inspections on site to underscore the keeping of all and any agreements made between all Parties concerned and ourselves.
4. With regard to the basement level of Bastion House: no works which encroach on sub existing structure base level are to be carried without a CPJCE Supervisor and preferably also in the presence of an archaeologist to ensure that no graves or human remains/ remnants of previous constructions are disturbed.
5. That strictly prior to the commencement of any works, official recognition of this Medieval Cemetery of the Jews of London and England by City of London Corporation is given in the form of the placing of a Monument, the design and structure of which has already been suggested by J-Trails but yet to be finally agreed upon in conjunction with ourselves at CPJCE.
6. That due to the sensitivity and complexity of the site, CPJCE requests a further on-site meeting with The Senior Planning Engineer. It is hoped that the proposed meeting will enable the Parties to successfully iron out any difficulties by way of mutual trust and agreement.
7. That the Developers recognize CPJCE as having the status of an “Adjoining Owner” as defined within The Party Wall Act in so far as they will agree to serve notice, appoint a surveyor and seek initial approval for all and any relevant construction proposals to CPJCE, and that both prior to and/or during construction they agree to fully disclose any variations to such proposals through their Party Wall Surveyor and obtain written approval from CPJCE.
8. That it is agreed between the Parties that the Developers work together with CPJCE in assuring that the Annual Pilgrimage to the site by members of the UK Jewish Community which is held on the Hebrew Calendar date of the murder of the Senior Rabbi of Medieval London Rabbi Jacob of Orleans be accommodated in a safe manner, and that the Pilgrims within those 24 hours be allowed to conduct their Annual Memorial Prayer Service at the site as well as their lighting of the memorial candles at the site as has been their custom and practice for decades.



Yours Sincerely

**Rabbi Y Schlesinger**  
**Chairman of the Rabbinical Board**  
**Committee for the Preservation of Jewish Cemeteries in Europe-(CPJCE)**  
**140 Kyverdale Road**  
**London N16 6PU-UK**  
**E-Mail: cpjcevaad@gmail.com**  
**Registered Charity Number 1073225**

**Rabbi H. Gluck OBE-(CPJCE)**

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Ms Gemma Delves  
Corporation of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: P01570341

25 January 2024

Dear Ms Delves

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LONDON WALL WEST, 140 LONDON WALL, 150 LONDON WALL,  
IRONMONGERS' HALL, SHAFTESBURY PLACE, LONDON WALL CAR PARK,  
LONDON, EC2Y (INCLUDING VOID, LIFTS AND STAIRS AT 200 ALDERSGATE  
STREET AND ONE LONDON WALL) LONDON EC2Y 5DN  
Application No. 23/01304/FULEIA**

Thank you for your letter of 19 December 2023 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

London Wall West is the former site of the Museum of London, built in the 1960s as part of the Martin-Mealand Plan for the area north of St Paul's Cathedral that was largely destroyed by bombing during WW2. The proposals seek a mixed-use redevelopment of the site to include offices, a cultural hub and other ancillary uses.

Historic England considers that the proposals would cause some harm. As the designated heritage assets are of significance, your authority has a duty under national, regional and local planning policy to give consideration of this harm and give this 'great weight'. Your authority will also be expected to secure public benefits.

**Historic England Advice**

**The role of Historic England**

Historic England is the Government's advisor on the historic environment and has a statutory role in the planning process. Our role in this site is to assess the impacts on the Scheduled Monuments and on the wider historic environment including the setting of designated heritage assets. This letter only refers to the designated assets and matters related to non-designated archaeological assets are covered in separate correspondence from my colleague Helen Hawkins.



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## Significance of the area

### Post-war planning in the City of London

The City of London was heavily bombed during WWII and the area to the north of St Pauls was totally devastated. The Martin-Mealand Scheme (1955), drawn up between the City of London and London County Council, developed the concept of an integrated series of office towers along both sides of Route XI (London Wall). The buildings would follow a north-south axis to minimise overshadowing of the high-density residential development behind it.

The architects Chamberlain, Powell and Bon (CPB) were commissioned to prepare a scheme for an area along London Wall as part of the Martin-Mealand scheme in 1955. These early plans were modified and presented again in 1959 including designs for the Barbican Estate. Elements of the plan were redesigned and modified until the Barbican Estate was completed in 1982.

### The Barbican Estate

The Barbican is widely regarded as an icon of Brutalist architecture in Britain, heavily influenced by Le Corbusier and in particular his work at Unite d'Habitation in Marseille.

The hard and soft landscape elements form an integral part of the design of the Barbican, creating large civic and residential spaces referencing London's historic garden squares. CPB were keen to present a strong green character within a Brutalist environment. This included the public terraces focussed on the canals and at podium level spanning Beech Street, as well as the private balconies and gardens associated with individual residential units. Characteristic features, from the extensive use of brick slips to the built-in planters and window boxes unify the appearance of the Estate, with the textures, tones and colours of materials given careful consideration by the designers.

St Giles Church and retained sections of the Roman and Medieval city walls informed the layout of the entire estate and were carefully retained and integrated into the gardens, creating a '*ruin park*' as described in the Barbican and Golden Lane Conservation Area Appraisal. At the same time, elevated walkways provided vehicle-free connectivity throughout the Estate and to adjacent areas of the city while affording myriad views into and across the various public and private garden spaces.

The Barbican Estate is within a conservation area and listed Grade II with the associated designed landscape registered Grade II\*. Very few post-war designed landscapes are so highly graded and therefore, the significance of the hard and soft landscaping is particularly high and any impacts on it require very careful consideration.



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### Museum of London (MoL)

As the Martin-Mealand plan evolved, the site at the junction of Aldersgate Street and London Wall was identified for a museum to combine the collections of the former Guildhall Library, the London Museum and Royal Exchange. Powell and Moya, appointed in 1962, developed the site utilising some Brutalist principles but the result was never regarded as matching the success of the work by CPB. Bastion House, the tallest building on the site, is visible in local views as well river prospects from the Thames.

The Museum of London buildings were issued with a COI in 2019 which expires in 2024.

### Ironmonger's Hall

Ironmonger's Hall is the only livery hall to have been built during the interwar period in the City of London. Designed by the Surveyor to the Company, Sydney Tatchell, in a Tudor/Jacobean revival style, the western elevation was designed as the public face and entrance to the building. However, this view was impaired by the 1960's MoL development on Aldersgate Street. The livery hall was listed Grade II in 2023.

### St Giles Church

St Giles-without-Cripplegate was one of the few buildings in the area that survived the bombing raids of 1940. Constructed in the 16th century and incorporating an earlier tower, the church was refaced in the 19th century and substantially repaired after WWII. It is a significant heritage asset, listed Grade I and an important part of the setting of the Barbican Estate and vice versa. The existing towers on London Wall impact on its setting.

### St Botolph's-without-Aldersgate Church and Postman's Park

Originally the site of a Saxon church and rebuilt in the 14<sup>th</sup> century, St Botolph's was one of the few churches to survive the 1666 Fire of London. However, it was almost completely rebuilt in the late 18<sup>th</sup> century and substantially shortened at the east end with the remodelling of Aldersgate Street in the early 19<sup>th</sup> century. The brick elevations to the south and west form part of Postman's Park, the site of the former churchyard and burial ground.

Postman's Park opened in 1880 and expanded to incorporate other adjacent burial grounds. It has the character of a quiet green space a short distance north of St Paul's Cathedral. It contains several memorials and plaques including Watt's Memorial to Heroic Self Sacrifice. The church is the guild church to the Worshipful Company of Ironmongers and listed Grade I.



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Postman's Park is within a conservation area of the same name, and also contains the scheduled monument 'London Wall: section of Roman wall and medieval bastion in Postman's Park and King Edward Street'. This is almost entirely buried, with a small section visible in the lightwell of Nomura House.

### Scheduled Monuments

The immediate area of the development contains three scheduled monuments associated with the fort and city wall of Roman London. Elements date from the Roman, medieval and post-medieval periods, with surviving elements of re-fortification and bastion construction.

These include rare upstanding remains, visible in the public realm and forming a coherent group outlining the complete line of the western wall of the Cripplegate Fort. They demonstrate the scale of the fort and the city wall, showing varying construction methods and they speak to the evolution of the City of London over nearly two millennia.

- London Wall: section of Roman and medieval wall and bastions, west and north of Monkwell Square (known as Bastion 14)
- London Wall: the west gate of Cripplegate fort and a section of Roman wall in London Wall underground car park adjacent to Noble Street (known as the Fort Gate)
- London Wall: section of Roman and medieval wall and bastion at Noble Street (known as the Noble Street stretch of London Wall)

In addition, Goldsmiths' Hall is also a Scheduled Monument, protected for its high architectural and decorative opulence, and its function as centre of craft and guild activities. Furthermore, it still retains a function as the Assay Office, showing the longevity and importance of highly skilled crafts within the City of London.

### Strategic and local views

The London View Management Framework (LVMF) is adopted Supplementary Planning Guidance (SPG) issued by the Greater London Authority (GLA) to protect key views of Westminster World Heritage Site and St Paul's Cathedral from public spaces across the capital. The framework identifies key panoramas, river prospects and townscape views, known as designated views, where developments are required to make a positive contribution and consider their impact on foreground, middle ground and background views.

Bastion House, the existing tower on the MoL site, is visible in some of the river



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prospect views identified in the LVMF. It can also be seen in local views, some of which are from the banks of the River Thames.

Furthermore, the Barbican and Golden Lane Conservation Area Appraisal highlights *“the extraordinary, ever-changing combination of architectural volumes and voids seen on perambulations through the estates”*. It identifies a number of representative views, including some towards the application site from positions at St Giles Terrace, Lakeside Terrace, and Wallside and other sections of the highwalks. It makes clear that much of the visual experience is kinetic, fortuitous, and more complicated than a limited number of fixed viewpoints.

## **Proposals and their impact**

### The scheme

The proposals by Shepherd Robson with Diller Scofidio + Renfro are for the complete demolition of the post-war buildings on the site and construction of three new buildings of 17, 14 and 5 storeys for a mixed-use scheme that includes offices and a new cultural hub. The tallest element is equivalent in height to Bastion House.

### Impacts

The proposed height of the development means that it will have an impact on the settings of more distant designated heritage assets in key views of them

LVMF View 13.A Blackfriars Bridge and Millennium Bridge (downstream): Whilst the focus of the view is St Paul’s Cathedral, the Barbican Estate towers are also prominent and recognisable due to the distinctive silhouette of the projecting concrete balconies. They impact on views of the dome of the cathedral.

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

LVMF View 17B.1 Golden Jubilee/Hungerford Bridge (downstream): The footbridge provides enhanced views east towards the City of London and as a river prospect view, the Thames dominates the foreground. The spire of St Bride’s Church and the dome of the Old Bailey, both of which are Grade I, are distinctive vertical elements seen against the sky.

The proposals will impact on the unusual, ornate ‘wedding cake’ spire of St Brides,



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removing the clear sky from behind much of the lower tier, diluting the effect of the highly characterful silhouette. The visual impact of the proposals does cause harm to the Grade I listed building through development in its setting. In my view, it would be at the mid-range of the scale of less than substantial harm.

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

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

The proposed hard and soft landscaping will inevitably have a relationship with the Grade II\* garden and be legible as an extension to it. The proposals should be informed by the registered landscape. The proposal is for a contemporary landscape scheme rich in biodiversity. However, the success of the relationship between the new landscaping and that of the Grade II\* landscape will depend on the quality and detail of the scheme.

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



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

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

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

#### The scheduled monuments of London Wall

It is not yet possible to fully determine the physical impact of the works on the monuments referred to as Bastion 14 and the Fort Gate in the absence of a detailed demolition and construction methodology and all services plans. Additionally, a plan for protection of the upstanding remains of these monuments will need preparation.

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

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

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

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



a planted swale as part of the site drainage strategy.

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

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

Bastion House and the Museum of London do currently compromise the setting, however, the increased mass and the loss of some of the clear space between the monument and the new building must be considered harmful. This must be weighed against any public benefits which might accrue, such as the provision of increased on-site interpretation and information.

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

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

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

Should you be minded to grant planning permission for this application, the works would also require scheduled monument consent for the monuments referred to as Bastion 14 and the Fort Gate. We would seek reassurance about the physical protection to the monuments, archaeological supervision of all works in the vicinity and the provision of substantial high-quality interpretation and extensive public access.



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With such reassurance, we would be likely to recommend to the Department of Culture, Media and Sport that consent be granted, subject to detailed conditions pertaining to the protection and enjoyment of the monuments.

#### The scheduled monument of Goldsmiths' Hall

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

#### **Policy**

The 1990 Planning (Listed Buildings and Conservation Areas) Act makes it a statutory duty for a planning authority to give special regard to the desirability of preserving listed buildings or their setting (section 16 and 66) when making decisions which affect them.

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2023 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.201). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.205). Clear and convincing justification should be provided for any harm caused (para.206), and any harm should be weighed against the public benefits of the scheme (para.208).

The Department of Culture, Media and Sports 2013 Policy Statement of 'Scheduled Monuments and Nationally Important but non-scheduled Archaeology' sets out governments position on the importance of protecting and presenting scheduled monuments, (see paragraphs 20 and 21 particularly) and should be considered regarding this planning application.

The strategic policy framework for London is set out in the London Plan. Its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance and appreciation, and to avoid harm. It justifies this by explaining the unique sense of place created by London's historic environment, and the irreplaceable nature of its heritage assets.

The London View Management Framework (LVMF) is a piece of Supplementary Planning Guidance (SPG) published by the Greater London Authority (GLA) in support of policies in the Mayor of London's 'London Plan' 2021. It is a material consideration



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in all planning decisions that relate to the designated views it identifies which focus on the Westminster WHS and St Paul's Cathedral.

The City of London Local Plan, adopted in 2015, includes policies which seek to protect:

- the Historic environment (CS12) including policies to protect gardens and open spaces (DM12.5);
- Protected Views (CS13)

and only allow tall buildings in suitable locations (CS14).

The Barbican Listed Building Management Guidelines (an adopted SPD) includes a volume on landscaping which provides a summary of significance as well as detailed assessment of character by zones.

### **HE position**

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

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

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

The interface between the proposed Northern Garden and the existing City of London School for Girls site requires careful consideration. The detailed designs should aim to preserve perceptible separation that enables appreciation and interpretation of the evidential and historical value of the service yard/car park underneath as functional elements of the Barbican Estate. At the same time, I would urge you to consider additional enhancement of the landscaped areas around Thomas More Highwalk, St Giles Terrace, and the City of London School for Girls sports ground where there are



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opportunities for improvement.

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

## Recommendation

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

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

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

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

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

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we



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Historic England

recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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# Barbican and Golden Lane Neighbourhood Forum

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Planning and Development Director  
City of London Corporation  
Department of Planning and Transportation  
PO Box 270  
Guildhall  
London  
EC2P 3EJ  
FAO: Gemma Delves & Amy Williams

31<sup>st</sup> January 2024

Dear Sir/Madam,

## **Objection to the applications; 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC**

This letter sets out Barbican and Golden Lane Neighbourhood Forum's formal objection to all three applications which together comprise the proposals for the site known as "London Wall West" as follows;

**23/01304/FULEIA** - *Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway. | London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN*

**23/01277/LBC** - *External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y). | 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y*

**23/01276/LBC** - *Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y). | Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA.*

## **Objectives of the Barbican and Golden Lane Neighbourhood Forum (BGLNF)**

BGLNF was designated by the City of London as a Neighbourhood Forum under the terms of the Localism Act 2011, to meet the following objectives;

- (a) to produce a Neighbourhood Plan for the promotion and improvement of the social, economic and environmental wellbeing of the Barbican and Golden Lane Neighbourhood Area, its residents and businesses;*
- (b) to ensure that any development in the Barbican and Golden Lane Neighbourhood Area is appropriate to the distinctive and historic character of the Barbican and Golden Lane Neighbourhood Area;*

(c) to promote high standards of town planning and architecture in the Barbican and Golden Lane Neighbourhood Area; and

(d) to develop, maintain and implement a Neighbourhood Plan in general conformity with the relevant statutory development plans for the Barbican and Golden Lane Neighbourhood Area, and in support of the Plan objectives, to propose projects that can be funded using the Neighbourhood Community Infrastructure Levy.

BGLNF's objection to these applications, therefore, is based on our objectives.

### **Summary**

The Barbican Estate, of which the Museum of London, Bastion House and associated public open space and public realm is an integral part, is of outstanding importance as a particularly significant and unusually well-preserved ensemble of post-war heritage and landscape. The buildings and highwalks proposed for demolition contain a very high level of embedded carbon, making demolition the most damaging of options for the site. Furthermore, the design is unsympathetic and inappropriate for this sensitive location and the massing would result in a serious loss of amenity for neighbouring residents and businesses, as well as damaging the setting of Grade I,II\* and II heritage assets, and removing significant views to and from St. Paul's Cathedral. The current proposals would entail a very high degree of harm to the significance of the Barbican, to local amenity and to climate change.

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

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

The Barbican Estate, including Powell & Moya's Museum of London and their neighbouring Bastion House building, taken together are one of the great treasures of the City of London. Attracting visitors from around the world, its importance is recognised as "a hugely important part of the City of London's post-war planning history"<sup>1</sup>. Indeed the government's Independent Panel on UNESCO World Heritage status has said *As a masterpiece of brutalist architecture and town planning reflecting the standards of its time and arguably, one of the best examples of municipal urbanism, the Barbican is one of the best examples of municipal urbanism in the Brutalist style in the world that has maintained its authenticity and integrity despite periods of adaptation and change*"<sup>2</sup>.

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

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

Harm of a very high order is likely to be caused to local amenity. The massing and the design are completely out of character with the Barbican Estate, of which the site forms an integral part. The scheme has no meaningful relationship with the listed Barbican, nor with the neighbouring buildings on Aldersgate Street. Instead the scheme would create impenetrable facing walls using a design vocabulary alien to their setting. Unlike the previous London Wall Place development, also on City-owned land and developed under a commercial partnership with Brookfield,

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<sup>1</sup> Twentieth Century Society – Buildings at Risk - <https://c20society.org.uk/buildings-at-risk/museum-of-london-bastion-house-city-of-london>

<sup>2</sup> Note to Barbican Cultural Alliance, August 2023

this proposal makes no attempt to respect the street plan. Sunlight and daylight will be restricted to an unacceptable level for neighbouring homes, and the risk of night-time light pollution from commercial uses is extremely high. Views to and from St. Paul's Cathedral will be affected with the massing proposed.

We are particularly concerned about the impact of demolishing buildings on the climate. The independent third-party review of carbon optioneering, requested from the planning department in December 2023, has not been made available to the Forum. Our opinion, therefore, is shaped solely by the applicant's own assessment which we consider to have significant shortcomings. Retrofit has been proved to be viable commercially and technically on this site and has the merit of being in line with the NPPF, the London Plan, the Local Plan, the emerging City Plan 2040, and the City's own Climate Action Strategy 2020-2027. It should be the approach here, especially as the City of London as landowner is a public body. We consider that the proposals would cause substantial harm to the environment with the extent of CO<sup>2</sup> to be released.

The City of London's current (2015) Local Plan includes Core Strategic Policy CS5: The North of the City. The North of the City is identified as containing "*a mix of areas and uses, including the strategic cultural quarter centred on the Barbican, and residential areas at the Barbican and Golden Lane, each with its own distinctive character*"<sup>3</sup>. This cultural quarter is also recognised in the London Plan 2021 as one of the capital's strategic cultural areas<sup>4</sup>. Given this, and the City's previous plan to put a Centre for Music on the site, there is a reasonable expectation that part of the site at least would be used for a rich cultural addition to the City. From the information provided we cannot see any *strategic* cultural element within this scheme, which raises significant questions as to how any space proposed would be secured, managed and coexist with the interests of future corporate tenants.

### **Housing Need**

The Forum notes that the London Plan sees the Barbican neighbourhood as a special area within the Central Activities Zone (CAZ) which is rich in cultural activity and where there is a rich mix of strategic functions and local uses. As this strategic plan for London says, this is a place where achieving a suitable sustainable balance is important *The quality and character of the CAZs predominantly residential neighbourhoods should be conserved and enhanced. This should ensure a variety of housing suitable to the needs of diverse communities, including affordable housing, whilst ensuring that development does not compromise strategic CAZ functions. Boroughs should also consider social infrastructure demands generated by residents, workers and visitors in the CAZ when undertaking social infrastructure need assessments*" (2.4.19)<sup>5</sup>. The City's current Plan expected that approximately 60 - 70% of new residential development in the City would take place in the Neighbourhood Area, and the Draft Plan to replace it expects more housing development in this Area than in others in the City.

As the City of London is the landowner as well as the local authority, the Forum takes the view that parts of this site should be used to address local housing need. The current Local Plan says that housing should be near existing residential areas, and the Barbican and Golden Lane Neighbourhood Forum's Housing Needs Assessment<sup>6</sup> concludes that;

- a) The 75+ population of the Neighbourhood is projected to increase by 482 individuals to reach a total of around 877 in 2040. This is a 122% increase doubling the share of the population in this age group.
- b) The projected household growth is 395 households.
- c) The future need in Barbican and Golden Lane produces a range of 121 to 134 specialist accommodation units that might be required during the Plan period, plus around 31 care home bedspaces.

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

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<sup>3</sup> The City of London Adopted Local Plan 2015, Policy CS5, p65

<sup>4</sup> The Mayor of London's London Plan 2021, [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

<sup>5</sup> The Mayor of London's London Plan 2021, CAZ policies such as 2.4.19, page 79

[https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

<sup>6</sup> January 2024

In London, there are 170,000 homeless Londoners which London Councils notes is the same size as the population of the City of Oxford.<sup>7</sup>

According to UCL's Bartlett School of Architecture<sup>8</sup>, many local authorities are directly delivering housing by their own landholdings. Of those doing so, 95% are building on their own land.

Given the special nature of the Neighbourhood and its housing needs, and the example of other local authorities providing housing on their own land, the Forum takes the view that at least some of the specialist housing need should be met on this site.

### **Policy context and draft City Plan 2040**

According to the City's latest published Development Information it already has an office supply pipeline of 515,207m<sup>2</sup> floorspace under construction plus 500,381m<sup>2</sup> of office floorspace permitted but not commenced (as of 31st March 2022). Against this extremely full pipeline of over one million m<sup>2</sup> of office permissions, the draft City Plan evidence documents show that there is doubt about the level of need for offices in the City on one hand and uncertainty over the secure supply of housing land on the other.

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

### **Conclusion**

We consider that the proposals would cause substantial harm to the Neighbourhood Area.

If granted these proposals would be a very poor outcome for such an important place; the qualities that make it so special would be deeply compromised or lost completely. This cannot be meaningfully remedied by improvements in design; a different approach, based on minimising demolition, is needed if this level of harm is to be avoided.

Furthermore, the proposals are a very inefficient means of raising money from the site. As we understand it the City has already run up debts of £11.5m<sup>9</sup> since 2020 on this planning application. Adding a developer's profit, plus £7m for demolition, will encumber the site with further debt, all of which affect the ability to secure the full extent of planning contributions needed to mitigate the significant harm that this proposal entails.

In recognising the Barbican's stature as a world-class example of municipal urbanism which has so far managed to retain its integrity and character, the government's Independent Panel on UNESCO World Heritage status also noted its serious concerns "*The site, located in the City of London, is clearly managed well at present, however there are serious concerns relating to the future management (assurance of freehold and local authority support) and conservation (potential developments affecting Outstanding Universal Value) of the site*<sup>10</sup>.

We regret that, instead of conserving and enhancing this world-class asset for the future, the Corporation of the City of London is proposing to subject it to significant and irreparable harm.

Yours sincerely,

Peter Jenkinson and Brenda Szlesinger

Co Chairs

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<sup>7</sup> <https://beta.londoncouncils.gov.uk/news/2023/homelessness-data-shows-need-emergency-action>

<sup>8</sup> Local authority Direct Provision of Housing: Fourth Research Report, January 2024

<sup>9</sup> Cllr Chris Hayward, Chair of Policy & Resources confirmed this at City Question Time on 30<sup>th</sup> January 2024

<sup>10</sup> Assessment provided to Barbican Cultural Alliance, August 2023

**By email only**

City of London Corporation

Direct Dial: 020 7650 1232

Email: [REDACTED]

Your Ref: 23/01304/FULEIA,  
23/01277/LBC and 23/01276/LBC

Our Ref: RGA/LEL/00575807/1

Date: 31 January 2024

Dear City of London Corporation

**Proposed development of “London Wall West” site (application references 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC)**

We act for the Barbican Association, on behalf of Barbican Quarter Action (“BQA”). BQA, an unincorporated association formed to campaign for environmentally, ethically and socially responsible decision-making for the built environment in the City of London, strongly opposes the proposed “London Wall West” development and objects to the planning and listed building consent applications referred to above.

Please find enclosed a detailed objection prepared on behalf of BQA by CarneySweeney, along with the following appendices:

- Appendix A: BQA letters submitted to the CoLC at pre-application stage
- Appendix B: Embodied Carbon Review by Targeting Zero
- Appendix C: BQA review of DAS by Jan-Marc Petroschka
- Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka
- Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw
- Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Horne
- Appendix G: Planning Policy Review table by CarneySweeney

Separately, our clients have also asked us to express their concern regarding the ongoing technical issues with the Corporation's planning webpage, which periodically ceases to allow representations to be uploaded. Please confirm that the Corporation will investigate this issue as a matter of urgency and accept representations beyond today's advertised deadline.

Yours faithfully



**Leigh Day**

Enc

Our reference: CSL287

31 January 2024

**Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC**

**London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall), London EC2Y**

1. We have been instructed by the Barbican Quarter Action Group ("BQA") pursuant to the following planning applications pertaining to the development of London Wall West; Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC (herein referred to as "the LWW Proposals") on a site which comprises the current home of Bastion House and the Museum of London at 140 – 150 London Wall, EC2 (herein referred to as "the LWW Site).
2. This statement sets out BQA's concerns and objections to date to these planning applications. The planning application documentation is extensive and detailed and so BQA may submit further comments. They will, however, not procrastinate in this regard, and will ensure that any follow up comment is submitted as soon as they are able. In addition and notwithstanding, the comments below refer to the inadequacy of some of the planning application documentation, and so BQA will wish to review and comment on any further amended documentation submitted to rectify these inadequacies.

**Background to the Proposed Development**

3. Since the announcement in 2015 that the Museum of London would be moving, the LWW Site has been under consideration by the City of London Corporation ("CoLC"), the landowner of the LWW Site, for redevelopment and regeneration. Most significantly, the LWW Site had previously been considered for the Centre of Music for the Barbican London Symphony Orchestra (LSO), the Barbican Centre and the Guildhall School of Music and Drama (and it was in this context that the application for the Certificate of Immunity from Listing was made – see paragraphs 17-18 below) but these proposals were cancelled by the CoLC in February 2021 due to the impact of Covid-19 and the announcement by LSO's conductor, Simon Rattle, one of the main driving forces behind the project, that he was leaving the organisation

*Public Consultation on the Emerging Proposals: May 2021 – June 2022*

4. In May 2021 early engagement with various stakeholder groups was conducted by the CoLC and later in December 2021 a consultation document was published by the CoLC Property Investment





Board setting out their emerging vision and plans for the LWW Site. The report - The Future of London Wall West (December 2021) begins by setting out what are considered to be the current limitations of the LWW Site, as well as the challenges in relation to the difficult to navigate public realm and the lack of access to the historic Roman Wall on site. The report notes that Bastion House and the Museum of London site are at the end of their design lives and no longer fit for purpose. The report further advises that studies were undertaken to assess the case for refurbishment, extension or partial redevelopment but that a full redevelopment of the LWW Site (with a responsible approach to re-purposing and re-using existing materials on site alongside highly sustainable design standards) would be the best approach. The report did not, however, provide any greater detail on the studies or the types of uses considered in relation to refurbishment and the BQA later submitted a Freedom of Information Act (“FOIA”) request in February 2022 to obtain details of the structural report and carbon assessment that was directly referenced in the December 2021 consultation. The FOIA included a request for environmental information under the Environmental Information Regulations 2004 (“EIR”).

5. The initial design concepts for the LWW Site consulted on in December 2021 revolved around the vision to make a *“vibrant, thriving, inclusive and sustainable place that the City can be proud of”*. A number of key benefits that the development could deliver were identified with the intention that these would align with the CoLC planning policies as set out in the emerging draft City Plan 2036, the Culture Mile Look & Feel Strategy and the Square Mile: Future City document as well as the CoLC Climate Action Strategy 2020 – 2027 which was adopted in 2020. The consultation document stated that such intended benefits include: Celebrating culture and the City’s heritage; Creating a sense of community; Creating new public spaces for people to enjoy; Meeting modern sustainability standards; Creating stunning architecture; and Delivering a range of high quality office spaces. In terms of land uses, there was no explanation as to the approach to potential land uses, other than to advise that the inclusion of flexible, high quality office space was in line with the draft City Plan 2036 which confirmed that a good supply of modern, sustainable office accommodation was needed to meet the needs of the City’s commercial occupiers and to keep pace with growing business needs.
6. Comments resulting from this consultation were later reported by the CoLC in their ‘London Wall West – Public consultation Round 1 Feedback Report’ and were considered by the CoLC to be focussed on a number of themes:

Height and massing of the buildings and the impact on light, views, security and footfall;

The demolition of existing buildings and associated embodied carbon;

The demand for new office space;

Walking and cycling routes; and

Maintaining access to the highwalks and fixing the lifts around the site.



7. Having reviewed all feedback given from the December public exhibitions the City Surveyors on behalf of the CoLC (as future applicant) launched a second public consultation in June 2022 on their developing plans for the LWW Site and several pop-up events and a further public exhibition were held. A key criticism raised by the BQA is that this consultation (as with the earlier December 2021 consultation) focused on a single option for redevelopment of the LWW Site and did not present any alternatives.
8. The CoLC June 2022 consultation pack set out the intention to deliver approximately 40,000sqm of new office space alongside affordable workspace and maker space, community and learning space for a variety of functions, new café and restaurant spaces, cultural spaces including for exhibitions, lecture/auditorium spaces along with a new 'culture cap' with views of St. Paul's Cathedral alongside a series of new interconnected landscaped open spaces and public realm. Information was also provided on the types of open spaces proposed, the culture, learning and community offer, the sustainability and energy strategy for the project and how the office space will meet current needs.
9. The consultation pack set out the design approach to the LWW Proposals and how the scheme would fit into the wider area; intended traffic safety improvements, new routes and improvements to the existing highwalks network alongside details of the proposed massing of the new buildings and the townscape and microclimate considerations. The proposed three new buildings were referenced in the consultation material as follows:
  - New Bastion House – at 17 storeys (86.7m AOD) and c. 38,000sqm – equivalent in height to the existing Bastion House;
  - Rotunda Building – at 14 storeys (75.3m AOD) and c. 31,000sqm – approximately 20m lower than the adjacent 200 Aldersgate Street; and
  - Northern Building – at 5 storeys (39.6m AOD) and c. 3,500sqm.
10. This second stage of consultation was supported by an interim Whole Life Carbon Assessment report dated May 2022, commissioned by the CoLC for consultation with stakeholders, and which was stated to provide a qualitative assessment of the existing buildings on the LWW Site along with a quantitative study of the carbon impacts of two tested development scenarios; Option 1 - which retains some of the existing building fabric and creates new development through new and retained building fabric and Option 2 - which is for the full demolition of the buildings on site and erection of new buildings. The BQA highlight that despite their earlier FOIA/EIR request made in February 2022 to obtain details of the structural report and carbon assessment that was directly referenced in the December 2021 consultation, this assessment was released by CoLC instead.
11. The Whole Life Carbon Assessment ("WLC Assessment") concluded that Bastion House could be retained as offices as a short- term solution but that the current building contained many considerable limitations including floor to floor heights, poor lift provisions, outdated fire safety



standards and poor energy performance. Bastion House was also identified as having several structural issues including the risk of disproportionate collapse, fire integrity and carbonation.

12. Due to the above, the WLC Assessment considered that a change of use to residential accommodation would be unfeasible and unviable. The Museum of London building was also deemed to be heavily constrained in design, structural and engineering terms) with similar issues relating to disproportionate collapse) giving limited scope for adaption to other uses. Overall, the assessment concluded that on a per-square metre basis Option 2 performed 10% better than Option 1. However, as Option 2 is larger, in absolute terms it has a higher Whole Lifecycle Carbon emission. The absolute carbon emissions for Option 1 are approximately 20 million kilograms, equating to just over 20% lower for Option 1 compared to Option 2.
13. In response to the WLC Assessment and the structural assessment assumptions which underpinned the report, the BQA presented the CoLC with two peer assessment reports in September 2022. The peer assessment reports were produced by two leading experts – Bob Stagg of Conisbee Structural Engineering and Simon Sturgis of Targeting Zero. The review undertaken by Consibee Structural Engineering considered the structural engineering aspects of the WLC Assessment and contradicted the assumption that Bastion House and the Museum of London building were at risk of disproportionate collapse. Since this was the basis on which CoLC only chose to compare Options 1 and 2, the WLC Assessment does not consider the option of retrofit. This is further highlighted in the report by Targeting Zero which advised that *“a more comprehensive retrofit approach than the one proposed, with Bastion House retained and retrofitted, would have far lower carbon emissions”*.
14. The peer assessment reports highlighted several fundamental flaws in the WLC Assessment and an evidenced request to the CoLC to reconsider the retention and retrofit of Bastion House was made by the BQA (with the intent that good practice would have commanded the WLC Assessment be withdrawn and the options appraisal re-evaluated/started again).
15. The CoLC set up a dedicated webpage for the LWW Proposals (<https://londonwallwest.co.uk/>) and it is here that feedback from the June 2022 round of consultation is reported as being focussed on the following themes:
  - Questions about the principle of redeveloping the site and the vision for the scheme;
  - Concerns over the scale of the design proposals;
  - The need for more office space;
  - The impact of the new buildings on locally listed assets; and
  - Distrust of the City of London Corporation.



16. In October 2022 it was announced that the CoLC Policy and Resources Committee had made the decision to reduce the size of the LWW Proposals in response to feedback from public consultation. It was confirmed that the width of the building proposed to replace the Museum of London would be reduced by 3 metres whilst the width of the building proposed to replace Bastion House would be reduced by 2 metres. The press release also noted that a 3D model of the final proposal for the LWW Proposals would be presented in 2023 ahead of the submission of a planning application. This commitment was never met.

#### *Immunity from Listing*

17. Alongside the consultation process set out above, a Certificate of Immunity from Listing was granted by the Secretary of State for Culture, Media and Sport, for Bastion House in August 2019 and this expires in August 2024. It is noted that an application to renew the certificate has recently been submitted to Historic England on the basis that no new evidence in favour of listing has come to light.
18. In contrast to the above, in 2023, The Twentieth Century Society published their latest 'Risk List' - a selection of ten twentieth-century buildings currently facing demolition or disfigurement. Eighth on the list is the Museum of London and Bastion House. Designed by architects Powell & Moya, the Museum of London is recognised as the first post-war museum to be built in London and the largest urban history museum in the world. Bastion House is also acknowledged by The Twentieth Century Society as a rare survivor of a hugely important part of the City of London's post-war planning history, and both buildings are identified as being under threat for total demolition due to the museum's move to Smithfield Market.

#### *Closure of Museum of London December 2022*

19. The Museum of London closed in December 2022, with the intention that it will re-open in 2026 in its new location at Smithfield Market. The costs of this relocation were originally estimated at £250 million and current estimates now place the cost at £337 million (source: Architects Journal, Museum of London on target for delayed 2026 opening, article by Anna Highfield, 2 May 2023.)

#### *CoLC Market Testing*

20. On 3 April 2023, a tender opportunity was listed on the procurement pages of the CoLC website allowing developers to express their interest in refurbishing the LWW Site. Whilst the results of this tender have not been publicly reported, Chris Hayward (Chairman of the Policy and Resources Committee at CoLC) stated at the City Question Time event held on 15 June 2023 that the CoLC had received expressions of interest that were considered to be credible (albeit commercially



confidential)<sup>1</sup>. In contrast, it is noted by the BQA that paragraph 5.5 of the Planning Statement submitted with the planning application advises that Bastion House is currently unoccupied following the primary lease expiring in 2023 and that the building and structure no longer meet the design needs and expectations of prospective office occupiers.

### **Consultation and Engagement**

21. The paragraphs above summarise the pre-application consultation carried out by the CoLC as applicant. Throughout this process the BQA have consistently raised concerns about the proposals to redevelop the LWW Site and we note below the letters submitted to the CoLC by the BQA throughout this process (copies of which are attached at Appendix A to this statement) in addition to which eight FOIA requests were submitted to the CoLC, one of which included a request under the Environmental Information Regulations 2004;

03 November 2022, Open letter from the BQA to Chris Hayward

23 June 2022, Response to proposals published 18<sup>th</sup> June 2022

12 April 2023, Exploring the potential to refurbish the London Wall West Site

15 June 2023, London Wall West

7 November 2023, Open reply to your letter of 29 September 2023

22 November 2023, London Wall West (LWW) pre-application: A glaring lack of consultation and transparency

22. Fundamentally the BQA wish to highlight that at no stage did the consultation material allow a public debate on the fundamental question of redevelopment of the LWW Site versus a scheme which considered the retention and/or adaptation and retrofit of the existing buildings on the LWW Site. This is central to the consideration of development scenarios later to be reflected in the WLC Assessment undertaken both at pre-application stage and now later as submitted with the planning application. Similarly, alternative massing options were never shared with the community during the early stages of public consultation, nor was the commitment to share a 3D model of the proposal prior to the submission of the application met. Whilst the CoLC did make nominal reductions in the width of the buildings (the width of the building proposed to replace the Museum of London reduced by three metres and the width of the building proposed to replace Bastion House reduced by two metres), these are considered by the BQA to be minimal concessions and it is only now (post submission) that a model of the LWW Proposals has been made available for public viewing and the scheme's true height and scale (and subsequent impact) can be fully appreciated. As such the BQA continue to express significant concerns at the massing of the LWW Proposals along with

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<sup>1</sup> Recorded event available to view at: <https://www.youtube.com/watch?v=EUOVSnkgOYs> (16:55 from start)



claims that the development will enhance the locality and its heritage assets (see paragraphs 79-82 and 83-86 below).

23. Criticism is also levied at the CoLC in relation to the market testing undertaken in April 2023. The CoLC advised that the purpose of the market testing was to respond to the local desire for the buildings to be retained and to explore a viable alternative to demolition. However, on 29 September 2023, the CoLC announced its intention to proceed with a planning application for the LWW Site which would include the demolition of the former Museum of London building and Bastion House. While stating that all options remained on the table, the CoLC argued that it had a duty to achieve “best consideration” and was under a “legal obligation to achieve maximum financial return”. The BQA make the following observations and criticisms in relation to this process:

there was no engagement on the decision to market test (a process only publicised on the CoLC’s own website); or the process itself which allowed a mere seven weeks (a period encompassing both school holidays and Easter) for developers to submit proposals;

the results of the market test exercise, which the CoLC subsequently described as credible and successful, were neither shared nor pursued;

the CoLC only later made explicit its true motives for pursuing the application as maximising financial return, stating that it had a legal duty to do so (and no further cost analysis has been shared by CoLC to evidence (if relevant) that demolition and redevelopment of the LWW Site is more profitable than a scheme involving retention and retrofit).

24. In conclusion the BQA consider that whilst the CoLC may consider that pre-application community engagement has been extensive, in fact the CoLC has:

Failed to involve the community in developing fundamental options for the future of the LWW Site once it had decided not to progress the Centre for Music. This is a major deficiency given the significant history and location of the site and the nature of its buildings.

Failed to adjust the proposals sufficiently to reflect the public feedback received.

Failed to share the results of the market testing or evidence that the buildings could not be successfully or viably retained and adapted.

Failed to keep the community updated on the evolution of the project. The last presentations to the community were June 2022 and the current LWW Proposals were not presented or consulted on in advance of submission – particularly on any matters relating to access and transport considerations.

Lacked transparency throughout e.g. its early whole life carbon assessment, including analysis of the re-use of the existing buildings and the results of the soft market test, have never been shared.





Not acted in accordance with national policy guidance in the NPPF to take account of the views of the community and to reconcile local interests.

### **Principle of Development and Land Uses Proposed**

25. The BQA instructed CarneySweeney to undertake a review of the principle of the proposed development and the land uses proposed.
26. For the purposes of Section 38 of the Planning and Compulsory Purchase Act (2004), which requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise, the development plan comprises the following documents:

London Plan (adopted March 2021)

City of London Local Plan (adopted January 2015)

27. Material considerations currently include the National Planning Policy Framework (December 2023) (“NPPF”) and National Planning Practice Guidance (“NPPG”). It is also appropriate to have regard to emerging policy, the following being a material consideration and a demonstration of ‘the direction of travel of policy’, albeit it does have limited weight at this stage:

City of London: Draft City Plan 2040

28. Whilst supplementary planning guidance (“SPG”), supplementary planning documents (“SPD”) and Planning Advice Notes (“PAN”) do not form part of the development plan, they assist interpretation of policy and are material considerations in the determination of planning applications.
29. In terms of the principle of redevelopment of the LWW Site, further consideration of this matter is set out below in relation to the discussion of retrofit and re-use vs demolition.
30. The planning application is supported by a Planning Statement which states at paragraph 5.6 that the development brief for the LWW Site is for a ‘commercial-led scheme, which aims to address the City’s strategic context and maximise the development potential for the Site’. Paragraph 5.6 goes on to advise that the City’s strategic context is considered to be formed of four main strands: Business, Culture and Leisure, Sustainability and Highways & Public Realm.
31. Chapter 9 of the Planning Statement considers the principle of the development. Reference is made to the NPPF and the presumption in favour of ‘sustainable development’ alongside the requirement that both planning policies and decisions should promote an effective use of land. This is further supported by reference to the London Plan Policies D3 (Part A) in seeking a design led approach to development and E1 (Part A) in terms of improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. Reference is then made to Strategic Objective 2 the City of London Local



Plan which seeks to ensure that challenges facing the five Key City Place are met, commenting that the area surrounding Cheapside and St. Paul's is identified as a vibrant office, retail and cultural destination for attracting visitors to the surrounding attractions.

32. Set against this background, BQA raise significant concern at the approach taken in defining the development brief for the LWW Site, and the lack of consideration that the CoLC as applicant has made to other strategic priorities set out in the NPPF and the development plan as a whole.
33. With regard to making effective use of land, this is addressed in Chapter 12 of the NPPF and Paragraph 124 advises that (our emphasis in bold); *“planning policies and decisions should support development that makes efficient use of land taking into account:*

*The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*Local market conditions and viability;*

*The availability and capacity of infrastructure and services-both existing and proposed as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

***The desirability of maintaining an area's prevailing character and setting** (including residential gardens or promoting regeneration and change); and*

***The importance of securing well designed, attractive and healthy places.”***

34. At a strategic level, the London Plan forms the Spatial Development Strategy for Greater London, setting out a framework for the city's development over the next 20 – 25 years. It is part of the development plan for London, and as such its policies inform decisions on planning applications within London boroughs. It is also the most up to date part of the development plan covering the City of London.
35. Chapter 2 of the London Plan sets out the overall spatial development pattern for London. In terms of key policy considerations, the BQA are aware that at a London wide spatial level the LWW Site is located within the Central Activity Zone (“CAZ”) which is described in the London Plan as *“the vibrant heart and globally-iconic core of London”*. The CAZ is considered to have several strategic functions which include, inter-alia, providing agglomerations of nationally and internationally significant offices and company headquarters; provision for arts, culture, leisure, entertainment; provision of tourism facilities and having a distinct heritage and built environment. The arts, culture, tourism and entertainment activities are stated within the London Plan as being a defining feature of the vibrant and distinctive character of the CAZ with its varied mix of daytime, evening and night-time uses, together making a vital contribution to London's culture and heritage. Noted within the London Plan are the locations considered to be rich in cultural activity, including the Barbican. The London Plan advises these areas and functions should be recognised, nurtured and supported in



line with the London Plan CAZ policy and other London Plan policies related to culture and supporting the evening and night-time economy.

36. Alongside such strategic functions, it is recognised that at a local level, the CAZ contains housing, social infrastructure and other community uses to address the needs of residents, visitors and workers. The London Plan advises that such locally orientated uses such as new residential are acceptable uses and are important to the character and function of the CAZ but should be complementary to and not compromise its strategic functions. To this end, Policy SD5 advises that offices and other CAZ strategic functions are to be given greater weight relative to new residential development except in certain locations, including predominantly residential neighbourhoods. The Mayor of London therefore advises that Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate.
37. The current City of London Local Plan was adopted in 2015 and explains the spatial strategy, vision and strategic objectives for the City of London, followed by the policies required to implement the strategy, set out though a series of five key themes. Each theme has a Core Strategy (“CS”) policy to address the strategic context followed by additional Development Management (“DM”) policies to be used when considering planning applications and other related consents.
38. At a strategic level the Local Plan highlights significant competing demands between the need to accommodate new office development alongside the need for new housing, social and community facilities and improved transport infrastructure. The plan is centred around five strategic objectives, the first of which is to maintain the City’s position as the world’s leading international financial and business centre. The remaining four relate to key City places, culture and heritage, environmental sustainability, and City communities. The table below taken from the Local Plan illustrates the overall scale and phasing of development that is anticipated by the plan to the period to 2026.

Land Use	2011-2016	2016-2021	2021-2026	Total 2011-2026
Offices	650,000m <sup>2</sup>	250,000m <sup>2</sup>	250,000m <sup>2</sup>	1,150,000m <sup>2</sup>
Retailing (A1-A5)	52,000m <sup>2</sup> * * Figures relate to the 2009-2016 period	44,000m <sup>2</sup>	40,000m <sup>2</sup>	136,000m <sup>2</sup>
Housing	667 units	430 units	550 units	1,647 units

Table 1. Indicative scale and phasing of growth in main land uses 2011-2026, CoLC Local Plan



39. In terms of distribution the plan highlights the scale of development that could take place in the five 'Key City Place' areas. These are identified in the plan's Key Diagram (see Figure 4 below) and include;

- The North of the City
- Cheapside and St Paul's
- Eastern Cluster
- Aldgate
- Thames and the Riverside

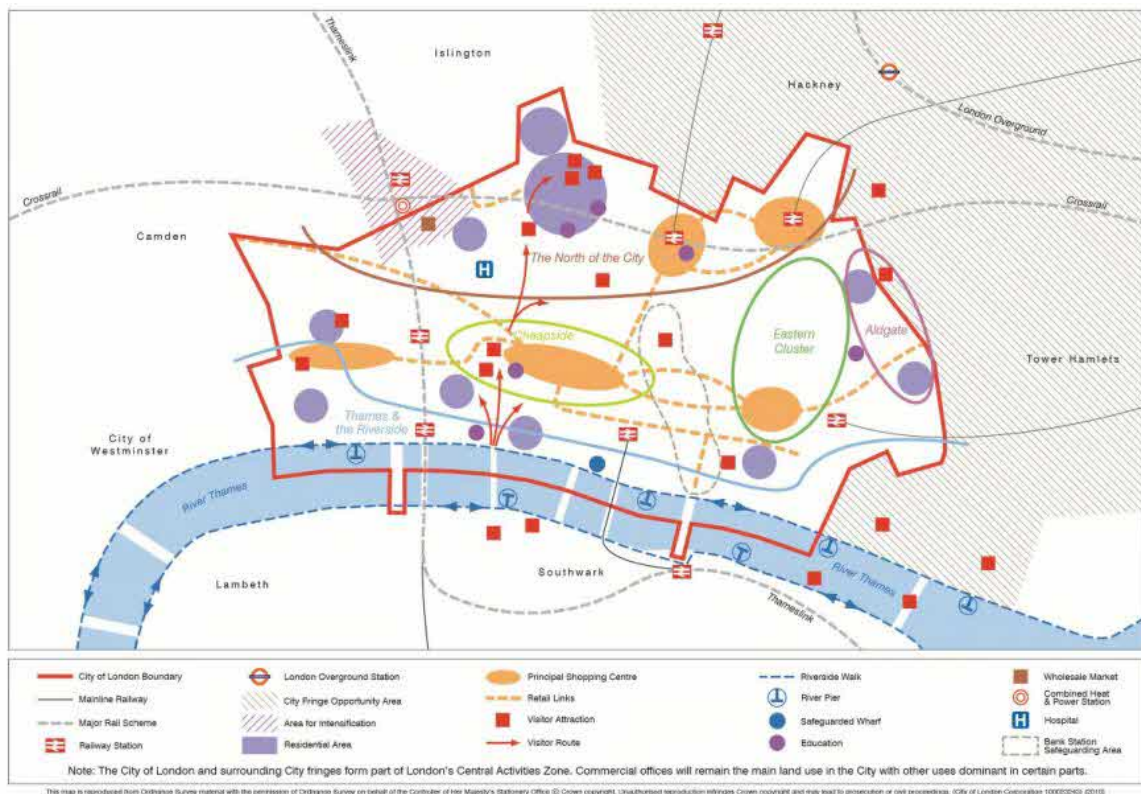


Figure 1. Key Diagram, CoLC Local Plan

40. Rather than placing the LWW Site in the area of Cheapside and St. Paul's (as is set out in the Planning Statement submitted with the application), CarneySweeney consider the LWW Site clearly falls within the 'North of the City' Key City Place area, the current spatial strategy for which is to address the impact of and accommodate growth resulting from Crossrail whilst maintaining the area's mix of uses, enhancing its cultural offer and delivering sustainable development. In terms of its capacity, the Local Plan anticipates the North of the City as indicatively accommodating 10-20% of the required office growth, 20-30% of the retail growth, 0-10% of the hotel growth and 60-70% of the housing growth. Whilst it is recognised that offices will be acceptable development across the City (unless indicated otherwise by policies in the Local Plan), this spatial strategy clearly identifies other uses as also being part of the vision.



41. In terms of maintaining the City's role as a world financial and business centre, the Local Plan advises that the North of the City contains a mix of uses, including the strategic cultural quarter centred on the Barbican and that careful planning is essential to retain the character and amenity of individual areas whilst managing growth.
42. The vision set out in the plan for the 'North of the City' is as follows:  
*"Passengers will emerge from new Crossrail stations to find a lively variety of restaurants and shops with attractive streetscapes and vistas. Attractive pedestrian routes will link pockets of well designed open space. Progressive building designs and sensitive refurbishments will mean residents, workers and visitors remain in a comfortable and safe environment that has adapted to climate change. The Barbican will form part of a wider strategic cultural quarter. Evening and night time activity will be well managed."*
43. Paragraphs 3.5.1 to 3.5.5 of the adopted Local Plan provide further background on the 'North of the City' Key City Place area noting that the area has the potential to lead the way as an 'eco design' district within the City and that the area is to deliver approximately 60-70% of the new residential development the City is expected to take. Reference is also made to the role of the cultural quarter focussed on the Barbican, whose offer and environment should be 'further enhanced'. The delivery strategy for this vision is guided by Core Strategy Policy CS5: The North of the City which states:

**Core Strategy Policy CS5: The North of the City**

*"To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure, by:*

1. *Ensuring that disruption to the City is minimised during construction of Crossrail and requiring the restoration of worksites to deliver enhancement of biodiversity, heritage assets and the public realm, open space provision and integration with other transport modes.*
2. *Implementing proposals for the rejuvenation of Farringdon, Moorgate and Holborn jointly with neighbouring boroughs in the Farringdon / Smithfield Area for Intensification, taking account of urban design studies, conservation area management strategies and area enhancement strategies.*
3. *Requiring improvements to pedestrian and cycle routes to maintain safe, effective and efficient pedestrian and cycle flows, including for disabled people, within and through the north of the City.*
4. *Ensuring the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as Smithfield Market, Barbican, Golden Lane and Broadgate, whilst preserving privacy, security and noise abatement for residents and businesses.*
5. *Identifying and meeting residents' needs in the north of the City, including protection of residential amenity, community facilities and open space.*





6. Safeguarding the Citigen combined cooling heating and power (CCHP) network and ensuring that, where feasible, all new development is designed to enable connection to the CCHP network.
7. Requiring the incorporation of sustainable drainage solutions (SuDS), such as green roofs, into development.
8. Requiring developers to make use of innovative design solutions to mitigate and adapt to the impacts of climate change, particularly addressing the challenges posed by heritage assets whilst respecting their architectural and historic significance.
9. Further enhancing the distinctive character of the Smithfield area by retaining a range of buildings suitable for accommodating a mix of uses, whilst recognising the particular challenges arising from the 24 hour character of the area.
10. Recognising and supporting the continued presence of both Smithfield Market and St Bartholomew's Hospital.
11. Promoting the further improvement of the Barbican area as a cultural quarter of London-wide, national and international significance."

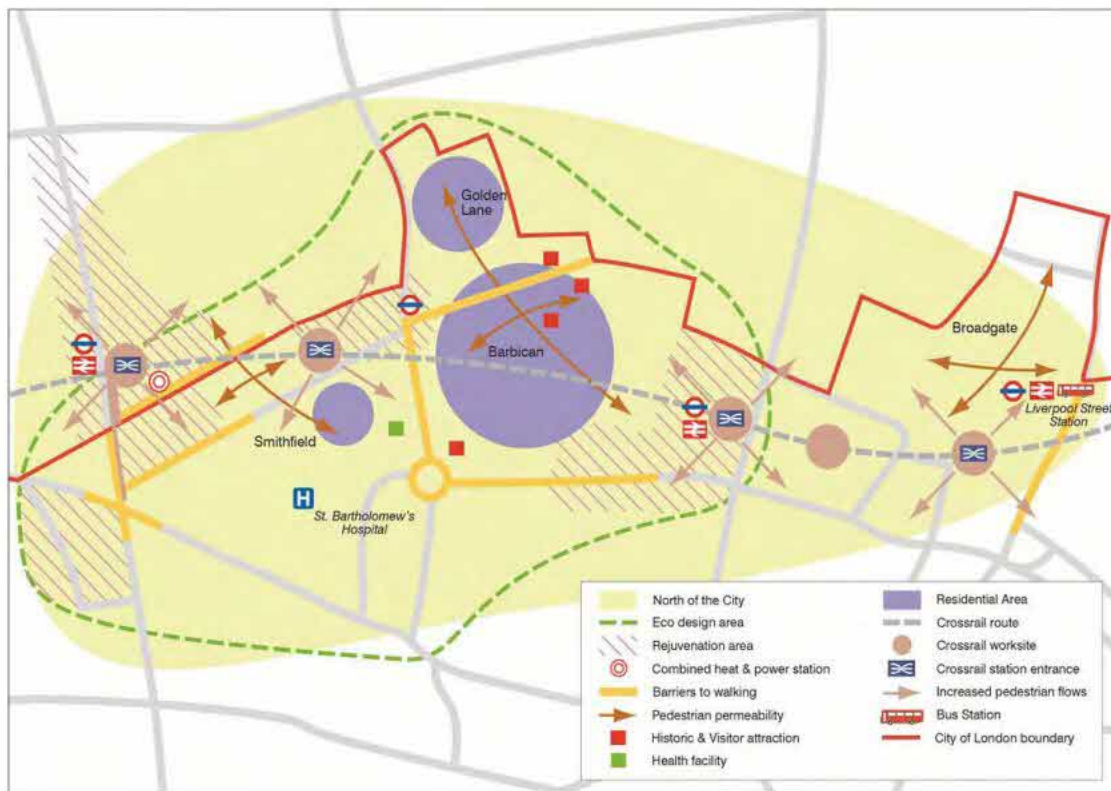


Figure 2. Strategic diagram representing the North of the City – CoLC Local Plan 2015.

44. CarneySweeney and the BQA are aware that the CoLC are currently in the process of producing a new Local Plan covering the period to 2040, setting out what type of development the CoLC expects to take place and where and that once adopted, it will replace the current adopted local plan. In





this regard, we refer to paragraph 48 of the NPFF which advises that “*local planning authorities may give weight to relevant policies in emerging local plans*” according to a number of factors, principally:

- their stage of preparation;
- the extent to which there are unresolved objections; and
- their consistency with the broader Framework.

45. Due to the early stage of preparation of the new Local Plan, whilst indicating a ‘direction of travel’, at the current time this plan can only be given limited weight in decision making.
46. The emerging draft local plan is titled ‘City Plan 2040’ and is intended to set out the vision and framework for future development in the City until 2040, outlining what type of development should take place and where, along with the policies and proposals that will guide decisions on planning applications.
47. A new Spatial Strategy is introduced by City Plan 2040 which highlights that different approaches to development and growth will need to be taken in different parts of the City to ensure a sustainable pattern of development in a way that enhances the unique character of the Square Mile. Whilst all parts of the Square Mile will continue to see growth and development over the lifetime of the plan, some areas are identified in the plan as Key Areas of Change (“KAOC”) and will see a greater proportion of net additional floorspace than other parts of the City or will undergo more significant change to their built form. In addition, and with reference to the LWW Proposals, the draft Spatial Strategy also notes:

*“Net additional office floorspace will primarily be delivered in the City Cluster KAOC, supplemented by floorspace in the Fleet Street and Ludgate KAOC and Liverpool Street KAOC. Office growth will be encouraged in all parts of the Square Mile.*

*Additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas.*

*Active frontages, with uses that are suitable for their context, will be delivered in all parts of the Square Mile, bringing vibrancy to the City and meeting the needs of people who live and work here and those who visit the area.*

*Focal areas for culture have been identified in the cultural planning framework, informed by the existing cultural character of different parts of the City and the potential for each area to contribute to the ongoing transformation of the City into a vibrant destination.*

*New hotels will be encouraged in suitable locations across the City, particularly in places near to transport hubs and where there is good access to visitor destinations in and outside the City.*

*Designated strategic and local views will inform development, with tall buildings focused in the City cluster and the Fleet valley, which are identified as areas suitable for tall buildings.*

*The unique character of different parts of the City, including the area’s rich heritage (which includes nearly 600 listed buildings, 27 conservation areas, 48 scheduled ancient monuments*



and four historic parks and gardens) will be celebrated and enhanced, and help to shape new development in the Square Mile.”

48. Figure 3 below shows how these are presented in the Key Diagram in City Plan 2040.

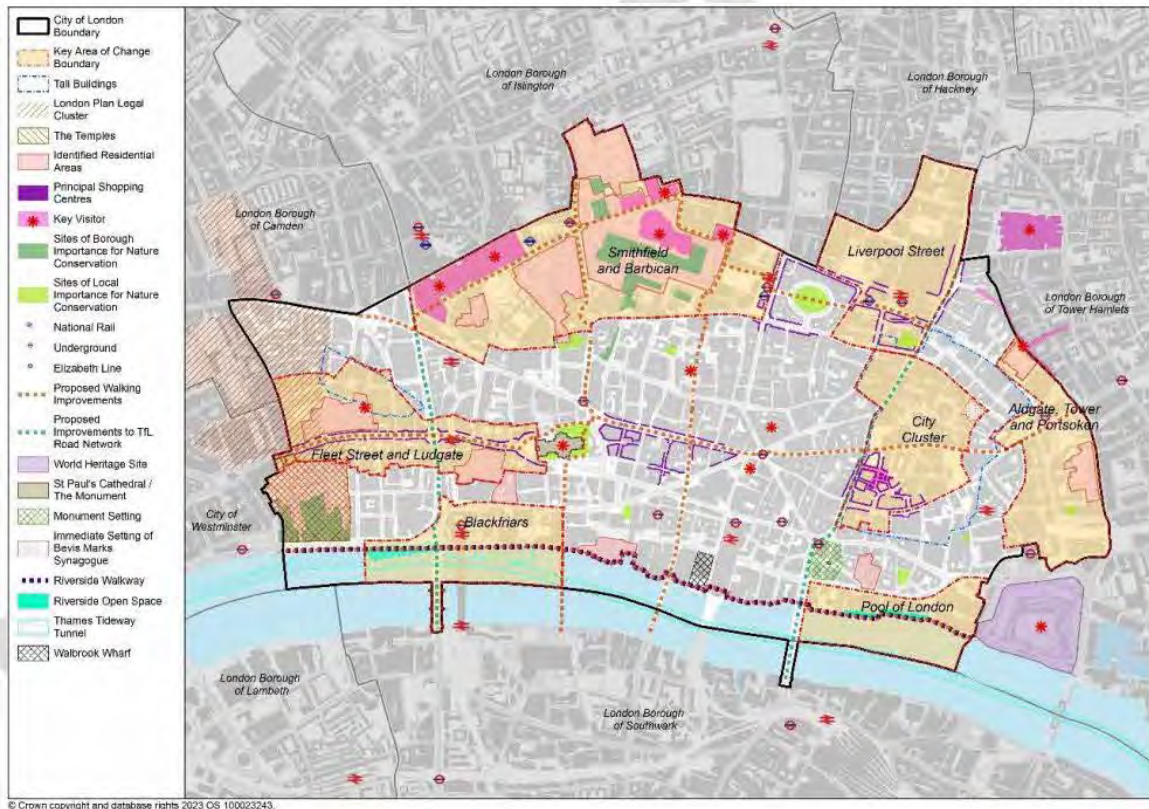


Figure 3. Key Diagram – City Plan 2040

49. The LWW Site falls within the Smithfield and Barbican KAOC and is adjacent to an identified residential area and draft Strategic Policy S23 (see below) sets out how the CoLC intend to improve the area. The supporting text to the policy highlights the Smithfield and Barbican KAOC as a vibrant, mixed-use area which is to undergo significant change and development over the life of the plan – specifically with reference to the relocation of the Museum of London to its new location at Smithfield.

**Draft Strategic Policy S23: Smithfield and Barbican<sup>2</sup>**

*“The City Corporation will improve the Smithfield and Barbican area by:*

1. *implementing the Culture Mile initiative, encouraging culture-led mixed-use development on major sites in the area as well as cultural infrastructure and complementary uses, and delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy;*

<sup>2</sup> Draft policy wording as reported to Local Plans Sub (Planning and Transportation Committee) 18 October 2023.



2. *ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican whilst seeking to preserve privacy, security and noise abatement for residents and businesses;*
  3. *ensuring future alternative uses appropriate to the listed status of the market buildings in Smithfield if the existing uses are relocated;*
  4. *supporting and enabling residential development in appropriate locations;*
  5. *identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;*
  6. *making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;*
  7. *seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;*
  8. *requiring improvements to pedestrian and cycle routes for all within and through the north of the City;*
  9. *supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network;*
  10. *supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role;*
  11. *encouraging a diverse leisure, retail, food and beverage offer, particularly along the route between the London Museum and the Barbican;*
  12. *encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists, including meanwhile use of vacant premises; and*
  13. *enhancing the special character of the area through sensitive change."*
50. CarneySweeney, on behalf of the BQA highlight that this draft strategic vision once again does not focus on the delivery of office growth but encourages culture led mixed-use development, supports residential development in appropriate locations and seeks to enhance the special character of the area.
51. Whilst it is material to consider the extent to which emerging policies and evidence also accord with existing adopted policies, particularly those of the London Plan, the weight accorded to different policies will be a matter for the decision maker, but policies will generally gain weight as they progress through the process of consultation and examination process through to adoption, particularly where they do not attract objections. Policies that closely accord with adopted policy in the existing Local Plan or London Plan may also merit more weight.
52. The BQA are aware that City Plan 2040 is being taken through committee approval for consultation between January and March 2024 and that consultation on Revised Proposed Submission Draft City Plan 2040 is anticipated to take place in spring 2024. In this regard the BQA reiterate this is a



draft Local Plan and reserves the right to comment separately on these emerging policies and the strategic vision for Smithfield and Barbican KAOC.

*Land uses proposed*

53. In terms of the land uses proposed the LWW Proposals comprise of:

<b>Land Use</b>	<b>Proposed (GIA sqm)</b>
Office (Class E(g(i)))	56,211
Retail / Restaurant (Class E(b))	1,112.4
Cultural (Sui Generis)*	8,182.9
Livery Hall (Sui Generis)	480.0
Public Car Park (Sui Generis)	594.2
Cycle Hub (Sui Generis)	703.0
<b>Total</b>	<b>67,283.5</b>

\* Cultural uses being further broken down into;

Food & Beverage/Retail	968.5sqm
Event/Exhibition/Venue	7,214.4sqm

54. By comparison the existing land uses at the LWW Site comprise of:

<b>Land Use</b>	<b>Existing (GIA sqm)</b>
Office (Class E(g(i)))	16,887
Retail / Restaurant (Class E(b))	0
Cultural (Sui Generis)	0
Livery Hall (Sui Generis)	439
Museum (Class F1(c))	15,188
Bar (Sui Generis)	287
Public Car Park (Sui Generis)	1,458
Cycle Hub (Sui Generis)	0
<b>Total</b>	<b>34,259</b>

*Office Floorspace*

55. In terms of office floorspace there will be a significant net uplift of 39,324sqm (GIA). it is recognised that the LWW Site is located within the CAZ and therefore the principle of protecting existing office space alongside the provision of new office floorspace is supported. However, given the strategic vision for the ‘North of the City’ Key City Place area, as set out in the adopted local plan, CarneySweeney, on behalf of the BQA, raise objection to this increased level of office provision on the LWW Site, primarily due to concern that such growth in this location will have a detrimental



impact on the distinct character, environment and heritage of this part of the CAZ, in conflict with Policy SD4 (Part C) of the London Plan and the NPPF.

56. Further details relating to the office needs within the City of London are set out in the Office Market Research Report, prepared by JLL (“OMRR”) and submitted in support of the application. The BQA have reviewed this report and raise the following key concerns;
57. The Terms of Reference set out at paragraph 1.1 in the OMRR are biased in favour of development. There is no meaningful economic analysis of construction cost / achievable rent / return on capital employed. There is no assessment of alternative economic scenarios, e.g. downturn / prolonged period of high borrowing costs.
58. Reference is made at paragraph 2.2.4 of the OMRR that future long-term demand will be boosted by occupiers displaced by older stock not meeting future minimum energy efficiency standards, however, no data is provided in relation to the percentage of office stock affected by the change in regulation.
59. More evidence is provided to support the statement at paragraph 2.25 of the OMRR that companies have been more footloose across central London, and focussing more on the quality of the building, connectivity, and immediate environment rather than traditional areas for industry.
60. The statement is made at paragraph 2.2.9 of the OMRR that *“TMT and general business services have grown, while the legal sector has seen a renaissance since the pandemic but prior to this had been an insignificant source of demand in the City. It is clear these sectors are still vital to market performance and are likely to do so moving forwards.”* The BQA contest that there is no analysis of the needs of these specific sectors and no indication of the likely source of tenants. The resurgence of traditional sectors is contradicted by the report taken to the Local Plans Sub (Planning and Transportation) Committee in June 2023 (“PCT Report”) which discusses the evidence base report “Future of Office Use” which was commissioned from ARUP to support the office policies review for City Plan 2040 and which states at paragraph 5: *“In 2023, 29% of take-up of office floorspace in the City of London was from “Media and Tech” firms, compared to 19% from “Financial” companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers”*
61. The OMRR advises that there were three transactions over 100,000 sqft completed since the beginning of 2021, and all were pre-lets. The BQA highlight that given 100,000 sqft equates to 9,259 sqm, there would need to be six such transactions to fully occupy the LWW Proposals. Given that there were only three such transactions in a period of 2.75 years, it could take two years to find such ‘large tenants’ and so the demand would need to come from smaller occupants. No evidence is provided to suggest sufficient demand for “prime” in the lower size transactions. Furthermore, of the list of largest transactions given in Table 4 of the OMRR, the BQA highlight that at 25.185 sqm this is roughly the size of the new Rotunda building. The OMRR provides no evidence of demand from an individual tenant for a building as large as New Bastion House (which at 35,523 sqm GIA,





is almost 40% bigger than the largest transaction). Again, this indicates that this will have to be a multi-tenant building.

62. At paragraph 4.2.1 of the OMRR it is noted that JLL's Future of Work survey found that when asked about their attitudes towards space, 92% of those surveyed based in London said that investing in quality space is a more significant priority for their company than expanding the total occupied footprint. The BQA consider this to be an unbalanced analysis of demand as it suggests no increase in demand but provides no information about the willingness / ability to relocate to a higher quality office vs. refurbish existing space occupied. The PTC Report paints a more complex picture and states at paragraph 9: *"Grade B office take-up is predominantly by creative and emerging-office based firms who are interested in enhanced amenities. The protection of existing office space is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential occupiers. However, there are challenges facing Grade B office space. In 2022, take-up of second-hand Grade B space in the City was 10,000m2, accounting for only 2.2% of all leasing market transactions in the City. Pre-pandemic, Grade B office stock provided an affordable workspace option for small businesses but this market area has not recovered after the pandemic. There are challenges for retrofitting Grade B space but there are successful examples in the City, including Millennium Bridge House, 81 Newgate Street and Ibex House."*
63. Paragraph 5.1.1 of the OMRR notes that there is a good level of demand for office space in the City of London, but occupiers are demanding the best space in which to create modern working environments. The BQA consider this to be a vague comment but is understood to refer to current demand rather than future demand. The PTC Report from June 2023 notes at paragraph 18 that *"Additional technical work is underway to better understand not just the potential demand for office floorspace, but the capacity to accommodate additional floorspace, having regard to other policy constraints including strategic and local views protection and heritage assets."* It is not clear whether the CoLC as Local Planning Authority has provided input to the CoLC as applicant in the light of this technical work.
64. The BQA consider the statement at paragraph 5.1.3 of the OMRR that office space around Farringdon and Barbican stations is particularly sought after with creative occupiers favouring the mixed-use environment over the more corporate City Core is not evidenced in the OMRR. That it should be examined is again highlighted by the June 2023 PTC Report which states at paragraph 8 that *"As emerging office-based firms tend to value different typologies of office spaces compared to traditional office-based firms, their growing number and size might imply a new shift in the market in terms of demand for best-in-class office spaces, with the fastest growing firms over-representing in the micro and small categories."*
65. The BQA highlights the statement made at paragraph 5.1.3 of the OMRR that *"The existing Museum building and road configuration currently create a visual barrier between these two sub-markets. London Wall West is an opportunity to link these two sub-markets with a purpose-built mixed-use office scheme."* This does not appear credible as there remains a significant visual





barrier in the form of 200 Aldersgate Street. Similarly, the benefits of the LWW Proposals listed at paragraph 5.1.4 of the OMRR are not considered to be unique to the submitted proposals.

*Cultural floorspace*

66. In terms of the loss of the cultural floorspace on the LWW Site, both London Plan Policy HC5 and the CoLC adopted Local Plan Policies CS11 and DM 11.1 seek to protect existing cultural venues and facilities. Policy DM 11.1 further stipulates that such loss will be resisted unless replacement facilities are provided on site or within the vicinity or in other facilities without leading to a shortfall in provision or that there is no realistic prospect of the premises being used for a similar purpose. Any scheme that results in such loss also must be accompanied by evidence of the lack of need (including marketing evidence to demonstrate the existing floorspace has been actively marketed). For the LWW Site, the Museum of London is being relocated to another site within the City and in close proximity, nevertheless, given the strategic vision for this part of the City, it is considered that it should be demonstrated that there is no demand for a similar level of need given the vision for the 'North of the City' Key City Place area in which the LWW Site is located. This policy approach is repeated in City Plan 2040 through Draft Policy CV1, and with reference to the issue of retrofit/re-use, CarneySweeney highlight that the strategic policy direction set out in City Plan 2040 in Draft Strategic Policy S6 refers to protecting areas of cultural significance including cultural buildings where they provide an anchor for cultural regeneration.
67. The application is supported by a Culture Plan (and Culture Needs Assessment) which has been reviewed by the BQA. The BQA raise concern that the Culture Plan is vague and speculative with a weak vision and with no sense of a coordinated strategy. No specific cultural partnerships have been identified. There are no defined capital/revenue models and no business models presented. The BQA are concerned it will therefore be left to any future developer to interpret as they wish and therefore the generic arts, culture and creative features of the LWW Proposals as referred to in the Culture Plan will be value engineered down or scoped out. Furthermore, the Culture Plan draws heavily on the CoLC flagship Destination City strategy, including the statement that the programme and events "will be led by Destination City". The BQA wish to highlight that the Destination City strategy is acknowledged by the CoLC as requiring a 're-set' and, as of January 2024, is currently under comprehensive external review (the terms of reference for which were discussed at the Culture, Heritage and Libraries Committee meeting of 20 November 2023).

*Residential floorspace*

68. Returning to the criticisms raised by the BQA on the pre-application consultation process and the evolution of the LWW Proposals, given the strategic vision for the North of the City as set out in the adopted Local Plan, the question is asked as to the decision to promote an office led redevelopment of the LWW Site. Whilst the policy requirement to ensure the reprovision of office floorspace and cultural floorspace is recognised, CarneySweeney, on behalf of the BQA, query why the CoLC have



ignored the opportunity to also deliver much needed housing in a part of the City that is considered compliant with Policy DM 21.1 of the CoLC adopted Local Plan which states that new housing will be provided in the City in or adjacent to identified residential areas (such as the Barbican) but this should not prejudice the business function of the City (as per Policy DM1.1).

**Retrofit and Re-use vs Demolition – Embodied Carbon Review**

- 69. The NPPF states at paragraph 157 that the planning system should support a transition to a low carbon future in by ‘encouraging the reuse of existing resources, including the conversion of existing buildings’ – conversely it is recognised that the NPPF also provides clear policy guidance on making the most effective use of land and requires local planning authorities to take a proactive role in bringing forward land that may be suitable for meeting development needs.
- 70. The London Plan provides the most up to date adopted strategic policy direction (together with related SPGs/LPGs) and also promotes the effective use of land through its ‘Good Growth’ policies which seek to optimise the redevelopment and re-use of brownfield land. Whilst retrofit and the re-use of buildings can contribute to carbon reduction, and both the Mayor’s WLC Assessment LPG and Circular Economy LPG advise that priority should be given to the re-use/retrofitting of buildings, neither policies SI2 or SI7 of the London Plan prohibit demolition (albeit that the policies do require development proposals referable to the Mayor to undertake a WLC Assessment and demonstrate the actions take to reduce life-cycle carbon emissions as well as to produce a Circular Economy Statement).
- 71. The adopted CoLC Local Plan states in Policy CS15 that demolition should be avoided through the re-use of existing buildings and the CoLC Carbon Options Guidance PAN provides the most recent intermediate position on how this will be considered by the CoLC as LPA. The CoLC emerging policy in City Plan 2040 also favours an embedded strategy of retrofit and the re-use of existing buildings.
- 72. As set out earlier in this statement, an interim WLC Assessment report (May 2022) was undertaken at pre-application stage to assess the existing buildings on the LWW Site. This WLC Assessment stated that a high-level engineering review of the existing buildings had been undertaken and highlighted there are three key challenges that would need to be addressed in any retention proposals. This includes material design life, fire integrity and design for disproportionate collapse. This WLC Assessment was undertaken based on two design options, subsequently eliminating any further discussions regarding the re-use of existing buildings despite the results indicating that the absolute Whole Life-Cycle Carbon emissions for the re-use of the existing buildings are approximately 20 million kilograms’ lower when compared to a redeveloped LWW Site. The WLC Assessment dismissed the option of retrofitting the existing buildings based on viability and feasibility.



73. The BQA instructed Simon Sturgis of Targeting Zero LLP to undertake a review of the LWW Proposals in relation to matters pertaining to the circular economy, the reduction of carbon and meeting net zero. Their full review is at Appendix B to this statement and their main conclusions are summarised below, as follows:

The proposals are not optimising the carbon emissions impacts and as a result are in direct opposition to UK National policies, GLA policies and the City's policies. These include the City's new sustainable guidance for developers dated 12 December 2023, covering retrofit and reuse, energy and whole life carbon and the circular economy. Their conclusion is that the planning application proposals ignore this new guidance.

There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to six options selected for detailed examination. These six options excluded 'option two' for a 'Major Refurbishment', which is the option that is most consistent with the approach favoured by the commercial bids in this City's market testing exercise.

The conclusion of the planning application submission reports is exactly the same as previous reports in May 2022, namely that a 'Major Refurbishment' approach is to be rejected in favour of 'new build'. This appears to demonstrate that the latest optioneering exercise is purely 'window dressing' to prove a pre-ordained choice 'new build', and that a 'major refurbishment' option has not been seriously investigated by the design team in detail as 'new build' was always the intended outcome.

74. Notwithstanding the conclusions above, Targeting Zero also comment that in the event of the LWW Proposals being approved, unless the levels of carbon emissions achieved are 'locked into' the scheme and become secured by way of legal agreement or planning condition, they are likely to be abandoned by any future purchaser, meaning that the figures achieved are effectively meaningless.

75. As a result, it is reasonable to conclude that there are failings in the approach to the Whole Life Cycle Carbon Assessment of the LWW Proposals. The CoLC Whole Life-Cycle Carbon Options PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emissions. It states that optioneering is required for all major schemes before the application is submitted and furthermore advises *"If substantial demolition is proposed, applicant will need to demonstrate that benefits of the demolition would clearly outweigh the benefits of retaining the existing building or part of the structure."* This approach reinforces the Mayor's WLC Assessment LPG by requiring developers to consider alternatives to demolition at the earliest stages of planning and in this regard, the BQA consider the failings highlighted by the group to the CoLC at pre-application stage relating to the option of retrofit and reuse of the buildings on the LWW Site have equally been dismissed in the appraisal of options assessed at planning application stage.



**Design, Public Realm and Landscaping**

76. Chapter 12 of the NPPF focuses on achieving well designed places and recognises that good design is a key aspect of sustainable development and creates better places in which to live and work and helps make development acceptable to communities. Paragraph 135 emphasises that planning policies and decisions should ensure that developments:

*“Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*Establish or maintain a strong sense place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

77. Furthermore paragraph 137 states: *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*

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



**Townscape and Views**

79. Mr Petroschka has also reviewed the submitted TVBHIA and his conclusions are attached to this statement at Appendix D. Again, Mr Petroschka concludes that a number of statements and conclusions in the assessment are incorrect, flawed, misleading and are strongly contested.
80. In particular, Mr Petroschka states that while many of the post-war office blocks on London Wall have been replaced and the density of the urban fabric increased, all new office blocks strictly follow the perpendicular grid of the post-war plan, continue to contain and define the urban street space and public realm, break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context and their immediate neighbours, including the Barbican Estate. All developments place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks.
81. None of the above prevailing qualities were applied to the two proposed development blocks. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining Conservation Areas, but also to the setting of the immediate and wider neighbourhood.
82. The BQA further highlight that the CoLC adopted Local Plan does not place the LWW Site in an area deemed to be inappropriate for tall buildings and as such Policy CS14 advises that within such areas, proposals for tall buildings will be considered suitable having regard to a variety of design considerations. The London Plan Policy D9 provides the more recent policy position in relation to tall buildings and sets out a much wider assessment of the impacts to be considered where development proposals include tall buildings. Policy D9 also requires development plans to identify the locations and building heights considered appropriate for tall buildings and states that tall buildings should only be developed in such suitable locations. The BQA are aware that Draft Strategic Policy S12 in City Plan 2040 defines a tall building as being over 75m AOD (therefore applicable to two of the buildings included in the LWW Proposals) but does not identify the LWW Site as being one of the tall building areas that are proposed to be identified as suitable for tall buildings. The BQA do not consider that the LWW Proposals respond to the LWW Site's existing character, or respect and enhance identified heritage assets and architectural features. Further commentary on heritage matters is provided below.

**Heritage**

83. The BQA instructed Alec Forshaw a highly experienced specialist heritage consultant to assess the heritage impacts of the LWW Proposals. He has considered the impacts within the local and immediate area, and left the potential impacts on long-distance views of St Paul's Cathedral or the riverside to Historic England and the GLA, who have particular remit and expertise in this field. Mr Forshaw's full report is at Appendix E to this statement.



84. Mr Forshaw questions the reliability of the submission material: Architect’s sketches and artistic illustrations give inaccurate impressions of the proposals with stretched and distorted perspectives; and photographs use wide angle-lenses, a technique used by estate agents in sales brochures to make internal rooms seem bigger than they are.
85. He strongly opposes the applicant’s consistent claims that the proposals, by virtue of their size, contrasting design and materials will enhance local views and settings.
86. Mr Forshaw concludes that the proposals cause widespread harm to a large number of heritage assets. This includes the complete loss of two undesignated heritage assets, and less than substantial harm, but nevertheless considerable harm to and erosion of significance of several Grade I, Grade II, Grade II\* scheduled monuments, some directly abutting, and the setting of three Conservation Areas. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm, requiring the balance of harm against public benefits in line with Paragraph 202 of NPPF. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere, nor other public benefits which would offset the great weight that must be given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

**Biodiversity and Ecology**

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

**Transport, Access, and Servicing**

88. The LWW Site is highly accessible by public transport. However, issues relating to vehicle access, highway safety, highway and public transport capacity, design of the public realm, and pedestrian connectivity and permeability are key considerations for the BQA.
89. The planning application is supported by the following documents which relate to the consideration of transport, access and servicing matters; Environmental Statement Chapter 6 ‘Traffic and Movement’ along with Appendices 6A ‘Transport Assessment’ and 6B ‘Travel Plan & Cycle Promotion Plan’; Draft Construction Environmental Management Plan; Delivery and Servicing Management Plan. Having reviewed each of these documents, the BQA wish to highlight three significant areas of concern:





- a. The operational impact of the LWW Proposals with three new buildings and a changed Ironmonger's Hall.
  - b. The impact of Phase 2 works relating to the removal of the St. Paul's Gyrotory system.
  - c. The impacts relating to the demolition of the existing buildings and the construction of the LWW Proposals on residents and other sensitive receptors (schools, businesses, Barbican Centre, St Giles Church and public and private gardens) within close vicinity to the LWW Site.
90. A fundamental concern relates to the proposed access and egress arrangements for vehicles to the redeveloped LWW Site. At present, access to service the buildings on the site is via a one-way system with access from London Wall and egress via the Aldersgate Street ramp. The latter is used primarily by residents accessing the TMH car park along with service and delivery vehicles supporting the residential community. The proposed development will abandon this 'through route' with all vehicles entering and exiting via the Aldersgate Street ramp.

*Operational impacts*

91. The Delivery and Service Plan (DSP) submitted with the application sets out the proposal that, on completion of the proposed development, all service vehicles as well as Barbican residents will use the Aldersgate Street ramp. The service vehicles will be held at a barrier on the ramp with an intercom to await instructions. Traffic will include vehicles accessing Bastion and Rotunda Yards at 10-11 servicing vehicles per hour, Barbican traffic at 10 - 15 vehicles per hour, with the addition of further servicing vehicles to the new North Office building and Ironmongers Hall. The ramp will thus need to provide for:
- All deliveries and services to and from the three new buildings.
  - All deliveries and services to and from Ironmongers' Hall.
  - All deliveries and services to and from the Barbican residents' car park (affecting Seddon, Thomas More, Lauderdale, Mountjoy and Lambert Jones Mews).
  - Emergency fire and ambulance access to and from Barbican residents' car park (there is no alternative access proposed in the scheme from the south of the site).
  - Barbican residents entering and exiting the car park.
  - Contractors, postal services, grocery deliveries and taxis entering and exiting the car park.
  - Pedestrians and cyclists (residents and deliveries) entering and exiting the residents' car park.
92. The DSP also provides a number of diagrams showing that there is inadequate width for two-way traffic at several points and thus proposes a traffic light control system for all servicing vehicles. It also proposes use of the TMH Service Yard as part of the route without any explanation of where the current activities at the Service Yard will be relocated.
93. The BQA consider this to be a significant design weakness for the following reasons:
- Residents' use of the Thomas More car park will be severely impacted from the outset and for the indefinite future once the buildings are completed.



There is significant likelihood of congestion on the ramp, in the single-lane sections of the proposed route and in the underground service yards.

The large increase in traffic on the ramp and lower levels resulting from this design proposal will have a significant adverse effect on noise and air pollution for residents in nearby residential blocks and on the CLSG sports field.

There will be frequent occasions when vehicles entering the ramp will be queued at the intercom barrier and backing onto Aldersgate Street, thus jeopardising safety for all road users at the top of the ramp onto Aldersgate Street.

It will create delay for emergency vehicles entering via ramp and exiting onto Aldersgate Street.

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

*Impact of Phase 2 of the St Pauls Gyratory works*

95. The Transport Assessment (TA) makes clear that demolition and construction on the LWW site and the highway scheme are interdependent - see paragraphs 6.4.49 and 6.4.50. Phase 2 of the Gyratory works is intended to happen when construction commences at the rotunda. The demolition of the rotunda and construction of the new highway layout cannot begin before 2028 in order to allow time for the many governance and consent processes that will need take place both within the CoLC and by TfL to have been completed - see paragraph 6.4.50 of the TA. The implication is also that the sale of the LWW Site must be completed by this time in order that the applicant can enter into the required section 278 agreement with the highway authority for the necessary highway works.
96. Earlier traffic modelling in connection with the St Paul's Gyratory proposals indicated that this change could result in a significant increase in delays to bus journeys as well as cars, taxis and other vehicles. In paragraph 6.4.32 of the TA it states *that "The junction modelling for the St Paul's Gyratory Transformation Project (Phases 1 and 2) is being undertaken by Norman Rourke Pryne and it is envisaged that TfL's Model Auditing Process (MAP) process for Phase 2 would be concluded after the planning application is submitted for the proposed development, as part of the s278 process"*.
97. The BQA raise concern that there is no up-to-date modelling of the likely traffic flows, travel times, congestion etc when the LWW Proposals are complete. This is particularly important given the removal of the Rotunda roundabout and its conversion to a signal-controlled junction with two-way traffic lanes. The BQA contend that the data underlying the traffic forecasts is disparate and out of date, and that more traffic modelling will be required in connection with obtaining TfL's consent to the removal of the rotunda roundabout. The BQA position on the impact of this removal is therefore reserved until this new traffic modelling has been undertaken and public consultation has taken place.



*Impacts during construction on residents and adjoining residential properties*

98. An initial review of the Draft Construction Environmental Management Plan (CEMP) has been undertaken by the BQA and the following comments are made. The BQA raise concern that almost no discussion or consultation with the local community has been undertaken in relation to the management and mitigation of construction impacts taking place over the course of a five-year period. The single exception to this was the opportunity to meet members of the LWW project team on 11 January 2024 at the London Centre. On raising concerns with the project team manager about the CEMP, the BQA were advised that *“it has been prepared by Multiplex who are unlikely to work on the construction project, and everything in it can be changed”*. BQA would like to express major concern at this apparent cavalier and dismissive approach on a matter that will affect the lives of many hundreds of residents over a period of at least five years.
99. A fundamental point of concern is the proposal that - from the commencement of development onwards - vehicles requiring direct access to the LWW Site will enter and exit via the existing ramp on Aldersgate Street. Furthermore, on page 36 of the CEMP, it is stated: *“Meanwhile, for safety reasons and to minimise construction delays, residents and service vehicles should access the car park using the back exit which can be found c.90m north of the rear service yard ramp along Aldersgate Street. This entrance provides access to the entire car park. Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however [it] should only be utilised when absolutely necessary”*.
100. This would be a major disruption to all current users of TMH car park and Lauderdale car park, and it is proposed to be in place for at least 5 years. The ‘back exit’ on Aldersgate St can only be accessed by a 180 degree turn from the road. The entrance height into the underground car park is too low for vans and possibly SUVs. The route through the Lauderdale car park to the TMH car park is very narrow, it has several hairpin bends and would become seriously congested.
101. The BQA consider this proposed re-routing to be impractical and unacceptable and that it should be prohibited.
102. Further concerns during the construction phase are the suspension of bus stops and cycle bays where these are heavily used by residents and those attending/working at St. Bart’s Hospital. Furthermore, it is considered that the impact of suspending public transport facilities for a 5+ year period on people with disabilities has not been assessed and is likely to be significant. Whilst commitment is made to contractors being part of the nationwide Considerate Contractors Scheme, the CoLC has its own Code of Practice for Deconstruction and Construction Sites (Ninth Edition) – January 2019 which should equally be met.
103. A further concern raised by the CEMP relates to the proposals for staff welfare facilities. in section 3.2.4 on page 61 it is stated: *“Staff Welfare - For the main construction and fitting out phases, a large set up will be required to accommodate up to an estimated 900 operatives and staff. It is proposed that the new concrete infill structure is constructed above the north service yard early in the programme to provide space for a multi-level accommodation building”*.



104. This would be a huge temporary structure which would overlook the CLSG sports field and most residents' flats in Thomas More House and Mountjoy House for at least a 5-year period. The BQA considers this to be totally unacceptable and that it should be prohibited by means of an appropriate planning condition.

**Daylight, Sunlight and Overshadowing and Solar Glare**

105. Anstey Horne were instructed by the BQA to review the submitted assessment in relation to daylight, sunlight, overshadowing, solar glare and light spillage within the Environmental Statement. Anstey Horne's report is at Appendix F to this statement. Their main conclusions are that there will be significant impact in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight. They further conclude there will be significant VSC daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant NSL daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight. Additionally, they conclude that there will be major adverse and significant incidences of solar glare to residents within Monkwell Square.
106. They also consider that further information is required to be submitted, as follows:
- VSC daylight results on a room by room basis;
  - VSC daylight results on a room by room basis without balconies;
  - NSL contour plots to establish the layout used within the analysis;
  - 'A clear sky' solar glare analysis to fully understand the potential for solar reduction at key road junctions;
  - An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP '2011' Guidance Notes; and
  - Confirmation of the location of the areas of additional light spill on the façade of Mountjoy House and that they do not coincide with the location of windows serving habitable rooms.
107. In addition Anstey Horne request that the following points be clarified:
- To verify the accuracy of the 3D modelling and analysis, confirm which properties are modelled from measured survey and which are modelled from photogrammetric survey;
  - Confirm how the windows and their locations have been modelled where photogrammetric survey has been used; and
  - Confirm the solar glare results within Appendix 13-F, including the angles on the field of vision on the solar glare result drawings.



108. Once the above information has been submitted, and made public, Anstey Horne will review and provide further conclusions to the BQA which may then be the subject of further submissions to the City of London Corporation as local planning authority.

**Archaeology**

109. The BQA are aware that the LWW Site is within an archaeologically sensitive area. The Planning application is supported by Environmental Statement Chapter 10 ‘Archaeology’ which assesses the likely environmental effects of the LWW Proposals with respect to archaeology. A review of this chapter of the Environmental Statement has been undertaken by Cathy Ross, an Honorary Research Fellow at the Museum of London, a resident of the Barbican Estate and member of the BQA. Having reviewed the chapter, her comments are as follows:

110. The archaeology scoping document and desk-based assessment (on which the chapter is based) both fail to consider the heritage assets of the Aldersgate side of the LWW Site, particularly any potential remains of Thanet House, one of the City’s grand Stuart mansions and a key site of interest for Britain’s political history. The evidential and historical potential of a site should be taken into account when considering the value of a heritage asset, and in this respect the documents are lacking. Thanet House and its gardens / environs have significant historical, political and architectural interest but are here ignored. More specifically:

111. At paragraph 15.2.2 and with reference to the remains of a Jewish Cemetery within the LWW Site - Nowhere is it made clear who actually owns the land between the Museum and the remains of the City wall. The BQA understand that the CoLC do have title to this piece of land. The report seems to assume that this land forms part of the Barbican’s group of gardens but this is clearly not the case (there are locked gates preventing public access to the Barbican’s territory).

112. At paragraph 15.2.4 – the BQA understand that any EIA has to evaluate ‘... *the significance of buried heritage assets, based on existing designations and professional judgment where such resources have no formal designation, and considering evidential, historical, aesthetic and communal value.*’ This is not considered to be the case here: the focus is entirely on the Roman remains and the much rebuilt City Wall. Other areas threatened with disturbance by this proposal have not been considered.

113. At paragraph 15.4.3 - as per paragraph 15.2.2, this implies the land is part of the Barbican estate and under City ownership. The BQA consider this point should be clarified.

114. At paragraph 15.4.20 – the BQA consider this section of the report to be completely inadequate as a summary of the whole site’s post-medieval significance. As mentioned above, Thanet House and the Aldersgate frontage must be included in any detailed consideration of the LWW Site’s ‘archaeological and historical context’, particularly given that the sites of these politically-charged 17th century buildings lie directly beneath the development. Nor is there any mention of the



Victorian development of the site (most of the standing remains of the City Wall are in fact Victorian or later). No mention either of the site's interest to Wesleyan Methodists.

115. At paragraphs 15.4.27 to 15.4.29 - the inference in these sections is that the access roads have '*heavily truncated if not removed completely*' archaeological remains. The BQA consider this to be very disputable. It is more likely that, as it says in paragraph 15.4.30 '*Archaeological remains (primarily the City ditch) have been shown to survive beneath and possibly between this localised truncation.*'
116. At paragraphs 15.4.32 to 15.4.33 – the BQA consider that these sections do at least acknowledge that there were post-medieval buildings on the LWW Site, but – again - without proper consideration of the actual buildings on this particular site. The text here is considered to be generic and based on assumptions.
117. At paragraphs 15.4.34 to 5.4.38 – the BQA consider these statements of significance points relate entirely to the Roman remains and ignore any heritage assets, actual or potential, relating to other periods of the past – Tudor and Stuart in particular.
118. Paragraph 15.4.39 – the BQA contend that surely the area of the Jewish cemetery extends beyond the footprint of Bastion House. In which case the potential for the survival of remains is higher than suggested here.

**GLA Referral**

119. The Town and Country Planning (Mayor of London) Order 2008 states that applications of potential strategic importance ('PSI applications') need to be referred to the London Mayor for his/her consideration. The definition of a PSI application is set out in a Schedule attached to this legislation. Part 3 of the Schedule deals with development which may affect strategic policies and Category 3E states that PSI applications include those for development:
- (a) 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
  - (b) Comprises or includes the provision of more than 2,500 square metres of floor space for a use falling within any of the following classes in the Use Classes Order [these uses include Class B1 Business, which has now been included within the new Class E of the Use Classes Order.
120. In this statement, we conclude that the redevelopment proposals for London Wall West do not accord with one more provisions of the relevant development plan and thus the planning application is required to be referred to the London Mayor under the Town and Country Planning (Mayor of London) Order 2008. To not do so will mean that the application has not been subject to the correct legal procedures.





**Public Benefits**

121. The Planning Statement submitted with the application sets out the range of purported public benefits that are considered to be provided by the LWW Proposals as they relate to Economic, Social and Environmental matters. The BQA has considered each of these as listed in the submitted Planning Statement and comment specifically on those below.

*Economic Benefits*

122. **Creating a catalyst for change and wider regeneration of the Barbican and Smithfield as one of the seven key areas of change, by investing significantly to unlock this key Site within the heart of the Culture Mile:** The seven 'key areas of change' is a reference to the strategic policy direction proposed by the CoLC in the emerging City Plan 2040. This is subject to further public consultation and scrutiny as the draft local plan progresses through to adoption and therefore the status of this policy direction should not be accorded the same weight as the adopted local plan. The LWW Site is currently located in the 'North of the City' area as defined in the adopted local plan. Whilst the principle of this benefit is accepted, it could equally be true of any other reuse the LWW Site.

123. **Delivery of approximately 56,000sqm GIA of new high quality, sustainable office workspace to meet a range of business needs across the Square Mile to enrich the City of London as a primary business centre of national and international importance:** Given the spatial strategy for the 'North of the City' area, the BQA disagree that the LWW Site should be promoted for significant office growth. The detrimental impacts in terms of heritage, design and townscape that result from the LWW Proposals as identified by the BQA are set out in this statement.

124. **Optimising the use of this underdeveloped site to a commercially led development with significant cultural uses within the buildings and the public realm:** The BQA consider that the LWW proposals comprise overdevelopment (not optimisation) with resultant heritage, design, townscape and other impacts as identified by the BQA in this statement.

125. **The demolition and construction phase of the development is anticipated to provide a significant amount of jobs targeted at local people:** Whilst the principle of this benefit is accepted, the BQA consider this could equally be true of any other reuse or redevelopment of the LWW Site. Whilst the BQA do not contest the number of jobs to be created during the construction phase, this 'benefit' is not specific to this development in particular; a significant number of construction jobs would be created by another form of redevelopment or as a result of the retrofit and adaptation of the existing buildings on the LWW Site. Also, these jobs are only temporary.

126. **The employment density will increase as a result of the Proposed Development through more efficient floorplates:** Whilst the principle of this benefit is accepted, it could equally be true of any other redevelopment or reuse/adaptation of the existing buildings on the LWW Site.

127. **Provision of Section 106 and Community Infrastructure Levy contributions to support the City's infrastructure:** The NPPG advises that planning obligations are entered into to mitigate the impacts of a proposal whilst Community Infrastructure Levy ("CIL") is a charge which can be levied on new



development by local authorities to help them deliver the infrastructure needed to support development in their area. The BQA therefore consider these are ‘requirements’ resulting from the LWW Proposals rather than ‘benefits’. The BQA consider the detrimental impacts of the LWW Proposals as set out in this statement are of greater significance.

*Social Benefits*

- 128. **Creation of a range of cultural uses (c. 8,000 sqm GIA) to activate the streetscape, facilitating the City’s strategic objective to implement Destination City:** The LWW Proposals do not deliver a like for like replacement of cultural floorspace on the LWW Site. The BQA highlight in this statement that Destination City is currently under review.
- 129. **The overall quality of the development and proposals offer would attract visitors, increase tourism, support and improve worker productivity and enhance the image of the area.** The BQA query how this statement can be qualified/evidenced by the CoLC. This statement could equally be true of any other reuse or redevelopment of the LWW Site.

*Environmental Benefits*

- 130. **Delivery of world class public realm and new open spaces:** The BQA do not consider the public realm and new open spaces to be provided by the LWW Proposals to be ‘world class’. The BQA note that no environmental benefits are promoted in relation to the design of the new buildings within the LWW Proposals. The BQA consider that the design is not beautiful or attractive as sought by the NPPF and indeed the design is flawed as set out in this statement.
- 131. **Deliver highly sustainable development targeting BREEAM “Outstanding”, delivering significant carbon dioxide reductions through implementing new efficient all electric plant and renewable technologies to improve energy efficiency and reduce greenhouse gas emissions:** The BQA consider this to be a planning policy requirement. Reduced impacts on the environment could similarly be achieved through the retrofit and reuse of the existing buildings or through reduced development of the LWW Site.
- 132. **Helping to facilitate the implementation of the fifth generation Citigen Network by providing space at basement level for new equipment to unlock the upgraded heating network:** The BQA query why this could not be delivered now, given that the CoLC are landowner.
- 133. **Implementation of Air Quality Positive measures within the scheme design in order to maximise benefits to local air quality in and around the site whilst also minimising exposure to existing sources of poor air quality:** The BQA consider this to be a planning policy requirement. Detrimental impacts of the development relating to air quality must be mitigated.



134. **Implementing a net waste positive approach to demolition of the buildings to support the circular economy:** The BQA consider this to be a planning policy requirement. A greater net waste positive approach would be to retrofit and reuse the existing buildings on the LWW Site.
135. **Delivering substantial new areas of public realm within the masterplan, including the landscaped Glade, including soft landscaping (including 98 trees, a net uplift of 71) and green open spaces; and as a result significantly increasing biodiversity and ecology across the site:** The quality of the open areas and landscaping proposals is not agreed by the BQA.
136. **Delivering significant urban greening measures on the buildings themselves.** The BQA consider the requirement to achieve urban greening improvements a planning policy requirement. Whilst the principle of this benefit is accepted, there is no assessment of the UGF score for the LWW Site as it exists compared to the UGF score of 0.41 for the LWW Proposals.
137. **Provision of alterations to the roadway to create a better experience for pedestrians and cyclists and provision of a short stay cycle hub. It would deliver growth in a highly sustainable location which will assist in the delivery of the City of London’s Transport Strategy, assisting in creating sustainable patterns of transport:** The BQA have identified significant concerns with the proposed transport proposals.
138. **Delivering a sustainable servicing strategy which includes off site consolidation:** The BQA raise significant concern in relation to the servicing strategy for the LWW Proposals and consider the use of the Aldersgate Street ramp as a single entry/exit route to be a design flaw that will have serious detrimental impact on the local residential community as users of this access.

**Planning Balance**

139. The NPPF (December 2023) states (at paragraph 11):  
*“Plans and decisions should apply a presumption in favour of sustainable development..... for decision-taking this means:*
- c) *Approving development proposals that accord with an up to date development plan without delay; or*
  - d) *Where there are no relevant development plan policies or the policies which are important for determining the application or are out of date, granting permission unless:*
    - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
    - ii. *Any adverse impacts of doing so would significantly and demonstrable outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*
140. At paragraph 20.13 of the Planning Statement submitted with the planning application for London Wall West, Gerald Eve comment:



*“It is considered that the Proposed Development complies with the Development Plan when considered as a whole and that other material considerations weigh in favour of the scheme. Any perceived harm arising from the Proposed Development is greatly outweighed by the public benefits. Accordingly, it is considered that the planning permission and listed building consent should be granted for the Proposed Development.”*

141. It is our view that this is not a full and considered planning balance assessment and as such cannot be relied upon. A full and proper planning balance assessment would thoroughly consider the following six questions:

Do the proposals comply with the Development Plan?

Do the proposals give rise to any harm to heritage assets, having applied a heritage balance?

Do the proposals give rise to any other harm?

Are there material considerations which should be weighed in the balance?

Do the benefits of the proposals outweigh any harm that has been identified?

Considering the Development Plan and the NPPF as a whole, are there factors to bring about a different conclusion?

142. Appendix G to this statement sets out the relevant planning policies of the Development Plan which are not referenced at all within the submitted Planning Statement and so have not been considered. This statement has already set out that the LWW Proposals do not comply with the Development Plan in a significant number of areas.

143. Mr Forshaw has concluded that the proposals cause widespread harm to a large number of heritage assets, including the complete loss of two undesignated heritage assets. He explains that harm to these assets, whilst less than substantial, is to such a degree that it will considerably erode and harm their significance. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere.

144. This statement has also identified a number of other harms as follows:

Impacts to the daylight levels received by neighbouring buildings;

Harm to the area’s prevailing character and setting;

The loss of cultural facilities;

Significant and avoidable increases in carbon emissions;

Impacts on townscape;

Impacts on local amenities by way of transport movements;

Overshadowing of public realm.

145. Other material considerations that we have identified to be weighed in the balance are as follows:

There is no adopted vision to promote significant office growth within this part of the City.

The emerging City Local Plan is at an early stage and therefore its policies only have limited weight at this stage.



There is a housing crisis and the opportunity to deliver much needed housing in this part of the City has been lost. This area is considered compliant with Policy DM21.2 of the adopted Local Plan which states that new housing will be provided in the City in or adjacent to identified residential areas, such as the Barbican, provided that this does not prejudice the business function of the City.

Market testing has identified other options for the LWW Site which would avoid the need for demolition, the identified harms and the increase in carbon emissions which the planning application proposals would create.

146. In the section above, we have commented on the public benefits, as identified in the submitted Planning Statement. In short, we do not agree with many of the asserted benefits.
147. Overall, we do not consider that the public benefits outweigh the harm that the proposals would bring to heritage assets and in relation to other matters, the failure to comply with a number of policies of the adopted Development Plan and the clear guidance in the NPPF as a whole to deliver beautiful and attractive development, in accordance with the prevailing character of an area.
148. As a result, it is our overall conclusion that planning permission should be refused for this proposed development.

## **Conclusions**

149. In light of the comments set out above, the BQA object to the planning applications and consider the applications should be refused.
150. As referred to above, this statement (and appendices) set out BQA's concerns and objections to these planning applications to date. The planning application documentation is extensive and detailed and so BQA may submit further comments. They will, however, not procrastinate in this regard, and will ensure that any follow-up comment is submitted as soon as they are able. In addition and notwithstanding, the comments below refer to the inadequacy of some of the planning application documentation, and so BQA will wish to review and potentially comment on any further amended documentation submitted to rectify these inadequacies.

**Appendix A: BQA letters submitted to the CoLC at pre-application stage**

**Appendix B: Embodied Carbon Review by Targeting Zero**

**Appendix C: BQA review of DAS by Jan-Marc Petroschka**

**Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka**

**Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw**

**Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Horne**

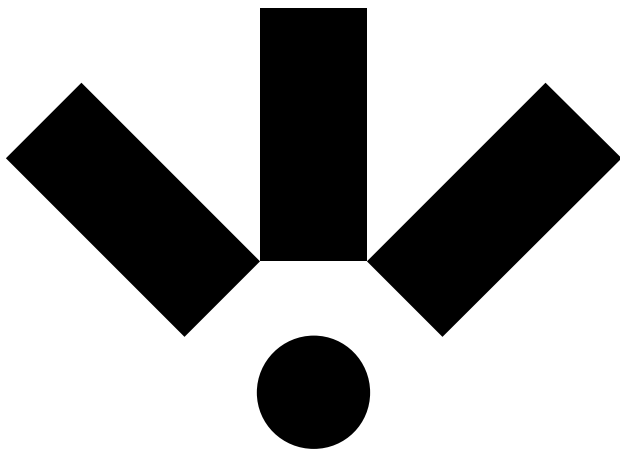
**Appendix G: Planning Policy Review table by CarneySweeney**



APPENDIX A







# BARBICAN QUARTER ACTION

On 24<sup>th</sup> October a letter was sent to many residents from Christopher Hayward, Chair of the Policy and Resources Committee of the City of London. In this letter, he maintains that the decision to marginally reduce the size of the London Wall West development is a response to 'consultation'.

Barbican Quarter Action (BQA) is publishing this open letter as a response and rebuttal of most of the content of Mr Hayward's missive. Please take a moment to read this and also to visit [www.londonstartshere.co.uk](http://www.londonstartshere.co.uk) where you can sign up to the campaign and see Mr Hayward's letter.

If you have skills and time to offer, especially in web updating (Square Space), social media, planning and architecture, the time to deliver messages like this through letter boxes, please get in touch via the website. We welcome your support.

## OPEN LETTER FROM BQA TO POLICY CHAIR, CHRISTOPHER HAYWARD

Dear Mr Hayward,

We refer to your letter to residents dated 24<sup>th</sup> October 2022. In line with previous communications from your office, there are a number of issues in this letter which are misleading or misguided. In the interests of clarity, we have highlighted below claims made by you and/or your advisors which simply do not stand up to scrutiny.

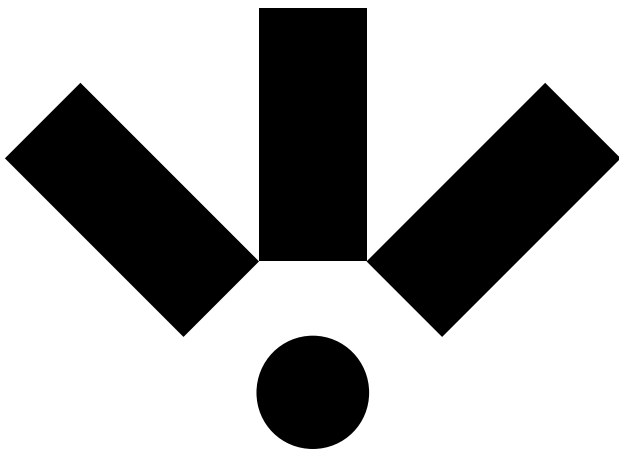
## CONSULTATION AND CONCERNS

You write that following consultations, the width of the proposed buildings has been reduced by two and three metres respectively. By omission you imply that mass and scale are the sole grounds for the hundreds of objections you received. However, many of the comments submitted were copied to our campaign email address. Those comments focus, amongst others, on the environmental impact, on damage to town and streetscape and adjacent listed heritage assets, and on lack of a cultural strategy. The barely perceptible reduction in girth does nothing to reduce the actual impact of the scheme and nor will it address real concerns raised in consultation.

## SUSTAINABILITY

Furthermore, it is perplexing that you would describe the new office space as sustainable. The 40,000kts of CO<sub>2</sub> undermine the accuracy of that claim. The 'demolition first' approach adopted by your office is, however, unsustainable and will contribute to global heating. Your officers and engineering advisors, Buro Happold, have accepted that your Whole Life Carbon Assessment Report (May 2022) which set out to justify the decision to demolish, is misleading and should be rewritten. The faulty report should be withdrawn.





# STOP. RETHINK. RESET.

## THE CITY'S EXPLORATION OF RETENTION OF EXISTING BUILDINGS

The City has not considered retention and retrofitting of all buildings. This was confirmed in the Stagg/Sturgis reports and by your advisors. All buildings at some point require work to bring them up to modern standards and these fine buildings, designed by world leading architects, will respond very successfully to retrofit as Bob Stagg confirmed in his report. Therefore, it is clear from independent experts that the buildings on the site could be retrofitted and repurposed.

## FEASIBILITY OF THE SCHEME AND FINANCIAL PLANNING

Given that no economic appraisals for any of the City's major projects have been carried out, it is difficult to claim that unless the building is of a minimum size that it is not feasible. The £50m sum raised will have little impact on the black hole in the City's finances and its attempt to fund its current projects. That £50m fails to take into account the demolition costs. Apparently reckless financial planning and over-committing to projects have resulted in claims at the Court of Common Council on 13<sup>th</sup> October 2022 that the City is at risk of going bankrupt. This is an unprecedented situation, the responsibility for which lies squarely with those continuing to promote these schemes without a comprehensive business plan or risk assessment. The waste of funds in pursuing these schemes suggests that the decision-making process in the Guildhall is contributing to the gaping hole in the City's coffers.

## A VIABLE FUTURE AND A CULTURAL STRATEGY

On 21<sup>st</sup> July 2022, you confirmed that no other cultural option for the site had been considered since the Centre for Music. What was to be a world class concert hall became overnight an office development. The element that you claim will be dedicated cultural space is not guaranteed. The City requires footfall seven days a week. Office workers have not returned to pre-Covid levels. However, small and medium-sized enterprises will not survive if footfall does not return. The LWW site seems an obvious site for a major cultural anchor that will see visitors from far and wide, generation after generation making multiple visits. Whatever the future of this strategic site, it must play a key role in any cultural strategy for the City. The City is falling behind its global competitors. This City needs a visionary cultural strategy now.

Again we ask the City to stop, rethink and reset plans for London Wall West. Do not demolish - retrofit and repurpose based on expert advice. This makes sense financially and environmentally and can make the City more competitive.

Adam Hogg and Averil Baldwin, Co-Chairs of Barbican Quarter Action

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To Chris Hayward  
Chairman of the Policy and Resources Committee  
City of London Corporation  
Guildhall  
Aldermanbury  
London EC2V 7HH

23 June 2022

## LONDON WALL WEST – RESPONSE TO PROPOSALS PUBLISHED 18 JUNE 2022

### OVERALL COMMENT

We are dismayed that the fundamentals of the proposed design remain the same as those we saw last December. The scheme proposes the demolition of Bastion House and the Museum of London. In their place is planned a huge office-led development of some 780,000 sq. ft, including two massive new towers, with limited cultural and green space. The scheme is wholly inappropriate for a site of such significance, both in its physical form and in terms of its proposed usage. Moreover, it undermines the City's desire, as expressed in Destination City, to be one of the world's premier destinations through its cultural offerings.

### OUR OBJECTIONS

We have been told repeatedly that the principal objective of the proposed development is to raise funds – for the move of the Museum of London and other City projects. By focusing on this objective, the City will:

Ignore the site's rich history, which features the Romans, Shakespeare, and John Wesley and many other historical features. The opening up of the Roman Fort Gate will be severely diminished by its commercial setting.

Sacrifice the site's public cultural heritage: as the home of the Museum of London for 50 years and the previously intended location of the world-class Centre for Music. It remains the Southern gateway to Culture Mile linking the South Bank and Tate Modern to St. Paul's Cathedral and beyond.

Confront visitors instead with a huge commercial development, with a cultural offering representing just over one per cent of its space.

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Compromise the nature and architectural integrity of the Barbican Quarter. The Barbican is world-renowned and one of the City's major post-war achievements. The Museum complements the public benefit of the Barbican while Bastion House reflects its admired Brutalist design. The new proposals include little in the way of public benefit while the height and mass of the buildings will dominate and diminish the surrounding neighbourhood.

Undermine many of its own policies and statements: the draft City Plan; the Open Space, Responsible Business and Climate Change strategies; the aims expressed in Destination City and the desire for the City to be a cultural hub, as expressed in the Barbican/Golden Lane Strategy .

There are also questions concerning the scheme's compatibility with the National Plan and the National Planning Framework . How can the City ask others to respect its policies if it fails to do so itself?

#### THE CITY'S CLIMATE CHANGE STRATEGY

It is now widely agreed that, because of the devastating impact of carbon emissions on global warming, and the large proportion of carbon emissions resulting from major construction projects, serviceable buildings should not be demolished if re-fitting them is a feasible alternative. Our polling showed that 88% of Barbican residents opposed demolition of Bastion House and the Museum of London. However, the Whole Life Carbon Assessment report prepared by the City's project team dismisses the option of retaining Bastion House without providing the necessary factual evidence. The judgement is based on a hypothetical assessment of risk rather than a full structural survey.

Moreover, if the scheme were to go ahead in its current proposed form, it would add over 45,000 tonnes of CO<sub>2</sub> to the atmosphere during the demolition and construction phases. This is more than the entire CO<sub>2</sub> annual output of the City Corporation's operational activities. How would this be compatible with the City's stated aim of achieving Net Zero in its own operations by 2027?

#### THE CONSULTATION PROCESS

The City has stated its *commitment to transparency and delivering a robust consultation process*. We have commented elsewhere that this is far removed from our experience. Above all, the City has failed to engage with local stakeholders

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on the fundamental issues about the site as recommended by the National Planning Policy Framework.

While the Project Team has specified the nature of the consultation undertaken to date and highlighted the key concerns that arose (the height and mass of the proposed buildings, and issues of sustainability) they have provided *no information whatsoever* on the extent of those concerns, and why so little has been done to address them. We can only assume that the City's failure to provide us with detailed information is because there is widespread opposition to these proposals.

In addition, the Project Team's graphics are selective and misleading. There is little assessment of the scheme's impact on the Barbican Estate and neighbouring conservation area. No 3D models demonstrating the full scale of what is proposed have been made available although we know they exist and their availability for stakeholders is encouraged in the London Plan .

We urge the City to live up to its commitment to transparency and consult meaningfully with the local community. The current process falls far short.

### CONCLUSION

This remains a short-sighted proposal, lacking vision and apparently driven solely by the desire to raise money. Furthermore, the intention to enter into a long lease with a developer carries the risk that even the limited public benefits of the proposal would later be jettisoned by the developer.

As our polling showed, there is no evidence the scheme has the support of the local community. It is contrary to many of the City's own policies. This is an outstanding site crying out for an imaginative scheme respecting its heritage and location. We once more invite the City to stop, think again, and work with us and the wider community to develop a scheme worthy of the site, the City and London itself.

Adam Hogg and Averil Baldwin Joint Chairs Barbican Quarter Action

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To Policy Chairman  
Chris Hayward

Wednesday, 12 April 2023

Dear Chris,

#### EXPLORING THE POTENTIAL TO REFURBISH THE LONDON WALL WEST SITE

Thank you for your letter of 3 April stating that the City Corporation will explore the potential to refurbish the London Wall West (LWW) site. We very much welcome this move.

As you know we object to the demolition of the former Museum of London and Bastion House on a number of grounds. Foremost amongst these is climate change. The demolition of the existing buildings and consequent redevelopment of the site would result in more carbon emissions than other options. Exploring alternatives is not only in line with your new guidance to developers, but essential in our view.

We also object to demolition because these are fine buildings, of pioneering design and high quality, capable of being successfully adapted and retrofitted. You refer in your letter to “a real desire locally for these buildings to be retained” but of course objection is not confined to the locality. Significantly, the Twentieth Century Society has included these buildings in its list of the 2023 top ten most threatened buildings across the UK. It calls for them to be retained, refurbished and adapted.

We question, however, whether by seeking interest in LWW on its own, an opportunity to maximise interest and value might be lost. The New Museum, The Arts Centre renewal, and the potential afforded by Smithfield East and LWW, provide the City with an opportunity to create a world-leading centre for the creative industries. Seeking interest to develop Smithfield East and LWW, with clarity on dates for vacant possession, might have greater appeal to prospective developers.

Finally, there is the time-scale. Seven weeks which include four Bank Holidays seems a short period in which to ask for expressions of interest. This is a site with complex buildings in a difficult urban setting. Retention of buildings may require significant adaptation, and targeted demolition and extension. We have never argued that narrow refurbishment is the only solution. More time and encouragement to develop alternative creative options for the buildings, the site and its surroundings might be desirable.

Thank you for the invitation to meet. Averil and I welcome the opportunity to discuss in detail the points raised above. Can you offer us a some dates in the near future?

Yours sincerely,

Averil Baldwin, Adam Hogg  
Co-Chairs Barbican Quarter Action



15 June 2023

To Chris Hayward, Policy Chairman City of London  
CC Paul Wilkinson, City Surveyor; Andrien Meyers, Chairman Investment Committee

## LONDON WALL WEST

We are writing to congratulate you, and the officers involved, on the recent soft market test to establish the level of interest in repurposing the former Museum of London and Bastion House buildings for new uses. As you know we have long campaigned for the City Corporation to rethink its plans for this site and seriously consider retention and reuse options, not least in response to the City's bold net-zero commitments.

We celebrate the market testing and wholeheartedly endorse any responses to the redevelopment of this site that clearly demonstrate:

- a true sense of vision and imagination for this outstanding historic and cultural site,
- that the current buildings at London Wall West are adaptable to many uses,
- a track record in creative, sustainable and viable refurbishment.

While we celebrate the City's actions in creating the soft market testing, we believe the process to have been seriously constrained, not least in providing just 31 working days to meet an extremely demanding brief and submit proposals. So, we are delighted to learn that developers have enthusiastically seized the opportunity and created proposals despite these constraints. This surely demonstrates that there is an appetite for retaining, repurposing and refurbishing these fine buildings; now included in the Twentieth Century Society's 2023 Risk List of the top ten most threatened in the UK. Moreover, it also demonstrates that fuller and more proactive marketing should generate valuable interest.

We hope the City's Investment Committee will now give these proposals the due attention they deserve and acknowledge that there are viable alternatives for the development of this exceptional site. Proposals that:

- are fit for the future of an ambitious, vibrant and diverse Destination City,
- reflect the potential and opportunities for cultural, creative and learning use of the site,
- demonstrate commitment to climate action and publicly underline the City's own innovative environmental planning policies should be prioritised.

We believe that retention and reuse options can represent best value for the City and enhance its reputation on the national and world stage.

We also hope that the next stage of decision making for options for the site will meaningfully involve the local community, in establishing any developer brief as well as the process for development. This would greatly enhance the intentions of the Residential Reset that you have championed. As you know, we have repeatedly said this campaign is not anti-development and is keen to offer our skills, insights and experience to work with you and your colleagues to create a valuable and truly future facing possibility for the site.

Adam Hogg  
Co-Chair, Barbican Quarter Action

7 November 2023

Chris Hayward  
Policy Chairman  
City of London Corporation.

Dear Chris,

### OPEN REPLY TO YOUR LETTER OF 29 SEPTEMBER 2023

We refer to your letter dated 29 September 2023 which you sent by email to us on 4 October 2023. There are substantive issues raised in your letter which merit further clarification. We make the following observations on the statements in your letter, with references being to paragraphs therein:

1. We note your intention to submit a planning application for the redevelopment of London Wall West and associated listed building consent (paragraph 1).
2. You claim that the decisions of the Policy and Resources Committee on 21 September 2023 and the Investment Committee meeting on 22 September 2023 to proceed with a planning application are in keeping with your *"duty to achieve best consideration"* (paragraph 2). Please provide without delay a copy of the background papers which informed those decisions. Given that the papers relate to the development of land owned by the Corporation we are advised that the Corporation is not entitled to withhold disclosure of the background papers on the grounds that they contain commercially sensitive information.
3. At the City-wide residents' meeting on 15 June 2023, you publicly stated that when assessing best value for the site a range of factors in addition to financial would be taken into account, including sustainability and the quality of the buildings. Please set out how you have taken these factors into account in your decision to proceed with the scheme.
4. You claim that the City Corporation is under a legal obligation to extract *"the maximum financial return"* for the site and that this equates to the *"best consideration"* (paragraph 3). Please explain how the City Corporation has on this occasion reduced the definition of best consideration to just the financial return. We note that this narrow interpretation was not applied in 2015 when the City Corporation agreed in principle to make the site available for a new Centre for Music, at the same time commenting on the site's strong cultural potential. Similarly, the vast sums spent on the development of the Justice Quarter were committed without an economic appraisal.
5. We note that while you rely on legislation in relation to your *"best consideration"* argument, that you fail to address the other element which the legislation imposes on local authorities, namely *"the best use of the land"*. The legislation does not allow local authorities to cherry-pick its provisions to promote its own schemes. We note that you do not mention that environmental issues have been considered at this or at any stage of the decision-making process. We challenge your contention that building more massive glass office blocks is the best use of the land. Working habits including working from home mean that office workers no longer come into the City five days a week. This does little to regenerate areas and promote footfall 5-7 days a week. The absence of a coherent current culture strategy for the City means that the use of the site as a cultural hub is not being considered as an alternative to a space that is office-led.
6. We note it is your intention to obtain planning permission from your own Planning & Transportation Committee before selling the site on for development by a third party (paragraph 4).

7. You claim to have listened to concerns about your proposal to demolish the buildings (paragraph 5) and that you have reduced the scale of the scheme accordingly. Your scheme is supported by a report by Buro Happold (and others) that claims that the buildings are at risk of disproportionate collapse. We note that you have not withdrawn that report despite its findings being discredited by BOA expert, Bob Stagg. We also note that the carbon emissions calculations set out in that same report were also discredited by BOA's carbon expert, Simon Sturgis. We note that no independent third-party review of the Buro Happold report has yet been published in line with the City's much hyped Carbon Options Guidance Advice Note.
8. We note that you confirm that the soft market test carried out this year proved successful. The credible responses (your words) were submitted despite the mere 31 working days available to applicants to complete a detailed proposal (paragraph 5). We note that you have decided not to pursue these credible responses and let the market decide the future of the site (paragraph 5). We remind you that earlier this year you wrote to residents, acknowledging a real desire locally for the former Museum of London and Bastion House to be retained. You said that you had listened to them and wanted to explore the possibility of a viable alternative to demolition. Having explored this possibility and, despite credible responses, you have decided once again to not seriously consider full retention options.
9. In explaining your decision to proceed, you make no reference to the recent shifts in planning policy at both national and local level prioritising retention of buildings for re-use and retrofit above demolition. For example, the Corporation's own Whole Life-Cycle Carbon Optioneering Planning Advice Note, and its draft City Plan 2040, which states (paragraph 12.1.15) *"As new developments are large consumers of resources and materials the possibility of sensitively refurbishing or retrofitting buildings should be considered in preference to demolition..."*.
10. Similarly, your explanation fails to take into account the decision by the Secretary of State, Michael Gove, on 20 July 2023 to refuse planning permission for the demolition of 456-472 Oxford Street. There are many parallels with London Wall West (environmental and heritage impact). A key consideration in his decision is whether retention options had been fully explored. We note that in the case of London Wall West full retention options have not and are not being actively considered.
11. Your explanation fails to take into account the heritage value of the two non-designated assets on the site. The inclusion of both buildings by Powell & Moya on the Twentieth Century Society's (the statutory consultee) 2023 buildings at risk register on account of the quality of their design and construction is significant. We note that at no point do you address the impact of demolition on these heritage assets.
12. You state that all options remain on the table and that ultimately it will be the market that will decide the optimum use of the buildings and occupancy mix. For the reasons set out above, we question the decision to proceed with a planning application allowing demolition. There already appears to be sufficient market interest to retain and retrofit these buildings in a manner reflecting the location and history of the site, at the same time securing a decent financial return for the City.

We therefore look forward to learning more about the rationale behind a decision which appears to contradict earlier commitments, disregards current planning policy and precedent, and ignores evidence of an appetite to retain and adapt the former Museum of London building and Bastion House.

Best wishes,

Adam Hogg and Averil Baldwin  
Co-Chairs, Barbican Quarter Action

22 November 2023

Christopher Hayward  
Policy Chairman  
City of London Corporation

Cc: Paul Wilkinson, City Surveyor;  
Gwyn Richards, [Planning and Development Director](#)<sup>1</sup>.

Dear Chris,

**LONDON WALL WEST (LWW)**  
**PRE-APPLICATION: A GLARING LACK OF CONSULTATION AND TRANSPARENCY**

## SUMMARY

The purpose of this letter is to ask you to withdraw the planning application for LWW because the City has failed to:

- Consult properly in line with both National Planning Guidance and your own Statement of Community Engagement;
- Fulfil the specific commitments you made in 2022 for further engagement in advance of the submission of the planning application;
- Follow the City's own [Carbon Options Guidance PAN](#)<sup>2</sup>.

We note that you have now submitted full planning applications for LWW to your Planning Department, which you state follows over two years of consultation. We have also seen the recent exchange of correspondence with Fred Rodgers, City resident, in which Paul Wilkinson, City Surveyor, claimed that the City considers it *“has engaged extensively with residents and key stakeholders.”*

We are advised that these engagements to date fail to fulfil your obligations regarding consultation on the submission of this planning application. We ask that you review this application immediately to ensure that genuine *“ongoing consultation”* in pre-application is respectful, open, reasoned, and meaningful engagement and to fulfil previous public commitments you have made.

## HOW THE CITY CLAIMS THAT IT COMMITS TO CONSULT ON PLANNING APPLICATIONS

*“The City is committed to early and ongoing consultation engagement on planning applications. This means working with developers, local residents and other stakeholders from the earliest possible stage of the development process until the submission of an application to shape and guide the development proposals that are most suitable in their context. The pre-application process requires respect and understanding for stakeholders’ interests, open, accessible and reasoned communication, and informative and meaningful engagement.”* (The City's Statement of Community Involvement, May 2023, Pre-Application Advice, Consultation and Engagement, Paragraph 4.8 ff.)

## WHAT “CONSULTATION” HAS ACTUALLY TAKEN PLACE

There were just two rounds of public consultation. A two-day exhibition of sketch proposals took place in December 2021. In June 2022 the second and last consultation on the same scheme with more detail included a two-day exhibition at Frobisher Crescent, a one hour-long pop up event at One New Change on a day of industrial action, and another one at St. Luke’s Community Centre.

The quality of the presentation material resulted in obfuscation of the proposed development, contrary to good practice as outlined in the City’s own Statement of Community Involvement and Developer Engagement Guidance. In particular:

- Despite repeated requests for a physical model to allow an assessment of the impact of the impact of the scheme, no model was ever produced or shared;
- No material other than sketches, artists’ impressions and a computer-animated 3D fly-through were presented;
- Despite repeated requests to show the scheme in context, no scaled architectural drawings of the proposal in relation to adjoining buildings and especially the listed buildings of the conservation area were ever shown whether in plan, section or elevation.

## WHAT WAS THE RESULT OF THIS CONSULTATION?

We see no evidence of the City using resident feedback to shape and guide the development proposals. We were told by the communications agency that managed the initial, extremely limited consultations that the responses were overwhelmingly negative and this was confirmed by the series of very well-attended public meetings convened by BQA. Thus “*consultation*” has not been open, accessible and reasoned communication nor informative and reasoned engagement.

On the other hand, too often it has been inadequate and misleading, as instanced by:

- The consultation response, which resulted in marginal reduction in girth of the two towers but failed to address widespread criticisms of the scheme’s fundamental nature, made both locally and in the national press and media. These criticisms included environmental impact, damage to town and street-scape, impact on adjacent heritage assets and conservation areas and a lack of cultural strategy.
- No further consultation on the detailed design of the marginally modified scheme as promised. Indeed, no further engagement whatsoever, despite a City press release of 20 October 2022 announcing - “*The scheme’s design team will now amend the design and prepare a 3D model so a final proposal for London Wall West can be presented next year, ahead of submitting a planning application*”.
- No direct communication with residents since April 2023, when you acknowledged a real desire locally for the retention of the former Museum of London building and Bastion House. You said that you had listened to these calls and wanted to explore the possibility of a viable alternative to demolition. You referred in that letter to the City’s new policies urging developers to consider alternatives to demolition.
- No feedback on the results of the subsequent soft market test, in which developers were afforded a mere 30 days to respond, other than comments that it had been successful and that there had been what you described in a public meeting as “credible” expressions of interest. Where is the evidence

that options for retaining existing buildings have been fully explored before proposing substantial demolition? Where have you shown that the benefits of demolition clearly outweigh the benefits of retaining the existing buildings? These requirements are described in your own planning advice note on Whole Life-Cycle Carbon Optioneering (Pre-Application stage, page 16 ff.).

## CONCLUSION

The timing of the submission of this planning application is indicative of the City's approach to consultation and avoidance of scrutiny: over the festive holiday season levels of engagement with stakeholders including City residents will be predictably at their lowest.

A Barbican resident has just commented to us that in his view *"the process of consultation has been dead for over a year"*. We question whether it ever properly existed. We now call on you to withdraw the planning application in order to fulfil:

- The consultation commitments made in the City's Statement of Community Engagement; and
- The specific promises you made last year to present the final proposals for LWW, to include a 3D model, ahead of submitting a planning application.

We look forward to your urgent response.

Best wishes,

Adam Hogg and Averil Baldwin  
Co-Chairs, Barbican Quarter Action

Corrections post submission:

1. Gwyn Richards is Planning and Development Director, not Interim Chief Planning Officer as in original letter.
2. Carbon Options Guidance PAN superseeds the Whole Life Carbon Optioneering Policy mentioned in the original letter.



APPENDIX B



# London Wall West – Museum of London and Bastion House

Planning Submission Ref: 23/01304/FULEIA

## Embodied Carbon Review

*on behalf of*

## Barbican Quarter Action

17 January 2024

**Contents:**

- 1. Executive Summary and Key Findings**
- 2. UK National, GLA, and City of London Planning Policies**
- 3. Conclusions on Planning Issues**
- 4. Options Appraisal**
- 5. Conclusions on Optioneering**

## 1. Executive Summary and Key Findings:

- 1.1. This report examines the City of London Corporation's (CoLC) planning submission for London Wall West, the Museum of London and Bastion House (23/01304/FULEIA) examining in particular at the carbon/net zero and circular economy issues. The submission proposals follow the initial CoLC London Wall West Whole Life Carbon Assessment of May 2022. The submission represents a modification of the May 2022 proposals.
- 1.2. In April/May 2023, the CoLC undertook a Soft Market Test, inviting developers to put forward detailed proposals that would retain and adapt the existing buildings on the London Wall West, the Museum of London and Bastion House site. The CoLC received a number of credible and viable proposals for a '**major refurbishment**' of the existing buildings. These proposals not only met the CoLC's commercial requirements, but also met a whole range of UK, GLA and CoLC net zero, retrofit, and carbon policies for this site. (see section 2 below).
- 1.3. This report looks at the policy environment in which the submission has been made in respect of the UK's commitments to achieve net zero by 2050, 78% reductions (compared to 1990 levels) by 2035, and 68% reductions (compared to 1990 levels) by 2030.
- 1.4. **Key Finding:** There are significant and growing policy requirements at UK National, GLA and CoLC levels to assist the UK meet its net zero carbon targets and move towards a circular economy. The submitted proposal is not optimising the carbon emissions impacts of developing this site, and as a result is in direct opposition to UK National, GLA policies, as well as the CoLC's own policies. (see sections 2.1-2.7 below)
- 1.5. **Key Finding:** As recently as 12<sup>th</sup> December 2023 the CoLC approved new sustainability guidance for developers in a 'huge step' towards net zero, covering retrofit and reuse, energy and whole life carbon, the circular economy. This proposal effectively ignores this new guidance (see section 2.7 below)
- 1.6. **Key Finding:** There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to 6 options selected for detailed examination. These 6 options excluded 'Option 2', for a 'Major Refurbishment'. This is 'Option 2 is the option that is most consistent with the approach favoured by the commercial bids in the City's market testing exercise. **Why was this then excluded?**
- 1.7. **Key Finding:** The conclusion of the current 2023 submission and the associated optioneering studies is exactly the same as the May 2022 proposal, i.e. that a 'major refurbishment' approach is to be rejected in favour of 'new build'. This demonstrates that the latest optioneering exercise is purely 'window dressing' to prove a pre-

ordained choice (new build), and that a 'major refurbishment' option has not been seriously investigated by the design team in detail as 'new build' was always the intended outcome.

- 1.8. **Key Finding:** If the CoLC proceeds with this new build development proposal, at the expense of the refurbishment route for which they have received viable commercial proposals, then the CoLC will be in direct conflict with their own latest guidance and policies. (see sections: 2.4.4 - 2.4.8, 2.6, below).
- 1.9. **Key Finding:** By ignoring their own policies and guidance with respect to net zero, the CoLC is demonstrating to the global commercial property and investment market that they do not consider these issues to be important which puts the CoL at a commercial disadvantage to European competitors who take carbon reduction more seriously.
- 1.10. **Key Finding:** Unless the levels of carbon emissions achieved and reported in the submission's GLA reporting template are 'locked into' the scheme and become legally binding they are likely to be abandoned by any site purchaser, which means that the figures achieved by the proposal are effectively meaningless.

## 2. UK National, GLA, and City of London Planning Policies

This section identifies those key policies at National, GLA and City of London level that prioritise retention and reuse, i.e. resource efficiency, circular economy and retrofit vs demolition, disposal as waste, and new build. It is important to note that at all these levels of national and local government, change is happening fast to ensure legislation and regulation adapt to meet the overarching requirements of a net zero and circular economy.

The proposed scheme has a current completion date of 2033 which is 9 -10 years away, and we can expect that the level of regulation in relation to the Government's legally binding commitments on climate change will only increase.

### Government Trajectory to Net Zero

- 2.1.1. The UK Government is legally committed to achieving Net Zero by 2050, 78% reductions by 2035, and 68% reductions by 2030, both compared to 1990 levels. These are already demanding with the completion date well after the first

milestone. **Already the pressure to retrofit rather than to build new is increasing and this is likely to accelerate, e.g. Secretary of State decision on M&S, Oxford Street.**

2.1.2. In support of the UK's downward carbon emissions trajectory, the 'Industrial Decarbonisation Strategy 2021', Action 5.5: Page 64, States the following:  
*"Increasing resource and material efficiency in practice means keeping products and materials in circulation for longer through circular economy approaches such as reuse, repair, recycling and reducing the quantity of materials used within manufacturing. This transformative approach, tackling both consumption and production related efficiency, reduces emissions at all stages of a product's lifetime."*

2.1.3. The UK Government's 'Net Zero Strategy: Build Back Greener', Department for Business, Energy and Industrial Strategy (BEIS) 2021 states the following:

Technical Annex, Item 81 states: *"Resource efficiency policies will have a net benefit to pressures on raw material availability, reducing raw material demand and consumption. Moving towards a circular economy, where priority is placed on extending the lifetime and lifecycle of a product through sharing, reusing, repairing, redesign and recycling, is likely to have a positive impact"*.

Resources and Waste, Item 47 p180. states: *"Government is committed to moving to a more circular economy. This means keeping built assets, products, and materials in use for longer, including through repair and reuse, and making greater use of secondary materials, thus reducing waste arising."*

Resource Efficiency, Item 47 p130. states: *"Resource efficiency measures reduce emissions from industrial processes by keeping products and materials in circulation for longer by way of reuse, repair, remanufacture and recycling as well as reducing material usage. These activities enable the retention of value, and in some cases the creation of new value for both the producer and customer, at a much-reduced environmental impact."*

Resource Efficiency Item 53 states p130: *"To realise the wider emissions saving potential of resource efficiency measures will require establishing frameworks which minimise virgin resource use and maximise recycled, reused, or remanufactured content."*

**All of the above four extracts are clear about: "minimise virgin resource use" "extending the lifetime of a product" through "reusing, repairing" and keeping "materials in use for longer". This is a clear and unambiguous call for a change in direction where existing buildings are involved.**



## 2.2. National Planning Policy Framework

- 2.2.1. Chapter 2 of the NPPF advises that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 2.2.2. Paragraph 8 of the NPPF confirms that there are three dimensions to sustainable development – economic (building a strong, responsive and competitive economy); social (providing a sufficient number and range of homes to meet the needs of present and future generations and fostering well-designed, beautiful and safe places); and environmental (**protect and enhance our natural, built and historic environment**).
- 2.2.3. Paragraph 157 states that the planning system should support the move to a low carbon future in a changing climate and that: *“It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; **encouraging the reuse of existing resources, including the conversion of existing buildings**”*.

## 2.3. GLA London Plan and Policies SI2; Whole Life Carbon, and SI7 Circular Economy (CE):

- 2.3.1. GLA Policy SI2, Principle No.1 p4: ***“Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option”***.
- 2.3.2. The submission quotes GLA Policy SI7, for example: *“Resource conservation, waste reduction, increases in material reuse and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration”*,
- 2.3.3. But the submission, unsurprisingly, does NOT quote GLA Policy SI7 para 1.1.3: ***“prioritising the reuse and retrofit of existing structures, can promote CE outcomes.”***
- 2.3.4. The submission also quotes the following from GLA Policy SI7: *“Meet or exceed the targets for each of the following waste and material streams:  
Construction and demolition – 95% reuse, recycling or recovery  
Excavation – 95% beneficial use”*.

**It should be noted that these commitments are routine from most contractors and do not therefore represent anything additionally beneficial.**

2.3.5. The submission states the following (Circular Economy Statement, p18):

*“Overall, there are strong aspirations to adopt circular economy principles in development projects including its operations, therefore the Applicant is committed to circular economy principles within the Site and to lead by example”.*

*This is ironic as the most ‘circular’ activity possible on this site is to reuse and refurbish the existing buildings, so the ‘Applicant’ i.e. the CoLC, is NOT meeting these requirements nor can it be said to be ‘committed to circular economy principles or leading by example’.*

2.3.6. GLA Policy SI2, Item 3.1.3: *“If substantial demolition is proposed, applicants will need to demonstrate that the benefits of demolition would clearly outweigh the benefits of retaining the existing building or parts of the structure. **Retention should be seen as the starting point; this will usually be the most sustainable option as it can make an immediate contribution toward the Mayoral objective of London becoming a zero carbon city by 2030**, as well as reflecting the need to both move towards a low-carbon circular economy (set out in Good Growth objective GG6 – Increasing efficiency and resilience) and to push development up the waste and energy hierarchies (see Policy SI 2 – minimising greenhouse gas emissions; and Policy SI 7 – reducing waste and supporting the circular economy)”.* *This has not been done, see section 4 below.*

2.3.7. GLA Policy SI2 Item 3.2.2.: Box 4, item 5: *“Confirmation that options for retaining existing buildings and structures have been **fully explored before considering substantial demolition**, including incorporating the fabric of existing buildings into the new development. See paragraph 3.1.3 for further guidance.”* *This has not been done, see section 4 below.*

## 2.4. Emerging Local Plan City Plan 2040

2.4.1. As set out earlier in this report the City of London Corporation (CoLC) is currently in the process of producing a new Local Plan covering the period to 2040, setting out what type of development the CoLC expects to take place and where. Once adopted, it will replace the current adopted local plan.

2.4.2. Paragraph 48 of the NPPF advises that *‘local planning authorities may give weight to relevant policies in emerging local plans’.*

2.4.3. In terms of strategic priorities, the plan sets out overarching economic, social and environmental objectives. Those that are of key importance to the LWW Site and LWW. Proposals include:

The 'Environmental Section' includes the statement: *"The need to shift the culture away from 'demolition first' to 'retrofit first'". Not achieved, see section 4 below.*

And also that *"Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development". Not achieved, see section 4 below.*

2.4.4. In terms of the economic objectives of City Plan 2040, draft Strategic Policy S4: Offices, updates adopted Policy CS1 Offices, notably through the policy, promotes the retrofitting of existing office buildings for office use as well as upgrades to their environmental performance and quality of accommodation. This is expanded upon by draft Policy OF1: Office Development which states that office development should prioritise the retrofitting of existing buildings. **Not achieved, see section 4 below.**

2.4.5. The retrofit first approach is further embedded in draft Strategic Policy S8: Design, with the aim of prioritising the retention of and retrofit of existing buildings which should be informed by an appraisal of the development options. (NB See Section 4 below). Such refurbishments should improve the environmental performance of existing buildings and minimise whole lifecycle carbon emissions. **Not achieved, see section 4 below.**

2.4.6. Further detail is then set out in draft Policy DE1: Sustainable Design, which requires a retrofit first approach and that all major development should undertake an assessment of options for the site in line with the CoLC Carbon Options Guidance PAN. **Not achieved, see section 4 below.**

2.4.7. Also referenced is Policy CE1 where the submission quotes as follows: *"This policy states that developments should be designed to promote circular economy principles throughout the life-cycle of the building, as established in the GLA's CES guidance. Examples include re-use and refurbishment of existing buildings, structures, and materials to reduce reliance on virgin resources". Not achieved.*

2.4.8. The submission also references policy CE1 as follows: *"Figure 2-4 which shows the circular economy hierarchy for building developments with retaining existing buildings as the preferred option. Retention serves as the starting point*

in redevelopment schemes and should be maximised before considering refurbishment and reuse through to the least preferable option of recycling materials from demolition works”.

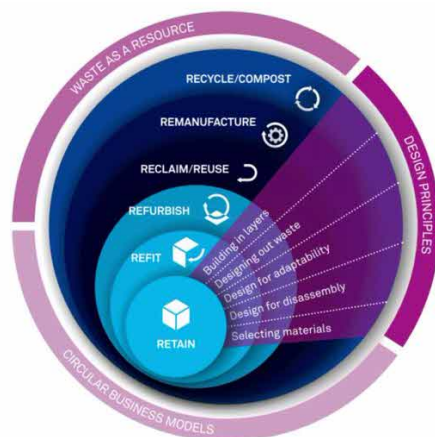


Figure 2-4 Circular economy hierarchy for building approaches as shown in Policy D3 of the London Plan. References Building Revolutions (2016), David Cheshire, RIBA Publishing.

Although referenced, this policy has not been followed.

2.4.9. Optioneering has NOT been correctly examined as ‘Option 2’ (see ‘Carbon Optioneering Study, including Dashboard 1 and Dashboard 2’), which aligns with the CoLC’s ‘Soft Market Test’ was rejected without being examined in detail. Not achieved, see section 4 below.

## 2.5. Planning Policy – Principles of Redevelopment

2.5.1. As noted, the NPPF states in paragraph 157 that the planning system should support a transition to a low carbon future in by ‘encouraging the reuse of existing resources, including the conversion of existing buildings’. Not achieved, see section 4 below.

2.5.2. The adopted CoLC Local Plan supports this and states in Policy CS15 that demolition should be avoided through the re-use of existing buildings and the CoLC Carbon Options Guidance PAN provides the most recent intermediate position on how this will be considered by the CoLC as LPA. It is clear, however, that the CoLC emerging policy in City Plan 2040 favours an embedded strategy of retrofit and the re-use of existing buildings. Whilst these policies do not yet have significant weight given the status of the emerging local plan, given that CoLC are also applicant it would seem inappropriate for this

emerging policy approach to not be adhered to without clear explanation and justification. **Not achieved, see section 4 below.**

2.5.3. The CoLC Whole Life-Cycle Carbon Options PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emissions. It states that optioneering is required for all major schemes before the application is submitted and furthermore advises “If substantial demolition is proposed, applicant will need to demonstrate that benefits of the demolition would clearly outweigh the benefits of retaining the existing building or part of the structure.” This approach reinforces the Mayor’s WLC Assessment LPG by requiring developers to consider alternatives to demolition at the earliest stages of planning and in this regard, the current interim WLC Assessment undertaken for the LWW Proposals will need to be reviewed and reconsidered (including options for part retention). **Not achieved, see section 4 below.**

2.5.4. As Section 4 below demonstrates the submitted Optioneering Appraisal is fundamentally flawed as it does not include a basic ‘Major Refurbishment’ as outlined in ‘Option 2’ which has been disregarded in the detailed optioneering process.

**2.6. The City of London on the 12<sup>th</sup> December 2023 approved new sustainability guidance for developers in a ‘huge step’ towards net zero.** Five key considerations are identified in the guidance for developers, in order to set exemplary standards for sustainability, without undermining the economic viability of planning applications. These include the following three relevant to this proposal:

2.6.1. **Retrofit and reuse** - Outlining the ‘retrofit first’ approach, promoting the reuse of existing buildings where this is the most sustainable and suitable approach for a site, in line with the City Corporation’s adopted Carbon Options Guidance. **Not achieved, see section 4 below.**

2.6.2. **Energy use and ‘Whole Life-Cycle’ carbon emissions** - Providing guidance on reducing and mitigating emissions from construction and the use of a building over its entire life, including demolition and disposal. **Not achieved, see section 4 below.**

2.6.3. **Circular Economy in Construction and Operation** - Demonstrating how developers should shift from a linear to a more circular construction model, where a long-life, loose-fit, low-energy approach is taken to all new and existing

buildings and materials, with focus then switching to reducing and treating waste produced by occupants. **Not achieved, see section 4 below.**

### 3. Conclusions on Planning issues:












- 3.1. The above Section 2 shows that at UK national level, GLA level and at City of London level there is ample policy that specifically prioritises the reuse of resources, circularity and retrofit over demolition and new build. **By proceeding with this submission, the CoLC is in direct conflict with their own current policies and guidance, as well as GLA policies and guidance and the UK national trajectory to net zero.**
- 3.2. That such demolition is against the UK national interest with respect to moving towards Net Zero by 2050, as well as to a Circular economy.
- 3.3. The submitted proposals have included optioneering, but as shown in Section 4 below, the most realistic refurbishment option, and the approach favoured by the commercial bids to refurbish with minimum new construction (called 'Option 2' in the submission) has been effectively ignored.
- 3.4. **Unless the carbon emissions levels proposed by the new scheme are effectively 'locked in' in any consent, in a similar way to GIA, massing etc, then the WLC levels achieved in the submission and reported in the GLA Spreadsheet showing the meeting or exceeding of GLA carbon targets will in effect be meaningless.**
- 3.5. By ignoring their own policies and guidance with respect to net zero, the CoLC is demonstrating to the global commercial property and investment market that they do not consider these issues as important. This puts the CoLC at a commercial disadvantage to European competitors who take this more seriously.

### 4. Options Appraisal

- 4.1. As part of the submission an 'Options Appraisal' or 'Evaluation of the Design Scenarios' was done within the 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2'. This shows that 11 options for the site were initially considered from Option 0, 'Do Nothing' to Option 9, a full redevelopment. Of these initial 11 Options the analysis focuses on 6 Options, Options 1, 3a, 3b, 5, 6, and 9, (numbers shown in green on diagram below).



4.2. Option 2: 'Major Refurbishment' is notably missing from this more detailed investigation, the reason given being that it is essentially an extension of a minor refurbishment (see diagram below, red box)

Scenario	Do Nothing	Minor Refurbishment	Major Refurbishment	Major Refurbishment with Extensions						Redevelopment	
	0	1	2	3a	3b	4	5	6	7	8	9
											
Selection of scenarios to be quantitatively assessed and main reasons for discounting	Considered not feasible due to current low energy performance, challenges with thermal comfort, low ceiling heights. Investment needed for carbonation, repair, fire risk, and structural robustness. Public realm redevelopment limited.	To be further analysed qualitatively and quantitatively	This scenario has been integrated to option 1 as a major refurbishment is considered necessary to be done to option 1 after 15 years of further operation.	To be further analysed qualitatively and quantitatively	To be further analysed qualitatively and quantitatively	Peninsula change limited by the areas of the Museum of London Building retained. Public realm redevelopment limited. Investment needed for carbonation, repair, fire risk, and structural robustness.	To be further analysed qualitatively and quantitatively	To be further analysed qualitatively and quantitatively	Peninsula change limited by the areas of the Museum of London Building retained. Public realm redevelopment limited. Challenges with the integration of new buildings into existing substructure of the Museum of London Building.	Size of the new buildings limited by the existing substructure or extensive reinforcement needed to increase it. Public realm redevelopment limited. Investment needed for carbonation, repair, fire risk, and structural robustness.	To be further analysed qualitatively and quantitatively

After the qualitative assessment of the 10 scenarios, and the "Do Nothing" baseline required by the Carbon Options Guidance document, cases 1, 3a, 3b, 5, 6 and 9 were selected for further qualitative and quantitative assessment. The extent of intervention per scenario has been defined in detail.

Diagram from page 17: 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2'.

- 4.3. This omission is significant as a 'Major Refurbishment' is the most plausible alternative low impact approach to the site in order to achieve a scheme that is also commercially viable. This has been proven by the City's decision to offer the site to potential bidders for 'major refurbishment' proposals by way of market testing.
- 4.4. The fact that a number of developers submitted design and commercial proposals that can be described as 'major refurbishment' demonstrates that this approach has both practical and commercial merit, yet it was specifically excluded from the detailed options appraisal.
- 4.5. The Submission's Options Appraisal or 'Evaluation of the Design Scenarios' is therefore fundamentally flawed and cannot be seen as a reliable examination of the options for the site.
- 4.6. The diagrams below (Figure 10-2 and 10-3), 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2', p35, show respectively for the 6 Options selected for detailed study; the carbon intensity (kgCO<sub>2</sub>e/m<sup>2</sup> GIA), and the total whole life carbon emissions (tCO<sub>2</sub>e) for each option.

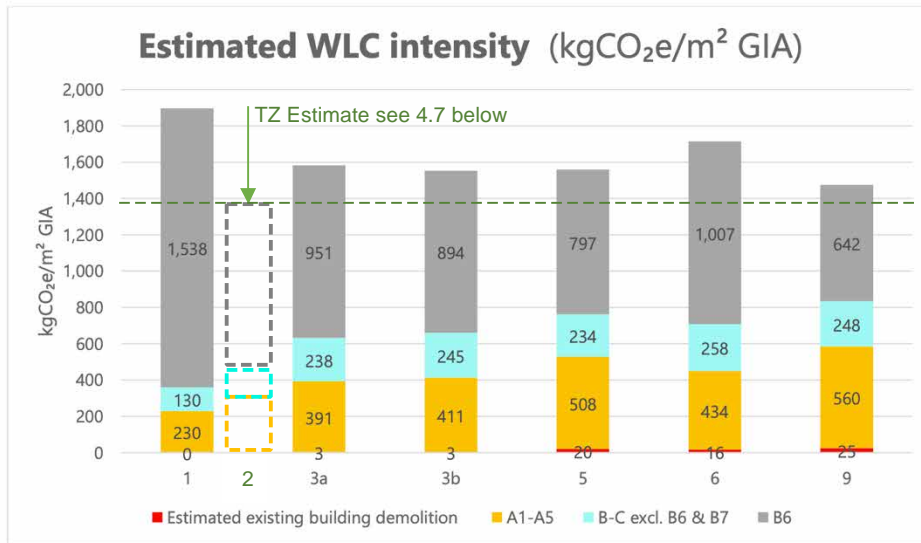


Figure 10—2 Estimated WLC Intensity Per Scenario Analysed

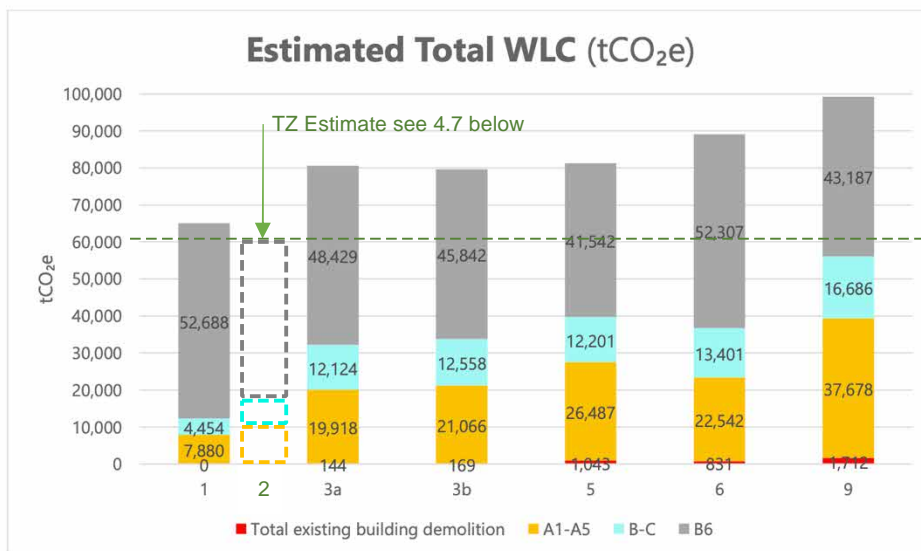


Figure 10—3 Whole Life Carbon Scenarios Comparison in Total Tonnes of CO<sub>2</sub> Per Scenario Analysed

4.7. Shown, dotted, is an estimate by the author of this report of what ‘Option 2’ might look like in comparison. This is based on the following assumptions:

That A1-A5 (yellow box) will be slightly more than Option 1, but less than Option 3A. This is reasonable as Option 1, described as a ‘minor refurbishment’ involves very little new work, whereas Option 3A ‘major work with extensions’ involves significant new construction not included in the ‘major refurbishment’ for ‘Option 2’.

The same logic applies to B-C excl. B6, B7 (blue box).

B6, Operational energy use (grey box) should, within a ‘major refurbishment’ be to current environmental standards, and therefore at least as good on a m2 basis

as Option 3b, even if possibly not quite as good as a new build Option 9. On a total basis operational energy use would be less than the other major works options due to the smaller area, GIA.

These assumptions would have to be verified through actual analysis of the major refurbishment proposals, but nevertheless represent a reasonable estimate of carbon emissions on a comparative basis.

- 4.8. The TZ additions to the submission diagrams 10-2 and 10-3 (Carbon Optioneering Study p35) show that on a carbon intensity basis ( $\text{kgCO}_2\text{e}/\text{m}^2$  GIA) a major refurbishment is the best option, and better than the new build. This is because the embodied emissions for refurbishment would be significantly lower than for new build, and even if the operational emissions were to be slightly higher on a  $\text{m}^2$  basis, the combination would be lower.
- 4.9. On a total carbon emissions basis ( $\text{tCO}_2\text{e}$ ), the major refurbishment would be the best overall, better even than a 'minor refurbishment'. This is because although the embodied carbon expenditure is more than a minor refurbishment, the improvement in operational performance would more than outweigh this.
- 4.10. The diagram below from the submission (Carbon Optioneering Study p34) compares the 6 options selected for more detailed analysis over a 60 year period. It should be noted that these trajectories (from the submission) should be treated with caution as they are only very indicative of what is likely to happen in reality. Nevertheless onto this diagram TZ has overlaid a yellow dotted line showing what an 'Option 2' might look like by way of comparison.

10.1.1 Cumulative Carbon Emissions Graph

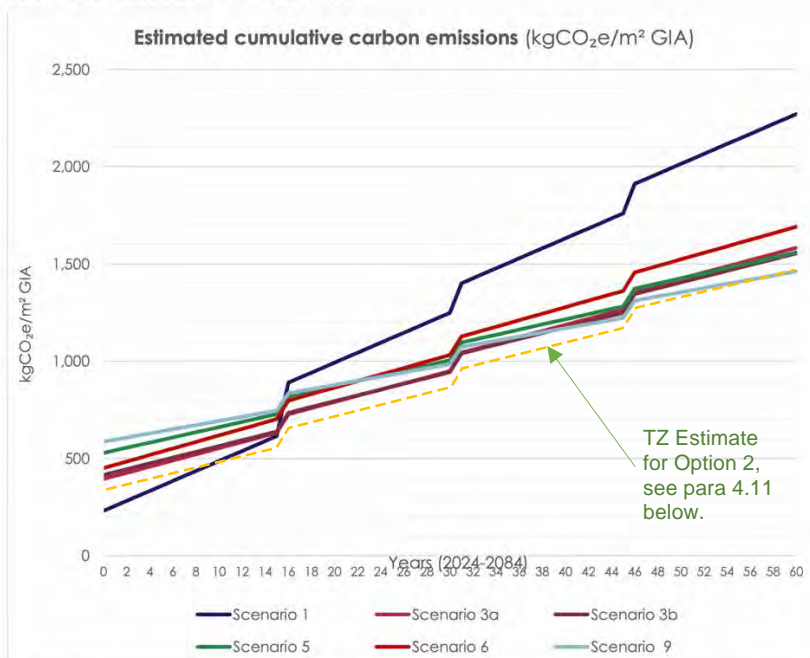
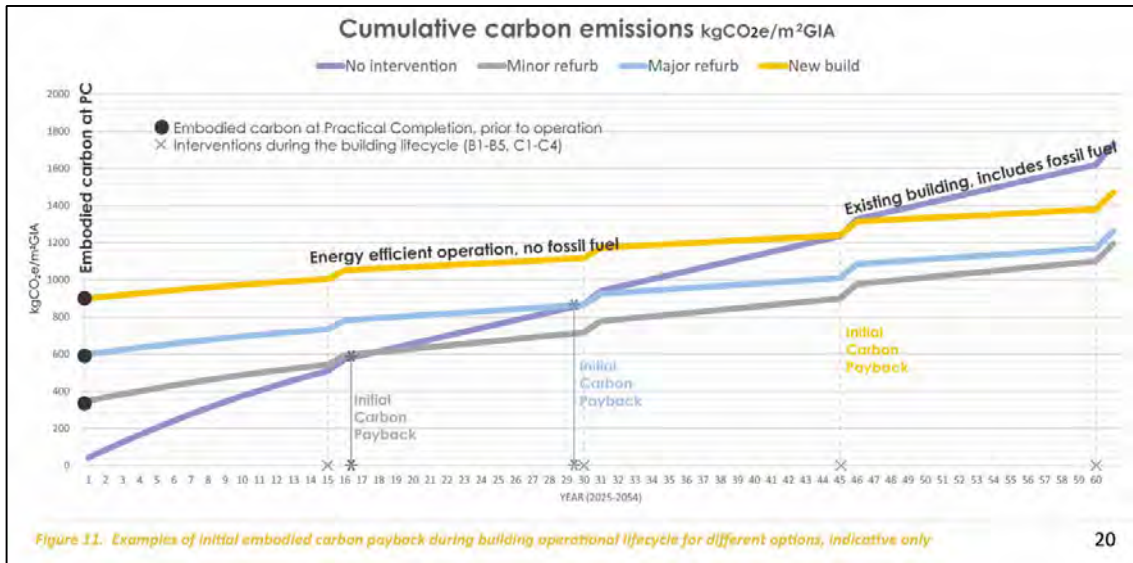


Figure 10—1 Estimated Cumulative Carbon Emissions (kgCO<sub>2</sub>e/m<sup>2</sup> GIA) Over A 60-Year Period, Including Whole Life-Cycle Carbon (Embodied and Operational) Emissions

4.11. The yellow dotted line, the assumed Option 2, starts above Option 1, but below the other options as per Figure 10.2 above. The trajectory is assumed to be similar to options 3a and 3b. This is because the Option 2 ‘major refurbishment’ would bring the buildings up to a good standard equivalent to Options 3a and 3b. As noted above in 3.10 this diagram should be treated with caution. However what is shown, is that the resulting trajectory over 60 years is better than the other refurbishment options, and about the same as the new build.

4.12. It should be noted that in the May 2022, ‘*Planning Advice Note; Whole Life Cycle Carbon Optioneering*’ by Hilson Moran for the City of London the following diagram ‘*Figure 11*’, shows the typical relative trajectories for various options see in particular ‘major refurb (blue line)’ vs ‘new build (yellow line)’. This shows that typically major refurbishment has a lower WLC life cycle over 60 years than new build. This is of significance as it clearly supports GLA ‘Policy Principle No 1’ (see section 2.3.1 above) to prioritise retrofit and illustrates that to achieve its net zero objectives, the City of London should be following this route.



## 5. Conclusions on Optioneering

- 5.1. The Optioneering study is fundamentally flawed as it does not include 'Option 2' 'Major Refurbishment' which is essentially what the City's market testing exercise covered. The study is not therefore a reliable source of information on optioneering.
- 5.2. The proposals therefore do not comply with draft Strategic Policy S8 and other relevant policies.

APPENDIX C





11	The CoL highways team identified the LWW site as providing the potential opportunity to transform the existing roundabout arrangement to create a consolidated peninsular site and improved public realm at the north end of the gyratory project.	It does not seem logical that the peninsular scheme diverting the traffic around the proposed building is driven by highways when a simple intersection with clear views and overview from all streets would be the safest option – for motorists, cyclists and pedestrians. The traffic scheme seems to be driven by the desire to maximise the footprint of buildings and therefore includes the area of the roundabout, including street and sidewalks within the site boundary.
24 ff	2.6 Site Historic Context	The historic context analysis fails or omits to mention the Roman and later Saxon gate (Aldersgate) in the City Wall to the south of the site and the importance of the historic route Aldersgate Street as the beginning of the A1, longest numbered road in the UK, connecting London towards Edinburgh.
32 6 <sup>th</sup> ¶	The Museum of London and Bastion House were a separate project from the Barbican development, however the intention was to connect into the pedway network of the Barbican, which was realised to one location to the north, and to the highwalk adjacent to London Wall, but not to the full extent that was originally planned.	Reductive presentation: the link between the Barbican Estate and the MoL/Bastion House goes far beyond the pedway system. The Museum of London and Bastion House were part of commercial Barbican South, the Barbican Estate formed residential Centre Barbican. The whole area, subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards, was laid out on an orthogonal grid. The areas were planned in response to each other, with open spaces contained in between the two developments and building volumes aligned, in proportion to each other, and all linked by an extensive network of pedways.
33 2 <sup>nd</sup> ¶	The majority of the Museum building is clad in a white rectangular tile in a simple stacked pattern. The massing of the buildings is monumental with exposed concrete columns, exposed concrete soffits and ribbon windows in the modernist style. A dark brick tiled flooring unifies the floorscape.	The description of the museum's massing as monumental is emotive and is contested. The Museum is a four-storey block of similar height as the historic buildings that survived the blitz (now mostly demolished and replaced by much taller buildings).
34 1 <sup>st</sup> ¶	Bastion House Bastion House was developed as part of the masterplan for the extension of London Wall, and was originally one of six similar office blocks that lined the new road. Bastion House is the only remaining building standing of this original context, which has all been lost.	Factually incorrect. While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived. City Tower on the south side of London Wall, designed by Sir John Burnet, Tait & Partners, built 1962-4, was first reclad by GMW Partnership in 1985, and comprehensively refurbished by ORMS in 2013. Another important building of the commercial South Barbican plan is Britannic Tower, former headquarters of BP. Designed by F. Milton Cashmore and H. N. W. Grosvenor, and built 1964-7, the building was successfully refurbished by Sheppard Robson and renamed Citypoint in 2000.
34 3 <sup>rd</sup> ¶	The floor to ceiling heights are 2.5m, which is low by modern office standards.	According to the approved plans, held by both LMA – file references COL/PL/01/168/B/001-023 - and City Corporation – planning file 4648, the floor-to-floor height is 11 feet - 3.35 metres - with a floor-to-ceiling height of 10 feet 2 inch – 3.10 metres – and a floor to false ceiling height of 9 feet – 2.74 metres. The floor to false ceiling height may be significantly increased with the use – as many modern office blocks do – of exposed services.
42, 43	Ar facts of interest on the site	Print mistake, pages double printed and not intelligible
60	Scenarios selected/not selected for whole life cycle carbon analysis.	Option 1, minor refurbishment, replacement of some of the MEP items, minor upgrade to the façade, is taken forward in the WLC assessment. This, however, is the most unlikely scenario.

		<p>Op on 2, major refurbishment of the existing building is excluded from the evaluation. However, any repurposing of the former museum and Bas on House will most likely involve a change of use and require substantial works to adapt the buildings, including changes to the interior and exterior.</p> <p>Op on 2 would have been the route progressed by the developers of the so market test in May/June 23, all of which have proposed the conversion of Bas on House from office use to hotel use.</p> <p>The options seem to be chosen to lead to the foregone conclusion and selection of op on 9, demolition and new build.</p>
66	<p>4.2 Urban Strategy - Urban and Cultural Axes</p> <p>Furthermore, the site lies on a North-South axis which connects the South Bank and Tate Modern to St. Paul's Cathedral, and the Barbican Centre and London Symphony Orchestra St. Luke's Venue to the North.</p>	<p>The diagram of connecting urban and cultural routes is a misinterpretation of factual movement through the area. The Barbican Highwalks are labyrinth-like and difficult to navigate. With only few access points they do not work as thoroughfare for the wider public.</p> <p>Moreover, this is deliberate – like all housing estates the internal routes are largely for access for residents and their visitors – they are not to provide major thoroughfares for through pedestrians – in order to maintain the residential nature of the estate.</p> <p>The main routes are at street level. The vast majority of visitors of the Barbican Centre use Beech Street as thoroughfare and not the Barbican podium. Aldersgate Street is the main route north from St Paul's. On the diagram the route from St Paul's terminates at the site. However, it continues past the site to the east-west axis of the new London Museum and Barbican Centre (Long Lane and Beech Street), past Barbican tube station and far beyond.</p> <p>A baseline study (by e.g. Spacy Syntax) looking at spatial accessibility, local route hierarchy, from high, medium to low would have shown how people move through the area.</p>
76 2 <sup>nd</sup> ¶	<p>Alternative Massing Strategies</p> <p>After finalising the site brief and laying out the road junction, key townscape guidelines were implemented to shape the size and placement of the buildings. A primary consideration was ensuring that the buildings would not obstruct the view of St. Paul's Cathedral from Millennium Bridge. Initially, there was an assumption that taller buildings could work if not directly behind the cathedral. With this in mind, various massing options were explored based on typical floor plate depth constraints, and their pros and cons were assessed.</p>	<p>While it is commendable that long distance views were considered, this should not absolve the design team from paying regard to medium-distance and close-up views of the development, nor other site constraints and urban design considerations.</p> <p>A carefully developed response would have analysed, understood and addressed the rich history of the site and area, pre- and post-war, the current specific urban context, its character, scale and grain, vistas, desire lines, and specifically the sensitivity of listed buildings and CAs. For example: the obvious alternative of turning the Rotunda into a public square and placing the building mass along the perimeter, similar to 200 Aldersgate and One London Wall, has not been assessed. Sketch 3 leaves a gaping hole in the middle where space defining building mass should be.</p> <p>For a strategic site of this importance this restricted options appraisal without a detailed townscape analysis but with a foregone conclusion in mind falls far short of the requirement to seriously evaluate alternative development options.</p> <p>Not mentioned is the fact that the proposed massing actually obscures access to one of the area's cultural icons. At present one of the Barbican towers is visible to anyone approaching from the south up St Martin Le Grand. The proposed Rotunda building blocks that view (impeding access to the iconic estate and replacing a</p>

		recognisable architectural landmark with a building of questionable design quality.
77 2 <sup>nd</sup> ¶	The building element on the Rotunda site creates a terminus of the Aldersgate Street Axis. The floor plates of the individual towers are appropriate for an efficient core and depth for daylighting.	As above, Aldersgate Street is an over 1600-year-old historic Roman route in and out of London. There is neither a historic nor an urban justification nor any benefit in creating a terminus in the middle of this important north-south axis and at the junction with London Wall.
77 3 <sup>rd</sup> ¶	This is also a significant benefit of the revised roadway configuration. The low podium also maximizes the openness and porosity of the site providing the potential to connect the North-South axis of movement in a clear intuitive manner.	To the contrary: The north-south axis is Aldersgate Street and not the meandering Barbican highwalks. Blocking Aldersgate Road with a terminus building is counterintuitive. This physically and visually splits and disconnects the north-south axis and represents a fundamental urban design flaw. The terminus building, blocking the junction, will be disorienting for pedestrian and vehicular movement along Aldersgate Street, St. Martin's Le Grand and London Wall.
77 4 <sup>th</sup> ¶	Lastly, Ironmongers' Hall is not cut off from the street, and has an improved relationship to the street from its current situation.	Historically the building sat on the inside of an urban block, within dense urban fabric, therefore only partially visible. Access was from Aldersgate Street via a small archway within the row of buildings along the street. Ironmongers Hall will now stick out like a sore thumb, like a relic, similar to the ruins of London Wall. This looks like Disneyfication of urban planning. Alec Forshaw will be a better judge. Please refer to image: Fig. 4.12: Superimposed sketch design for Ironmongers' Hall in the TVBHIA, page 21
78 1 <sup>st</sup> ¶	Having established the initial block massing part, the proposed building massing was refined through a series of operations responsive to micro-climate within the public spaces - by opening up the central public spaces - by opening up the central public spaces, along with further considerations of the strategic views of the development with the townscape context, and residential amenity considerations.	This is urban planning by deduction. The sole ambition of the massing exercise seems is to push the quantum of developable area to legally unchallengeable limits. The scheme represents a total disregard for the historic and urban context, the scale and grain of the area, and the visual and physical impact on its immediate surrounding, listed buildings and CAs. It is a self-serving development which looks at optimising the semi-public realm at its heart while turning its back onto its neighbours and public street space, specifically the main north-south route Aldersgate Street.
82	Design Sketch Studies: Public Realm A series of design sketches and studies helped evolve the public realm design into the final proposals as shown later in this document. A selection of these sketches focused on the different aspects of the public realm are included here.	No consideration has been given to the quality of Aldersgate Street; it is treated as the back of the development. Instead of reinforcing and improving the historic north-south axis of, the diagram omits this main and direct route. The movement from Aldersgate Street south, up onto and across the glade and then back onto Aldersgate Street north is a diversion and does not follow a natural desire line.
85	Feedback Summary	To be addressed by AB's SCI review.
86	Across the course of the evolution of the Proposed Development, feedback on the height and massing proposed was received from both the consultation process and pre-application meetings with planning officers. Multiple approaches to reducing the building massing were studied and implemented.	No other points raised at the public consultations were addressed.
94 4 <sup>th</sup> ¶	The overall curved forms of the buildings help reconcile the multiple site orientations and geometries between the City urban grid, the Barbican urban grid, and the Rotunda which is angled at odds relative to the rest of the context.	The only reference is to opposite equally curved One London Wall. The curved forms are at odds and do not relate to the strictly orthogonal grid of Centre Barbican (Barbican Estate) and South Barbican (London Wall). They stand in

		stark contrast and opposition and therefore do not reconcile.
95 1 <sup>st</sup> ¶	The pair of buildings seen as forming a gateway in the City - recalling the historic function of this location as a gate in the City Wall - is again apparent from the North, with a greatly increased public realm connectivity and porosity to view at the pedestrian levels.	The semi-public glade is not a gateway. The proposed scheme does exactly the opposite of a gateway: it blocks the public realm and views by placing a terminus building in the middle of Aldersgate Street. A gate places a marker on both sides of a road, not in the middle.
95 3 <sup>rd</sup> ¶	The solar shading screen of the outer facades wraps onto the North facades as well to perform a different function: to create the sense of the buildings closing their facades in the direction of adjacent residential buildings.	This gesture does not prevent direct overlooking of the bedrooms of Montjoy House, nor the only external amenity the City of London School of Girls.
108	Public spaces. The Glade Garden is located at the Highwalk level, projecting over the Central Plaza. It creates a surreal garden environment that is detached from the lively activity of the streets below, a green space for contemplation at the heart of the development, surrounded by banks of lush planting that also extend up the planted terraced facades of the buildings that flank it.	The current highwalks and the Rotunda, roads and sidewalks are public thoroughfares. In contrast, who will own, control and maintain the glade? Since the site will be disposed of, it seems that the buyer and developer would own this area. This would turn currently public space into semi-public /semi-private space. As this space is little overlooked at night, will it be closed after office hours? Will there be private security?
		The quality of the central garden space as outdoor amenity will be limited due to the tall buildings surrounding it. During spring, summer and autumn the glade will only receive around two hours/day of sunshine, and none during winter. Please refer to Environmental Statement Volume III: Technical Appendices, APPENDIX 13-D, Transient Shadow Results
110	Culture Space	As the CoL will not develop the scheme but sell it to the highest bidders who will likely redesign the scheme to suit their needs, this part is aspirational only.
121	West Side Elevation	The uniformity of the outer façade, its lack of detail, its scale and grain bear no relation to the listed Barbican Estate.
122	East Side Elevation	The uniformity of the outer façade, its lack of detail, its scale and grain bear no relation to the listed Barbican Estate. The east elevation makes opposite 1 London Wall look small in comparison. This view demonstrates how the Rotunda building terminates the view of this important junction.

APPENDIX D



20 (4.17)	<p>The Barbican Estate was of importance to the redevelopment of the site: the highwalk, or pedway as it was known at the time, was a crucial element of the site's design. However, the buildings on site – the Museum of London and Bastion House – were not designed in conjunction with the Barbican Estate. The only requirement for development on the site was that the buildings should connect into the Barbican Estate and City wide network of pedestrian highwalks. The Museum of London was conceived as a sprawling, low-lying mass, predominantly clad in white tiles, and with a dark brick rotunda at its southwestern tip.</p>	<p>Reducive presentation: the link between the Barbican Estate and the MoL/Bastion House goes far beyond the pedway system:</p> <p>The entire Barbican area, devastated by heavy bombing during WWII, was subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards. "A powerful motivation in the preparation of the various post-war reconstruction plans was a desire to prevent uncontrolled piecemeal development with no aesthetic coherence." (Barbican Penthouse over the City, David Heathcote, page 72.)</p> <p>The Museum of London and Bastion House were part of commercial Barbican South, the Barbican Estate formed residential Centre Barbican. The whole area was laid out on an orthogonal grid.</p> <p>As condition for the Centre Barbican development the architects Chamberlain, Powell &amp; Bon had to integrate the LCC and Planning Committee's Commercial Barbican plan.</p> <p>The two areas were planned on the same perpendicular grid and in response to each other, with streets and open spaces contained in between the two developments and building volumes aligned, in proportion to each other, and all linked by an extensive network of pedways.</p>
20 (4.17)		<p>Philip Powell and Geoffrey Powell were firm friends and knew each other well from university days, even sharing the same house.</p> <p>The choice of the same materials of the two cultural buildings, the Barbican Centre and the Museum of London is not by coincidence: The galleries at the later Barbican Centre were clad in white rectangular tiles just as the earlier Museum of London. Similar to the residential buildings of the Barbican Estate, the museum itself is supported by pick-hammered concrete columns, as is Bastion House, while the office block's façade followed the planning authority's strict design brief for the six London Wall towers for uniform appearance and inspired by latest office blocks in New York.</p>
20 (4.17)	<p>Bastion House was one of a number of commercial slab blocks which were designed to line the main route of London Wall, the rest of which have since been redeveloped. The 1970s OS map shows the site boundary empty (with the exception of the fragments of historic City wall), awaiting development to the south of the part completed Barbican Estate (Fig. 4.9).</p>	<p>Factually incorrect:</p> <p>While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived.</p> <p>City Tower on the south side of London Wall, designed by Sir John Burnet, Tait &amp; Partners, built 1962-4, was first re-clad by GMW Partnership in 1985, and comprehensively refurbished by ORMS in 2013.</p> <p>Another important building of the commercial South Barbican South is Britannic Tower, former headquarters of BP. Designed by F. Milton Cashmore and H. N. W. Grosvenor, and built 1964-7, the building was successfully refurbished by Sheppard Robson and renamed Citypoint in 2000.</p>
23 (4.22)	<p>Bastion House is the only remaining office block associated with the post-war masterplan for London Wall, which envisaged the construction of six curtain-walled office blocks, arranged equidistantly to either side of the widened road.</p>	<p>Factually incorrect:</p> <p>While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived.</p>
23 (4.22)	<p>Whilst there is some historic interest associated with Bastion House for these reasons, little else of the masterplan remains today beyond the broad roadway and hard edges of Route XI. The walkway has been fragmented and bypassed by further</p>	<p>It is misleading and factually incorrect to claim walkways being fragmented and bypassed by further development, diluting of the aspirations of the plan, when the opposite is the case:</p>



	development of London Wall, diluting the aspirations of the plan.	Along the north side of London Wall, the replacement schemes Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE, and Foster's Moor House on More Lane Ave have adhered to the principles of the original masterplan. All schemes have maintained, continued and celebrated the highwalk connections, while bringing the buildings down to street level. Buildings follow the perpendicular grid of the original plan, and continue to frame existing streets, external spaces and gardens. The highwalks continue to be highly popular and their extend, with smaller and larger circuits, serve many as a measure of daily exercise, especially for joggers, the older generation.
23 (4.24)	The 2019 HE COI report notes the mundane appearance of Bastion House and its lack of architectural quality when compared to other commercial buildings of a contemporary date, several of which are listed in recognition of their innovation and design quality.	In contrast, the 20 <sup>th</sup> Century Society has added the building to their 2023 Risk List: "The first post-war museum to be built in London and the largest urban history museum in the world, the Museum of London was designed when architects Powell & Moya were at the height of their reputation and prestige. Best known for the Skylon at the Festival of Britain they were one of the most significant practices in post-war Britain. Housed within an angular and robust white-tiled concrete structure, the museum is skilfully placed on a considerably constrained site. Its solidity protects the interiors from the traffic noise outside and shelters a quiet courtyard garden, while a great dark brick-clad rotunda – referencing the nearby Roman city walls – rises from the centre of a busy roundabout, acting as an arrival point to the complex. To the east is Bastion House, also by P&M, built as a speculative office development above the podium, as part of the new museum scheme. Standing on piers of biscuit-coloured concrete with Miesian bronzed curtain walling, it is now a rare survivor of a hugely important part of the City of London's post-war planning history."
		The COI was granted on the back of the proposals for the Centre of Music to replace the buildings. The public benefit of a grand concert hall for the LSO would have outweighed the loss of the MoL and Bastion House. The only person ever consulted on the special interest of the MoL and Bastion house is Kenneth Powell, who wrote the Powell and Moya article in Architects' Journal in 1996, and book in 2009. His negative views of the buildings are widely known. Another and younger architectural historian might take a different view.
23 (4.29)	It has been established that the Museum of London does not possess the special interest required for statutory listing. The reasonings for which are fully outlined in the Historic England COI advice reports in 2015 and 2019 respectively (Ref. 1-19 and Ref. 1-20).	See response to 4.24 above.
24 (4.32)	Just beyond Alban Gate, MAKE's London Wall Place scheme (2016) refurbished a section of highwalk and introduced landscaped public space at street level around remnants of the City wall (St Alphage Gardens). Generally, recent development along London Wall has entailed the removal of remnants of the pedway and the reintroduction of pedestrian routes and entrances at street level.	Claiming that generally recent development has entailed the removal of remnants of the pedway system is therefore factually incorrect, the opposite is the case: The latest scheme, Deutsche Bank, located between Moor Lane and Moorfields, continues the old highway link from the Barbican Estate to Moorgate Station. The large office block, owing to the tube station entrance at ground, has its main at highwalk level. MAKE's London Wall Place, one of the most recent schemes, replaced the original St Alphage House and surrounding podiums. The buildings successfully celebrate

		<p>the highwalk theme with new sculptural bridges retracing all original links, including the pedestrian bridge across London Wall.</p> <p>Foster's More House replaced the most eastern tower and is linked at high level to Deutsche Bank and London Wall Place.</p> <p>The highwalk from 1 London Wall Place across London Wall is temporarily closed due to the demolition and redevelopment of the opposite office block City Place on Basinghall Street. Once completed, the highwalk, which connects the ground floor of City Tower to the Guildhall and the Barbican, will be reinstated.</p> <p>As not all highways are visible on Google, it may have helped the assessor to go beyond a simple desk top study and pay the area a visit.</p>
24 (4.34)	<p>When assessed for statutory listing, Bastion House was acknowledged as the <i>first</i> commercial work undertaken by Powell and Moya, and the only remaining, largely externally unaltered, commercial <i>office</i> associated with the post-war masterplan for London Wall. There is some historic interest associated with Bastion House for these reasons, but the fragmentation of the walkway and redevelopment on London Wall has largely eroded the aspirations of the masterplan, therefore limiting the historic interest of Bastion House.</p>	<p>It is therefore incorrect to talk about fragmentation and erosion of the aspirations of the masterplan, therefore limiting the historic interest of Bastion House:</p> <p>Four of the original London Wall towers stood on the north side of the street. Three of these have been replaced, Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE and Moor House by Foster and Partners. All of these replacement schemes have continued and celebrated the highwalk connections, while bringing the buildings down to street level – one does not preclude the other.</p>
24 (4.35)	<p>Whilst there is a Miesian quality to Bastion House, it was described in the Architects Journal of 1996 as 'in anonymous Miesian mode', and when compared to listed post-war <i>office</i> buildings it appears mundane and somewhat old-fashioned in its treatment, lacking in architectural quality and innovation.</p>	<p>The article in the Architect's Journal from 4 July 1996, An architecture of continuity, We celebrate the <i>first</i> 50 year of Powell Moya Partnership – a practice whose work represents the best social values of post-war Britain, is again written by Kenneth Powell. He seems to be the only authority ever written, or ever to be quoted or consulted on the scheme. His negative views of the buildings are widely known but may not be representative.</p> <p>The C20 board is meeting this week to consider their view.</p>
25	Townscape Character Area Diagram	<p>The London Wall TCA should include the area in between Moore Land, Moorfields and Ropemaker Street. This area forms part of the original Barbican South area and masterplan.</p>
30 (5.5)	<p>New Bastion House</p> <p>... the proposed building has a slightly larger footprint, which would result in a slight increase of visibility in views from the south bank ...</p>	<p>Misleading.</p> <p>The footprint of the proposed building measures between two and a half metres and three metres that of the original Bastion House</p>
30 (5.5)	<p>While the tonality and opacity of the outer elevations will embed the building into the architecture of the Barbican Estate, the <i>fin</i> vertical expression of the outer 'husk' will have a much lighter visual character than the over-scaled, concrete expression of the Barbican, legibly placing these new buildings within an existing urban backdrop in views from within the Estate.</p>	<p>The exact opposite is the case:</p> <p>The description suggests that the proposed Bastion House, due to its detailing, will appear lighter than its neighbour, the over-scaled Barbican.</p> <p>A view of the east elevation (DAS, page 122, 5.11 Site East Elevation) demonstrates that the vast volume of the proposed tower will appear oversized and, in such close proximity, dwarf the adjacent Mountjoy House.</p> <p>Instead of forming a backdrop the proposed buildings will visually encroach and dominate the southern perimeter of the conservation area.</p>
31 (5.12)	<p>... the pedestrian experience along Aldersgate Street and London Wall significantly enhanced.</p>	<p>The enhancement of the street environment would be welcomed. However:</p> <p>The tall Rotunda building and 200 Aldersgate will create a tight, lightless and canyon-like street environment.</p> <p>The placing of a terminus building at this important road junction, blocking views and diverting the street, will be disorientating for pedestrians and motorists alike.</p>

31 (6.12)	The scale and design character of the proposed buildings would complement the existing townscape character of the site. The high-quality of the architectural treatment and the enhancement to the quality of the public realm on site would result in an enhancement to townscape character and quality. This will result in <i>beneficial effects</i> to TCA 1, TCA 3, TCA 4 and TCA 6 and <i>neutral effects</i> to TCA 2 and TCA 5, where the <i>effects</i> are negligible in scale. There would be no adverse <i>effects</i> on TCAs.	Exactly the opposite: The development is out of scale, lacks grain. The overly large and amorphous volumes bear little relation to the post-war masterplan with its perpendicular grid and synergy between Barbican South and Centre Barbican area. By placing a large terminus building on top of the road junction, the proposed scheme does not respect the historic route and important axis of north-south vehicular and pedestrian movement. What is interpreted as neutral and beneficial is in fact harmful to a large number of heritage assets, CAs and to the townscape in general.
89	View 12, St Martin's Le Grand, outside entrance to no.16. The glimpsed view of the distant Lauderdale Tower and opaque presence of the existing Rotunda (former Museum of London) would be replaced with a building of an appropriate scale and high design quality, providing an interesting and complementary focal point to the view. Sensitivity: medium Scale and Nature of <i>Effect</i> : moderate, <i>beneficial</i>	This is contested: St Martin's Le Grand and Aldersgate Street (south) are framed by a mix of four to nine-storey high buildings of various styles and eras, however, consistent in their materiality (largely Portland Stone). The large and prominent neo-classical No.1 St Martin's Le Grand (Nomura House) covers the entire block along Angel Street. Together with the adjacent Grade I listed St. Botolph's church it forms the eastern perimeter of the Postman's Park Conservation Area. View 12 clearly demonstrates that the proposed Rotunda building, due to its encroaching position, its height, grain and materiality will dominate the street scene, appear overpowering and dwarf the buildings along the street, specifically the Grade I listed church and even the substantial Nomura House of the CA. This view is too far away to show the impact of the proposed development on much smaller St. Botolph's without Aldersgate. Note: the two tall buildings at the street junction, 200 Aldersgate Street and One London Wall, both step down to the prevailing height of their neighbours. One of the stated aims of this development is to enable access to the City's cultural facilities. But by obscuring an existing view of the Barbican's Lauderdale Tower from the south (one of the few remaining medium-distance views of the estate from the south), this proposal reduces access to a longstanding cultural asset in the City (the listed Barbican estate, an internationally renowned icon of 20 <sup>th</sup> century urban planning) in favour of an office block with an uncertain cultural offering.
107	View 17, Aldersgate: west pavement. This will be an exceptionally high-quality development, with coherent and visually engaging buildings and spaces at this important and historic City gateway location. Magnitude of Impact: high Scale and Nature of <i>Effect</i> : moderate, <i>beneficial</i>	The placing of this tall terminus building in the middle of Aldersgate Street, blocking views and circulation, just meters away from the historic location of the former Roman and later Saxon city gate and the beginning of the A1 route to Edinburgh, will cause substantial harm to the existing and historic townscape.
132	View 24, Barbican Estate: St Giles Terrace New Bastion House and Rotunda building would have a light appearance, clearly positioned in the background of the view. The proposed development would be a high-quality secondary background element in the view, with the foreground forming the principal focus. The proposed development would not detract from the townscape and visual qualities of the foreground, and would form a sensitive, high-quality, and well-considered addition to the	This view is considered harmful to the Barbican Estate, the setting and character of the CA: As the Centre Barbican plan had to incorporate the South Barbican plan, the buildings were designed in proportion and aligned with each other. The current Bastion House has the same depth as Mountjoy House, the buildings were initially planned aligned but were later staggered along the same axis. The footprint of New Bastion House will increase by two and a half to three-fold. This vast volumetric increment and swelling across the axis, coupled with the reduction

	<p>setting of the Estate which, as seen in this view, is already characterised by tall modern buildings.</p> <p>Magnitude of Impact: high</p> <p>Scale and Nature of Effect: major, beneficial</p>	<p>of distance from approximately 30 to 20 metres to Montjoy House will appear overly close, imposing and disproportionate.</p>
137	<p>View 26, Barbican Estate: Thomas More Highwalk terrace, west end, overlooking tennis courts.</p> <p>Magnitude of Impact: high</p> <p>Scale and Nature of Effect: major, beneficial</p>	<p>This view is considered harmful to the amenity of the school, the Barbican Estate, the setting and character of the CA:</p> <p>Comments as above.</p> <p>In addition, there will be considerable overlooking of Mountjoy House, and of City of London School of Girls' external amenity and sports ground.</p> <p>Coupled with the North Building and the Rotunda building, there is a significant loss of sky and sense of enclosure.</p>
161 (12.2)	<p>Neither the former Museum of London or Bastion House, nor any other buildings on the site, have been identified by CoLC officers as non-designated heritage assets (NDHAs).</p>	<p>Who gets to decide what a NDHA is? There is no Local List.</p>
161 (12.3)	<p>Externally, the former Museum forms somewhat of a barrier within the local townscape, particularly the vast blank frontage of the rotunda which forms a harsh environment which is not pedestrian-friendly.</p>	<p>Correct.</p> <p>The Rotunda is the result of a much too small site for the MoL, and the post-war concept of separation of vehicular traffic at street level and pedestrian movement on pedways above. The Rotunda is a public space and garden with views in all directions, it was once to become the heart of the pedway system.</p> <p>From today's perspective, the Rotunda is certainly a mistake: It blocks views and movement along Aldersgate Street.</p> <p>As the applicant is proposing complete redevelopment, why not mend, but reinforce the blockage of this important street with a 14-storey tower?</p> <p>The proposed development exasperates the blockage of the historic route and will create a canyon-like street environment between the tall Rotunda building and 200 Aldersgate Street.</p> <p>Apart from the sheer mass created, there is no benefit and only harm to the immediate and wider urban setting.</p>
161 (12.3)	<p>In regard to Bastion House, it is acknowledged that it is the only commercial building designed by Powell and Moya and externally is largely unaltered which gives the building a degree of interest, however, the building has a restrained form and treatment lacking the innovation and quality of listed examples of its type and date.</p>	<p>Together with the St Helen's (previously known as the Aviva Tower or the Commercial Union building) at 1. Undershaft, soon to be demolished to make place for a taller tower, Bastion House is the City's only remaining and unaltered Miesian tower of that era.</p>
161 (12.3)	<p>Bastion House has some historic interest for its part in London's post-war masterplan, but this is overshadowed by the redevelopment of London Wall which has eroded the town-planning aspirations of the plan.</p>	<p>Emotive language. Neither Bastion House nor its historic interest are overshadowed by recent redevelopment.</p> <p>Four of the original London Wall towers stood on the north side of the street. Three of these have been replaced, Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE and Moor House by Foster and Partners.</p> <p>The airiness of initial concept of six towers on two-storey podia has been lost. However, all replacement schemes follow the orthogonal grid of the original plan, and together with the Barbican Estate continue to frame existing streets, external spaces and gardens, and retain the highwalk connections around and across the site.</p>

167 (12.56)	A key characteristic of the Barbican Estate is that the residential accommodation is privately owned, as originally intended.	The Barbican Estate was originally built for rent for middle to high income earners. Most flats and houses have been sold following the introduction of RTB with the 1980 Housing Act.
167 (12.60)	The Estate has predominantly flat roofs of asphalt.	Wrong. All lower blocks of the Barbican have barrel vaulted roofs throughout, which are a striking and instantly recognisable motif of the estate. It appears that the author has never been to site.
167/8 (12.66)	There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. That includes the slab block Bastion House, on the site, which was conceived as part of a separate masterplan for commercial development along London Wall, rather than in conjunction with the Barbican Estate.	As explained under above point 20 (4.17), the Museum of London, Bastion House, the Barbican Estate and the Barbican Centre share the same palette of materials and repeat architectural elements and language.
167/8 (12.66)	As such, tall and large modern commercial buildings form a well-established part of the Barbican Estate's setting. Their scale and proximity further contribute towards a sense of enclosure and segregation which is characteristic of the Barbican Estate and forms part of its significance. The Barbican Estate buildings are appreciable against this background of tall buildings within its close setting, and, despite the proximity of the modern commercial buildings, there remains a clear sense of separation between the heritage asset and its urban surroundings.	This approach and justification are highly contested. This is key to this highly subjective interpretation of the TVBHIA. New building on the perimeter of the site contribute to the setting of the Barbican by virtue of their contrasting large scale and proximity leading to a high degree of enclosure?
		Over the past 30 years, four of the six original 1960s London Wall office blocks have been replaced. The density of the urban fabric has significantly increased, with height and volume extending into the area of the former two-storey podium. These tall and large modern office blocks, however, have a few things in common. They all: Strictly follow the perpendicular grid of the post-war South and Centre Barbican plan. Continue to contain, define and reinforce the urban street space and public realm. Break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context, their immediate neighbours, including the Barbican Estate. Place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks. None of the above prevailing qualities were applied to the two proposed developments. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining CAs, but also to the setting of the immediate and wider neighbourhood.
		On the east side of the Barbican area, replacement blocks of the post-war development along Moor Lane generally follow the shoulder height of the Barbican Estate. From here the height and massing increases, away from the Estate and towards Moorfields. What were once two point-blocks, Britannic Tower and More House, with lower blocks in between, is de facto

		<p>morphing into an approximate 20-storey continuous high wall.</p> <p>The result represents the piecemeal approach the original masterplan sought to avoid. The haphazard and jugged wall of buildings is not a redeeming quality. On the contrary, it is judged to be harmful to the setting of the Barbican, the CA, and the residential amenities, specifically of listed Willoughby House.</p>
174 (14.15)	<p>Due to the scale and type of the existing commercial blocks to the south of the Conservation Area, including the existing Bastion House, the proposed development would be in keeping with the character of this part of the setting of the Conservation Area. New Bastion House broadly the same height as the existing Bastion House and is visible to a similar degree but would bring a noticeable improvement to that part of the site in terms of its design and materials. The proposed Rotunda Building would be noticeably taller than the existing buildings on that part of the site, however it would be lower than Bastion House, with more limited visibility in the Conservation Area and, when seen, it would complement New Bastion House in terms of its design, and it would be seen and understood within the existing large scale commercial development which already characterises the southern setting of the Conservation Area.</p>	<p>In contrast to the proposed buildings other developments adjacent to the Postman's Park, and Barbican Estate and Golden Lane CAs with their listed buildings, attempt to respond to its specific urban context of their immediate neighbours:</p> <p>200 Aldersgate steps down to adjacent London House and Little Britain, where the building is successively broken down in scale.</p> <p>One London Wall steps down to 10 Aldersgate Street, aligning it with the roofline of its neighbours along Aldersgate Street.</p> <p>88 Wood Street is in height aligned with its smaller scale neighbours along Wood Street.</p> <p>London Wall Place breaks down its mass into proportionate sections and places height in a careful composition and in response to the buildings of the Barbican Estate, allowing for sufficient breathing space.</p> <p>Developments along Moor Lane reduce the height along the street to that of the Barbican Estate.</p> <p>The proposed development consists of two massive volumes that are alien to the grain established by neighbouring buildings, dwarfing even the large structures of Alban Gate and One London Wall. The proposed development, due to its proximity encroaches on the CA.</p> <p>The enormous (Pevsner) Alban Gate is one of the least successful buildings along London Wall, specifically its London Wall bridging half creating a dark, windy and hostile street environment. It should not serve as precedent.</p>
175 (14.19)	<p>The slight erosion to the backdrop of the bell tower of St Botolph's in some views from within the Park (View 14B) would be balanced by the high quality design and materials of the proposals and the scale, type and location of the proposed buildings, which would be in keeping with that part of the setting of the Conservation Area, and the substantial improvement to the quality of the setting of the Conservation Area and the Church at the north end of Aldersgate Street (View 13).</p>	<p>This interpretation is challenged.</p> <p>The view of St Bride's spire shall be protected, however, not the bell tower of Grade I listed St Botolph's?</p> <p>The encroachment of the Rotunda building on Postman's Park and the loss of sky will be harmful to the setting of the church, the park and the conservation area.</p>
176 (14.31)	<p>The Barbican Lauderdale tower would be obscured by the proposed Rotunda Building in views north along St Martin's Le Grand (View 12), however this view is incidental and not part of the heritage significance of the Barbican Estate; the visibility and prominence of the Barbican towers in other views will remain.</p>	<p>Lauderdale Tower represents an important view for wayfinding from Tate to St Paul's to Barbican Centre.</p>
176 (14.33)	<p>The proposed development, in its scale and design, would be in accordance with the established character of the south part of the setting of the</p>	<p>This is contested.</p> <p>With 60- to 70-meter-long elevations of monotonous fins, the proposed development consists of two massive</p>



	Estate and would enhance the skyline through high-quality architectural design.	volumes that are alien to the grain established by neighbouring buildings, dwarfing even the large structures of Alban Gate and One London Wall. Please refer to drawings: DAS, page 121, 5.11 Site West Elevation DAS, page 122, 5.11 Site East Elevation
199	A5, Bridge above Aldersgate from Barbican Station	This is one of the harmful views of the proposed development. The proposed Rotunda building will close the gap between the east and west sides of Aldersgate Street, creating one continuous wall of development, and visually turning the street towards St Paul's into a dead-end road. Not mentioning the actual building into the photomontage by solely a blue dotted outline seems intentionally deceptive.

APPENDIX E



**MUSEUM OF LONDON AND BASTION HOUSE  
140 & 150 LONDON WALL EC2Y 5DN & EC2Y 5HN**

**LONDON WALL WEST REDEVELOPMENT**

**PLANNING APPLICATION 23/01304/FULEIA  
LBC APPLICATIONS 23/01276/LBC & 23/01277/LBC**

**HERITAGE ASSESSMENT ON BEHALF OF BARBICAN  
QUARTER ACTION**

**SCOPE OF REPORT**

1. This report, prepared on behalf of Barbican Quarter Action, focusses on the heritage impacts of the proposals within the local and immediate area. It does not consider the potential impacts on long-distance views of St Paul's Cathedral or the riverside. These matters are left to Historic England and the Greater London Authority who have a particular remit and expertise in this field, or to other London boroughs such as Lambeth and Islington whose own protected local views may potentially be affected.

**DESCRIPTION OF PROPOSALS**

2. Planning permission is sought for:

“Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office, cultural uses, food and beverage/café, access, car parking, cycle parking and highway work; part demolition of reconfiguring of the Ironmongers' Hall, creation of new Ancient Monument viewing area, public realm alterations to Plaisterer's Highwalk, John Wesley Highway, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the voids, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of the new City Walkway and hard and soft landscaping; and associated and ancillary works, structures and highway works.”

3. Listed Building Consent is sought for:

“External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of the new highwalks, hard and soft landscaping, and works associated with the

construction of new buildings with the development proposed at London Wall West (140 & 150 London Wall), Shaftesbury Place, and London Wall car park”.

“Demolition of Ferroners’ House alongside external alterations to the façade and roof level of Ironmongers’s Hall, internal reconfiguring to cores and back of house areas and works associated with the development proposed at London Wall West, Shaftesbury Place and London Wall car park”.

## **GENERAL COMMENTS ON PRESENTATION MATERIALS**

4. The architect’s sketches and artistic illustrations contained within the applicant’s Design & Access Statement, and displayed for public view in the London Centre, generally give an unreliable impression of the proposals with stretched and distorted perspectives. A simple examination of the model shows, for example, that Approach View 1 is not correct in terms of showing the true height of the Rotunda Building, the ‘Glade’ in View 4 appears far larger than it will actually be in reality, and View 6 of the ‘Aldersgate Plaza’ has a similarly enlarged perspective.

5. The applicant’s Townscape, Visual and Built Heritage Impact Assessment (TVBHIA) is more rigorously prepared. However, while the ‘existing’ and ‘proposed’ comparative images may be accurate in their own right, according to the methodology set out, the photographs generally use a wide-angle lens which does not always reflect what is seen or sensed by the human eye. In the photographic images middle-distance objects appear to be farther away, and hence smaller and diminished in context. It is similar to the technique often used by estate agents in sales brochures to make internal rooms seem bigger than they are.

## **POLICIES TO PROTECT THE HISTORIC ENVIRONMENT**

6. The National Planning Policy Framework, the London Plan (2021), the City of London Plan (2015) and the emerging City Plan 2040 all contain numerous policies for the preservation and enhancement of the historic environment. These are set out in the applicant’s submissions and do not need to be repeated here. While they provide a framework for decision-making, they also rely on an understanding of the significance of the assets which are affected and how the proposals potentially impact on that significance.

## **IMPACT ON HERITAGE ASSETS**

### **Existing buildings on the site**

7. The existing buildings proposed for demolition are not designated heritage assets. However, they directly abut a Scheduled Ancient Monument, Ironmongers' Hall (Grade II Listed), the Barbican (Grade II Listed), and the Barbican Park and Garden (Grade II\* Listed). The site also directly abuts the Barbican and Golden Lane Conservation Area and lies close to Postman's Park Conservation Area and Foster Lane Conservation Area, all of which contain Grade I Listed Buildings.

8. A Certificate of Immunity from Listing was issued in 2015 and renewed in 2019 for both the existing Museum of London building and Bastion House. This COIL expires in August 2024.

9. The City Corporation does not have a register of locally listed buildings or non-designated heritage assets.

10. The Museum and Bastion House were designed as one scheme by the highly respected architectural practice of Powell and Moya. Historic England's assessment as part of its consideration of the application for a Certificate of Immunity from Listing in 2014 and its renewal in 2019 stated the following: "Whether considered individual buildings or as two elements of one entity, it is acknowledged that both buildings have a degree of architectural and historic interest, but they do not meet the very high bar set for buildings of their date and type and should not be added to the statutory list".

11. The Principles of Selection for Listed Buildings (March 2010) states that "particularly careful selection is required for buildings from the period after 1945".

### **The Museum of London**

12. According to Historic England's assessment, the stellar reputation of Powell and Moya confers some significance of the Museum of London building, although it falls short of the required architectural interest and is too altered to meet the criteria for listing. Historically, it has interest as the first post-war museum to be built in London and, at the time, the largest urban history museum in the world. On these grounds it should therefore be classified as a non-designated heritage asset.

13. Powell and Moya's design for the Museum has always attracted interest as an example of non-grandiose modernism. The building's thoughtful reticence was noted on its opening. In 1982 the architectural critic Bryan Appleyard

praised the new Museum building as ‘brilliant’; its ‘beautiful variations and careful detailing are demonstrations of late modernism at its cool and satisfying best’ (*The Times*, 26 November 1982, see Appendix 1). The contrast with the more robust style of the Barbican Estate was seen as rewarding. While the 1982 article was written before the new entrance was built in 2010 this too was designed by Wilkinson Eyre in a ‘cool’ and undemonstrative manner that complimented Powell and Moya’s original plans and the Barbican Estate beyond.

14. The original Rotunda of the Museum of London was placed in the middle of Aldersgate Street, which marks the start of the ancient Roman Road to the north, now known as the A1 and the longest numbered road in the UK. While the Rotunda blocks the road, this was done at a time when there were extensive plans to separate pedestrians from vehicular circulation, intended to cross the whole of the City of London. The Rotunda was envisioned as a central hub of the proposed pedway system from where the pedestrian had an elevated vantage point with views in all directions, including south towards St Paul’s. These features also arguably contribute towards its significance as a heritage asset.

15. While the Museum and its Rotunda are not actually part of the Barbican Estate they were intended to integrate and connect into the Barbican’s network of public pedways and highways, and designed with a high degree of architectural sympathy and synergy with the Barbican.

16. The proposal involves the total loss of the Museum and its Rotunda. Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of the harm and the significance of the heritage asset. The replacement of the existing Rotunda with a commercial building will cement the blocking of this vital and historic artery of Aldersgate Street, and furthermore demolish and privatise these important existing public views.

### **Bastion House**

17. Bastion House forms part of the post-war masterplan for the Barbican South Development, as shown in Figure 1. The six office blocks along London Wall, four on the north side and two on the south, plus the development to the east of the Barbican, including Britannic House, were all based on the same orthogonal grid of the Barbican Estate. This grid was set up to be parallel with Moorgate to the east, and then rigorously applied up to Beech Street/Chiswell Street in the



north, to Aldersgate Street in the west, and straddling both sides of the new dual-carriageway section of London Wall (Route XI). Historic England's assessment notes that Bastion House possesses particular historic interest for its part in this post-war masterplan.

18. The 1959 plan (Figure 1) predates the Museum and shows the potential position of Bastion House as a direct continuation of Mountjoy House. In the event, to accommodate the Museum, Bastion House was constructed marginally to the east, but still on the same orientation. It is consciously set at an angle to London Wall so that it aligns precisely with the grid of the Barbican blocks to the north. It is also a very similar width to Mountjoy House.

19. Designed in a strongly Miesian form sitting above its plinth it is carefully proportioned and detailed. It is the only unaltered (externally) survival of the six similar office blocks that flanked the northern vehicular bypass for the City. Together with the Commercial Union Building (the Aviva Tower), soon to be demolished for the development of No.1 Undershaft, it is the last surviving example of its type in the City of London.

20. It has been suggested by the applicant that Bastion House suffers from structural defects that constrain its retention and reuse, but these have been strongly rebutted by independent experts. It does not reduce its heritage significance.

21. As with the Museum the proposal involves total demolition, and Paragraph 203 of NPPF must be therefore considered and give due weight to the total loss of the non-designated heritage.

22. The applicant's claim (for example in the analysis of View 15 in the applicant's TVBHIA,) that the demolition of Bastion House is a heritage benefit and that new Bastion House is a 'major beneficial' townscape enhancement compared to the existing is strongly challenged. Many of the THBVIA views show how much more prominent and dominant the new buildings will be, with no regard whatsoever for their context.

23. It is important to note that when four of the original six towers to the east of Bastion House fronting London Wall were subsequently demolished, all the replacement development schemes followed the same perpendicular grid, as can be clearly seen in Terry Farrell's Alban Gate and MAKE's London Wall Place.

**Setting of the Barbican Grade II Listed (Ref. 1352667)**

**Setting of the Barbican Park and Garden Grade II \* Listed (Ref. 10001668)**

**Setting of the Barbican and Golden Lane Conservation Area**

24. These separately designated heritage assets overlap considerably in terms of their heritage significance, and the impact of the proposals is therefore assessed together.

25. Bastion House was designed with clear reference to and continuation of the strictly orthogonal grid layout of the Barbican. Powell and Moya were completely aware of the design rationale of Chamberlain Powell and Bon in their layout of the Barbican complex. Bastion House aligns precisely with the adjacent Mountjoy House, and indeed picks up on the rhythm of its fenestration. The external plain white tiling of the Museum complex has close synergy with that in the contemporary Barbican Arts Centre.

26. The western edge of the Barbican estate, fronting onto Aldersgate Street and continued by the Golden Lane Estate fronting Goswell Road, is low-rise, providing a human scale to the eastern side of this important north-south thoroughfare. The towers of the Barbican are set back from the edges of the podium deck. The existing Museum of London complex respects and continues this modest scale to the junction with London Wall and incorporates the low-level rotunda in the centre of the vehicular roundabout.

27. The demolition of the Museum and Bastion House will erode and isolate the historic contextual setting of the Barbican complex. The scale, mass and form of the proposed Rotunda Building and New Bastion House will radically change the setting of the Barbican on its southern and western side. The applicant's TVBHIA consistently and wrongly claims that the proposals will enhance the setting of the Barbican, based on the premise that, despite being bigger, the contrasting design and materials will be less intrusive. The opposite will be the case. The amorphous, bloated shape of the new buildings proposed, combined with their scale, footprint and materials, will jar with the orthogonal nature of the Barbican to its north.

28. The Barbican Estate Listed Buildings Management Guidelines Volume II SPD (October 2012) notes in Paragraph 2.2.7 that controlling and limiting alterations to the exterior spaces within the Barbican is of the utmost importance to preserving the special architectural and historic character of the Barbican Estate as a whole. Its setting, and the impact of changes to views into and out of the Barbican, are of great importance.

29. The proposed 14 storey height and mass of the proposed Rotunda Building radically alters the established townscape and introduces an entirely inappropriate scale on the east side of Aldersgate Street. Together with the highest part of the 200 Aldersgate Street (built in 1991) which lies directly opposite, the combination will create a canyon-like constriction in Aldersgate Street, clearly apparent on examination of the model. View 13 in the TVBHIA is very misleading as it neither includes the full height of the new buildings nor the relationship with 200 Aldersgate Street. The Rotunda Building will block views of the Barbican from the further south, notably the fine view from St Martin Le Grand of the pencil-thin Lauderdale Tower. It will radically alter and harm the setting of the Barbican from the south.

30. Similarly, the setting of the western side of the Barbican will be harmed in views from the north, particularly as illustrated in View A5 on the TVBHIA, taken from the public bridge to Barbican Station. View 17, taken from the western pavement of Aldersgate Street, similarly shows how the increased bulk of New Bastion house and the Rotunda Building will loom over the southernmost frontage of the Barbican to Aldersgate Street. The impact will be equally harmed in views from further north, near the junction with Long Lane, and from the eastern pavement.

31. The existing landscape of the Barbican has very high heritage significance, recognised through Grade II\* listing, and the existing Museum building and Bastion House contribute positively to its setting. Policy CS12.4 of the City of London Local Plan 2015 specifically seeks to safeguard the character and setting of the City's gardens of special historic interest.

32. The Barbican Listed Buildings Management Guidelines Volume IV SPD (2015) focusses on the listed landscape and notes in paragraph 1.4.11 that the podium and highwalks offer a continuous range of viewpoints from which to survey the surrounding city. The map of important views and vistas in the Appendix to Volume IV of the SPD identifies the view south from the Lakeside Terrace as the most important public panoramic view within the whole of the Barbican complex.

33. Similarly, the Barbican and Golden Lane Conservation Area SPD, adopted on 1<sup>st</sup> February 2022, describes the character of the south Barbican sub-area on page 27. "At the southernmost end of the estate are the 'foothills' of the Barbican, where the scale is lowest and closest to more traditional forms of building, which are illustrated by the remnants of the Roman and medieval City wall and the church of St Giles Cripplegate. The street level podium, the park and the raised walkways all offer a multitude of important views across and

beyond the Barbican. The SPD selects several views of particular importance on pages 31 and 32, notably Nos. 12, 16, 21 and 26 which all comprise views to the south with Bastion House in the background.

34. The applicant's TVBHIA illustrates some of these views. From the Lakeside Terrace Views 19, 20 and 21 all show that the wider massing of New Bastion House will be a larger incursion into the backdrop view than the existing. From the western end of St Giles' Terrace, View 24 shows that the Rotunda Building impinges on the existing clean outline of Mountjoy House. The view out of the Barbican to the south from the Wallside Highwalk will be fundamentally changed for the worse, as shown in View 27. View A7 further illustrates how the existing clean gap between the slim orthogonal mass of Bastion House and Mountjoy House will be eroded by the proposals.

35. From a continuum of publicly accessible areas the two new tall buildings will become very prominent background features, filling areas of existing sky, and providing a muddled silhouette to the Barbican buildings. This will harm the existing character and appearance of the Barbican and Golden Lane Conservation Area and the setting of the Barbican complex as a listed building.

#### **Setting of St Giles Cripplegate Grade I Listed (Ref. 1359183)**

36. This is a building of the highest heritage significance and its retention and repair after war damage was a key element incorporated into Chamberlin Powell and Bon's design for the Barbican. Its setting comprises a major part of its heritage significance.

37. There are fine existing views of the church from the public podium areas immediately adjacent to the north side of the church, from the extensive terrace on the north side of the lake and from the entire length of Gilbert Bridge. In this continuum of views the slim and restrained outline of Bastion House is often visible, but the majority of the silhouette of the church, its tower and crenelated nave parapet is seen against clear sky. This will be greatly changed by the two tall buildings proposed. The impact will harm the setting of the church and hence its significance.

38. In the 'as existing' View 21 of the TVBHIA the right-hand side of the tower of St Giles is clearly defined against sky; in the proposal the rotunda will fill in and spoil that clean outline. The applicant's claim that the impact is beneficial is strongly challenged. Similarly in View 22 from Andrewes Highwalk the gap between the tower of St Giles and the existing Bastion House is effectively filled in by the new development. It should be noted that there is a continuum of views along this highwalk beneath Gilbert House in which 200 Aldersgate is

often completely masked by the church. The new Rotunda Building, owing to its width and height, will be continually visible.

39. From St Giles Terrace, which is effectively the modern ‘churchyard’ and integral to the significance of the church, View 23 in the TVBHIA takes just one position in this important public space but it illustrates how the wider massing of New Bastion House and its fussy architectural treatment will impact negatively on the backdrop of the church and harm its setting.

### **Setting of Ironmongers’ Hall Grade II Listed (Ref. 145812)**

40. Ironmongers’ Hall (excluding Ferroners’ House) was statutorily listed on 20<sup>th</sup> April 2023. This is an important change to its heritage status and its heritage significance since pre-application discussions and public consultation for the redevelopment proposals. Dating from 1923-25 (with a 1975 extension by Fitzroy Robinson that is not included in the listing), it is one of the few buildings in the area that survived wartime destruction and post-war clearance. It has been listed because of its distinctive Tudor/Jacobean Revival architecture, its historic interest as the purpose-built home of the Worshipful Company of Ironmongers and the only livery company hall built between the wars, and for its group value lying next to the Grade II listed Barbican.

41. Historic England’s very thorough listing description notes that “the hall is reached via Shaftesbury Place, off Aldersgate Street. Always hemmed in by surrounding buildings, it now occupies a tight site enclosed by the Museum of London and the Barbican”.

42. Powell and Moya were deeply aware of the constraints placed by the existence of the Ironmongers’ Hall on their designs for the Museum of London. While they and the City Corporation might have preferred at the time for it to be demolished and relocated, Powell and Moya accepted its retention and skilfully designed a setting that respected its scale and historic setting.

43. Shaftesbury Place is an ancient alley off Aldersgate Street, as shown on historic maps (Figure 2), and was one of several on both sides of the street, some associated with old coaching inns. Shaftesbury Place, however, was associated with Shaftesbury House, a mansion attributed to Inigo Jones in Chapter XXVI of Walter Thornbury’s *Old and New London* (1878), and lived in by Anthony Ashley Cooper, Earl of Shaftesbury. Although the mansion had long disappeared, Shaftesbury Place was a long-established constraint when Ironmongers’ Hall was built in the early 20<sup>th</sup> century. Together with the Hall and frontage buildings to Aldersgate Street, Shaftesbury Place survived the war, as shown on the 1945 map (see Figure 3).

44. Powell and Moya retained the ancient configuration of Shaftesbury Place and recreated the historic arched entrance off Aldersgate Street and secluded forecourt. They respected and paid homage to the network of passageways, alleys and courtyards that had characterised the area before the war and which survives in some other historic parts of the City.

45. The City Corporation have policies to retain, and reinstate where possible, its historic street pattern of lanes, alleys and courtyards. Paragraph 3.12.6 of the Local Plan states that “the pattern of streets, lanes, alleyways and other open spaces such as squares and courts is a distinctive element of the City’s townscape and is of historic significance. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings”. The eradication of Shaftesbury Place would conflict with this policy.

46. Shaftesbury Place was paved in brick in order to be similar to the Barbican podium and pedways. The archway gives shelter and respite from the noise and pollution of the busy traffic on Aldersgate Street, and the yard provides a semi-private space which is well suited to wedding parties and other such functions which hire the Livery Hall.

47. Historically Ironmongers’ Hall was always approached through an archway beneath a continuous run of buildings along the east side of Aldersgate Street. The proposals will radically change the setting of the Ironmongers’ Hall by exposing it to much greater public view and activity. This is heralded by the applicant as a major heritage benefit, but this is considered highly debatable. This existing and historic intimacy and secluded nature of its setting is part of its significance, and its radical alteration will be harmful. The proposed ‘Aldersgate Plaza’ bears little resemblance to the historic form of Shaftesbury Place. Moreover, the exposure of Ironmongers’ Hall will be compounded by the overwhelming scale of the north end and street frontage of the Rotunda Building, which presents a cliff onto Aldersgate Street. View 18 of the applicant’s TVHBIA is telling. The frame of the ‘existing’ photograph contains the whole of the existing frontage buildings to Aldersgate Street while the ‘proposed’ image omits the vast scale of the new buildings, so huge that they cannot be fitted into the frame.

48. Some of the best existing views of Ironmongers’ Hall are from the high walks of the Barbican. View 26 is from the Thomas More Highwalk in which the slim lines and simple geometry of the existing Bastion House provide a dignified background to the hipped roofs, gables and chimneys of Ironmongers’

Hall, together with ample areas of sky. Much of this sky will be filled in by the new Bastion House and Rotunda Building which will provide a high wall of development behind. View A8 shows the impact even more alarmingly; the cantilevered form of the new Bastion House ‘leans’ over the roofs of Ironmongers’ Hall while the Rotunda Building looms behind the chimneys and blocks the existing view of the top of the dome of St Paul’s Cathedral. View A9, taken from the Thomas More Highwalk near Mountjoy House shows how the wider footprint of new Bastion House and the massing of the Rotunda Building, together with their uncontextual architectural treatment, will radically alter what at present is a very fine and unspoilt view of Ironmongers’ Hall.

**Setting of Roman and Medieval Wall and Bastions, west and north of Monkswell Square Scheduled Ancient Monument (Ref. 1018888)**  
**Setting of Barber-Surgeon’s Hall and Physic Garden**

49. The existing podium element of Bastion House and the flank wall of the Museum form the western edge and immediate setting for the remarkable surviving above-ground sections of Roman and Medieval wall and bastions which run from London Wall to the Barbican lake. These are set in public gardens which contain mature planting. This Scheduled Ancient Monument is of the highest heritage significance. The greatly increased bulk of the proposed development in terms of its footprint and solidity will have an overwhelming and harmful impact on the setting of the Ancient Monument and the amenity of the public open space. The curving bulbous design is a marked contrast to the restraint and discipline that characterised Bastion House and the Museum and the southern edge of the Barbican.

50. View 27 in the TVBHIA taken from the Wallside Highwalk indicates a massive and deleterious change in the existing townscape and setting for the Ancient Monument and public gardens which will be overwhelmed by the scale and form of the new development.

51. To the east the neo-Georgian post-war Barber-Surgeon’s Hall (built in 1969) is a non-designated heritage asset, together with its Physic Garden, one of ten livery company gardens surviving in the City, which is also of historic interest in its own right. The greatly increased massing of the proposal will harm the setting of these non-designated heritage assets.

52. View 28 in the TVHBIA shows the increased impact of the greater bulk of New Bastion House on the setting of Barber-Surgeon’s Hall as seen from Monkswell Square to the east.



**Setting of St Botolph Aldersgate Grade I Listed (Ref. 1064732)**  
**Setting of Postman's Park Conservation Area**

53. St Botolph's Aldersgate Church is a building of the highest heritage significance, Grade I listed. It sits within its former churchyard, now known as Postman's Park. At the western end of the church the low square tower, built of brick, with a lead dome and a small bellcote is a distinctive feature. There is a continuum of fine views of the church from the middle and southern side of Postman's Park. The low massing of the existing buildings on the north side of Little Britain and the south-east part of 200 Aldersgate results in existing views of the tower bellcote silhouetted against open sky. The proposed development will fill this existing area of sky and will alter and harm the setting of St Botolph Aldersgate.

54. The proposal will also harm the character and appearance of Postman's Park. Already enclosed by substantial buildings on its southern flank (Namura House) and the block of flats comprising 75 Little Britain (built 1996), the existing view of sky to the north above the range of buildings on the north side of Britain Street is extremely important to the character and appearance of Postman's Park. It contributes to its sense of 'openness' which is noted as being an integral component of its character in the Conservation Area Character Appraisal and Management Guidelines (SPD). The proposal will seriously curtail these sky views to the detriment of its character and its amenity. The proposal will loom above the terrace of buildings on the north side of Little Britain. It will reduce the amount of natural light to the Watts Memorial plaques. The view of St Botolph's Church is specifically identified (3B) in the Conservation Area Management Guidelines.

55. Views 14A, 14B and A4 provided in the applicant's TVHBIA show some of the impact of the Rotunda Building. However, no view is provided from the pathway along the south side of Postman's Park which provides a continuum of views to the north.

56. The Rotunda Building will also appear above 75 Little Britain in views from King Edward Street. View B17 in the TVHBIA is not taken from the best position. Examination of the model shows that the impact on the skyline looking east from the west side of King Edward Street will be considerable, including views down Little Britain itself.

57. It should be noted that the Draft City Local Plan 2040 does not identify London Wall West as an area that is appropriate for tall buildings. While it will no doubt be argued by the applicant that the northern section of 200 Aldersgate

Street already sets a precedent for tall buildings, there is no doubt that its height detracts from the character and appearance of Postman's Park. An additional tall building, closer and with a bigger footprint than the tall section of 200 Aldersgate Street, will exacerbate this harm. Two 'wrongs' will not make a 'right' in this situation. It is frankly extraordinary that the applicant's assessment of the impact of the Rotunda Building is 'moderately beneficial'.

58. There will also be a harmful impact on the southern section of Aldersgate Street. The existing Museum Rotunda provides a low-rise termination to the view north along St Martin Le Grand and the southern section of Aldersgate Street. The 1990s development immediately north of Little Britain was carefully restricted to six storeys in height in order to protect the setting of the east end elevation and nave of St Botolph's Church, and the backdrop of views of the western spire and south elevation from Postman's Park. The proposed 14 storey tower of the new Rotunda Building will radically alter this view and the harm setting of the church and the eastern edge of the Postman's Park Conservation Area.

### **Setting of St Anne and St Agnes Church Grade I listed Ref. 1286384 Setting of Foster Lane Conservation Area**

59. The Church of St Anne and St Agnes on the north side of Gresham Street is a building of the highest heritage significance. There are important views of the church from the south and east. In these views the charming and diminutive belfry is visible against sky, and it is notable that the scale of modern development to the north has been restrained in order not to overpower the setting of the church. The new Rotunda Building will be clearly visible rising above these buildings, particularly from the north-eastern end of Foster Lane, which is arguably the best view of the church. The view of the tower and belfry will be harmed by this intrusive backdrop. View B18 in the applicant's TVHBIA fails to encompass this view, and is oriented to look down Noble Street, conveniently excluding the church.

60. The western boundary of the Foster Lane Conservation Area directly abuts the Postman's Park Conservation Area at St Martin Le Grand. Immediately to the north of the Conservation Area, Castle House, 4-6 Aldersgate Street (built in 1999) and the corner of Aldersgate Street and London Wall, part of Foster's One London Wall (completed in 2005), respect the prevailing townscape context with five/six storey scale, and the setting of St Botolph's Church opposite, and St Anne and St Agnes to its south. The low scale of the existing Museum

Rotunda provides a very modest and unassuming background. This view and the wider townscape context will be significantly altered by the scale of the new Rotunda Building. Its scale will become a very prominent and obtrusive feature which will harm the setting of the Foster Lane Conservation Area.

61. The Foster Lane Conservation Area Character Summary and Management Strategy SPD 2015 identifies important views of the 19<sup>th</sup> century townscape at the corner of Gresham Street and Aldersgate Street. The applicant's TVHBIA fails to include this view of the corner of Gresham Street. View 13 is too close, taken from the south side of the existing roundabout, albeit the scale of the new Rotunda Building will be overwhelming. View 12 taken towards the southern end of St Martin Le Grand is too far south.

### **Wider Impacts on other Heritage Assets**

62. The applicant's TVHBIA includes dozens of 'before' and 'after' images from distant viewpoints. It will be for others to comment on these impacts, such as the incursion into the existing backdrop views of the tiered spire of St Bride's Church, Fleet Street, evident in Views 1 and 2 of the TVHBIA, or potential views from parts of Charterhouse Square or The Charterhouse itself, not considered in View B23.

### **OVERALL ASSESSMENT OF HARM**

63. The proposal involves the complete loss of two non-designated heritage assets, namely the former Museum of London building and Bastion House. There is substantial harm to these heritage assets.

64. The proposal involves less than substantial harm to the setting of several listed buildings, a Registered Park and Garden, a Scheduled Ancient Monument, and the setting of three conservation areas.

65. The most damaging impacts on designated heritage assets are the background views of the church of St Giles Cripplegate from within the Barbican, and the views of the spires of St Botolph Aldersgate from Postman's Park and St Anne and St Agnes from Gresham Street, both currently silhouetted against sky. While this is less-than-substantial harm, as defined in National Planning Policy Framework and Guidance, it lies potentially at the middle-to-upper range of less-than-substantial harm, given that the heritage assets are Grade I buildings of the highest significance of which their setting is a major contributor.

66. There is also less-than-substantial harm to the setting of Ironmongers' Hall and the Barbican, to the setting of the London Wall Scheduled Ancient Monument and to the character and appearance of the Postman's Park and Foster Lane Conservation Areas. These come at the lower-to mid-range of the scale.

67. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm. Paragraph 202 of NPPF is thus relevant, requiring the balance of harm against public benefits.

## **HERITAGE BENEFITS**

68. The applicant's claim that the proposals contain considerable heritage benefits is strongly challenged and disputed. The opening up of the setting of Ironmongers' Hall to wider public view and exposure, as explained above, is not considered to be a benefit. The claim made by the applicant throughout the TVBHIA that the new development will have only beneficial impacts on the historic environment is strongly refuted.

## **BALANCING HARM AGAINST PUBLIC BENEFITS**

69. Paragraph 202 of NPPF states that "where a development proposal will lead to less than substantial harm to the significance of the heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

70. Paragraph 203 of NPPF requires that "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

71. Paragraph 199 of NPPF requires that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Given the considerable degree of less-than-substantial harm that is caused to designated assets of very high heritage significance, this must be given great weight.

72. Paragraph 200 of NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”. It is not at all clear from the current proposals that such justification exists.

73. During the developer’s application for a Certificate of Immunity from Listing in 2014 and 2019 considerable emphasis was placed on proposals at the time to develop the site for a new concert hall and music centre, as a key component in the aim to create a Cultural Mile along the northern edge of the City. It was suggested that it would be impossible to adapt the existing structures of the Museum to create the large concert hall then envisaged, and that the large public benefit from the new concert hall would therefore justify comprehensive demolition. The COIL would ensure that the balance of heritage harm against public benefit would not be altered by the increased heritage significance that statutory listing would confer. However, the concert hall and music centre have now been abandoned and replaced by a commercial scheme with less definite cultural public benefit. Indeed, one of the benefits now muted by the applicant is that profits from the development will help to pay for the relocation of the Museum to Smithfield, which is happening in any event.

74. The proposals, promoted by the owner of the land, are speculative, with no pre-let or funding provision, likely intended to maximise the value of the site with a view to disposal to a developer. It seems probable that there are alternative options which could retain at least some of the existing fabric of both the Museum and Bastion House. Such alternatives would likely cause less heritage harm and might also provide a variety of uses, some of which could construe public benefit, whilst also achieving a positive value for the owner. The optimum viable use for the site might not be that which achieves the highest value in purely monetary terms.

## **CONCLUSION**

75. The proposals cause widespread harm to a large number of heritage assets, including the complete loss of two undesignated heritage assets. Harm to designated heritage assets is less than substantial, but nevertheless of such degree that will considerably erode and harm their significance. This harm is not outweighed by heritage benefits elsewhere, nor do there appear to be other outstanding public benefits which would offset the great weight that must be

given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

Barbican Quarter Action

December 2023

### **Author of this report**

Alec Forshaw worked for 35 years as a conservation and urban design officer in local government. As a specialist heritage and planning consultant he has presented evidence at major Public Inquiries including Smithfield (2014), Liverpool Welsh Streets (2014), New River Head (2017), Norwich Anglia Square (2020), Custom House (2021), and M&S Oxford Street (2022). He contributed to the designation of the Barbican and Golden Lane Conservation Area, and has been heavily involved in the very recent designation of the Creechurch/Bevis Marks Conservation Area. He is the co-author of *The Barbican: Architecture and Light* (2015) and *New City: Contemporary Architecture in the City of London* (2013).

### **APPENDIX**

*From God's house to Bauhaus and back again* Bryan Appleyard, published in *The Times* 26 November 1982

### **LIST OF FIGURES**

Figure 1 Map of South Barbican Development Masterplan 1959

Figure 2 Alleys off Aldersgate c.1840

Figure 3 Ordnance Survey Map 1945

Bryan Appleyard, complete with Pevsner's writings and architect Will Alsop, appraises a selection of modern buildings

From God's house to Bauhaus and back again

Should the appreciation of post-war architecture be left to the experts or can the public at large raise their eyes skyward in admiration rather than conventional condemnation? A leisurely weekend walk through the City of London can confound the sceptics and provide a real insight into the best of modern buildings

Modern architecture requires some explanation. Its post-war reputation in this country has been appalling and the buildings of the seventies, designed in reaction to the public's disgust, have done little to redress the popular standing of the art.

It is not enough to complain, as architects persistently do, about cowardly clients, inept planning and mindlessly difficult local protest groups. That is merely to compound the incomprehension. It would be far better for architects to own up to the immensity of the mistakes and to the petty mediocrity of most modern developments; then to spend the rest of the time drawing attention to the best that has been achieved.

Post-war British architecture has thrown up a number of fine buildings, some with the confident air of near-masterpieces. But the strength of the reaction against the failures has meant that most people no longer bother to look.

They are there, however, and the City of London is as good a place as any to walk around and look for them. But first it is necessary to understand a few of the reasons for the peculiar nature of modern architecture. Of all the arts, architecture is the one in which the artist aspires most literally to the realm of the deity. Sir John Soane's Bank of England presupposes a God as surely as Lewis Cabot's King's Cross presupposes a train.

A building is centred on the ritual function which provides the rain out and providing decent plumbing, the architect, however, requires it to be beautiful. In a beautiful building he is simply playing at God's creation is supremely functional and yet it is also beautiful. The ideal beauty is provided as a beneficent embellishment by the 'decorative' or 'ornamental' structure was no more than such an embellishment; indeed, it was essential for the architect was to fulfil his god-like function.

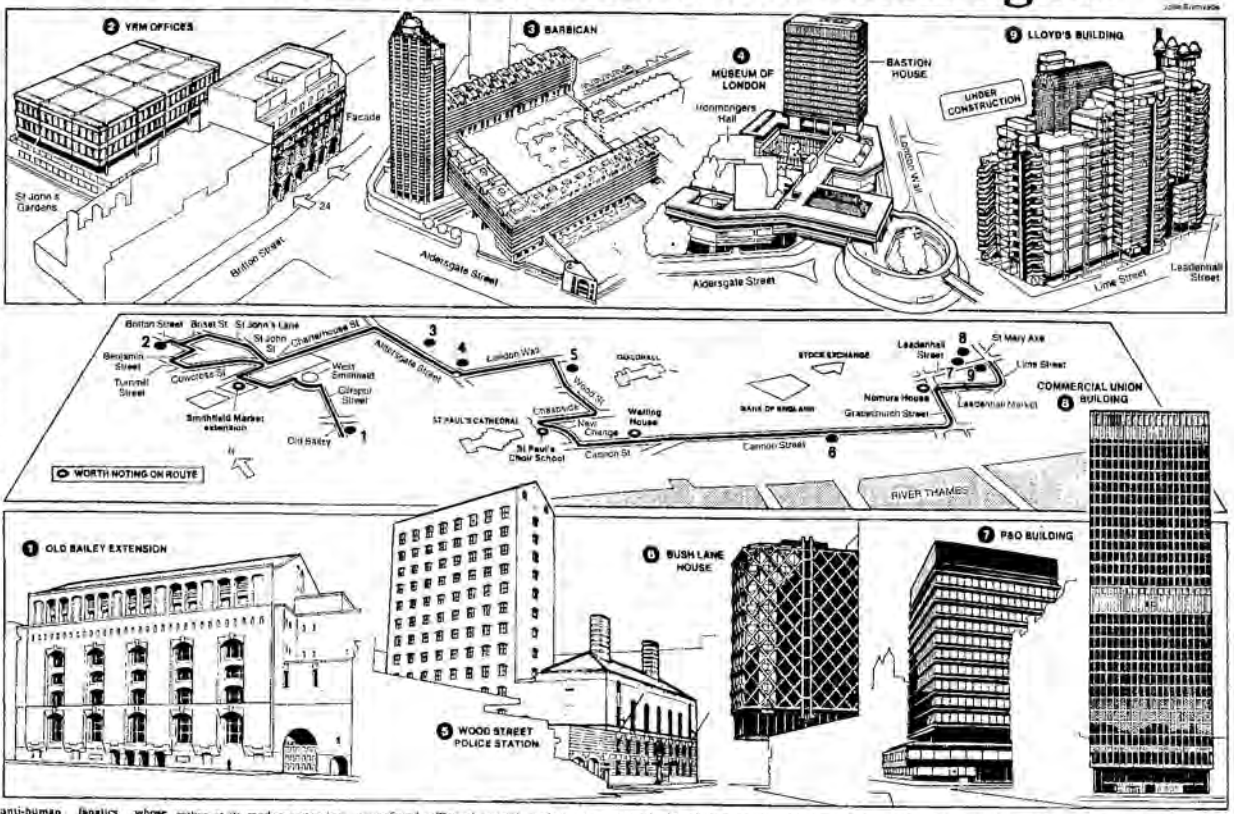
The Victorian professed belief in that view led to such extravagant masterpieces as St Francis Station. For the first time and applied decoration were part of the transcendent and moral significance attached to commerce. Even the most Victorian house would be adorned with decorative mouldings.

At the height of this decorative extravaganza, though, a few people decided that God had died. The carnival continued into this century, but the decorative gap being an 'accident' - but then the crisis came. Vulgarity, it is assumed, had been caused by the First World War, in reality that was only a symptom, and the trend was diagnostic long before.

In the godless post-war world of generation of prodigiously-gifted architects went back to basics. In the manner of Walter Gropius at the Bauhaus or of Le Corbusier or Mies van der Rohe a profound disgust with the idea of decoration was conceived. A new conceptual centre had to be found for their art to replace the decayed metaphysics. For Mies this new centre was an eternal perfection of abstract form, for Le Corbusier it was a visionary determination to transform the world - 'architecture of revolution' - he said - and for Gropius it was a new priestly orian functionalism.

The notion of 'expressed structure' was conceived, it meant that the final appearance of a building should be dependent on its construction. Decoration or disguise was an offence against clear light of the new Utopia.

It is any now to mock the idealism which characterized these 'visions'. With hindsight we can blame them for the horror executed by lesser talents. Tom Wolfe in his book From Bauhaus to our House (Cape) does just that, but, in doing so, he fails to grasp the creative power they possessed. Without that, modern architects can be portrayed all too simply as slavish acolytes of a gang of



anti-human fanatic whose antics are laughable when they are not destroying our cities. But Mies' buildings are beautiful and Le Corbusier did possess an astonishingly fertile and varied visual imagination. Wolfe's verbal arabesques at the expense of an aesthetic he perceives as anti-life are less impressive if reduced to their essence - a banal, noisy exercise in philistinism.

British building in the fifties and sixties was conceived under the modernist spell. The steel and glass towers that began to decorate our skyline were 'expressed structure' or 'form-following function' whether we liked it or not. Gradually it began to emerge that we did not want the anti-property developer fury of the sixties spilled over

'The overall effect is breathtaking while the avoidance of any grand entrance permits it to be human as well'

into anti-architect fury. The profession lost its nerve and post-modernism appeared.

In Britain this was marked by a regressive re-architecture based on pitched, tiled roofs and affected use of brickwork. Hitting the Town Hall became the apotheosis of the 'new vernacular' with its populist attempt to reflect the styles of the acres of semi around it.

But, in the wake of that failure, there are now signs of a new brand of post-modernism based upon a more courageous eclecticism. Significantly the iron tracery and extravagant camouflage of Victorian railway stations are playing a large part in that revival.

rather as its modern extension southwards down Old Bailey. This is the first of two buildings by the firm of McMorran & Whitby on our route and both can fairly claim to be among the best.

Built in 1967-69, the Old Bailey extension was well ahead of its time in the abandonment of modernist conventions, not for the new vernacular, but for a far more coherent and radical style. The frontage on to Old Bailey itself is brilliant with its massive sheets of Portland stone interrupted by recessed windows with flat arches and by vertical projections which sweep smoothly back into the wall just above street level. At the top there is a haunting row of arches, some blanked off, while the entrance is an understated and surprisingly small doorway after the drama of the rest of the frontage.

The architects wisely declined to attempt to blend with the neo-baroque extravaganza of Mountford's original building. Indeed the clear line of their shallow-arched roof looks suspiciously like an ironic comment on its somewhat empty rhetoric.

But the overall effect is breathtaking while the avoidance of any grand entrance permits it to be human as well.

Heading northwards through Smithfield and a maze of streets we arrive at 24 Briton Street - the first truly classic piece of modern architecture on the walk. These are the offices of the architects York, Roseberry, Marshall. They are behind the Victorian street frontage which the firm has restored and converted into shops and flats.

The effect of such stunning simplicity is not easily achieved. Note specifically the carefully-noticed relationship of the block as a whole to its surrounding space. But note especially the rigour of the detailing: the revolving door entrance, for example, is prevented from creating a nasty bulge by being set back slightly more than the usual. The doors thus provide a satisfying vertical shape into the facade. Note also the tone of the red steel facings a heightened version of the usual colour of the treated steel in the building.

It is a building which challenges our anger at the relentless simplifying tendency of modernism. It reveals that amplification can attain harmony rather than monotony. Mies sired much that is bad but here at least his purism and

rigour found sufficiently careful disciples.

Returning to Charterhouse Street we head east towards the unavoidable Barbican. Like the West End's Centre Point this is a development which is likely to drive people to nail their colours to the mast on the subject of modern architecture. For a start it is intended to be lived rather than worked in and for people living reluctantly in tower blocks it is the popular image of everything that is vile about architecture.

However, people do choose to live in the Barbican and usually they are happier even the higher up the towers they go. Alsop's main criticism is the lack of colour though he defends vigorously the care which has gone into the shaping of the towers. But he admits that the development as a whole suffers from being too large for the firm of architects - Chamberlin, Powell & Bon had their scheme accepted in 1959 but their arms centre was only finished last year.

The date of the scheme's acceptance is important because it means that the Barbican concept began to age dangerously in the midst of the building programme. The realization that a raised podium and apparently endless dripping concrete corridors may be intimidating rather than welcoming slowly began to dawn on people as crime and vandalism flared in and disfigured one council block after another. Intrinsic comparisons with Le Corbusier's 'Ville Radieuse' - never actually built - are inevitable when confronted with such strict anti-individual idealism.

Pevsner rightly described the design of the Barbican's immediate neighbour in Aldersgate Street as 'brilliant'. It is a building which, after another London, began in 1972 whose beautiful variations and careful detailing are demonstrations of late modernism at its cool and satisfying best.

Its problem lay in crossing the road to the brick mound at the centre of the roundabout at the junction with London Wall. Powell & Moya achieved this by projecting the ribbon windows of late modernism at its coolest and satisfying best.

'Expressed structure' is even handled with unusual sensitivity in the rough concrete pillars which rise through the facade of the building, cutting through tiles and even through windows. The effect is complex and clean and the rhythm of the movement across the road

endows an unexpected ethereal quality to the composition seen from the west.

Powell & Moya also designed the office block, known as Maston House, which grows out of the museum development. This was the last in the series of blocks that ran dramatically the length of the dual carriageway section of London Wall. The others are somewhat anonymous utilitarian products, very much representative of post-war British modernism. Maston House, however, is given a more massive look by its brown colouring, yet the effect is raised by the way the whole is offset from the building below on concrete pillars and blocks. The building itself is perhaps a routine expression of slightly-elaborated modernism but it is

building completely lack the oppressive quality of the borrowings of the 'new vernacular'.

In contrast, 80 Cannon Street - Bush Lane House - whose place in the mainstream of architectural thinking is evident from the moment you catch a glimpse of the black block enclosed in its massive steel lattice. Rarely can the doctrine of 'expressed structure' have been taken so literally. The steel tubes carry water as a fire precaution and, structurally, were intended as a means of preventing vibrations from tube trains. In reality, as Alsop points out, there are many ways of doing that and the real reason was probably that the architects just wanted to build their huge lattice.

The effect from a distance is of a somewhat crude outcrop but at street level the empty space left by the raised first floor creates a surprisingly attractive effect. The block is raised with sufficient care and to a sufficient height to prevent any oppressive effect for the pedestrian. Its cleanliness prevents this being even more than an interesting building but it is worth noting as yet another variation on the simple modernist theme.

Through to Gracechurch Street where number 3 - Nomura House - has an elegant Italian feel with its angled windows, and then through the superb Victorian Leadenhall Market opposite. With its magnificent ironwork so beloved of young architects today - this is an appropriate review that being even the walk, the junction of Leadenhall Street, St Mary Axe and Lime Street.

This promises to be an intersection which will stand as a monument to the achievements of modernism. On one side - Richard Rogers' new Lloyd's building is slowly rising to its climax in a 290 foot glass-roofed atrium. In spite of the current vogue for Rogers' work largely based on the popular success of the Centre Pompidou in Paris, it is important to remember that he is in effect no more than a late modernist. He is still in the business of 'expressed structure' even if he has added a somewhat baroque twist to the ideology. In the wake of Rogers' failure to make the shortlist for the National Gallery extension, it is some consolation and Lloyd's had already given him this opportunity for another major London building.

Opposite is the Commercial Union Building, built in 1964-69 by Carter, Melvin, Ward & Partners. This is perhaps the

most uncompromising application of Mies' idealism in London. The delicacy of its construction is stunning and the way the piazza in front dips down from street level has the effect of presenting the entire 387-foot frontage to us in one breathtaking sweep. The P.O. building next door is a reasonably worthy companion but lacks the uncompromising grace of the C.U.

The climax of the walk is thus a suitably commercial one, for Mies, modernism was the style of architecture which defined the modern corporate look; it have emerged from such Utopian dreams. They may not have reinstated God in the process but at least they have restored mercy, unpredictable, unplanable man.

'The proportions and the raised level achieve what many a development has attempted - the effect of floating'

saved by the proportions and the raised level which achieves what many a development has attempted - the effect of floating.

Turning right off London Wall into Wood Street we come to the police station which is McMorran & Whitby's second building on this walk. Completed only last year, it again has the firm appears to have stepped effortlessly beyond modernism without the struggles and intercession which have characterized the same step among others.

Again using Portland stone, they have this time produced an initially conventional-looking frontage which is justified (looking up again, the smooth stone returns for a brilliant, slightly tapered, tower with massive chimney stacks. Then looking up again, the smooth stone returns for a brilliant, slightly tapered, tower with massive chimney stacks. Then looking up again, the smooth stone returns for a brilliant, slightly tapered, tower with massive chimney stacks.

This is a relatively unknown building - indeed, Alsop was completely unaware of its existence - but it is an important one. The initial sense of oddness gives way to admiration at the coherence of the development. Only at the back does this break down slightly where the tower meets the lower level. The references to older styles meet

the references to older styles meet

Advertisement for Teacher's Scotch Whisky. The text reads: 'TEACHER'S. A WELCOME AWAITING.' Below the text is an illustration of a bottle of Teacher's Scotch Whisky and a glass. The background features a circular logo with 'EST. 1850' and a silhouette of a man in a top hat. The bottom right corner shows a silhouette of a dog.



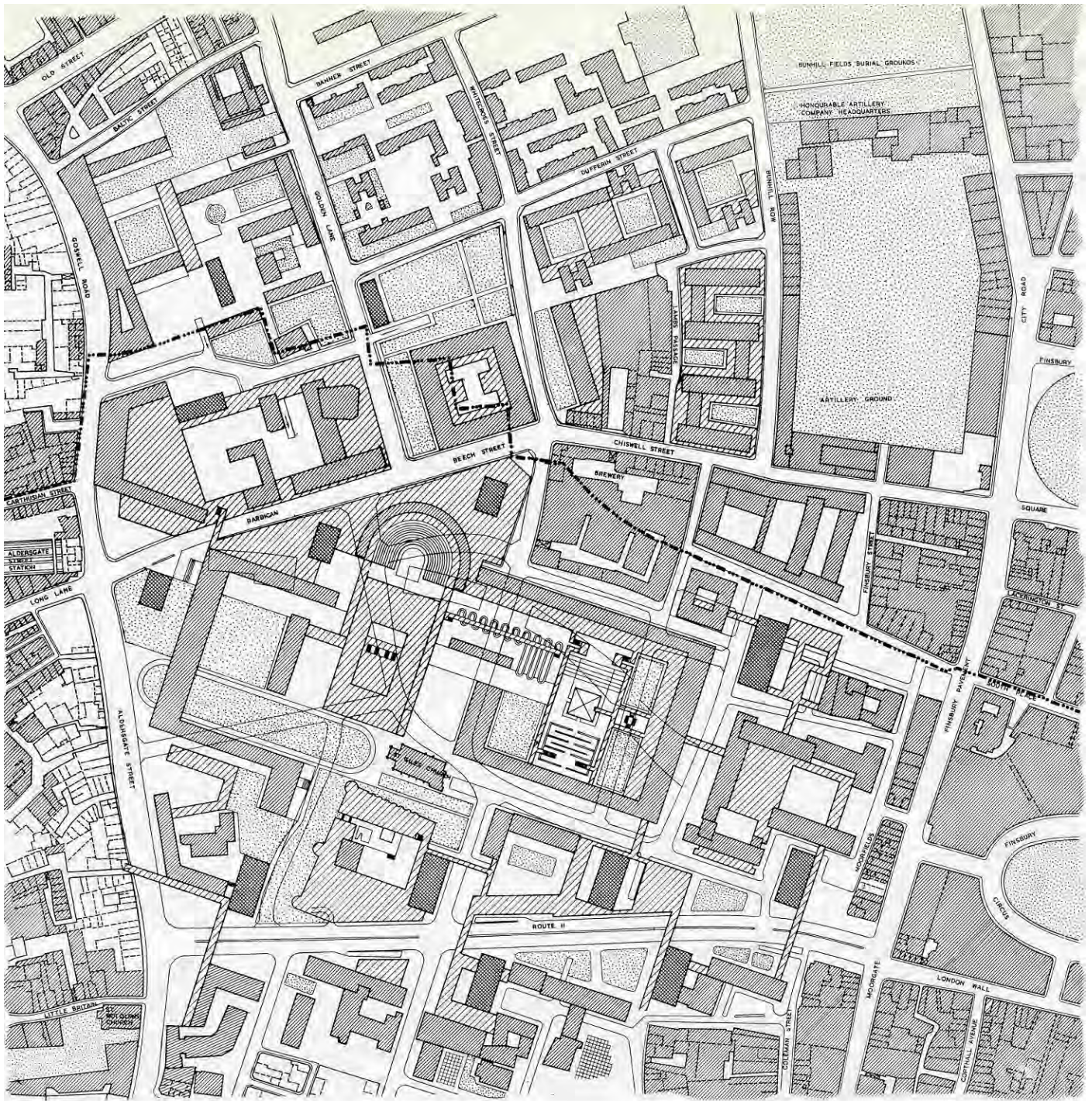


FIGURE 1 MASTERPLAN 1959



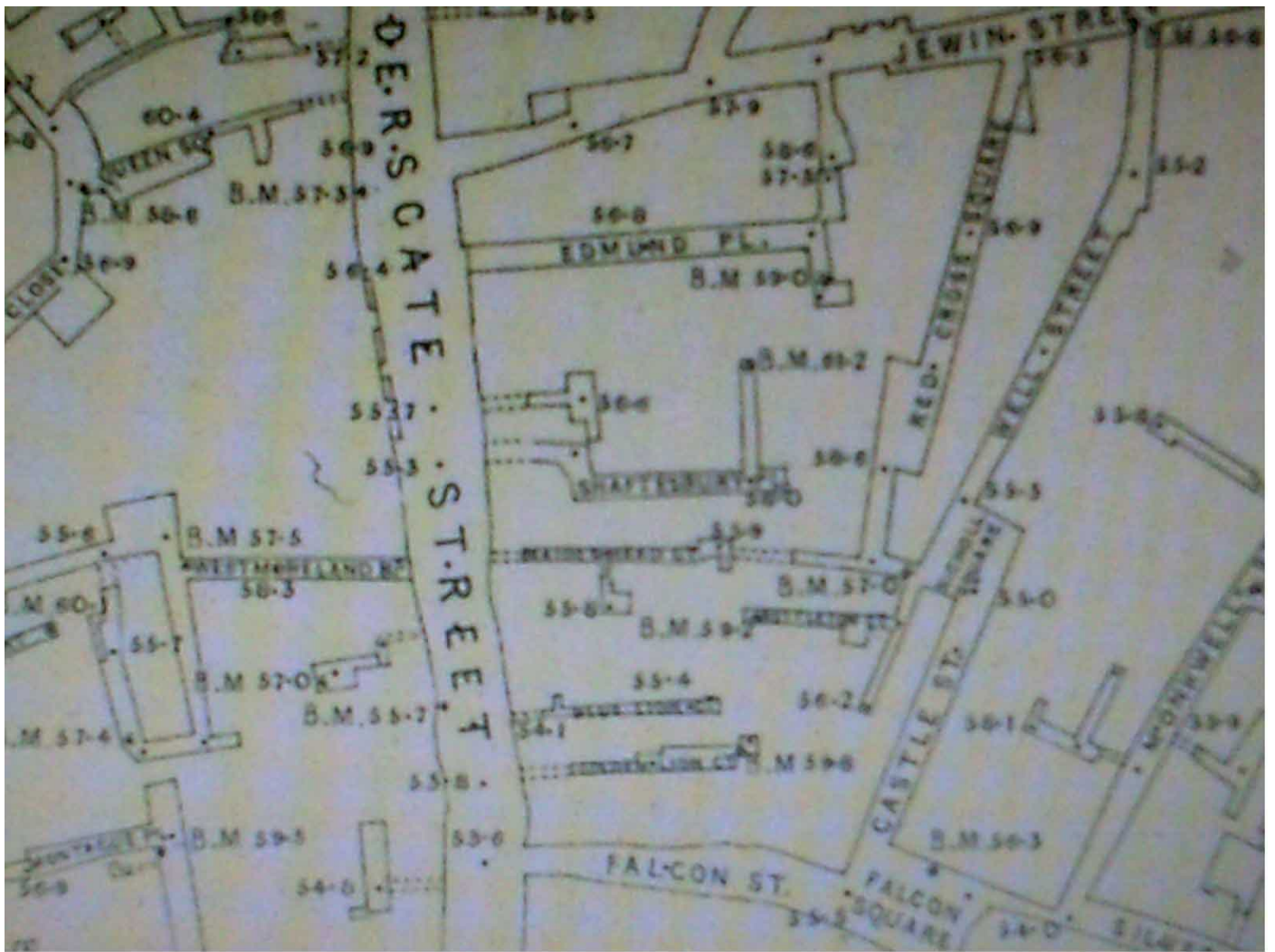


FIGURE 2 ALLEYS OFF ALDRSGATE c.1840




FIGURE 3 1945 OS MAP

APPENDIX F



29 January 2024

By Email only: 

Dear Brenda,

**RE: (ROL01285) Redevelopment of 140 & 150 London Wall and its effect upon the Barbican Estate residents Monkwell Square and London House – Daylight and sunlight**

Anstey Horne has been instructed by the Barbican Quarter Action group to review the ES chapter report on Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage that accompanies the planning application for 140 & 150 London Wall (planning application 23/01304/FULEIA).

As part of the review, we have been asked to comment upon the methodology adopted for the various assessments and upon the overall impact that the proposed scheme will have upon the residents of the Barbican, Monkwell Square and London House. This letter sets out our observations.

**Review of methodology**

**3D Contextual Model**

The 3D computer model of the existing site and surrounding context upon which the assessments are based, has been constructed using “*photogrammetric survey, site photography and OS information*” and has subsequently “*been updated using measured survey of the adjacent properties to the site*” (paragraph 13.2.7).

Photogrammetric survey does not establish the location of windows on a façade and has a built-in tolerance of up to 300mm. Measured survey provides greater accuracy of modelling and results.

The City of London as the Local Planning Authority should request confirmation as to which properties are modelled from measured survey and which are modelled from photogrammetric survey. In addition, confirmation as to how the windows and their locations have been modelled where photogrammetric survey has been used.

Until it is confirmed which properties are modelled from measured survey and which are modelled from photogrammetric survey, the overall accuracy of the modelling and analysis results cannot be commented upon.



## Daylight and Sunlight Assessment (Impact upon neighbours)

The BRE guidance sets out the tests that should be adopted when assessing the impact upon existing neighbours under section 2.2 of the document. The guidance states that the vertical sky component (VSC), no sky line (NSL) and annual probable sunlight hours (APSH) tests should be used.

Comparative daylight illuminance analysis ('illuminance method') has been undertaken for the surrounding properties (paragraph 3.2.17). Daylight illuminance is an absolute assessment of the daylight performance within a proposed scheme as set out within section 2.1 of the BRE guidance.

The appendices do not include any NSL contour plots. Therefore, it is not possible to see what layouts Waldrams' have used for each of the neighbouring properties. It would be helpful to review these to establish how the internal configurations of neighbours have been modelled, particularly where assumed layouts have been applied, as this can heavily influence the findings of the NSL test.

## Solar Glare Assessment

The solar glare analysis has been undertaken using climate based data (paragraph 13.2.44). We request that a supplementary assessment of solar glare on a 'clear sky' basis be provided to fully understand the potential for solar reflection at key road junctions.

The report states that "incidence of proposed glare arising from the proposed development.....is likely to be major adverse and significant" for the residents of Monkwell Square (paragraph 13.6.180). It would therefore be helpful for the number of tested viewpoints to be expanded to also include windows to the north and south ends of the elevation (either side of the currently tested viewpoints).

It would also be helpful to see the angles on the field of vision illustrations on the appendix 13-F solar glare results drawings. It is assumed that the angles are 3°, 10°, 20°, 30°, 40° etc.

## Light Spillage Assessment

The report states that "there are only small areas of low additional light spill, the impact at Mountjoy House is therefore negligible and the effect not significant, particularly as any of these small areas do not appear to coincide with windows serving habitable space" (paragraph 13.6.125)

No clear indication of where the additional light spill occurs to the facade of Mountjoy House has been provided. A drawing should be provided which overlays the light spill analysis and the facade of Mountjoy House to confirm the areas of additional light spill do not coincide with windows serving habitable rooms.

In addition, the City of London as the Local Planning Authority should request that the analysis for the site be rerun without the light spill from the existing neighbouring buildings being considered in the baseline scenario.

This will determine the effect of the proposed scheme in isolation and whether the proposed scheme meets the pre and post curfew targets of 25 and 5 Lux as set out within the ILP (2011) Guidance Notes.

#### Review of results for Impact Upon Neighbours

The VSC daylight results have been run on a room-by-room basis as well as a window-by-window basis (Table 13-22 and paragraph 13.6.40). The room-by-room results do not appear to be appended to the report. It is therefore not possible to comment upon this assessment.

Reference is made to a without balconies assessment as justification for the impact upon Mountjoy House (paragraph 13.6.40). These results do not appear to be appended to the report. It is therefore not possible to comment upon this assessment.

The results for Mountjoy House, show that there will be significant (moderate or major) VSC daylight impacts to 12 bedrooms on the 1<sup>st</sup> to 6<sup>th</sup> floors. Nine of these bedrooms will also experience a significant reduction in annual sunlight. The remaining three bedrooms will experience a minor reduction in annual sunlight outside of the BRE guidance target.

The results for London House (172 Aldersgate Street), show that seven windows will experience significant (moderate) VSC daylight impacts. Five of these windows serve living/dining rooms or living/kitchen/dining rooms. A further eight rooms will experience significant (moderate or major) NSL daylight impacts. Two of these rooms are living/dining rooms.

With regard sunlight for London House, paragraph 13.6.64 states that “in sunlight terms, 46 of 47 living rooms with windows that face within 90° of due south meet the target value for APSH with the proposal in place. The impact to these windows is therefore considered negligible”. The results in the appendices appear to list seven living rooms with windows that face within 90° of due south (pages 44 to 47). Three of the windows serving these living rooms experience significant (major) impacts in both annual and winter sunlight, two of which are located with no winter sunlight (R1 on the eighth and ninth floors). A further three windows experience significant (major) impacts in winter sunlight.

We have reviewed the sun-on-ground overshadowing analysis and while there is a reduction in sunlight, these are within the BRE guidelines. We therefore have no further comment.

With regard solar glare, paragraph 13.6.180 states that there will be major adverse and significant incidence of solar glare to Monkwell Square, and that “mitigation measures including the use of non-reflective glass coatings or fritting will be required”. Such measures need to be specified by the architect at the design stage to avoid “major adverse and significant” and therefore unacceptable levels of solar glare.



## Review of results for Internal Daylight Assessment

The report concludes that the scheme will not achieve the BREEAM daylighting credits. The report goes further to state that achieving BREEAM daylight credits is difficult in urban locations and lists the competing requirements of the design scheme. We therefore have no further comment.

## Conclusion and Recommendations

There will be significant impacts in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight.

There will be significant VSC daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant NSL daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight.

There will be major adverse and significant incidences of solar glare to residents within Monkwell Square.

The City of London as the Local Planning Authority should request that the following points be clarified:

- To verify the accuracy of the 3D modelling and analysis, confirmation of which properties are modelled from measured survey, and which are modelled from photogrammetric survey should be requested;
- Confirm how the windows and their locations have been modelled where photogrammetric survey has been used; and,
- To confirm the solar glare results within appendix 13-F, include the angles on the field of vision on the solar glare results drawings.

In addition, the following information and assessments should be provided:

- VSC daylight results on a room-by-room basis;
- VSC daylight results on a room-by-room basis without balconies;
- NSL contour plots to establish the layout used within the analysis;
- A 'clear sky' solar glare analysis to fully understand the potential for solar reflection at the points assessed;
- Expanded the number of tested viewpoints for solar glare for Monkwell Square;
- An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP (2011) Guidance Note; and

- Confirm the location of the areas of additional light spill on the façade of Mountjoy House to show that they do not coincide with the location of windows serving habitable rooms.

Kind regards



Anstey Horne

APPENDIX G



London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

The London Plan 2021	
POLICY	Referenced in Planning Statement?
Policy GG1 Building Strong and Inclusive Communities	Y
Policy GG2 Making the Best Use of Land	Y
Policy GG5 Making the Best Use of Land	Y
Policy GG6 Increasing Efficiency and Resilience	Y
Policy SD4 The Central Activities Zone	Y
Policy SD5 Offices, other Strategic Functions and Residential Development in the CAZ	Y
Policy D2 Infrastructure requirements for sustainable densities	Y
Policy D3 Optimising site Capacity through the Design-led Approach	Y
Policy D4 Delivering Good Design	Y
Policy D5 Inclusive Design	Y
Policy D6 Housing quality and standards	Y
Policy D8 Public Realm	Y
Policy D9 Tall Buildings	Y
Policy D11 Safety, Security and Resilience to Emergency	N
Policy D12 Fire Safety	Y
Policy E1 Offices	Y
Policy E2 Providing Suitable Business Space	N
Policy E3 Affordable Workspace	N
Policy E10 Visitor infrastructure	N
Policy HC1 Heritage conservation and growth	Y
Policy HC3 Strategic and Local Views	Y
HC4 London View Management Framework	Y
Policy H5 Supporting London’s culture and creative industries	N
Policy G1 Green Infrastructure	Y
Policy G4 Open Space	Y
Policy G5 Urban greening	Y
Policy G6 Biodiversity and Access to Nature	Y
Policy G7 Trees and Woodlands	Y
Policy SI 1 Improving Air Quality	Y
Policy SI 2 Minimising Greenhouse Gas Emissions	Y
Policy SI 7 Reducing Waste and Supporting the Circular Economy	N
Policy SI 12 Flood Risk Management	Y
Policy SI 13 Sustainable Drainage	Y
Policy T1 Strategic Approach to Transport	Y
Policy T2 Healthy Streets	Y
Policy T4 Assessing and Mitigating Transport Impacts	Y
Policy T5 Cycling	Y
Policy T6 Car parking	Y
Policy T7 Protecting and enhancing London’s Waterways	Y

London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

The City of London Local Plan 2015	
POLICY	Referenced in Planning Statement?
Policy CS1 Offices	Y
Policy DM 1.1 Protection of office accommodation	
Policy DM 1.2 Assembly and protection of large office development sites	Y
Policy DM 1.3 Small and medium sized business units	Y
Policy DM 1.5 Mixed uses in commercial areas	Y
Policy CS3 Security and Safety	
Policy DM 3.1 Self-containment in mixed use developments	
Policy DM 3.2 Security measures in new developments around existing buildings	
Policy DM 3.3 Crowded places	
Policy DM 3.4 Traffic management	
Policy CS5 The North of the City	
Policy CS10 Design	Y
Policy DM 10.1 New development	Y
Policy DM 10.4 Environmental Enhancement	Y
Policy DM 10.7 Daylight and sunlight	Y
Policy DM 10.8 Access and inclusive design	Y
Policy CS11 Visitors, Arts and Culture	
Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities	
Policy DM 11.3 Hotels	
Policy CS12 Historic Environment	Y
Policy DM 12.1 Managing change affecting all heritage assets and spaces	
Policy DM 12.3 Listed buildings	
Policy DM 12.4 Ancient monuments and archaeology	Y
Policy DM 12.5 Historic parks and gardens	
Policy CS13 Protected views	Y
Policy CS14 Tall Buildings	
Policy CS15 Sustainable Development and Climate Change	Y
Policy DM15.1 Sustainability requirements	
Policy DM 15.2 Energy and CO2 emissions assessments	Y
Policy DM 15.3 Low and zero carbon technologies	
Policy DM 15.4 Offsetting of carbon emissions	Y
Policy DM 15.5 Climate change resilience and adaptation	
Policy DM 15.6 Air quality	Y
Policy DM15.7 Noise and light pollution	Y
Policy DM15.8 Contaminated land and water quality	
Policy CS16 Public Transport Streets and Walkways	Y
Policy DM 16.1 Transport impacts of development	
Policy DM 16.2 Pedestrian movement	
Policies DM 16.3 Cycle parking	
DM 16.4 Facilities to encourage active travel	
DM 16.5 Parking and servicing standards	Y
Policy CS17 Waste	
Policy DM 17.2 Designing out construction waste	Y

London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

Policy CS19 Open Spaces and Recreation	N
Policy DM 19.1 Additional open space	N
Policy DM 19.2 Biodiversity and urban greening	Y
Policy DM 21.3 Residential environment	N
Policy CS22 Social Infrastructure and Opportunities	N

Emerging Local Plan City Plan 2040	
POLICY	Referenced in Planning Statement?
Draft Strategic Policy S1: Health and Inclusive City	Y
Draft Policy HL1: Inclusive buildings and spaces	N
Draft Policy HL2: Air quality	N
Draft Policy HL3: Noise	N
Draft Policy HL5: Contaminated land and water quality	N
Draft Policy HL6: Location and protection of social and community facilities	N
Draft Policy HL9: Play areas and facilities	N
Draft Policy HL10: Health Impact Assessments (HIA)	N
Draft Strategic Policy S2: Safe and Secure City	N
Draft Policy SA1: Crowded Places Publicly accessible locations	N
Draft Policy SA3: Designing in Security	N
Draft Strategic Policy S4: Offices	Y
Draft Policy OF1: Office Development	Y
Draft Policy OF2: Protection of Existing Office Floorspace	N
Draft Strategic Policy S6: Culture and Visitors	Y
Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities	N
Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities	Y
Draft Policy CV3: Provision of Visitor Facilities	N
Draft Strategic Policy S7: Infrastructure and Utilities	N
Draft Policy IN2: Infrastructure Capacity	N
Draft Strategic Policy S8: Design	Y
Draft Policy DE1: Sustainable Design	Y
Draft Policy DE2: Design Quality	Y
Draft Policy DE3: Public Realm	Y
Draft Policy DE5: Terraces and Elevated Public Spaces	Y
Draft Policy DE8: Daylight and Sunlight	N
Draft Policy DE9: Lighting	N
Draft Strategic Policy S9: Transport and Servicing	N
Draft Policy VT1: The impacts of development on transport	N
Draft Policy VT3: Vehicle Parking	N
Draft Strategic Policy S10: Active Travel and Healthy Streets	N
Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding	N
Draft Policy AT2: Active Travel including Cycling	N
Draft Policy AT3: Cycle Parking	N
Draft Strategic Policy S11: Historic Environment	Y
Draft Policy HE1: Managing Change to Historic Environment Development	Y



London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

Draft Policy HE2: Ancient Monuments and Archaeology	N
Draft Strategic Policy S12: Tall Buildings	N
Draft Strategic Policy S13: Protected Views	N
Draft Strategic Policy S14: Open Spaces and Green Infrastructure	Y
Draft Policy OS2: City Urban Greening	N
Draft Policy OS4: Biodiversity Net Gain	N
Draft Strategic Policy S15: Climate Resilience and Flood Risk	N
Draft Policy CR1: Overheating and Urban Heat Island Effect	N
Draft Strategic Policy S16: Circular Economy and Waste	N
Draft Strategic Policy S23: Smithfield and Barbican Key Area of Change	Y

City of London SPD/PAN	
POLICY	Referenced in Planning Statement?
Air Quality SPD, July 2017	Y
Archaeology and Development Guidance SPD, July 2017	Y
Barbican and Golden Lane Conservation Area SPD, February 2022	Y
Lighting SPD, October 2023	Y
Office Use SPD, January 2022	Y
Open Space Strategy SPD, January 2015	Y
Planning Obligations SPD, July 2014	Y
Protected Views SPD, January 2012	Y
Barbican Listed Building Management Guidelines, Volumes I, II and IV (2012-2015)	N
Archaeology in the City PAN,	N
Carbon Options Guidance PAN, March 2023	N
Developer Engagement Guidance PAN, May 2023	N
Preventing suicides in high rise buildings and structures PAN, November 2022	N
Solar Convergence PAN, July 2017	Y
Solar Glare PAN, July 2017	N
Sunlight PAN, July 2017	N
Wind Microclimate PAN, August 2019	Y

London Plan Guidance	
POLICY	Referenced in Planning Statement?
Planning for Equality and Diversity in London SPG, October 2007	N
All London Green Grid SPG, March 2012	N
London View Management Framework SPG, March 2012	Y
Play and Informal Recreation SPG, September 2012	N
The Control of Dust and Emissions during Construction and Demolition SPG, July 2014	N
Accessible London: Achieving an Inclusive Environment SPG, October 2014	Y
Social Infrastructure SPG, May 2015	N
Public London Charter LPG, October 2021	N
Circular Economy Statements LPG, March 2022	Y

London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

Whole Life-Cycle Carbon Assessments LPG, March 2022	Y
Fire Safety LPG, draft June 2022	N
Sustainable transport, Walking and Cycling LPG, December 2022	N
Air Quality Positive LPG, February 2023	N
Air Quality Neutral LPG, February 2023	N
Urban Greening Factor LPG, February 2023	Y
Optimising Site Capacity: A Design-Led Approach LPG, June 2023	N



Historic England

Gemma Delves  
Environment Department  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

Your Ref: 23/01277/LBC  
Our Ref: 218206

Contact:  
Helen Hawkins  
02079733223  
helen.hawkins@historicengland.org.uk

31<sup>st</sup> January 2024

Dear Ms Delves,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2021**

140 London Wall, 150 London Wall, Shaftsbury Place, And London Wall Car Park, London EC2Y

*External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftsbury Place, and London Wall Car Park, London, EC2Y)*

**Recommend Archaeology Conditions**

Thank you for your consultation received on 12<sup>th</sup> December 2023.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

**Assessment of Significance and Impact**



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The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

London Wall West is located just to the north-west of the Roman and medieval city walls and Roman fort. Parts of the Scheduled walls are included within the site boundary. A Jewish cemetery of possibly 11th century date extends partially onto the north-east area of the site, within the Barber Surgeon's garden and beneath Bastion House. This formed the only Jewish cemetery in England until 1290 when the Jews were expelled. No evidence for the cemetery is visible above ground. Jewish law strictly forbids the disturbance or excavation of Jewish graves. A full response to the development proposals for London Wall West from the Committee for the Preservation of Jewish Cemeteries in Europe (CPJCE) has been received by CoL and their concerns have been reflected in the advice provided below.

This response relates solely to non-designated archaeological issues. Impacts on designated assets, including the Scheduled Monuments and their settings, will be covered by our Development Advice Team who will respond separately.

Impacts from the proposed development on potential archaeology for this application are limited to the new landscaping design for the Northern Garden and Barber Surgeon's Garden. There does not appear to be any below ground impact from construction of the new Mountjoy Close highwalk.

The submitted ES includes a chapter for archaeology and also a baseline report has been provided as an appendix (Appendix 15). The results of the pre-determination archaeological evaluation have been provided to GLAAS separately rather than submitted with the planning application, but MOLA have confirmed that the results of the evaluation have been used to assess the archaeological potential of the site and are included in the ES where relevant. The evaluation report should be submitted as part of any necessary ES revisions or updates.

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



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In our response to the scoping document, GLAAS requested that the ES contain an explanation of how the new development will avoid any impact on the potential remains of the medieval Jewish cemetery in the north-east of the site and demonstrate how and where these remains have already been removed by the current basement. Unfortunately, this has not been as clearly demonstrated by either the ES or the Appendix as we had hoped. Some discussion of medieval burials has been provided, but the ES does not make fully clear that these relate to the burial ground at St Giles, which partially extended onto the site, not the Jewish cemetery. Any revisions or amendments to the ES should include a clearer assessment of impact for the Jewish cemetery within the Northern garden and Barber Surgeon's Garden.

The hard and soft landscaping around the new Mountjoy Close highwalk, in the Northern Garden and the Barber Surgeon's Garden, incorporates a small part of the projected extent of the Jewish cemetery. Burials from the former St Giles burial ground and Roman archaeology may also be present in this area. No construction work is proposed in this area and the archaeology baseline states that the landscaping work here will be carried out through ground that has been raised by 1m in height. No plans showing new services were available at this stage and so it is unclear if any below ground excavation is proposed in this area.

It is therefore recommended that a plan be produced which shows the area of the Jewish cemetery within the Northern Garden and Barber Surgeon's Garden and also indicates a 'no dig' zone around this area. The 'no dig' area should be incorporated into the landscaping method statement, the SUDS, the method statement for new services and the Construction Management Plan. This should be secured by condition and the 'no dig' zone demarcated on site by solid fixed barriers for the duration of the construction work. Any landscaping proposed in this area should be carried out through raised made ground which has been imported into the area and is of sufficient depth to prevent any excavation into the current ground level for construction of the new landscaping proposals. Any removal of hardstanding currently in the area should not affect the softer ground below and an archaeological watching brief should be carried out during the removal of hardstanding etc in order to confirm that previous ground levels are not disturbed.

The anticipated Roman, medieval and post-medieval archaeology which may survive elsewhere on the site is likely to be of low-moderate significance and, in places, very truncated. This archaeological potential can therefore be mitigated through the use of planning conditions. A full programme of public benefit, which includes opening up access to the Roman west fort gate, currently located in the underground car park, is proposed. The proposals also include new interpretation for the City walls, an exhibition space and digital and artistic interpretation of the heritage of the site. It is unfortunate that the information from the cultural strategy, which was submitted with the ES, was not included within the archaeology mitigation proposals within the ES as this would have usefully demonstrated the



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benefits of public access to this formerly hidden monument. An assessment of the public benefit should be included in any ES revision or amendment.

### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

### Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

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

**Mitigation for archaeology in the area affected by the landscaping works has been built into the scheme by ensuring that the ground is raised by 1m in the two northern garden areas, as described in the archaeological desk-based assessment.** If this is carried out then only the two archaeological planning conditions outlined below will be necessary, in order to ensure full protection for the Jewish cemetery during the construction works.

I therefore recommend attaching two archaeological conditions as follows:

Condition 1 No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or



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- development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and
- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
  - B. Where appropriate, details of a programme for delivering related positive public benefits
  - C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

**Informative** The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

## Condition 2: Preservation - protection

No development shall commence until details of fencing, signage and other control measures to protect the part of the Jewish Cemetery that may extend onto the site have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of operational works.

**Informative:** A plan of the relevant area should be produced and approved by GLAAS. This plan should then be incorporated into all relevant method statements, including but not limited to landscaping, new services, SUDs and the Construction Management plan. The area shown on the plan should also be approved by the CPJCE.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological work would comprise the following:



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## Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

An archaeological watching brief should be carried out during the removal of any hardstanding etc in the Northern Garden and Barber Surgeon's Garden in order to ensure that potential remains of the Jewish cemetery are not disturbed.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



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31 January 2024

Dear Gemma Delves

**London Wall West, Bastion House and Museum of London, 140-150 London Wall, EC2Y**

REF: 23/01304/FULEIA, 23/01277/LBC & 23/01276/LBC

The Twentieth Century Society has been notified of the above applications for the comprehensive redevelopment of the Museum of London and Bastion House site to provide three new buildings ('North Building', 'Bastion House' and 'Rotunda Building') providing office floorspace with a cultural and retail offering with a public plaza at street-level and 'the Glade', an elevated garden at highwalk level. The Society strongly objects to the scheme due to the loss of the two existing buildings, which should be identified as Non-Designated Heritage Assets (NDHAs), and on account of the substantial harm that would be caused by the development to the setting of the Grade II listed Ironmongers' Hall and to the Barbican Estate, which is Grade II listed, with a Grade II\* registered landscape and is set within the Barbican and Golden Lane Conservation Area.

**ASSESSMENT**

The Society strongly objects to the proposed redevelopment on account of the substantial harm that would be caused to the site's heritage assets. This includes:

Non-Designated Heritage Assets

The Museum of London and Bastion House

The Museum of London was built in 1971-76 to designs by Powell and Moya, one of the most significant practices in post-war Britain. It was the first post-war museum to be built in London, and is a robust and interesting response to the constrained and historic site. To the east is the 'Miesian' Bastion house also by Powell and Moya which was built as part of the new museum scheme and is a rare surviving example of the firm's commercial output. It is also an important survivor of the original post-war 'Route XI' LCC masterplan. Bastion House was the last of six office towers which were built along London Wall in the 1960s and 70s - only two survive and Bastion House is the best preserved of the two.

The Museum of London (MoL) and Bastion House should be identified as Non-Designated Heritage Assets. Planning Policy Guidance (PPG, 2019) identifies NDHAs as "buildings [...] identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets". This accurately describes the MoL and Bastion House which were turned down for inclusion on the national list but clearly have heritage significance in a local context for the reasons set out above. The PPG explains

that local planning authorities may identify NDHAs as part of the decision-making process and we urge you to do so here.

The proposed development would involve the full demolition of the MoL and Bastion House which should be treated as NDHAs. The National Planning Policy Framework (NPPF, 2023) includes a paragraph on NDHAs which states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset” (paragraph 209). The scale of harm or loss would be at the highest level as the buildings would be completely demolished.

The NPPF describes heritage assets as “an irreplaceable resource” (paragraph 195) and states that “In determining applications, local planning authorities should take account of [...] the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation” (paragraph 203). We have yet to see compelling evidence proving that refurbishing and repurposing the buildings would not be deliverable. In fact, we understand that the City received credible bids from a number of developers proposing schemes that involved the retention and reuse of the existing buildings. As such, it remains our understanding that the buildings are structurally sound and capable of being upgraded and adapted for reuse. There should be a strong presumption in favour of repurposing and reusing buildings, as outlined in paragraph 157 of the NPPF: “The planning system should support the transition to a low carbon future in a changing climate [...] [and] encourage the reuse of existing resources, including the conversion of existing buildings”.

#### Designated Heritage Assets:

##### The Barbican Estate

Developed on a site devastated by WWII bombing, the Barbican Estate was designed from 1955 and built between 1962 and 1982. The architects were Chamberlin, Powell and Bon, a leading post-war practice. The Barbican is an internationally celebrated work of British post-war Brutalist architecture and urban planning.

The Barbican Estate lies to the north of the proposed redevelopment site. The significance of the estate is recognised in its Grade II listing, in the registration of its landscape at Grade II\* and in its designation as the Barbican and Golden Lane Conservation Area.

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

Harm would be caused through the demolition of the MoL and Bastion House. Built contemporaneously with the estate, the MoL and Bastion House form part of the Barbican’s history and its architecture and highwalks relate and integrate it to the estate. It is our view that the MoL and Bastion House make an important and positive contribution to the setting of the designated estate. The proposed redevelopment would result in the loss of the existing buildings (which constitute high-quality, complementary contemporary development) in views towards and from the estate, but would also result in the loss of a site which contributes to the estate’s historic significance. As outlined in Historic England’s guidance, ‘The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (2017)’, ‘setting’ is experienced through views but also through “our understanding of the historic relationship between

places [...] For example, buildings that are in close proximity [...] may have a historic or aesthetic connection that amplifies the experience of the significance of each.” (p.2). The loss of this contemporary development built in the ‘70s in connection with the Barbican would serve to further disconnect the estate from its original post-war urban landscape - this landscape has already been eroded by recent development and would be further harmed by the proposed scheme.

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

- From St Paul’s Cathedral Golden Gallery (view 11 within the TVBHIA, part 14, pp.85-86). This view is from the highest viewing gallery of St Paul’s, a strategic heritage asset, which is regularly enjoyed by visitors and tourists. The Barbican is currently clearly legible in this view, but the proposed development (specifically the Rotunda) would substantially obscure the Barbican, particularly the estate’s Thomas More House. The Barbican is an important heritage asset which should remain fully on show in this key view.
- Looking north along St Martin’s Le Grand (view 12 in the TVBHIA, part 15, pp.88-89). The Barbican Estate’s Lauderdale Tower is currently appreciated as a landmark building that terminates this view down this major thoroughfare in the City of London. The proposed development (again, specifically the Rotunda) would completely block views of the tower. The applicant’s suggestion that the development, on account of its ‘high design quality’, would be an appropriate replacement in this view to an iconic designated heritage asset is erroneous.
- From views from Aldersgate (view 17 within the TVBHIA, part 22, pp.106-107). The proposed development would impact on the estate’s setting here, which is another key thoroughfare within the City. In current views, which take in both the MoL and Bastion House, the MoL is seen to be low-lying and its white tile-clad elevations distinguish the building from the Barbican while ensuring that it is a complementary neighbour. Built to five storeys and designed with highly-modelled brick elevations, the proposed ‘North Building’ would compete with the Barbican’s John Wesley Turret in this view.

The development would also impact on views from within the designated Barbican Estate. This is shown in the applicant’s TVBHIA in views:

- From the Lakeside Terrace (view 21 within the TVBHIA, part 26, pp.121-122) and from St Giles’ Terrace, outside St Giles Cripplegate (view 24 within the TVBHIA, part 29, pp.130-131). In both of these views, the proposed Rotunda would appear beside/behind the Barbican and would remove some of the clarity of the architectural expression of the roofline and elevations of the listed Mountjoy House.
- From views from the Thomas More Highwalk terrace (view 26 within the TVBHIA, part 31 & part 32, pp.136-137 and supplementary verified view A8 in the TVBHIA, PART 43, pp.207-208). Bastion House and the MoL are clearly seen within this view. With its low-lying, horizontal form and in the treatment of its tile-clad elevations which distinguish it from the concrete of the estate, the MoL complements the Barbican’s listed highwalk in this view. The proposed North Building would have a much more visually intrusive impact on this part of the estate on account of its bold modelling and tonally similar finishes.
- The new development would be highly visible in numerous other views from within the estate - for example, from the Highwalk from Wallside (which is a noted local view from the

Barbican and Golden Lane CAA, view 26) (view 27 within the applicant's TVBHIA, part 33, pp.142-143); from the western end of St Giles' terrace (another noted local view within the CAA, view 16) (supplementary verified view A7 within the TVBHIA, part 42, pp.204-205); from Monkwell Square (view 28 in the TVBHIA, part 34, pp.145-146); from Beech Gardens (supplementary non-verified view, B26, pp.264-265); and from the Defoe Highwalk (supplementary non-verified view, B27, pp.266-267). In all these views, Bastion House and the MoL provide an appropriate backdrop to the estate, on account of their simple, rectilinear profiles and restrained elevation treatments. The facade design of the proposed developments are complicated in their massing and expression and would serve to draw the eye away from the estate's designated architecture and landscape.

The applicant claims that the proposed development would be in keeping with the character and scale of the existing urban context to the south of the estate. While we accept that there has been tall development nearby, this does not justify further harmful encroaching development. As outlined in Historic England's guidance on setting, "Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting [...] consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the heritage asset" (p.4). The proposed development, particularly the Rotunda which would replace the low-rise MoL, would have a seriously detrimental impact on the setting of the designated estate.

#### The Ironmongers' Hall

The hall was built in 1922-25 by Sydney Tatchell for the Worshipful Company of Ironmongers. It is a rare example of an interwar livery hall, built in a Neo-Tudor/ Jacobean revival style with richly-decorated interiors that are remarkably well preserved. The building was threatened with demolition in the post-war period to facilitate the construction of the Museum of London, but the Minister of Housing and Local Government intervened, following a public inquiry, to ensure that the Ironmongers was saved and it was subsequently intelligently incorporated within the new development by Powell and Moya. The Ironmongers' Hall was recently Grade II listed, with the Society's support.

The Ironmongers' Hall is accessed off Aldersgate St, via the historic Shaftesbury Place. The applicant notes the hall's 'enclosed' setting, being enveloped by the MoL and approached by way of an opening off Aldersgate. It observes how the hall was hemmed in by buildings and accessed underneath an archway like this when it was built in the 1930s, prior to WWII bombing which cleared the site. The hall did not originally have a full street frontage, but was rather intended to be glimpsed from the street (as seen in the applicant's figure 4:12 within part 2 of the TVBHIA, p.21). When the architects incorporated the hall into the new MoL development, Powell and Moya retained this historic entrance sequence and spatial character. As demonstrated in view 18 from Aldersgate (TVBHIA, part 23, pp.109-110), the proposed development would open the hall up to the street. The applicant claims that 'the creation of new views of the Hall' from Aldersgate would contribute to 'an overall enhancement to the setting of the Hall, and [...] increased appreciation of the heritage significance of the listed building' (14.28 within the TVBHIA, part 36, 176) – the implication is that this opening up of the site would be a heritage benefit. It is our view that the enclosed character of the hall's setting and the way it is revealed through glimpses from the street contributes to its significance and the loss of this in the development would be detrimental, rather than positive or beneficial. It can hardly be claimed, as the applicant does, that the proposed highwalk would partly retain this enclosed character.

Not only would the sense of enclosure be lost, but the loss of the MoL and Bastion House buildings themselves would have a harmful impact on the hall's setting and significance. While not its original setting, the MoL development has become part of the hall's post-war history. As outlined in Historic England's guidance on setting, "Settings of heritage assets change over time [...] settings which have changed may [...] themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term." (p.4). It is our view that the existing buildings contribute positively to the setting of the Grade II hall and their loss would have a detrimental impact.

The proposed development would itself negatively impact on views of the Grade II listed Ironmongers' Hall, particularly from the Thomas More Highwalk. This is seen in the applicant's TVBHIA view 26 (parts 31 & 32 of the TVBHIA, pp.136-137) and supplementary verified view A9 (part 44 of the TVBHIA, pp.210-211). The clean rectilinear forms and simple, muted finishes of the existing buildings provide a harmonious contrast with the warmth and characterful roofline of the Ironmongers' Hall, with its gables and hipped roof with a gablet. The proposed buildings appear far more intrusive and overbearing, and their complicated massing and expression would visually compete with and distract from the hall. Their impact on views of the listed building would be detrimental.

#### Policy relating to Designated Heritage Assets

Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 state that 'In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and 'In the exercise, with respect to any buildings or other land in a conservation area [...] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

The NPPF (2023) states that

- 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).' (paragraph 205)
- 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'(paragraph 206)
- 'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.' (paragraph 207)

The London Plan (2021) Policy HC1: Heritage conservation and growth (C) states that 'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative



impacts of incremental change from development on heritage assets and their settings should also be actively managed’.

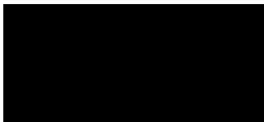
The adopted City of London Local Plan (2015) includes Policy DM 10.1: New development which states that ‘the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways’. Policy DM 12.1: Managing change affecting all heritage assets and spaces states that ‘4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.’

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

This substantial harm would not be outweighed by heritage benefits nor by the public benefits that would be delivered by the scheme. This is ultimately an office development, with some (albeit not substantial) public cultural offerings. Economic, social and environmental benefits could be achieved through a scheme which retained and revitalised the existing buildings on the site. Their demolition and the site’s redevelopment is not ‘necessary’ to provide these benefits.

It is our view that the scheme contravenes national and local policy regarding the conservation of heritage assets. We urge the local authority to refuse permission for the development.

We hope that these comments are of use to you. We would be grateful if you could please inform us of your decision on these applications.



Yours sincerely,

Coco Whittaker

**Senior Caseworker**

The Twentieth Century Society  
70 Cowcross Street  
London, EC1M 6EJ



**Remit:** The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

**THE IRONMONGERS' COMPANY**

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ENTRANCE IN ALDERSGATE STREET

Planning and Development Director  
City of London Corporation  
Department of Planning & Transportation  
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FAO of Gemma Delves, Case Officer

30 January 2024

Dear Sirs

**Application Ref No: 23/01304/FULEIA**

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

**Application Ref No: 23/01276/LBC**

**Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y). | Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA**

- 1. Introduction** – This letter is written on behalf of the Worshipful Company of Ironmongers London, the Ironmongers' Charity and Ferroners plc (together "Ironmongers" or "the Company") which, taken together, are the legal owners of and related entities interested in Ironmongers' Hall and Ferroners House in Shaftesbury Place, London EC2Y 8AA, who write on behalf of themselves and associated Ironmongers charitable and other entities.

As you will be well aware, the Hall and Ferroners' House are almost entirely enclosed and surrounded by the existing – now closed – Museum of London, both lying to the west of and close to the existing Bastion House.

The recently registered planning and listed building applications referenced above are therefore of course a matter of the greatest interest and concern to Ironmongers, given that were it to be consented and built, very substantial impacts would be experienced by the owners and occupiers of both the Hall and Ferroners House, during and following what is identified in the application as a construction period of sixty-eight months, from January 2028 to August 2033, encompassing overlapping demolition, piling (including enabling works), basement box construction, super-structure and finishes, and external works and landscaping. On any view, this is a very significant development proposal which would clearly cause huge disruption to the ongoing beneficial use and occupation and servicing of the Hall.

2. **The Ironmongers' Company** – The Worshipful Company of Ironmongers, having existed since the 1300s, received its Royal Charter from Edward IV in 1463, is tenth in order of precedence according to the ranking established in 1515 for the 48 City of London Livery Companies then in existence. Following the occurrence of an air raid in 1917, in which the Hall, then located in Fenchurch Street, was badly damaged, the Company relocated to its current site almost 100 years ago, the Hall having been dedicated by the Bishop of London on 17 June 1925.

The Company places great value in its very long-standing relationship with the City of London, and with the City Corporation – which we hope can be maintained long into the future.

3. **High-level summary of the Company's position with respect to the application** – The Company takes its responsibilities as a City occupier and neighbour with the utmost seriousness. We entirely recognise – and are fully supportive of the fact that – the fabric of a dense urban environment such as at the west end of London Wall will (and must) evolve, change, and adapt over time, both to anticipate and respond to changing circumstances.

The Company does, though, bring objectivity to its task. We would not wish to obstruct a proposal which clearly met, indeed surpassed, with ease, our requirements and expectations of a carefully designed new neighbouring group of buildings.

To this end, we have both commissioned detailed advice from experienced consultants, and made our own careful assessment of the likely impacts which this proposal, if consented and built, would have on the continued operation of our Hall.

The Company at the highest level of abstraction, subject to what is said below, fully supports the redevelopment of the application site, entirely recognising that the now functionally obsolescent Museum of London is in need of wholesale replacement. We are, though, frankly unpersuaded as to the position on Bastion House at the present time.

Both the City Surveyor and we fully appreciate, of course, that any scheme such as proposed here could not proceed unless the Corporation acquires the freehold of Ferroners' House.

The Company does have some fundamental questions over the City Surveyor's approach to the in-depth consideration of genuine alternatives to the scheme as currently proposed, that would have, in the longer term – post completion – less adverse impact on Ironmongers' Hall. We have reservations over whether the current proposal should be considered to be the last word on the build-out of this highly complex site.

Last, but by no means least, the Company will not take a step back from its determined insistence upon a high level of contractual protection with respect to legally enforceable Asset Protection and Neighbourly Matters Agreements that would need to be secured before any works were to commence.

4. **Ironmongers' Hall** – The Hall was listed at Grade II by the Secretary of State on the advice of Historic England on 20 April 2023 under [Ref No 1485812](#). As will be seen, the listing excludes Ferroners' House. The Hall as a City Livery Hall is of course a paradigm example of a highly sensitive receptor in planning terms.

The history of the redevelopment of the land at the western end of London Wall on the east side of Aldersgate Street is of relevance and interest in the context of the emerging development of what became the site of the Museum of London and Bastion House. The City Corporation in the post-war years designated large areas of land which had sustained extensive wartime damage from aerial bombardment into Redevelopment Units; and one such Unit was designated as involving essentially the entirety of the land on which the Museum of London was built, and on which Ironmongers' Hall then stood and continues to stand. The City Corporation's objective of securing a Compulsory Purchase Order for the whole of the Redevelopment Unit was thwarted by the unequivocal recommendation of the CPO Inspector, endorsed by the Secretary of State, to exclude the site of Ironmongers' Hall and its immediate environment in Shaftesbury Place from the CPO.

This could be said to have guaranteed that it would be and would remain inevitable that Ironmongers' Hall should necessarily co-exist for the semi-indefinite future alongside the contiguous land owned by the Corporation of London in a good-neighbourly fashion and configuration, not only for the 1960s recovery from extensive war damage, but for subsequent generations of redevelopment, as is now apparent.

Whatever may be the view as to whether the City Corporation achieved this objective in the design and construction of its surrounding Museum of London in the years following confirmation of the CPO, the intended demolition of the Museum (and Bastion House) and their replacement with next-generation development to create a new townscape environment that would continue to co-exist as a good neighbour of Ironmongers' Hall presents a vital opportunity to remedy past wrongs, and to reset such important matters for the next generation of buildings and the badly-needed improvements to the public realm around the buildings.

5. **Ferroners' House** – The office extension known as Ferroners' House was developed on the Company's estate in 1975 – 1977 physically attached to the Hall; it is not considered to be a building of any notable architectural merit (and does not form part of the listing). It is, however, an important asset for the Company, generating significant revenue from

sub-lettings, both arms' length commercial tenants, and other established City entities, the Shipwrights Livery Company, included.

6. **General observations on the application** – Attention is drawn to a stark contradiction in the approach to the application. It is described in the Planning Statement as a “unique” opportunity to reform this part of London Wall. Yet as all involved are well aware, the most careful consideration was being given until 2021 to the proposal to build the Centre for Music on the very site which forms the current application. It is self-evident from this that the site is capable of accommodating entirely different forms of development, as well as completely different uses.

The key issue is whether the current application, if consented in its submitted form, would bring about an exemplary new urban environment, featuring design of the highest quality, which would command strong support, a commendable and sympathetic neighbour to adjoining buildings and uses, in line with national and city planning policy requirements. Quoting from para 131 of the recently published NPPF (December 2023):

*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.*

It would be reasonable for the Company and indeed other close neighbours of the site to look for firm commitments from the City Corporation that any scheme considered by the Planning & Transportation Committee represented the final form of any development that might come about. Regrettably, however, history teaches that a resolution to grant planning permission for a complex development is seldom the last word – and a developer introduced into the equation treats the committed envelope as no more than a starting-point for a scheme which then undergoes unremitting value-engineering and compromises (including enlargement) in its detailed design. It would be of assistance to the Company to be informed of whether that is a state of affairs for which we should be prepared in this case.

The enormous scale, bulk and massing of the development envelope proposed would sit very uneasily alongside Ironmongers' Hall and would clearly have very significant adverse impacts due to its height and proximity – including on the degradation of the light received by the Hall. The proposed Rotunda Building, of considerable bulk and size on its own, is seen from the application materials to cast significant shadow across the Hall, which would undoubtedly be highly detrimental. The design overall pays scant regard to the Hall as a sensitive receptor listed neighbour, and would for generations be seen as a poor piece of townscape. An objective assessment may question whether the City Corporation has a degree of conflict of interest in setting on this scale of development as appropriate for this site.

7. **Some specific areas of note** – Having reviewed the detail of the submitted material, attention is drawn to the following issues:

- a) **The Client Brief from the outset** – It is unfortunately (and highly regrettably) necessary to read between the lines of the prolix application material in order to try to ascertain the originating brief from the City Surveyor when, after the Centre for Music project had been initially and then finally abandoned. It would be of benefit to the Company's greater understanding of the overall approach to this proposal for us to understand when, how, and why, the fundamentally different CfM design morphed into the current scheme, now applied for, under the control of the same lead architect. Two uniquely high-quality designs for exactly the same site, less than three years apart, to an onlooker – and certainly to a neighbour surrounded by the application site - perhaps invite a justifiable insistence on challenging the thinking underlying the approach to the design. Exactly how much attention was paid, by critical-friend challenge, to the rather rapid evolution to move on from the CfM proposal, to where the Corporation now stands? Please could we see the social and economic drivers that were influential in the emergence of the brief.

**The viability of the proposal** – **The application material** is notably silent on the viability of the proposal and from our review of the materials no viability statement has been provided. The Company makes the assumption that the justification for the scale of the proposal is founded at least in part – perhaps rather significantly – on the asserted need for new buildings of very considerable scale and assumed value in a 2033 commercial market at (indicative) completion, and far beyond. The Company is being asked to pay a huge price for this development to proceed. As a very longstanding City institution, the Company has always eschewed speculation as a basis on which to maintain a sure footing for the future. It is fervently hoped that the City Surveyor has adopted the same approach here.

- b) **The committed level of detail in the application** – There is a disturbingly approximate, seemingly calculated, shortcoming in the level of detail embedded in the submitted application drawings which form part of the committed application materials. The Site plans, elevations, sections and use plans submitted as part of the Design and Access Statement, as well as the drawings and plans found at Appendix 2 of the Environmental Statement do not provide sufficient detail as to the relevant impacts of the development, particularly on the Ironmongers' Hall. In addition to this, the various plans and the different locations these are found make it very difficult for a thorough assessment to be made. This makes it very difficult for immediate neighbours to form a clear, well-informed view about, still less obtain very clear advice on, likely potential direct impacts of this scheme if it were to go ahead. It also invites questions about the extent to which the environmental impact assessment does – or could – accurately assess the likely significant impacts of the scheme. From the drawing blocks on the application drawings, it is evident that the drawings were the subject of amendment during the application process. There are material internal inconsistencies among and between the submitted drawings. The



expected phasing of the proposed development, and thus its impacts on Ironmongers, is virtually impossible to ascertain.

It is no answer to this point that the likely extensive conditions that would be on any planning permission would provide a framework for the plugging in of gaps. No draft conditions are available to review – and are probably months away from being exposed to public analysis. The City as planning authority would need to be completely satisfied that the release of a planning permission for this scheme were safe to do. Not least because the setting of a threshold would be highly relevant to the subsequent determination of proposals for the later amendment of the development proposal. This will be of concern to neighbours, including Barbican residents and other sensitive receptor owners and occupiers.

- c) **Serious harm to heritage assets** – The Non-Technical Summary of the environmental statement contains, at paragraph 3.13.12, in the section headed ‘Townscape, Visual and Built Heritage Impact Assessment (TVBHIA)’ the somewhat insouciant comment as follows:

*“The proposed development includes the demolition of Ferroners’ House which forms an extension to the Grade II listed Ironmongers’ Hall but is not included within the statutory listing. The proposals further include minor works to the listed buildings in association with the wider proposed development. A minor beneficial effect on Ironmongers’ Hall (Grade II) would result from the improved appreciation of its heritage significance facilitated by the removal of its existing 1970s extension, the opening up of the Aldersgate Street frontage, enhancements to the character of the landscape surrounding the listed building, and improved pedestrian access and movement within its immediate setting.”*

The ES Volume II: Townscape, Visual and Built Heritage Impact Assessment at paragraph 14.30 provides the following:

*“On balance, due to the removal of detracting elements (primarily Ferroners’ House), and the creation of new views of the Hall – mainly from Aldersgate Street, but also from the proposed new landscape and improved pedestrian routes around the Hall – the proposed development would result in an overall enhancement to the setting of the Hall, and there would be an increased appreciation of the heritage significance of the listed building. This impact is considered to be below in magnitude. The scale of effect would be minor and the nature of the effect would be beneficial.”*

We invite you to explain the background to this assessment. Does it accord and correspond with your Department’s general approach to heritage harm appraisal? How will the Corporation provide an independent critique of the assessment?



- d) **The depth of genuine consideration of less harmful alternatives** – The Alternatives and the Design Evolution chapter in the submitted Environmental Statement shows a lack of detail as to the degree to which there have been genuine considerations of less harmful alternatives, particularly when one has regard to the Ironmongers' Hall. Massing Sketch 2 and 3 as detailed in the chapter provided that the Ironmongers' Hall would be completely cut off from the street, and provides a brief outline of other issues with these designs. However, none of these are discussed in sufficient detail.
- e) **Specifically, the north-south Pedestrian Walkway parallel to Aldersgate Street, and a high circulatory walk to the rear of the Cultural Centre** - The siting of the City Walkway on the west side of the listed Hall, entirely contrary to the scheme design shown to the Company in earlier pre-application consultations, repeats the gross mistake in the previous design of the Museum of London, serving only to enclose and obstruct the front (west-facing) elevation of the Hall, and is avoidable, harmful and will be regarded as an unardonable example of fundamentally poor quality design.

The introduction of a high circulatory walk to the rear of the Cultural Centre in close proximity to the Hall would introduce the likelihood of noise disturbance and add both to the sense of enclosure and the reduction in the light received by the Hall - another example of poor design which needs further analysis.

- f) **The paucity of the assessment of construction-phase impacts on Ironmongers' Hall and other sensitive receptors nearby** – There are significant areas of concern identified by the applicant in its own assessments, that raise justifiable issues for Ironmongers, not least because there are very significant works of separation which would be required to demolish Ferroners' House, which is structurally integrated with the Hall. To take a few examples:
- The **construction vibration** is anticipated to exceed the SOAEL (significant observed adverse effect level) for both potential disturbance and structural damage to the Hall [ES, para 7.5.11];
  - This concern is further commented on in para 7.8.1 of the ES, which states [in part] that '...some significant noise and vibration effects may remain after mitigation during the demolition and construction phase of the proposed development. As part of the CEMP/ section 61 application the regime for monitoring construction noise and vibration and associated limits at various receptors will be agreed with the CoLC. This would be expected to comprise an appraisal and condition survey of Ironmongers' Hall building and its susceptibility to damage as well as on-site trials to establish in situ levels of vibration and how the levels of vibration can be minimised and managed in order to avoid building damage. Appropriate vibration limits will be set between the contractor and the Council to protect surrounding receptors, this will include a protocol to produce warnings if the works are approaching the agreed trigger levels and associated actions e.g. to investigate the cause and review works methodologies prior to any limit being reached'.

- The Construction and Environment Management Plan prepared by Multiplex and submitted with the application, which the Applicant has accepted will be a condition on any permission granted in the ES chapter on Demolition and Construction, provides comment on the owners and occupiers requiring specific legal agreements to be established to enable the construction of the elevated slab to progress in this sensitive location. However, no further detail is provided.

This is highly confusing. The reference to ‘significant *noise*’, as well as significant *vibration*, is omitted in para 7.8.1, and appears to have fallen away. The setting of appropriate limits (vibration only, it would appear) are to be set between the contractor and the Council, with no reference to the Ironmongers Company – we assume that the Company would not be a bystander in this exercise, when first set up, and on a very active continuing basis. The levels to be set appear to be confined to the avoidance of building damage – not, it would seem, to any element of regard for the sensitive receptor nature of the use of the Hall by the Company during the almost six-year programme of works to carry out the development.

The Company had been given, and had in good faith relied upon, repeated assurances given by the Corporation’s various lead officers in the very protracted (largely one-way) communications preceding the submission of the application in late December 2023, that full protection would be offered in contractually enforceable Asset Protection and Neighbourly Matters Agreement form. It is disquieting for the Company to be required to sift through a very large amount of detail - not shown to us in draft in advance – and to discover details of this kind which are of obvious concern to the Company. All the more so, because there has been no constructive engagement from the Corporation in several disciplines (Planning, Surveyor, and more) at various levels on the subject of asset protection.

- g) **Embodied Carbon; and the case for the retention of Bastion House** – There will inevitably be very close attention paid to this subject, and rightly so. The Company is considering the position in close detail, recognising that the law, practice, and politics of this are all in a very volatile state at present. Sufficient to state for now that the Company reserves its position entirely on this subject. It is regrettable that the City Surveyor was so reluctant to place his cards face-up on the table from an early stage, and made necessary the need for reliance on Freedom of Information legislation for access to be gained to key factual data; yet now makes a virtue and strength out of why there is a compelling case for the wholesale demolition of Bastion House. This does not add up. It requires much closer scrutiny from independent evaluation.
- h) **Daylight, Sunlight and Overshadowing impacts** – Daylight and Sunlight impact is a further aspect over which the Company has strong reservations. Paragraph 7.13 of the Planning Statement states that:

*“The majority of nearby properties experience reductions smaller than the threshold at which changes may become noticeable i.e. a less than 20% change. Where this is not the case, and reductions are beyond the retained level of daylight is considered to be good for an urban location and the effect is minor overall. It is considered that on balance the proposed development accords with Policy DM10.7 and Draft Policy DE2”.*

This will clearly need further examination, since it manifestly falls short of good, let alone best, practice on this important subject. The Company is advised that recent decision-making on the subject at and above Inspectorate level established at appeals would be highly likely to adopt a very different approach to the subject than is revealed by the extract quoted above.

As indicated above, the Rotunda element would loom up over the Hall and introduce significant and most unwelcome overshadowing.

The subject of rights of light is for separate consideration.

- i) **Wind assessment** – Given recent experience of the highly unsatisfactory conditions brought about by wind impact of new tall buildings in the City, the Company is highly sceptical of the conclusion that the proposals would result in no significant wind microclimate effects, and the rather casual assertion that in this respect the proposals accord with applicable London Plan and Local Plan policies. The methodology used in assessments on this element by the development industry would appear to be crude and inexact to a high degree. We consider that a more hesitant approach would be in order; combined with a clear recognition that, given the close proximity of long-term sensitive receptor immediate neighbours, were unsatisfactory conditions to be experienced, remedial steps would immediately be taken. It is disappointing to read that no supplementary mitigation appears to have been considered.
8. **Draft Planning Conditions and s106 Planning Obligations** – We trust that your authority, in acknowledgement of the very significant impacts which this project would have on Ironmongers’ Hall in both the construction and post-completion stages will recognise and accept that if the scheme proceeds to a resolution to grant and beyond, Ironmongers would be invited to participate to the fullest extent in the framing of relevant draft planning conditions and planning obligations addressing both the entire construction period and post-construction estate management matters.

Your unqualified assurance to this effect is requested. It would plainly not be acceptable for these to be developed to an advanced stage and presented to Ironmongers as a *fait accompli*.

9. **Asset Protection and Neighbourly Matters Agreement** – We make the same point regarding active participation in relation to this topic. In this regard, entirely without prejudice to the Ironmongers position in relation to the application, early in-depth constructive discussion on asset protection and neighbourly matters appears to the

Company to be a responsible step to be taken in the context of the appropriate stewardship of the recently-listed Hall.

Previous discussions on this topic have not borne fruit, which we consider to be rather regrettable.

10. **In conclusion** – The Company is realistic that the wholesale replacement of the Museum of London is a sensible course of action to pursue, provided that the replacement form of development is guaranteed to produce a very high-quality sensitively designed urban environment, including public realm of the highest quality worthy of this important location, respectful of the rich heritage and sensitive receptor uses in the neighbourhood. The Company is unpersuaded of the robustness of the case for the replacement of Bastion House, on currently available information. As indicated, we also question the justification for the sheer scale and bulk of the development proposed.

The level of commitment incorporated in the application falls short and allows scope for value-engineering and depletion of design quality. The application reveals a lack of flexibility of thinking about genuine alternatives considered, which would give rise to a more suitable scheme. The siting of the City Walkway on the west side of the listed Hall, entirely contrary to the scheme design shown to the Company in earlier pre-application consultations, repeats the gross mistake in the previous design of the Museum of London, serving only to enclose and obstruct the front (west-facing) elevation of the Hall, and is avoidable, harmful and will be regarded as an unpardonable example of fundamentally poor quality design. It is one of the aspects of the approach taken to the design of the walkways which needs to be fundamentally rethought, another being the proposed high circulatory walk to the rear of the Cultural Centre. The microclimate effects, notably daylight and sunlight impacts, overshadowing and wind conditions, all need further analysis and independent evaluation. The construction impacts demonstrate that close co-operation with the Company would be essential. The phasing of the scheme in construction is wholly unsatisfactory. The assurance of uninterrupted servicing capability for the Hall, a material consideration of high importance, is ignored, and appears to be rather precarious, which is plainly unsatisfactory.

The need for the highest level of asset protection for the Hall, and acknowledging both the impact of the loss of income during the construction phase and the critical importance of the separation works that would be required, clearly a sine qua non of any project being acceptable even at the highest level of abstraction, seemingly continues to be overlooked by the City Surveyor as the landowner. This is as surprising as it is regrettable, given that the scheme will be unable to proceed if the City Surveyor is unable to agree terms with the Company over a potential acquisition of the freehold of Ferroners' House, currently attached to the listed Hall.

Yours faithfully



Colonel CPH Knaggs OBE  
Clerk

Good Growth

Gemma Delves  
City of London Corporation  
By Email

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

Dear Gemma Delves

**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

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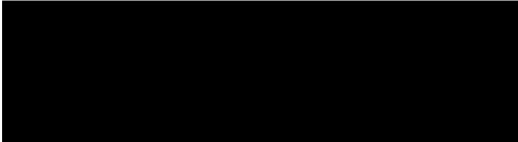
We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

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



## Representing the interests of Barbican Residents

Barbican Association Planning Sub-Committee  
c/o 343 Lauderdale Tower  
Barbican  
London EC2Y 8NA

Department of the Built Environment  
City of London  
PO Box 270,  
Guildhall  
London EC2P 2EJ

11 February 2024

**For the attention of Ms Gemma Delves, Planning Officer**

Dear Ms Delves,

**Objection to applications 23/01304/FULEIA; 23/01276/LBC; 23/01277/LBC – London Wall West**

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to **object** to the above applications relating to the site at London Wall West. We endorse the objections submitted by the Barbican Quarter Action group, of which the BA is a member, but we make these additional points on behalf of our members. The grounds for objection include: significant loss of residential amenity, significant harm to heritage assets, paucity of perceived cultural benefits, and significantly harmful environmental impact. In addition, we point out that the access arrangements for the construction phase and servicing during the life of the building are unworkable, and that consultation on these aspects has been non-existent.

We are disappointed that the applicant has decided to overlook all the concerns and issues highlighted by the many residents and interested parties that live and work in the vicinity of the proposed development site during the consultation process. It is also disappointing to note that the City of London Corporation rejected several proposals to re-fit and re-purpose Bastion House and the Museum of London – offers it itself described as credible – in favour of the demolition of these two important examples of post war architecture and their replacement with oversized offices for which there is questionable demand, and in an area of the City prioritised for housing, not offices. This is also in contravention of the City's (and national) policy of "Retrofit and re-use".

In our view, the proposals are both unsympathetic and inappropriate in size for this sensitive and densely populated residential and mixed urban location and the massing would consequently bring both a serious loss of amenity to residents and loss of architectural coherence with little wider benefit to the City of London. The proposals will cause significant harm to the setting of Grade 1, Grade 2 and Grade 2\* heritage assets abutting as they do so closely to a number of key listed buildings and City Conservation



areas. These include the Grade 1 St Botolphs and St Giles churches, the Grade 2 and Grade 2\* listed Barbican Estate and landscape and the Barbican and Golden Lane Foster Lane and Postman's Park Conservation Areas.

### **Significant loss of residential amenity**

The proposed massing of the buildings will cause substantial loss of light to many residents in the neighbouring Barbican Estate, particularly those blocks nearest to the site, namely Seddon, Thomas More and Mountjoy Houses. The Daylight and Sunlight documents submitted with these applications suggest that *"the overall impact on daylight to Mountjoy House is considered to be negligible to minor adverse and thus the effect is not significant.....Overall, therefore, the impact on daylight and sunlight to Thomas Moore House is considered to be minor adverse and thus the effect is not significant.* The documentation comes up with a similar analysis with regard to light spill and solar glare.

The emerging Local Plan 2040 takes into account the cumulative effects of developments. The successive building of taller buildings in Aldersgate and on London Wall has already affected lighting levels in residents' flats. The massing of the proposed new Bastion House is 2.5x that of the existing building. The proposed new Rotunda building is planned to be 14 storeys high (vs the existing low-level Museum of London structure) and the new North building 5 storeys high. The loss of daylight and sunlight to all nearby premises will be significant to the residents concerned.

Residential amenity will be impacted not only by loss of daylight and sunlight but also by the attendant impacts of overshadowing, light spill, solar glare, and noise. The risk of night time light pollution is an additional concern.

Loss of privacy and overlooking are also issues of concern. The buildings not only overlook many residential properties but also that of the City of London School for Girls. In this latter regard, for example, we note that in addition to the many office windows overlooking the area, the proposed welfare block during the many years of construction is planned to be adjacent to and overlooking the school's sports pitches in addition to the many residents in Thomas More House, giving rise to additional concerns regarding the safeguarding of pupils.

The loss of light and privacy and the inevitable impact of noise and pollution from the demolition and construction of the site over many years will have seriously adverse effects on the health and well-being of residents, workers and visitors to the area from commencement of the works through to 2033.

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

In the emerging Draft City Plan 2040 in Policy HS3: Residential environment it states: *"The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements....* It goes on: **2. All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to**

***adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE9.***

Although not yet adopted, the emerging plan should take considerable weight, partly because it has been so long in production and the policies on residential protection have been there (unchallenged) since the first iteration. Moreover, Policy DM 21.3 Residential environment in the Local Plan 2015 is not even referenced in the planning statement, which is surprising given the extent to which the development impinges on the residential environment, including taking over some of its space.

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

The Barbican was deliberately designed to provide a tranquil residential place in the City. This development puts that tranquillity at risk – and the Agent of Change principle mentioned in the emerging Local Plan 2040 requires new developments to provide adequate mitigation or to be resisted.

It is also clear from the servicing and construction plans that the impact on residential amenity has not been taken seriously in these proposals.

Policy CS5 The North of the City in the Local Plan 2015 includes:

*4. Ensuring the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as Smithfield Market, Barbican, Golden Lane and Broadgate, **whilst preserving privacy, security and noise abatement for residents and businesses.***

*5. Identifying and meeting residents' needs in the north of the City, **including protection of residential amenity, community facilities and open space.***

Again we are not reassured that these proposals acknowledge the need to protect privacy, security, and noise abatement.

Moreover, it is clear from both the 2015 and 2040 plans that new housing in the City is intended to be built adjacent to the existing residential clusters. The use of the London Wall West site for offices removes the site as a prime candidate for housing, next to the City's largest residential cluster.

### **Significant harm to heritage assets**

These proposals will cause substantial harm to the heritage of the area and they ignore the cultural history of the site. The design and massing of the buildings sit totally out of character with both the listed Barbican Estate which it borders and the neighbouring buildings in Aldersgate Street, London Wall and St Martins le Grand.

These proposals would have a major negative impact on the surrounding area. The site marks an ancient gateway to the City on a thoroughfare that has been in constant use since Roman times and its planned re-routing would destroy the historic Roman street line. The

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

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

A view of one of the Barbican's iconic towers from St Martin Le Grand to the south would be completely obscured by the bulk of the Rotunda Building. Given the stated aim of the developers to provide a gateway to the cultural offerings of the area, it is ironic that one of the existing cultural offerings (namely the Barbican estate) should be obscured from view by what is just another office building, bearing no design relationship to the brutalist estate.

With specific regard to the Barbican and Golden Lane estates, the Barbican and Golden Lane Supplementary Planning Document (SPD) published in February 2022 states that the *"Barbican Estate is a unique example of coherent inner city planning of the post war era.....and goes on "the overall plan form of the Barbican, and the integrated relationship between buildings, spaces, lakes, podium walkways all contribute to the special value of the composition as a totality"*. The SPD also sets out the City of London Corporation's policies relating to this important conservation area. The document states that ***"Development should preserve and enhance the distinctive character and appearance of the Barbican and Golden Lane conservation area – as set out in this SPD – and the significance of individual heritage assets within the boundary. Where appropriate, development should seek to better reveal the significance of the conservation area and other individual heritage assets."***

The SPD goes on to state that *"Conservation area status, following designation in 2018, requires that in the exercise of planning functions, special attention must be paid to the desirability of **preserving or enhancing the character and appearance of the area**"*.

### **Where are the cultural benefits?**

The City is in the process of ramping up the concept of Destination City, replacing the previous Culture Mile initiative. The London Wall West site should surely act as a gateway to this significant cultural area and not act as a monolithic obstruction. The London Plan 2021 recognised this area as one of London's strategic cultural areas which went some way to supporting the City of London's previous plans to put a Centre for Music on the site. Once these plans were shelved it was not unreasonable that part of the site at least would be used for a meaningful cultural addition to the City (though that is arguable since the Museum is being replaced and enlarged on a site nearby). Or, more radically, the City could

have taken a strategic look at the site and considered what the City is most deficient in – the obvious alternatives being housing and green space.

We note that the cultural plans for the site are vaguely specified and uncertain. Only c12% of the total site is to be apportioned to culture (and of which c2% is to be apportioned to food and beverage spaces). The remaining space is to be apportioned (speculatively) to office use, thereby providing no significant addition to the cultural offerings of the area. Indeed, we argue that overall the proposals have an adverse effect on the existing cultural elements of the area: the new buildings block the visibility of the cultural events and exhibitions already on offer across the iconic Barbican estate and its Arts Centre. We would remind the committee that the Barbican was described by the government's Independent Panel on UNESCO World Heritage status *"As a masterpiece of brutalist architecture and town planning reflecting the standards of its time and arguably, one of the best examples of municipal urbanism, ....that has maintained its authenticity and integrity despite periods of adaptation and change"*.

At present someone coming north up St Martin Le Grand sees a large area of sky above the roundabout with a view of one of the Barbican towers (itself a cultural attraction). The proposals would completely block that view of the Barbican and of the sky, also obscuring wayfinding and the route to the north.

### **Servicing and construction plans unworkable**

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

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

Total predicted traffic flows will more than double and restrict access for residents, their deliveries and for emergency vehicles. Even Buro Happold, the consultant engineers, state that this plan is far from ideal given that *"the constraints of the existing site and Ironmongers Hall result in a layout where two way circulation is not possible for large good vehicles and refuse trucks, such that there are only limited passing opportunities. Furthermore, visibility is somewhat restricted especially around the retained Ironmongers Hall building such that vehicles travelling in opposite directions cannot easily see oncoming vehicles."*

#### *Construction phase*

The proposal that during the construction phase the ramp from Aldersgate Street to the Thomas More carpark should be restricted to construction traffic only is completely unrealistic. The only other vehicle access to that car park is down a narrow one way ramp with a 180 degree turn at the bottom. This is not navigable by anything larger than a medium sized car (and a skilled driver). The route is not wide enough for more than one

vehicle: backing up to let vehicles through would involve backing onto Aldersgate Street at one end and round an 180 degree turn at the other. The entrance will not accommodate the City's waste lorries that remove rubbish or vans larger than a car.

The Construction and Environmental Service Plan says at p 32 "*Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however this should only be utilised when absolutely necessary.*" Data from 2017 from an audit of the Thomas More car park showed over 100 vehicle movements a day. The number of deliveries is likely to have increased since then. About 33 of those a day were accounted for by residents with parking places. The others were contractors' vehicles for the estate and for residents and delivery vehicles. Access for these vehicles will be "absolutely necessary" many times in the day. Such mingling of construction vehicles and residential and other non-construction traffic is, as the Construction report implies, unsafe.

#### *During operation of the completed buildings*

The proposal is that all three new buildings - New Bastion House, the Rotunda, and the North building (plus Ironmongers) will be serviced via the ramp into Thomas More carpark. The service road from London Wall that exits onto the top part of the ramp currently will disappear.

The North building will not have enough space in its service area for vehicles to turn round so they will enter the area frontwards and have to backout onto the ramp (as shown in 23/01277/LBC). Thus obstructing all other incoming and outgoing traffic and contravening the City's servicing standards. Local Plan 2015 Policy **DM16.5** item 4 says "*On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear.*"

It is not clear whether and how the residents' use of the carpark will be reconfigured and there has been no consultation with residents or other stakeholders about this aspect of the plan.

The information in 23/01277/LBC shows that the areas of the carpark that currently

- allow deliveries for residents to be unloaded
- house the electric vehicle charging points,
- provide parking for Mountjoy House,
- provide an emergency exit from the Girls School
- provide facilities for long term estate contractors

will no longer be available: the space will be a traffic route to the new buildings' service areas.

There is no information on the implications of this traffic on access for emergency vehicles to the flats.

The application envisages between 104 and 174 vehicle movements (depending on how many are consolidated) a day to service the three buildings. That is on top of the current level of vehicle movements from residents' vehicles and the Thomas More Carpark is the busiest in the Barbican (2017 figures showed about 100 vehicle movements a day).

The proposed new buildings on the London Wall West site are considerably larger than the existing buildings on the site - and will therefore have greater servicing needs - yet the access for servicing is much less than that available for the older buildings.

These proposals for access are not fit for purpose and if this application is to go ahead need to be radically reworked to:

- provide an alternative access for construction vehicles
- provide additional access during the operation of the building. It cannot be acceptable for significantly increased levels of noisy and air polluting traffic to be placed near to a residential site.

Moreover, the proposal to remove the roundabout – which has not been subject to a full consultation – will force traffic exiting from the ramp from the Thomas More carpark that wants to go north and west to go some considerable way south and east before finding its correct route. This will only lead to further congestion on London Wall (which is likely to be busier because of any future restrictions to Beech Street).

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

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

The ARUP report supporting this application indicates that the growth area for office demand is in emerging businesses, which need cheaper, smaller, flexible spaces. There also remains significant uncertainty about the long-term demand for offices given that post-Covid patterns of work still do not appear to have been established.

Indeed, the ARUP report itself points to very diverse scenarios for the future. City Officers have advised that the expectation is that demand will lie between the in-person return and the hybrid ARUP scenarios, but without explaining the rationale for the choice. Given the amount of office space that the City already has in the pipeline, it remains questionable as to whether the proposed developments at London Wall West are critical to the City's overall office space targets.

### **Environmental impact**

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

In a press release issued by the City of London Corporation on 12<sup>th</sup> December 2023 it was announced that the City's Planning and Transport Committee had approved a new Sustainability Supplementary Planning Document (SPD). It went on to say that *"The move aligns with the organisation's Climate Action Strategy, which supports the achievement of net zero for the whole Square Mile by 2040. The SPD ... sets out what the City Corporation expects to see addressed through the developer's approach to their sites and the design and construction of buildings. The SPD aligns with the emerging City Plan 2040, expected to be approved and adopted in 2024. Five key considerations are identified in the guidance for*

*developers, in order to set exemplary standards for sustainability, without undermining the economic viability of planning applications. These include:*

***Retrofit and reuse*** - *Outlining the ‘retrofit first’ approach, promoting the reuse of existing buildings where this is the most sustainable and suitable approach for a site, in line with the City Corporation’s adopted Carbon Options Guidance.”*

Having publicly and repeatedly announced that “retrofit first” is to form the cornerstone of the City’s planning policy, we question why this policy was ignored in relation to the London Wall West site. This runs counter to all accepted sustainability considerations including at national level, notably NPPF 2023, section 14 as well as the City’s own.

The justification for demolishing Bastion House was that the building was structurally unstable. This has, however, been proven to be incorrect and supports the view that Bastion House – together with the Museum of London building - could and should be repurposed.

In this regard, the City Corporation’s soft market test for interested parties to express their interest in retaining and repurposing the site was flawed from the outset, being too short a period of time for any interested party to adequately assess the site. The three credible responses seem not to have been properly followed up.

### **Summary and conclusion**

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

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

It removes a major candidate site for housing – in an area of the City where more housing is part of the Local Plan.

It offers little extra green space.

This part of the City is not a key area for large offices, and it is not clear that another three office buildings will offer much benefit to the City

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-committee

Sue Cox – Deputy Chair, Barbican Association Planning Sub-committee



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**From:** Jane Smith  
**Sent:** Sunday, February 11, 2024 6:42 PM  
**To:** Hughes, Ian  
**Cc:** SMCX34; [chairbarbassociation](#); [theszlesingers](#); Chair, Mountjoy House  
**Subject:** [Unsafe servicing proposals for London Wall West](#)

THIS IS AN EXTERNAL EMAIL

Dear Ian

I am writing to you as City Operations Director on behalf of the Barbican Association about our serious concerns about the access and servicing arrangements for the proposed development at London Wall West (planning applications 23/01304/FULEIA; 23/01276/LBC; 23/01277/LBC).

Irrespective of the merits or otherwise of the applications, we think the proposals for access during construction and for servicing during operation of the building are unsafe and unworkable.

We have not had a chance to make representations on them because we were not consulted on these aspects pre-application.

We are interested to know the observations of the transportation and roads team on these aspects.

Our concerns are set out below.

The proposed access to all the buildings of the London Wall West site for vehicles is via the ramp from Aldersgate Street to the Thomas More carpark that serves Seddon,

Mountjoy, and Thomas More Houses and Lauderdale Tower.

### **Construction phase**

The Construction and Environmental Management plan says on p 31

" It is assumed that the rear service yard will be restricted to construction traffic only from the commencement of the main demolition post museum closure and will remain restricted until the project's completion"

This is unrealistic.

The developer's proposed alternative for residential use of the car park is to use the entrance to Lauderdale Car park. But this is only accessible by small vehicles - and skilled drivers - and is only wide enough for a single vehicle on a steep ramp. Backing up to let vehicles through would involve backing onto Aldersgate Street at one end and round an 180 degree turn at the other. The entrance will not accommodate the City's waste lorries that remove rubbish or vans larger than a car.

p32 goes on to say

" Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however should only be utilised when absolutely necessary."

Data from 2017 from an audit of the Thomas More car park showed over 100 vehicle movements a day. The number of deliveries is likely to have increased since then.

About 33 of those a day were accounted for by residents with parking places. The others were contractors' vehicles for the estate and for residents and delivery vehicles. Access for these vehicles will be "absolutely necessary" many times in the day.

Such mingling of construction vehicles and residential and other non-construction traffic is, as the Construction report implies, unsafe.

### **During operation of the completed buildings**

The proposal is that all three new buildings - New Bastion House, the Rotunda, and the North building (plus Ironmongers) will be serviced via the ramp into Thomas More carpark. The service road from London Wall that exits onto the top part of the ramp currently will disappear.

The North building will not have enough space in its service area for vehicles to turn round so they will enter the area frontwards and have to backout onto the ramp (as shown in 23/01277/LBC) – which is against City policy

It is not clear whether and how the residents' use of the carpark will be reconfigured and there has been no consultation with residents or other stakeholders about this aspect of the plan.

The information in 23/01277/LBC shows that the areas of the carpark that

- Allow deliveries for residents to be unloaded
- house the electric vehicle charging points,
- provide parking for Mountjoy House,
- provide an emergency exit from the Girls School
- provide facilities for long term estate contractors

will no longer be available: the space will be a traffic route to the new buildings' service areas.

There is no information on the implications of this traffic on access for emergency vehicles to the flats.

The application envisages between 104 and 174 vehicle movements (depending on how many are consolidated) a day to service the three buildings. That is on top of the current level of vehicle movements from residents' vehicles and the Thomas More Carpark is the busiest in the Barbican (2017 figures showed about 100 vehicle movements a day).

The proposed new buildings on the London Wall West site are considerably larger than the existing buildings on the site - and will therefore have greater servicing needs - yet the access for servicing is much less than that available for the older buildings, and will have to share limited space with the existing residential traffic.

We would be interested in your observations.

Best wishes

Yours sincerely

Jane

Jane Smith

Chaire, Barbican Association planning subcommittee



Your ref:  
My ref: 23/08719/OBS

**Please reply to:** Allison Borden  
Tel No: [REDACTED]  
Email: [REDACTED]

Gemma Delves  
City of London  
PO Box 270, Guildhall, London EC2P 2EJ

**Town Planning & Building Control**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

22 February 2024

Dear Sir/Madam

#### TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

#### SCHEDULE

**Application No.:** 23/08719/OBS      **Application Date:**  
**Date Received:** 12.12.2023      **Date Amended:** 12.12.2023

**Plan Nos:** City of London Letter Dated 12 December 2023

**Address:** Development Site At London Wall West, Bastion House And Museum Of London,  
London Wall, City Of London, London

**Proposal:** Planning permission for the following (23/01304/FULEIA): Demolition of 140 and 150 London Wall to provide a phased development comprising: the construction 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 reconfiguration of the ironmongers' Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterer's 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 and hard and soft landscaping; and associated and ancilliary works, structures and highways works.

Listed Building Consent for the following: (23/01277/LBC): External alterations to existing highwalks at the Barbican Estate including the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, Shaftsbury Place, and London Walk Car Park, London EC2Y)

Listed Building Consent for the following: (23/01276/LBC): Demolition of Ferroners' House alongside alterations and facade and roof level of Ironmonger' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, Shaftsbury Place, and London Walk Car Park, London EC2Y)

Yours faithfully



**Deirdra Armsby**  
**Director of Town Planning & Building Control**

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



**Note:**

- 3f The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.





**From:**  
**To:**  
**Subject:** LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response  
**Date:** 29 February 2024 15:19:28

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

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[ ref:a0zTw0000000gvJIAQ;dff45c89e0cecb1c3f2a26704c4ed5d1:ref ]



Ms Gemma Delves  
Corporation of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: P01570341

5 March 2024

Dear Ms Delves

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LONDON WALL WEST, 140 LONDON WALL, 150 LONDON WALL,  
IRONMONGERS' HALL, SHAFTESBURY PLACE, LONDON WALL CAR PARK,  
LONDON, EC2Y (INCLUDING VOID, LIFTS AND STAIRS AT 200 ALDERSGATE  
STREET AND ONE LONDON WALL) LONDON EC2Y 5DN  
Application No. 23/01304/FULEIA**

Thank you for your letter of 27 February 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

London Wall West is the former site of the Museum of London, built in the 1960s as part of the Martin-Mealand Plan for the area north of St Paul's Cathedral that was largely destroyed by bombing during WW2. The proposals seek a mixed-use redevelopment of the site to include offices, a cultural hub and other ancillary uses.

Historic England considers that the proposals would cause some harm. As the designated heritage assets are of significance, your authority has a duty under national, regional and local planning policy to give consideration of this harm and give this 'great weight'. Your authority will also be expected to secure public benefits.

**Historic England Advice**

**The role of Historic England**

Historic England is the Government's advisor on the historic environment and has a statutory role in the planning process. Our role in this site is to assess the impacts on the Scheduled Monuments and on the wider historic environment including the setting of designated heritage assets. This letter only refers to the designated assets and matters related to non-designated archaeological assets are covered in separate correspondence from my colleague Helen Hawkins.



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## Significance of the area

### Post-war planning in the City of London

The City of London was heavily bombed during WWII and the area to the north of St Pauls was totally devastated. The Martin-Mealand Scheme (1955), drawn up between the City of London and London County Council, developed the concept of an integrated series of office towers along both sides of Route XI (London Wall). The buildings would follow a north-south axis to minimise overshadowing of the high-density residential development behind it.

The architects Chamberlain, Powell and Bon (CPB) were commissioned to prepare a scheme for an area along London Wall as part of the Martin-Mealand scheme in 1955. These early plans were modified and presented again in 1959 including designs for the Barbican Estate. Elements of the plan were redesigned and modified until the Barbican Estate was completed in 1982.

### The Barbican Estate

The Barbican is widely regarded as an icon of Brutalist architecture in Britain, heavily influenced by Le Corbusier and in particular his work at Unite d'Habitation in Marseille.

The hard and soft landscape elements form an integral part of the design of the Barbican, creating large civic and residential spaces referencing London's historic garden squares. CPB were keen to present a strong green character within a Brutalist environment. This included the public terraces focussed on the canals and at podium level spanning Beech Street, as well as the private balconies and gardens associated with individual residential units. Characteristic features, from the extensive use of brick slips to the built-in planters and window boxes unify the appearance of the Estate, with the textures, tones and colours of materials given careful consideration by the designers.

St Giles Church and retained sections of the Roman and Medieval city walls informed the layout of the entire estate and were carefully retained and integrated into the gardens, creating a '*ruin park*' as described in the Barbican and Golden Lane Conservation Area Appraisal. At the same time, elevated walkways provided vehicle-free connectivity throughout the Estate and to adjacent areas of the city while affording myriad views into and across the various public and private garden spaces.

The Barbican Estate is within a conservation area and listed Grade II with the associated designed landscape registered Grade II\*. Very few post-war designed landscapes are so highly graded and therefore, the significance of the hard and soft landscaping is particularly high and any impacts on it require very careful consideration.



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### Museum of London (MoL)

As the Martin-Mealand plan evolved, the site at the junction of Aldersgate Street and London Wall was identified for a museum to combine the collections of the former Guildhall Library, the London Museum and Royal Exchange. Powell and Moya, appointed in 1962, developed the site utilising some Brutalist principles but the result was never regarded as matching the success of the work by CPB. Bastion House, the tallest building on the site, is visible in local views as well river prospects from the Thames.

The Museum of London buildings were issued with a COI in 2019 which expires in 2024.

### Ironmonger's Hall

Ironmonger's Hall is the only livery hall to have been built during the interwar period in the City of London. Designed by the Surveyor to the Company, Sydney Tatchell, in a Tudor/Jacobean revival style, the western elevation was designed as the public face and entrance to the building. However, this view was impaired by the 1960's MoL development on Aldersgate Street. The livery hall was listed Grade II in 2023.

### St Giles Church

St Giles-without-Cripplegate was one of the few buildings in the area that survived the bombing raids of 1940. Constructed in the 16th century and incorporating an earlier tower, the church was refaced in the 19th century and substantially repaired after WWII. It is a significant heritage asset, listed Grade I and an important part of the setting of the Barbican Estate and vice versa. The existing towers on London Wall impact on its setting.

### St Botolph's-without-Aldersgate Church and Postman's Park

Originally the site of a Saxon church and rebuilt in the 14<sup>th</sup> century, St Botolph's was one of the few churches to survive the 1666 Fire of London. However, it was almost completely rebuilt in the late 18<sup>th</sup> century and substantially shortened at the east end with the remodelling of Aldersgate Street in the early 19<sup>th</sup> century. The brick elevations to the south and west form part of Postman's Park, the site of the former churchyard and burial ground.

Postman's Park opened in 1880 and expanded to incorporate other adjacent burial grounds. It has the character of a quiet green space a short distance north of St Paul's Cathedral. It contains several memorials and plaques including Watt's Memorial to Heroic Self Sacrifice. The church is the guild church to the Worshipful Company of Ironmongers and listed Grade I.



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Postman's Park is within a conservation area of the same name, and also contains the scheduled monument 'London Wall: section of Roman wall and medieval bastion in Postman's Park and King Edward Street'. This is almost entirely buried, with a small section visible in the lightwell of Nomura House.

### Scheduled Monuments

The immediate area of the development contains three scheduled monuments associated with the fort and city wall of Roman London. Elements date from the Roman, medieval and post-medieval periods, with surviving elements of re-fortification and bastion construction.

These include rare upstanding remains, visible in the public realm and forming a coherent group outlining the complete line of the western wall of the Cripplegate Fort. They demonstrate the scale of the fort and the city wall, showing varying construction methods and they speak to the evolution of the City of London over nearly two millennia.

- London Wall: section of Roman and medieval wall and bastions, west and north of Monkwell Square (known as Bastion 14)
- London Wall: the west gate of Cripplegate fort and a section of Roman wall in London Wall underground car park adjacent to Noble Street (known as the Fort Gate)
- London Wall: section of Roman and medieval wall and bastion at Noble Street (known as the Noble Street stretch of London Wall)

In addition, Goldsmiths' Hall is also a Scheduled Monument, protected for its high architectural and decorative opulence, and its function as centre of craft and guild activities. Furthermore, it still retains a function as the Assay Office, showing the longevity and importance of highly skilled crafts within the City of London.

### Strategic and local views

The London View Management Framework (LVMF) is adopted Supplementary Planning Guidance (SPG) issued by the Greater London Authority (GLA) to protect key views of Westminster World Heritage Site and St Paul's Cathedral from public spaces across the capital. The framework identifies key panoramas, river prospects and townscape views, known as designated views, where developments are required to make a positive contribution and consider their impact on foreground, middle ground and background views.

Bastion House, the existing tower on the MoL site, is visible in some of the river



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prospect views identified in the LVMF. It can also be seen in local views, some of which are from the banks of the River Thames.

Furthermore, the Barbican and Golden Lane Conservation Area Appraisal highlights *“the extraordinary, ever-changing combination of architectural volumes and voids seen on perambulations through the estates”*. It identifies a number of representative views, including some towards the application site from positions at St Giles Terrace, Lakeside Terrace, and Wallside and other sections of the highwalks. It makes clear that much of the visual experience is kinetic, fortuitous, and more complicated than a limited number of fixed viewpoints.

## **Proposals and their impact**

### The scheme

The proposals by Shepherd Robson with Diller Scofidio + Renfro are for the complete demolition of the post-war buildings on the site and construction of three new buildings of 17, 14 and 5 storeys for a mixed-use scheme that includes offices and a new cultural hub. The tallest element is equivalent in height to Bastion House.

### Impacts

The proposed height of the development means that it will have an impact on the settings of more distant designated heritage assets in key views of them

LVMF View 13.A Blackfriars Bridge and Millennium Bridge (downstream): Whilst the focus of the view is St Paul’s Cathedral, the Barbican Estate towers are also prominent and recognisable due to the distinctive silhouette of the projecting concrete balconies. They impact on views of the dome of the cathedral.

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

LVMF View 17B.1 Golden Jubilee/Hungerford Bridge (downstream): The footbridge provides enhanced views east towards the City of London and as a river prospect view, the Thames dominates the foreground. The spire of St Bride’s Church and the dome of the Old Bailey, both of which are Grade I, are distinctive vertical elements seen against the sky.

The proposals will impact on the unusual, ornate ‘wedding cake’ spire of St Brides,



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removing the clear sky from behind much of the lower tier, diluting the effect of the highly characterful silhouette. The visual impact of the proposals does cause harm to the Grade I listed building through development in its setting. In my view, it would be at the mid-range of the scale of less than substantial harm.

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

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

The proposed hard and soft landscaping will inevitably have a relationship with the Grade II\* garden and be legible as an extension to it. The proposals should be informed by the registered landscape. The proposal is for a contemporary landscape scheme rich in biodiversity. However, the success of the relationship between the new landscaping and that of the Grade II\* landscape will depend on the quality and detail of the scheme.

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





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

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

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

#### The scheduled monuments of London Wall

It is not yet possible to fully determine the physical impact of the works on the monuments referred to as Bastion 14 and the Fort Gate in the absence of a detailed demolition and construction methodology and all services plans. Additionally, a plan for protection of the upstanding remains of these monuments will need preparation.

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

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

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

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



a planted swale as part of the site drainage strategy.

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

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

Bastion House and the Museum of London do currently compromise the setting, however, the increased mass and the loss of some of the clear space between the monument and the new building must be considered harmful. This must be weighed against any public benefits which might accrue, such as the provision of increased on-site interpretation and information.

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

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

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

Should you be minded to grant planning permission for this application, the works would also require scheduled monument consent for the monuments referred to as Bastion 14 and the Fort Gate. We would seek reassurance about the physical protection to the monuments, archaeological supervision of all works in the vicinity and the provision of substantial high-quality interpretation and extensive public access.



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With such reassurance, we would be likely to recommend to the Department of Culture, Media and Sport that consent be granted, subject to detailed conditions pertaining to the protection and enjoyment of the monuments.

#### The scheduled monument of Goldsmiths' Hall

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

#### **Policy**

The 1990 Planning (Listed Buildings and Conservation Areas) Act makes it a statutory duty for a planning authority to give special regard to the desirability of preserving listed buildings or their setting (section 16 and 66) when making decisions which affect them.

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2023 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.201). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.205). Clear and convincing justification should be provided for any harm caused (para.206), and any harm should be weighed against the public benefits of the scheme (para.208).

The Department of Culture, Media and Sports 2013 Policy Statement of 'Scheduled Monuments and Nationally Important but non-scheduled Archaeology' sets out governments position on the importance of protecting and presenting scheduled monuments, (see paragraphs 20 and 21 particularly) and should be considered regarding this planning application.

The strategic policy framework for London is set out in the London Plan. Its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance and appreciation, and to avoid harm. It justifies this by explaining the unique sense of place created by London's historic environment, and the irreplaceable nature of its heritage assets.

The London View Management Framework (LVMF) is a piece of Supplementary Planning Guidance (SPG) published by the Greater London Authority (GLA) in support of policies in the Mayor of London's 'London Plan' 2021. It is a material consideration



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in all planning decisions that relate to the designated views it identifies which focus on the Westminster WHS and St Paul's Cathedral.

The City of London Local Plan, adopted in 2015, includes policies which seek to protect:

- the Historic environment (CS12) including policies to protect gardens and open spaces (DM12.5);
- Protected Views (CS13)

and only allow tall buildings in suitable locations (CS14).

The Barbican Listed Building Management Guidelines (an adopted SPD) includes a volume on landscaping which provides a summary of significance as well as detailed assessment of character by zones.

### **HE position**

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

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

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

The interface between the proposed Northern Garden and the existing City of London School for Girls site requires careful consideration. The detailed designs should aim to preserve perceptible separation that enables appreciation and interpretation of the evidential and historical value of the service yard/car park underneath as functional elements of the Barbican Estate. At the same time, I would urge you to consider additional enhancement of the landscaped areas around Thomas More Highwalk, St Giles Terrace, and the City of London School for Girls sports ground where there are



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opportunities for improvement.

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

## Recommendation

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

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

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

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

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

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we



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Historic England

recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas  
[REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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**From:**  
**To:**  
**Subject:** RE: Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 06 March 2024 16:50:00  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

Thank you for your re-consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** lpalondonwallwest  
**Sent:** 27 February 2024 14:15  
**To:** lpalondonwallwest  
**Subject:** Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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**From:**  
**To:**  
**Cc:**  
**Subject:** RE: Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 15 March 2024 16:02:59  
**Attachments:** [image001.png](#)

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THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Thank you for your e-mail.

After reviewing the documents I can't see any relevant documents that changes our previous comments dated 19 December 2023. Therefore our water capacity condition still stands and we have no further comments to make.

Kind Regards,

**Saira Irshad**

Development Database Administrator

Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ



It's everyone's water

---

**From:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>  
**Sent:** Thursday, March 14, 2024 3:55 PM  
**To:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>  
**Cc:** Delves, Gemma  
**Subject:** Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

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Dear Consultee/Contributor,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall,

Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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Good Growth

Gemma Delves  
City of London Corporation  
By Email

**Our ref:** 2024/0150/S1  
**Your ref:** 23/01304/FULEIA  
**Date:** 15 March 2024

Dear Gemma Delves

**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 14 March 2024 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 reconsulted on the application under following category of the Mayor of London Order, as the site boundary encroaches into a small section of the Postman's Park Conservation Area:

**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 meters of floorspace for class B1 (business)”*

I have assessed the details of the application and, given the scale and nature of the proposals, conclude that the amendments do not give rise to any new strategic planning issues.

City Hall, Kamal Chunchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

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

Therefore, 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



Gemma Delves  
Corporation Of London  
Development Plan  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2023/136521/03  
**Your ref:** 23/01304/FULEIA  
**Date:** 18 March 2024

Dear Gemma,

**London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (Including Void, Lifts and Stairs at 200 Aldersgate Street and One London Wall) London EC2Y 5DN.**

**Demolition of 140 & 150 London Wall to Provide a Phased Development Comprising: The Construction of New Buildings for a Mix of Office (Class E(G)), Cultural Uses (Sui Generis) and Food And Beverage/Cafe (Class E(B)), Access, Car Parking, Cycle Parking and Highway Works Including Reconfiguration of the Rotunda Roundabout, Part Demolition and Reconfiguring of the Ironmongers Hall (Sui Generis), Creation of a New Scheduled Monument Viewing Area, Public Realm Alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; Removal of Two Highwalks Known as Falcon Highwalk and Nettleton Court; Alterations to the Void, Lifts and Stairs at 200 Aldersgate Street and One London Wall, Introduction Of New City Walkway.**

Thank you for reconsulting us on the above planning application. There are no constraints within our remit at this site and based on a review of the newly submitted information, we have **no further comments** on the application, and reiterate the following advice.

### **Advice to LPA**

#### **Use of Sustainable Drainage Systems (SuDS)**

Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 167 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

Cont/d..

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

### **Advice to applicant**

#### **Water Resources**

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

#### **Commercial/Industrial developments**

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

#### **Final comments**

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Yours sincerely,

**Harry Scott**  
**Planning Advisor**

E-mail: [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk)

Tel: 02030251774

**From:**  
**To:**  
**Subject:** LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response  
**Date:** 19 March 2024 08:40:33

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ ref:a0zTw0000000gvJIAQ;b3c56f02f4a11e1e428c463b924b69e0:ref ]

Gemma Delves  
Development Division  
Corporation of the City of London  
*Sent via email only*

25 March 2024

Dear Gemma,

**Re: London Wall West (ref: 23/01304/FULEIA)**

I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the proposals for the London Wall West scheme.

Please note, to our understanding the scheme has not substantively changed since the last round of pre-application consultation with the Cathedral, or through the rounds of re-submission that have been undertaken since later 2023. As such, the comment below is principally formalised from our pre-application response issued in April 2023 and refined for the late 2023 submission.

**Planning Policy Context**

A number of key policies are relevant to this proposal in relation to the Cathedral. These are drawn from the adopted City of London Local Plan 2015, the London Plan 2021, and the National Planning Policy Framework. We have also given consideration as to the emerging draft City Plan 2040 (previously City Plan 2036). Whilst a broad range of policies are relevant, particular consideration is given to those concerning protection of the historic environment and tall buildings.

The key policies relevant to the impact of the emerging proposals on the Cathedral are summarised below:

City of London Local Plan 2015:

- Core Strategic Policy CS10: Design
- Policy DM 10.1 New Development
- Policy DM 10.4 Environmental Enhancement
- Core Strategic Policy CS12: Historic Environment

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Policy DM 12.1 Managing change affecting all heritage assets and spaces

Core Strategic Policy CS13 Protected Views

Core Strategic Policy CS14 Tall Buildings

The City's Protected Views SPD is of course also of relevance.

One of the particular points of emphasis within the Emerging City Plan 2040 – and as directed by the GLA – is the correct and suitable placement of tall buildings. The spirit and detail of these emerging policies therefore has some weight and relevance for this application.

The London Plan 2021:

Policy D1: London's Form, character and capacity for growth

Policy D4: Delivering Good Design

Policy D9: Tall Buildings

Policy HC1: Heritage Conservation and Growth

Policy HC3: Strategic and Local Views

Policy HC4: London View Management Framework (the LVMF SPG is also of relevance)

National Planning Policy Framework:

Chapter 12: Achieving well designed places

Chapter 16: Conserving and enhancing the historic environment

Comment

Overview of Consultation

The developer team has had a number of helpful consultation meetings with the Cathedral regarding emerging proposals for the redevelopment of London Wall West (including Bastion House). We welcome their co-operative attitude and the open nature of these meetings and thank the developer team for the further information issued to the Surveyor's Office. This letter does not seek to reiterate previous consultation responses issued by the Cathedral, but to consolidate our feedback from our meeting held 22 February 2023 including commentary in response to the additional information received to date.

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## Discussion

### Visual & Heritage Impact

We welcome the visual assessment offered by the developer team during the pre-application period, which allowed a focussed discussion on heritage significance, setting and visual impact. The additional views information provided during this process has been helpful in assisting our understanding of the scheme and related impacts.

As discussed, our concerns lie with the views from the south of the Cathedral, for example from Bankside, taken from the viewing plaque in front of the Tate Modern. The additional information provided at pre-application stage (in the form of the kinetic view) was helpful in understanding the rationale behind the viewpoint selection as manifested in the application material: the view appears to show the visual change at its greatest extent.

Within this view, a portion of the proposed development will be visible above the skyline of the Cathedral. We appreciate that a small part of the existing roof of Bastion House is currently visible in this location. However, we understand that the proposals would cause an increase in visible built form in this view. This is regretted and we have asked if the current harm should not be removed as City policy generally seeks to achieve.



Existing view (zoomed)

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Proposed view (zoomed)

The scheme – which is removing the structural form of Bastion House – is an opportunity to remove the visible harm of the structure that currently appears above St Paul’s. This would be an opportunity for heritage enhancement, removing a detracting element that would increase the ability to appreciate the significance of the Cathedral.

We welcome the design development information illustrating how potential impacts to the Cathedral have been taken into account during the design process and ameliorated (see pages 76 and 78 respectively). Unfortunately, even with the reduction of Bastion House height (see ‘operation 3 on pg. 78) we understand from our pre-application discussions and review of the TBHVIA that the scheme proposes an increase in development in the view from the south bank near the Tate.

We also note the Millennium Bridge view where there are (continuing) impacts and (minor) harms. We concur with Historic England’s formal evaluation of the issue. We note that in the Tavernor rebuttal there is no engagement with the actual point at issue, which is that there is harm. In our view Tavernor should properly evaluate this harm – and officers should acknowledge and take this into their weighting. In the event that a consent is granted, then there of course must be a proven public benefit and/or balancing planning obligations.

While we accept that these harms are minor (and less than substantial), any increase in detracting elements has the potential to affect how the significance of the Cathedral is appreciated. These impacts across the City

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are incremental and accumulate – in some views quite rapidly over time to the detriment of the policy objective and setting. For instance, within views from Bankside the prominence of the Cathedral is apparent, and the skyline of the building (above the balustrade) is an important part of how its significance as a historic landmark is understood.

The additional information discussed at the pre-application meeting, provided via email (but it seems not fully referenced in the application pack) notes that the removal of visual change above the parapet of the Cathedral was in fact possible, but would necessitate the loss of development area. We understand there is likely a viability case behind this (that will have also influenced the appearance of the scheme in views from Millenium Bridge), but wish to stress that a full options appraisal and associated viability calculations need to be clearly and concisely offered to evidence the case for this increase in harm. While options are discussed in the application material in the DAS and Chapter 3 of the ES (along with other elements of design development) it would be very useful for us to have sight of how this particularly relates to the harmful element in question – or be directed to it in the extensive application material.

The additional information provided at pre-application stage also included a number of elements marked as “TBD” – mainly in relation to roofscape and plant. These are not clearly noted within the TBHVIA or design report. We would encourage the design team to ensure that these measures presumably to be conditioned, do not further the visual change and potential heritage impact and strongly urge these to be resolved as part of this application. Even so, we would also seek to be notified and engaged at discharge of condition stage if these elements are to be resolved post-submission.

During pre-application discussion we also noticed some loss of the view of the Ball and Cross from within the Barbican estate. This has been borne out by the submission scheme (See view 26 within the Barbican Estate: Thomas More Highwalk terrace, west end, overlooking tennis courts). We understand the design team’s view that these are incidental, unplanned views of the Cathedral (of which there are many). However, the visibility of the ball and cross, the very pinnacle of the Cathedral, is nonetheless linked to the historic interest of the Grade I listed building as a focal point on the London skyline. There is a very low level, residual harm in the loss of these views that we urge should be taken into the weighting process.

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Existing



Proposed

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 **St PAUL'S**  
CATHEDRAL

## Cultural Programming

For completeness, we reprise here the considerations we wrote at pre-application stage.

The aspiration of the scheme to include a flexible cultural offering as central to the proposals and a core element in the ‘public benefits’ which support the development, is welcome. We would also welcome further discussion about how the Cathedral could be involved in such spaces, especially given the obvious visual and experiential link between the proposed development and St Paul’s.

New development in the setting of the Cathedral often includes reference to cultural offerings to St Paul’s and the wider City. However, in our experience this may get diluted in scope from consultation onwards, through to any eventual scheme as constructed and operated. As such, we would strongly recommend that this cultural offering is enshrined within the application to a greatest extent possible under formal planning conditions, obligations and S106 agreement(s).

We understand some of the limits of the planning system with regard to controlling this ‘public benefit’ long term. However, we would encourage the developer team to “front-load” any application with this information and be pro-active in seeking planning obligations and Section 106 agreements that directly relate to this cultural provision and links to other forthcoming schemes such as the St Paul’s Gyrotory and the City of London Culture Mile. Given our discussion, we assume the developer team is minded to pursue this avenue – however not to re-iterate our support of this approach within this letter would be a missed opportunity.

We would therefore take this opportunity to offer a number of requests for the cultural programming in any forthcoming application:

- Any planning approval should require absolute confidence in the enduring delivery of the cultural programme. The mechanisms for this delivery should be as clearly defined as possible, especially in terms of the quantum of funding, how funding would be calculated, who would be responsible for sustaining the funding and the duration of funding.

- As such, the strategic aims and objectives of the cultural programme should be carefully considered. Objectives and detailed management policies should be SMART – specific, measurable, achievable, realistic and time-bound.
- The planning approval, when granted, should include a clearly defined requirement to commit to delivering the cultural programme, with a clear statement of competence (including an agreed definition of roles and responsibilities) for those that would be involved in delivery.
- There should be a clear mechanism for monitoring the efficacy of the cultural programme. This should involve monitoring the outcomes of the programme against the specific aims and objectives discussed above. This is crucial as it will quantify how the scheme delivers a “public benefit” that will evolve and grow over time. This is especially important given that we have identified a level of harm to the significance of the Cathedral, a Grade I listed building which the programme is being offered up as a balancing benefit.
- We also request that in an approval there is an ongoing commitment to measured engagement. This should be reflected in the governance structures of the cultural project. An option to ensure this would be a forum, which the Cathedral would be pleased to take part in if invited.

## Conclusion

We commend the developer team for their approach to consultation and to the material provided at pre-application stages. We also seek to re-assure the team that we have no objection in principle to the scheme, welcome the cultural offering proposed, and wish to explore the opportunities for the Cathedral to be a part of this moving forward.

As noted above, we have concerns over the effective increase of the visual impact of Bastion House in a number of views of the Cathedral from the south and the associated heritage impacts. The applicant’s rebuttal of these concerns appear to be unduly dismissive and we invite officers to maintain an objective clarity in reporting on these matters. In our opinion, these changes do cause a material degree of harm to the significance of this Grade I listed heritage asset. As yet, we note that there has still to be a clear and evidenced demonstration that a ‘no harm’ option has been drawn and evaluated.

Surveyor to the Fabric

Given this harm, it is crucial that the public benefits of the scheme, as promoted by the project team, are tangible and deliverable. As such, we have included a series of recommendations for the effective delivery of the cultural programme and other obligations, which includes the meaningful involvement of the Cathedral where we can assist.

We therefore hope that this is a letter of comment that strengthens the shared aims of the Cathedral and the City.

Yours sincerely,



Surveyor to the Fabric  
cc: Tom Nancollas: Interim Assistant Director (Design), City of London Corporation

Rebecca Thompson: Director of Property, St Paul's Cathedral

**Directors:**

Oliver Caroe RIBA AABC  
Mark Hammond RIAS RIBA AABC

**Associates and Designers:**

Touseer Ahmad RIBA AABC CEPH  
Matthew Cox RIBA CA MAPM  
Andrew Senior ARP

Surveyor to the Fabric



Caroe Architecture Ltd. is a company limited by guarantee, registered in England & Wales: registered number 06927269; Lewis House, Great Chesterford, Essex CB10 1PF





Your ref:  
My ref: 24/01358/OBS

**Please reply to:** Nikki Mitchell  
Tel No: [REDACTED]  
Email: [REDACTED]

Gemma Delves  
City of London  
PO Box 270, Guildhall, London EC2P 2EJ

**Town Planning & Building Control**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

26 March 2024

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING ACT 1990**

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

**SCHEDULE**

**Application No.:** 24/01358/OBS                      **Application Date:**  
**Date Received:** 27.02.2024                      **Date Amended:** 27.02.2024

**Plan Nos:** Letter from City of London dated 27 February 2024.

**Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers Hall, Shaftesbury Place, London Wall Car Park, City Of London, London,

**Proposal:** Planning permission for the following (ref. 23/01304/FULEIA):

Demolition of 140 and 150 London Wall to provide a phased development comprising of 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 and hard and soft landscaping, and associated and ancillary works, structures and highways works.

Yours faithfully

[REDACTED]

**Deirdra Armsby**  
**Director of Town Planning & Building Control**



**Note:**

- 3f The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.





Historic England

Gemma Delves  
Environment Department  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

Your Ref: 23/01304/FULEIA  
Our Ref: 218209

Contact:  
Helen Hawkins



2<sup>nd</sup> April 2024

Dear Ms Delves,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2021**

London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Recommend Four Archaeological Conditions**

Thank you for your consultation received on 12<sup>th</sup> December 2023.



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The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

### Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

London Wall West is located just to the north-west of the Roman and medieval city walls and Roman fort. Parts of the Scheduled walls are included within the site boundary. A Jewish cemetery of possibly 11th century date extends partially onto the north-east area of the site, within the Barber Surgeon's garden and beneath Bastion House. This formed the only Jewish cemetery in England until 1290 when the Jews were expelled. No evidence for the cemetery is visible above ground. Jewish law strictly forbids the disturbance or excavation of Jewish graves.

This response relates solely to non-designated archaeological issues. Impacts on designated assets, including the Scheduled Monuments and their settings, will be covered by our Development Advice Team who will respond separately.

The submitted ES includes a chapter for archaeology and also a baseline report has been provided as an appendix (Appendix 15). The results of the pre-determination archaeological evaluation have been provided to GLAAS separately rather than submitted with the planning application, but MOLA have confirmed that the results of the evaluation have been used to assess the archaeological potential of the site and are included in the ES where relevant. The evaluation report should be submitted as part of any necessary ES revisions or updates.

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



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

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

A small area to the north of Bastion House, in the north-east part of the proposed development and including the Barber Surgeon's Garden, incorporates a small part of the projected extent of the Jewish cemetery. No construction work is proposed in this area and the archaeology baseline states that the landscaping work here will be carried out through ground that has been raised by 1m in height.

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



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

The anticipated Roman, medieval and post-medieval archaeology which may survive elsewhere on the site is likely to be of low-moderate significance and, in places, very truncated. This archaeological potential can therefore be mitigated through the use of planning conditions. A full programme of public benefit, which includes opening up access to the Roman west fort gate, currently located in the underground car park, is proposed. The proposals also include new interpretation for the City walls, an exhibition space and digital and artistic interpretation of the heritage of the site. It is unfortunate that the information from the cultural strategy, which was submitted with the ES, was not included within the archaeology mitigation proposals within the ES as this would have usefully demonstrated the benefits of public access to this formerly hidden monument. An assessment of the public benefit should be included in any ES

### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

### Recommendations

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



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

I therefore recommend attaching four archaeological conditions as follows:

**Condition 1** No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

**Informative** Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

**Condition 2: Preservation - protection**



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No development shall commence until details of fencing, signage and other control measures to protect the part of the Jewish Cemetery that may extend onto the site have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of operational works.

Informative: A plan of the relevant area should be produced and approved by GLAAS. This plan should then be incorporated into all relevant method statements, including but not limited to landscaping, new services, SUDs and the Construction Management plan. The area shown on the plan should also be approved by the CPJCE.

### Condition 3: Foundation Design ...

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. This submission will be informed by the Stage 1 evaluation. The development shall be carried out in accordance with the approved details.

### Condition 4: Public Engagement

No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.

Informative: Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

#### Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and



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preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Further evaluation should be carried out on the site once more access to the different areas is available. The results of the evaluation will feed into the mitigation design, which is likely to comprise excavation and watching briefs.

## Public engagement

Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained will be communicated, in addition to formal publication and deposition of the archive, through display of the fort remains, new interpretation for the walls and a permanent exhibition. The archaeology could also inform site design and public art.

## Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

An archaeological watching brief should be carried out during foundation removal in Bastion House. This is likely to also require attendance by a member of the CPJCE in order to confirm that no Jewish burials survive in this area.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



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**From:**  
**To:**  
**Cc:**  
**Subject:** RE: Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 03 April 2024 09:11:17  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good morning,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the façade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Thank you for your re-consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** lpalondonwallwest

**Sent:** 14 March 2024 15:55

**To:** lpalondonwallwest

**Cc:** Delves, Gemma

**Subject:** Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee/Contributor,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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Your ref:  
My ref: 24/01717/OBS

**Please reply to:** Nikki Mitchell

Tel No: [REDACTED]

Email: [REDACTED]

Gemma Delves  
City of London  
PO Box 270, Guildhall, London EC2P 2EJ

**Town Planning & Building Control**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

3 April 2024

Dear Sir/Madam

#### TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

#### SCHEDULE

**Application No.:** 24/01717/OBS

**Application Date:**

**Date Received:** 14.03.2024

**Date Amended:** 14.03.2024

**Plan Nos:** Letter from City of London dated 14 March 2024.

**Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers Hall, Shaftesbury Place, London Wall Car Park, City Of London, London,

**Proposal:** Planning permission for the following (ref 23/01304/FULEIA) Demolition of 140 and 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 and hard and soft landscaping; and associated and ancillary works, structures and highways works.

Listed Building Consent for the following (23/01277/LBC): External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y) Listed Building Consent for the following (23/01276/LBC):

Demolition of Ferroners House alongside external alterations to the facade and roof level of Ironmongers Hall, internal reconfiguring to cores and back of house areas and

associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Yours faithfully

  
**Deirdra Armsby**  
**Director of Town Planning & Building Control**

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
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- The terms 'us' and 'we' refer to the Council as local planning authority.





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- The terms 'us' and 'we' refer to the Council as local planning authority.



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**From:** [Active Travel England Planning](#)  
**To:** [lpalondonwallwest](#)  
**Subject:** LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response  
**Date:** 13 December 2023 16:29:18

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ ref:a0zTw0000000gvJIAQ;1645970a932a10efb55221c697112dee:ref ]

**From:** [Location Enquiries](#)  
**To:** [lpalondonwallwest](#)  
**Subject:** RE: Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 20 December 2023 16:55:38  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>

**Sent:** 12 December 2023 16:25

**Subject:** Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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[www.thegardenstrust.org](http://www.thegardenstrust.org)

[margiehoffnung@thegardenstrust.org](mailto:margiehoffnung@thegardenstrust.org)

22<sup>nd</sup> December 2023

Research - Conserve - Campaign

The City of London Corporation  
Guildhall  
PO Box 270  
London EC2P 2EK  
[plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk)

Dear Sir or Madam,

**Ref : 23/01276/LBC - Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y); Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA**

**23/01277/LBC - External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y); 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y**

**23/01304/FULEIA - Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway; London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN**

Thank you for consulting The Gardens Trust (GT), in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. We have liaised with our colleagues in the London Parks & Gardens Trust (LPG) and their local knowledge informs this joint response.

We are considering all three of the above applications together and it is apparent that care has been taken to delineate the new landscape from the Barbican, whilst using an existing architectural feature to connect the walkway to Mount Joy House which is in line with the original design ethos of the estate, connecting walkways and social spaces.

We are supportive of the proposal to mediate between the Barbican Estate and the new environment, both being respectful to each other, but not perpetuating undesirable conditions; in particular the proposals at Highwalk and garden levels, where the uses and design are more focused on quiet activities, contemplation, and the enjoyment of the landscape itself. We are also supportive of the

proposal to create a continuous garden connector which both creates new garden spaces, and stitches together existing green space with enhanced accessibility between all public levels of the site.

Finally, we would like to endorse the landscape proposals by Nigel Dunnet, even though the landscape planting character has clearly changed over the decades since its inception. One thing we would like to suggest, however, is the creation of a garden maintenance plan for the Estate as there is a lot of new planting. Introducing a new set of 'gardens' comes with responsibility and its ultimate success lies with careful maintenance in the future.

Yours sincerely,

Margie Hoffnung  
Conservation Officer



Historic England

Gemma Delves  
Environment Department  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

Your Ref: 23/01276/LBC  
Our Ref: 218204

Contact:  
Helen Hawkins



5<sup>th</sup> January 2024

Dear Ms Delves,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2021**

**Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA**

*Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).*

**Recommend No Archaeological Requirement**

Thank you for your consultation received on 12<sup>th</sup> December 2023.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and made available in connection with this application, I



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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Correspondence or information which you send us may therefore become publicly available.



conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77190] City of London APA

Although the area for demolition is located in an area of known archaeology, the basement of Ferroner's House and the loading bay have already been excavated to c 11.50m OD, which is likely to have removed the majority of any archaeological remains in this area. No development outside the footprint of the previous building is proposed and therefore the proposed development is unlikely to have an impact on archaeology of significance.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001

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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



# SOUTHWARK COUNCIL

LBS Registered Number: 23/OB/0074

Date of issue of this decision: 08/01/2024



www.southwark.gov.uk

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LBS Reg. No.: 23/OB/0074

Date of Issue of Decision: 08/01/2024

Your Ref No.:

---

Applicant Gemma Delves  
City of London

## **NO COMMENTS made in reference to your consultation on the following development:**

Planning permission for the following (ref. 23/01304/FULEIA): Demolition of 140 and 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 Plaisterer's 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 and hard and soft landscaping; and associated and ancillary works, structures and highways works.

Listed Building Consent for the following (23/01277/LBC): External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Listed Building Consent for the following (23/01276/LBC): Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

At London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One

## DECISION NOTICE

**LBS Registered Number:** 23/OB/0074

**Date of issue of this decision:** 08/01/2024



[www.southwark.gov.uk](http://www.southwark.gov.uk)

London Wall).

In accordance with your letter received on 19 December 2023 and supporting documents.

Signed: *Stephen Platts*

Director of Planning and Growth



Ms Gemma Delves  
Corporation of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: [REDACTED]

Our ref: **W:** L01570344

22 January 2024

Dear Ms Delves

### **Arrangements for Handling Heritage Applications Direction 2021**

**LIVERY HALL IRONMONGERS' HALL SHAFTESBURY PLACE LONDON EC2Y 8AA**

**Application No. 23/01276/LBC**

Thank you for your letter of 19 December 2023 regarding the above application for listed building consent made by your authority. On the basis of the information available to date, we do not wish to offer any comments. We suggest that this application should be determined in accordance with national and local policy guidance and that you seek the views of your specialist conservation adviser.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas



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*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

**By email only**

City of London Corporation

Direct Dial: 020 7650 1232

Your Ref: 23/01304/FULEIA,  
23/01277/LBC and 23/01276/LBC

Our Ref: RGA/LEL/00575807/1

Date: 31 January 2024

Dear City of London Corporation

**Proposed development of “London Wall West” site (application references 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC)**

We act for the Barbican Association, on behalf of Barbican Quarter Action (“BQA”). BQA, an unincorporated association formed to campaign for environmentally, ethically and socially responsible decision-making for the built environment in the City of London, strongly opposes the proposed “London Wall West” development and objects to the planning and listed building consent applications referred to above.

Please find enclosed a detailed objection prepared on behalf of BQA by CarneySweeney, along with the following appendices:

- Appendix A: BQA letters submitted to the CoLC at pre-application stage
- Appendix B: Embodied Carbon Review by Targeting Zero
- Appendix C: BQA review of DAS by Jan-Marc Petroschka
- Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka
- Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw
- Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Horne
- Appendix G: Planning Policy Review table by CarneySweeney

Separately, our clients have also asked us to express their concern regarding the ongoing technical issues with the Corporation's planning webpage, which periodically ceases to allow representations to be uploaded. Please confirm that the Corporation will investigate this issue as a matter of urgency and accept representations beyond today's advertised deadline.

Yours faithfully



**Leigh Day**

Enc

Our reference: CSL287

31 January 2024

**Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC**

**London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall), London EC2Y**

1. We have been instructed by the Barbican Quarter Action Group (“BQA”) pursuant to the following planning applications pertaining to the development of London Wall West; Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC (herein referred to as “the LWW Proposals”) on a site which comprises the current home of Bastion House and the Museum of London at 140 – 150 London Wall, EC2 (herein referred to as “the LWW Site”).
2. This statement sets out BQA’s concerns and objections to date to these planning applications. The planning application documentation is extensive and detailed and so BQA may submit further comments. They will, however, not procrastinate in this regard, and will ensure that any follow up comment is submitted as soon as they are able. In addition and notwithstanding, the comments below refer to the inadequacy of some of the planning application documentation, and so BQA will wish to review and comment on any further amended documentation submitted to rectify these inadequacies.

**Background to the Proposed Development**

3. Since the announcement in 2015 that the Museum of London would be moving, the LWW Site has been under consideration by the City of London Corporation (“CoLC”), the landowner of the LWW Site, for redevelopment and regeneration. Most significantly, the LWW Site had previously been considered for the Centre of Music for the Barbican London Symphony Orchestra (LSO), the Barbican Centre and the Guildhall School of Music and Drama (and it was in this context that the application for the Certificate of Immunity from Listing was made – see paragraphs 17-18 below) but these proposals were cancelled by the CoLC in February 2021 due to the impact of Covid-19 and the announcement by LSO’s conductor, Simon Rattle, one of the main driving forces behind the project, that he was leaving the organisation

*Public Consultation on the Emerging Proposals: May 2021 – June 2022*

4. In May 2021 early engagement with various stakeholder groups was conducted by the CoLC and later in December 2021 a consultation document was published by the CoLC Property Investment



Board setting out their emerging vision and plans for the LWW Site. The report - The Future of London Wall West (December 2021) begins by setting out what are considered to be the current limitations of the LWW Site, as well as the challenges in relation to the difficult to navigate public realm and the lack of access to the historic Roman Wall on site. The report notes that Bastion House and the Museum of London site are at the end of their design lives and no longer fit for purpose. The report further advises that studies were undertaken to assess the case for refurbishment, extension or partial redevelopment but that a full redevelopment of the LWW Site (with a responsible approach to re-purposing and re-using existing materials on site alongside highly sustainable design standards) would be the best approach. The report did not, however, provide any greater detail on the studies or the types of uses considered in relation to refurbishment and the BQA later submitted a Freedom of Information Act (“FOIA”) request in February 2022 to obtain details of the structural report and carbon assessment that was directly referenced in the December 2021 consultation. The FOIA included a request for environmental information under the Environmental Information Regulations 2004 (“EIR”).

5. The initial design concepts for the LWW Site consulted on in December 2021 revolved around the vision to make a *“vibrant, thriving, inclusive and sustainable place that the City can be proud of”*. A number of key benefits that the development could deliver were identified with the intention that these would align with the CoLC planning policies as set out in the emerging draft City Plan 2036, the Culture Mile Look & Feel Strategy and the Square Mile: Future City document as well as the CoLC Climate Action Strategy 2020 – 2027 which was adopted in 2020. The consultation document stated that such intended benefits include: Celebrating culture and the City’s heritage; Creating a sense of community; Creating new public spaces for people to enjoy; Meeting modern sustainability standards; Creating stunning architecture; and Delivering a range of high quality office spaces. In terms of land uses, there was no explanation as to the approach to potential land uses, other than to advise that the inclusion of flexible, high quality office space was in line with the draft City Plan 2036 which confirmed that a good supply of modern, sustainable office accommodation was needed to meet the needs of the City’s commercial occupiers and to keep pace with growing business needs.
6. Comments resulting from this consultation were later reported by the CoLC in their ‘London Wall West – Public consultation Round 1 Feedback Report’ and were considered by the CoLC to be focussed on a number of themes:

Height and massing of the buildings and the impact on light, views, security and footfall;

The demolition of existing buildings and associated embodied carbon;

The demand for new office space;

Walking and cycling routes; and

Maintaining access to the highwalks and fixing the lifts around the site.



7. Having reviewed all feedback given from the December public exhibitions the City Surveyors on behalf of the CoLC (as future applicant) launched a second public consultation in June 2022 on their developing plans for the LWW Site and several pop-up events and a further public exhibition were held. A key criticism raised by the BQA is that this consultation (as with the earlier December 2021 consultation) focused on a single option for redevelopment of the LWW Site and did not present any alternatives.
8. The CoLC June 2022 consultation pack set out the intention to deliver approximately 40,000sqm of new office space alongside affordable workspace and maker space, community and learning space for a variety of functions, new café and restaurant spaces, cultural spaces including for exhibitions, lecture/auditorium spaces along with a new 'culture cap' with views of St. Paul's Cathedral alongside a series of new interconnected landscaped open spaces and public realm. Information was also provided on the types of open spaces proposed, the culture, learning and community offer, the sustainability and energy strategy for the project and how the office space will meet current needs.
9. The consultation pack set out the design approach to the LWW Proposals and how the scheme would fit into the wider area; intended traffic safety improvements, new routes and improvements to the existing highwalks network alongside details of the proposed massing of the new buildings and the townscape and microclimate considerations. The proposed three new buildings were referenced in the consultation material as follows:
  - New Bastion House – at 17 storeys (86.7m AOD) and c. 38,000sqm – equivalent in height to the existing Bastion House;
  - Rotunda Building – at 14 storeys (75.3m AOD) and c. 31,000sqm – approximately 20m lower than the adjacent 200 Aldersgate Street; and
  - Northern Building – at 5 storeys (39.6m AOD) and c. 3,500sqm.
10. This second stage of consultation was supported by an interim Whole Life Carbon Assessment report dated May 2022, commissioned by the CoLC for consultation with stakeholders, and which was stated to provide a qualitative assessment of the existing buildings on the LWW Site along with a quantitative study of the carbon impacts of two tested development scenarios; Option 1 - which retains some of the existing building fabric and creates new development through new and retained building fabric and Option 2 - which is for the full demolition of the buildings on site and erection of new buildings. The BQA highlight that despite their earlier FOIA/EIR request made in February 2022 to obtain details of the structural report and carbon assessment that was directly referenced in the December 2021 consultation, this assessment was released by CoLC instead.
11. The Whole Life Carbon Assessment ("WLC Assessment") concluded that Bastion House could be retained as offices as a short- term solution but that the current building contained many considerable limitations including floor to floor heights, poor lift provisions, outdated fire safety



standards and poor energy performance. Bastion House was also identified as having several structural issues including the risk of disproportionate collapse, fire integrity and carbonation.

12. Due to the above, the WLC Assessment considered that a change of use to residential accommodation would be unfeasible and unviable. The Museum of London building was also deemed to be heavily constrained in design, structural and engineering terms) with similar issues relating to disproportionate collapse) giving limited scope for adaption to other uses. Overall, the assessment concluded that on a per-square metre basis Option 2 performed 10% better than Option 1. However, as Option 2 is larger, in absolute terms it has a higher Whole Lifecycle Carbon emission. The absolute carbon emissions for Option 1 are approximately 20 million kilograms, equating to just over 20% lower for Option 1 compared to Option 2.
13. In response to the WLC Assessment and the structural assessment assumptions which underpinned the report, the BQA presented the CoLC with two peer assessment reports in September 2022. The peer assessment reports were produced by two leading experts – Bob Stagg of Conisbee Structural Engineering and Simon Sturgis of Targeting Zero. The review undertaken by Consibee Structural Engineering considered the structural engineering aspects of the WLC Assessment and contradicted the assumption that Bastion House and the Museum of London building were at risk of disproportionate collapse. Since this was the basis on which CoLC only chose to compare Options 1 and 2, the WLC Assessment does not consider the option of retrofit. This is further highlighted in the report by Targeting Zero which advised that *“a more comprehensive retrofit approach than the one proposed, with Bastion House retained and retrofitted, would have far lower carbon emissions”*.
14. The peer assessment reports highlighted several fundamental flaws in the WLC Assessment and an evidenced request to the CoLC to reconsider the retention and retrofit of Bastion House was made by the BQA (with the intent that good practice would have commanded the WLC Assessment be withdrawn and the options appraisal re-evaluated/started again).
15. The CoLC set up a dedicated webpage for the LWW Proposals (<https://londonwallwest.co.uk/>) and it is here that feedback from the June 2022 round of consultation is reported as being focussed on the following themes:
  - Questions about the principle of redeveloping the site and the vision for the scheme;
  - Concerns over the scale of the design proposals;
  - The need for more office space;
  - The impact of the new buildings on locally listed assets; and
  - Distrust of the City of London Corporation.





16. In October 2022 it was announced that the CoLC Policy and Resources Committee had made the decision to reduce the size of the LWW Proposals in response to feedback from public consultation. It was confirmed that the width of the building proposed to replace the Museum of London would be reduced by 3 metres whilst the width of the building proposed to replace Bastion House would be reduced by 2 metres. The press release also noted that a 3D model of the final proposal for the LWW Proposals would be presented in 2023 ahead of the submission of a planning application. This commitment was never met.

*Immunity from Listing*

17. Alongside the consultation process set out above, a Certificate of Immunity from Listing was granted by the Secretary of State for Culture, Media and Sport, for Bastion House in August 2019 and this expires in August 2024. It is noted that an application to renew the certificate has recently been submitted to Historic England on the basis that no new evidence in favour of listing has come to light.
18. In contrast to the above, in 2023, The Twentieth Century Society published their latest 'Risk List' - a selection of ten twentieth-century buildings currently facing demolition or disfigurement. Eighth on the list is the Museum of London and Bastion House. Designed by architects Powell & Moya, the Museum of London is recognised as the first post-war museum to be built in London and the largest urban history museum in the world. Bastion House is also acknowledged by The Twentieth Century Society as a rare survivor of a hugely important part of the City of London's post-war planning history, and both buildings are identified as being under threat for total demolition due to the museum's move to Smithfield Market.

*Closure of Museum of London December 2022*

19. The Museum of London closed in December 2022, with the intention that it will re-open in 2026 in its new location at Smithfield Market. The costs of this relocation were originally estimated at £250 million and current estimates now place the cost at £337 million (source: Architects Journal, Museum of London on target for delayed 2026 opening, article by Anna Highfield, 2 May 2023.)

*CoLC Market Testing*

20. On 3 April 2023, a tender opportunity was listed on the procurement pages of the CoLC website allowing developers to express their interest in refurbishing the LWW Site. Whilst the results of this tender have not been publicly reported, Chris Hayward (Chairman of the Policy and Resources Committee at CoLC) stated at the City Question Time event held on 15 June 2023 that the CoLC had received expressions of interest that were considered to be credible (albeit commercially



confidential)<sup>1</sup>. In contrast, it is noted by the BQA that paragraph 5.5 of the Planning Statement submitted with the planning application advises that Bastion House is currently unoccupied following the primary lease expiring in 2023 and that the building and structure no longer meet the design needs and expectations of prospective office occupiers.

**Consultation and Engagement**

21. The paragraphs above summarise the pre-application consultation carried out by the CoLC as applicant. Throughout this process the BQA have consistently raised concerns about the proposals to redevelop the LWW Site and we note below the letters submitted to the CoLC by the BQA throughout this process (copies of which are attached at Appendix A to this statement) in addition to which eight FOIA requests were submitted to the CoLC, one of which included a request under the Environmental Information Regulations 2004;

03 November 2022, Open letter from the BQA to Chris Hayward

23 June 2022, Response to proposals published 18<sup>th</sup> June 2022

12 April 2023, Exploring the potential to refurbish the London Wall West Site

15 June 2023, London Wall West

7 November 2023, Open reply to your letter of 29 September 2023

22 November 2023, London Wall West (LWW) pre-application: A glaring lack of consultation and transparency

22. Fundamentally the BQA wish to highlight that at no stage did the consultation material allow a public debate on the fundamental question of redevelopment of the LWW Site versus a scheme which considered the retention and/or adaptation and retrofit of the existing buildings on the LWW Site. This is central to the consideration of development scenarios later to be reflected in the WLC Assessment undertaken both at pre-application stage and now later as submitted with the planning application. Similarly, alternative massing options were never shared with the community during the early stages of public consultation, nor was the commitment to share a 3D model of the proposal prior to the submission of the application met. Whilst the CoLC did make nominal reductions in the width of the buildings (the width of the building proposed to replace the Museum of London reduced by three metres and the width of the building proposed to replace Bastion House reduced by two metres), these are considered by the BQA to be minimal concessions and it is only now (post submission) that a model of the LWW Proposals has been made available for public viewing and the scheme’s true height and scale (and subsequent impact) can be fully appreciated. As such the BQA continue to express significant concerns at the massing of the LWW Proposals along with

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<sup>1</sup> Recorded event available to view at: <https://www.youtube.com/watch?v=EUOVSnkgOYs> (16:55 from start)



claims that the development will enhance the locality and its heritage assets (see paragraphs 79-82 and 83-86 below).

23. Criticism is also levied at the CoLC in relation to the market testing undertaken in April 2023. The CoLC advised that the purpose of the market testing was to respond to the local desire for the buildings to be retained and to explore a viable alternative to demolition. However, on 29 September 2023, the CoLC announced its intention to proceed with a planning application for the LWW Site which would include the demolition of the former Museum of London building and Bastion House. While stating that all options remained on the table, the CoLC argued that it had a duty to achieve “best consideration” and was under a “legal obligation to achieve maximum financial return”. The BQA make the following observations and criticisms in relation to this process:

there was no engagement on the decision to market test (a process only publicised on the CoLC’s own website); or the process itself which allowed a mere seven weeks (a period encompassing both school holidays and Easter) for developers to submit proposals;

the results of the market test exercise, which the CoLC subsequently described as credible and successful, were neither shared nor pursued;

the CoLC only later made explicit its true motives for pursuing the application as maximising financial return, stating that it had a legal duty to do so (and no further cost analysis has been shared by CoLC to evidence (if relevant) that demolition and redevelopment of the LWW Site is more profitable than a scheme involving retention and retrofit).

24. In conclusion the BQA consider that whilst the CoLC may consider that pre-application community engagement has been extensive, in fact the CoLC has:

Failed to involve the community in developing fundamental options for the future of the LWW Site once it had decided not to progress the Centre for Music. This is a major deficiency given the significant history and location of the site and the nature of its buildings.

Failed to adjust the proposals sufficiently to reflect the public feedback received.

Failed to share the results of the market testing or evidence that the buildings could not be successfully or viably retained and adapted.

Failed to keep the community updated on the evolution of the project. The last presentations to the community were June 2022 and the current LWW Proposals were not presented or consulted on in advance of submission – particularly on any matters relating to access and transport considerations.

Lacked transparency throughout e.g. its early whole life carbon assessment, including analysis of the re-use of the existing buildings and the results of the soft market test, have never been shared.



Not acted in accordance with national policy guidance in the NPPF to take account of the views of the community and to reconcile local interests.

### **Principle of Development and Land Uses Proposed**

25. The BQA instructed CarneySweeney to undertake a review of the principle of the proposed development and the land uses proposed.
26. For the purposes of Section 38 of the Planning and Compulsory Purchase Act (2004), which requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise, the development plan comprises the following documents:

London Plan (adopted March 2021)

City of London Local Plan (adopted January 2015)

27. Material considerations currently include the National Planning Policy Framework (December 2023) (“NPPF”) and National Planning Practice Guidance (“NPPG”). It is also appropriate to have regard to emerging policy, the following being a material consideration and a demonstration of ‘the direction of travel of policy’, albeit it does have limited weight at this stage:

City of London: Draft City Plan 2040

28. Whilst supplementary planning guidance (“SPG”), supplementary planning documents (“SPD”) and Planning Advice Notes (“PAN”) do not form part of the development plan, they assist interpretation of policy and are material considerations in the determination of planning applications.
29. In terms of the principle of redevelopment of the LWW Site, further consideration of this matter is set out below in relation to the discussion of retrofit and re-use vs demolition.
30. The planning application is supported by a Planning Statement which states at paragraph 5.6 that the development brief for the LWW Site is for a ‘commercial-led scheme, which aims to address the City’s strategic context and maximise the development potential for the Site’. Paragraph 5.6 goes on to advise that the City’s strategic context is considered to be formed of four main strands: Business, Culture and Leisure, Sustainability and Highways & Public Realm.
31. Chapter 9 of the Planning Statement considers the principle of the development. Reference is made to the NPPF and the presumption in favour of ‘sustainable development’ alongside the requirement that both planning policies and decisions should promote an effective use of land. This is further supported by reference to the London Plan Policies D3 (Part A) in seeking a design led approach to development and E1 (Part A) in terms of improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. Reference is then made to Strategic Objective 2 the City of London Local



Plan which seeks to ensure that challenges facing the five Key City Place are met, commenting that the area surrounding Cheapside and St. Paul's is identified as a vibrant office, retail and cultural destination for attracting visitors to the surrounding attractions.

32. Set against this background, BQA raise significant concern at the approach taken in defining the development brief for the LWW Site, and the lack of consideration that the CoLC as applicant has made to other strategic priorities set out in the NPPF and the development plan as a whole.
33. With regard to making effective use of land, this is addressed in Chapter 12 of the NPPF and Paragraph 124 advises that (our emphasis in bold); *“planning policies and decisions should support development that makes efficient use of land taking into account:*

*The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*Local market conditions and viability;*

*The availability and capacity of infrastructure and services-both existing and proposed as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

***The desirability of maintaining an area's prevailing character and setting** (including residential gardens or promoting regeneration and change); and*

***The importance of securing well designed, attractive and healthy places.”***

34. At a strategic level, the London Plan forms the Spatial Development Strategy for Greater London, setting out a framework for the city's development over the next 20 – 25 years. It is part of the development plan for London, and as such its policies inform decisions on planning applications within London boroughs. It is also the most up to date part of the development plan covering the City of London.
35. Chapter 2 of the London Plan sets out the overall spatial development pattern for London. In terms of key policy considerations, the BQA are aware that at a London wide spatial level the LWW Site is located within the Central Activity Zone (“CAZ”) which is described in the London Plan as *“the vibrant heart and globally-iconic core of London”*. The CAZ is considered to have several strategic functions which include, inter-alia, providing agglomerations of nationally and internationally significant offices and company headquarters; provision for arts, culture, leisure, entertainment; provision of tourism facilities and having a distinct heritage and built environment. The arts, culture, tourism and entertainment activities are stated within the London Plan as being a defining feature of the vibrant and distinctive character of the CAZ with its varied mix of daytime, evening and night-time uses, together making a vital contribution to London's culture and heritage. Noted within the London Plan are the locations considered to be rich in cultural activity, including the Barbican. The London Plan advises these areas and functions should be recognised, nurtured and supported in



line with the London Plan CAZ policy and other London Plan policies related to culture and supporting the evening and night-time economy.

36. Alongside such strategic functions, it is recognised that at a local level, the CAZ contains housing, social infrastructure and other community uses to address the needs of residents, visitors and workers. The London Plan advises that such locally orientated uses such as new residential are acceptable uses and are important to the character and function of the CAZ but should be complementary to and not compromise its strategic functions. To this end, Policy SD5 advises that offices and other CAZ strategic functions are to be given greater weight relative to new residential development except in certain locations, including predominantly residential neighbourhoods. The Mayor of London therefore advises that Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate.
37. The current City of London Local Plan was adopted in 2015 and explains the spatial strategy, vision and strategic objectives for the City of London, followed by the policies required to implement the strategy, set out though a series of five key themes. Each theme has a Core Strategy (“CS”) policy to address the strategic context followed by additional Development Management (“DM”) policies to be used when considering planning applications and other related consents.
38. At a strategic level the Local Plan highlights significant competing demands between the need to accommodate new office development alongside the need for new housing, social and community facilities and improved transport infrastructure. The plan is centred around five strategic objectives, the first of which is to maintain the City’s position as the world’s leading international financial and business centre. The remaining four relate to key City places, culture and heritage, environmental sustainability, and City communities. The table below taken from the Local Plan illustrates the overall scale and phasing of development that is anticipated by the plan to the period to 2026.

Land Use	2011-2016	2016-2021	2021-2026	Total 2011-2026
Offices	650,000m <sup>2</sup>	250,000m <sup>2</sup>	250,000m <sup>2</sup>	1,150,000m <sup>2</sup>
Retailing (A1-A5)	52,000m <sup>2</sup> * * Figures relate to the 2009-2016 period	44,000m <sup>2</sup>	40,000m <sup>2</sup>	136,000m <sup>2</sup>
Housing	667 units	430 units	550 units	1,647 units

Table 1. Indicative scale and phasing of growth in main land uses 2011-2026, CoLC Local Plan





39. In terms of distribution the plan highlights the scale of development that could take place in the five 'Key City Place' areas. These are identified in the plan's Key Diagram (see Figure 4 below) and include;

- The North of the City
- Cheapside and St Paul's
- Eastern Cluster
- Aldgate
- Thames and the Riverside

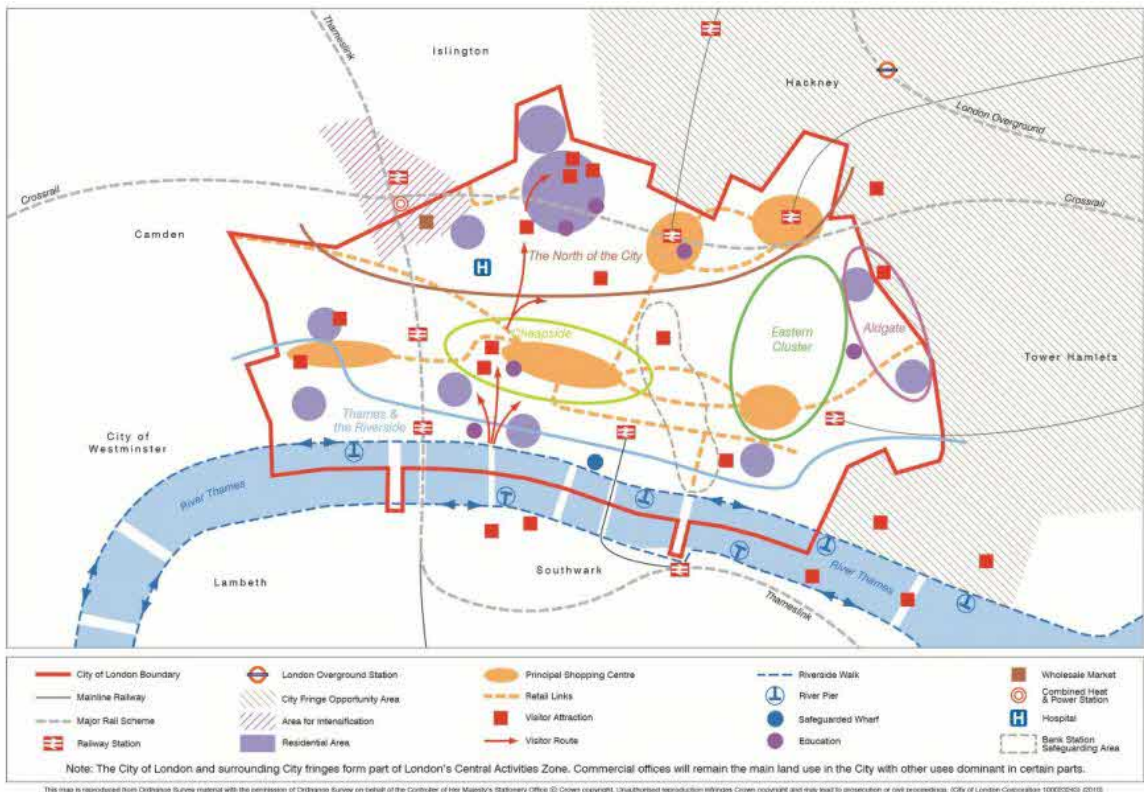


Figure 1. Key Diagram, CoLC Local Plan

40. Rather than placing the LWW Site in the area of Cheapside and St. Paul's (as is set out in the Planning Statement submitted with the application), CarneySweeney consider the LWW Site clearly falls within the 'North of the City' Key City Place area, the current spatial strategy for which is to address the impact of and accommodate growth resulting from Crossrail whilst maintaining the area's mix of uses, enhancing its cultural offer and delivering sustainable development. In terms of its capacity, the Local Plan anticipates the North of the City as indicatively accommodating 10-20% of the required office growth, 20-30% of the retail growth, 0-10% of the hotel growth and 60-70% of the housing growth. Whilst it is recognised that offices will be acceptable development across the City (unless indicated otherwise by policies in the Local Plan), this spatial strategy clearly identifies other uses as also being part of the vision.





41. In terms of maintaining the City's role as a world financial and business centre, the Local Plan advises that the North of the City contains a mix of uses, including the strategic cultural quarter centred on the Barbican and that careful planning is essential to retain the character and amenity of individual areas whilst managing growth.
42. The vision set out in the plan for the 'North of the City' is as follows:  
*"Passengers will emerge from new Crossrail stations to find a lively variety of restaurants and shops with attractive streetscapes and vistas. Attractive pedestrian routes will link pockets of well designed open space. Progressive building designs and sensitive refurbishments will mean residents, workers and visitors remain in a comfortable and safe environment that has adapted to climate change. The Barbican will form part of a wider strategic cultural quarter. Evening and night time activity will be well managed."*
43. Paragraphs 3.5.1 to 3.5.5 of the adopted Local Plan provide further background on the 'North of the City' Key City Place area noting that the area has the potential to lead the way as an 'eco design' district within the City and that the area is to deliver approximately 60-70% of the new residential development the City is expected to take. Reference is also made to the role of the cultural quarter focussed on the Barbican, whose offer and environment should be 'further enhanced'. The delivery strategy for this vision is guided by Core Strategy Policy CS5: The North of the City which states:

**Core Strategy Policy CS5: The North of the City**

*"To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure, by:*

1. *Ensuring that disruption to the City is minimised during construction of Crossrail and requiring the restoration of worksites to deliver enhancement of biodiversity, heritage assets and the public realm, open space provision and integration with other transport modes.*
2. *Implementing proposals for the rejuvenation of Farringdon, Moorgate and Holborn jointly with neighbouring boroughs in the Farringdon / Smithfield Area for Intensification, taking account of urban design studies, conservation area management strategies and area enhancement strategies.*
3. *Requiring improvements to pedestrian and cycle routes to maintain safe, effective and efficient pedestrian and cycle flows, including for disabled people, within and through the north of the City.*
4. *Ensuring the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as Smithfield Market, Barbican, Golden Lane and Broadgate, whilst preserving privacy, security and noise abatement for residents and businesses.*
5. *Identifying and meeting residents' needs in the north of the City, including protection of residential amenity, community facilities and open space.*



6. Safeguarding the Citigen combined cooling heating and power (CCHP) network and ensuring that, where feasible, all new development is designed to enable connection to the CCHP network.
7. Requiring the incorporation of sustainable drainage solutions (SuDS), such as green roofs, into development.
8. Requiring developers to make use of innovative design solutions to mitigate and adapt to the impacts of climate change, particularly addressing the challenges posed by heritage assets whilst respecting their architectural and historic significance.
9. Further enhancing the distinctive character of the Smithfield area by retaining a range of buildings suitable for accommodating a mix of uses, whilst recognising the particular challenges arising from the 24 hour character of the area.
10. Recognising and supporting the continued presence of both Smithfield Market and St Bartholomew's Hospital.
11. Promoting the further improvement of the Barbican area as a cultural quarter of London-wide, national and international significance."

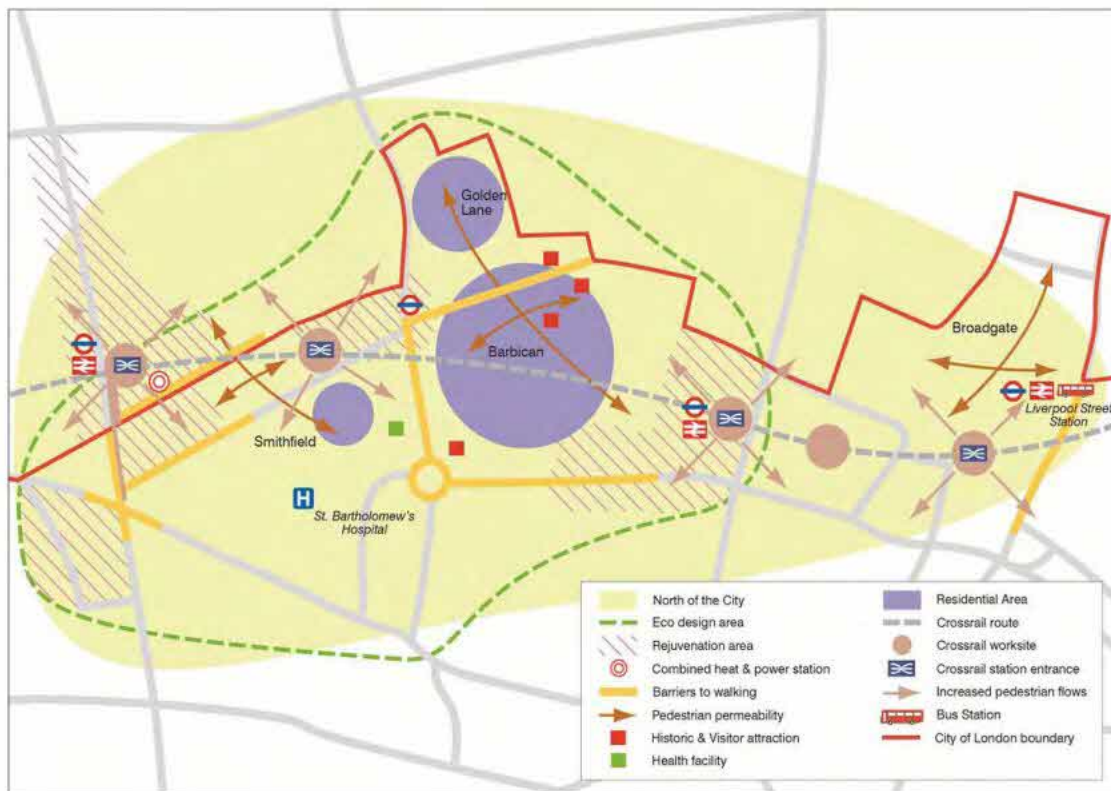


Figure 2. Strategic diagram representing the North of the City – CoLC Local Plan 2015.

44. CarneySweeney and the BQA are aware that the CoLC are currently in the process of producing a new Local Plan covering the period to 2040, setting out what type of development the CoLC expects to take place and where and that once adopted, it will replace the current adopted local plan. In



this regard, we refer to paragraph 48 of the NPFF which advises that “local planning authorities may give weight to relevant policies in emerging local plans” according to a number of factors, principally:

- their stage of preparation;
- the extent to which there are unresolved objections; and
- their consistency with the broader Framework.

45. Due to the early stage of preparation of the new Local Plan, whilst indicating a ‘direction of travel’, at the current time this plan can only be given limited weight in decision making.
46. The emerging draft local plan is titled ‘City Plan 2040’ and is intended to set out the vision and framework for future development in the City until 2040, outlining what type of development should take place and where, along with the policies and proposals that will guide decisions on planning applications.
47. A new Spatial Strategy is introduced by City Plan 2040 which highlights that different approaches to development and growth will need to be taken in different parts of the City to ensure a sustainable pattern of development in a way that enhances the unique character of the Square Mile. Whilst all parts of the Square Mile will continue to see growth and development over the lifetime of the plan, some areas are identified in the plan as Key Areas of Change (“KAOC”) and will see a greater proportion of net additional floorspace than other parts of the City or will undergo more significant change to their built form. In addition, and with reference to the LWW Proposals, the draft Spatial Strategy also notes:

*“Net additional office floorspace will primarily be delivered in the City Cluster KAOC, supplemented by floorspace in the Fleet Street and Ludgate KAOC and Liverpool Street KAOC. Office growth will be encouraged in all parts of the Square Mile.*

*Additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas.*

*Active frontages, with uses that are suitable for their context, will be delivered in all parts of the Square Mile, bringing vibrancy to the City and meeting the needs of people who live and work here and those who visit the area.*

*Focal areas for culture have been identified in the cultural planning framework, informed by the existing cultural character of different parts of the City and the potential for each area to contribute to the ongoing transformation of the City into a vibrant destination.*

*New hotels will be encouraged in suitable locations across the City, particularly in places near to transport hubs and where there is good access to visitor destinations in and outside the City.*

*Designated strategic and local views will inform development, with tall buildings focused in the City cluster and the Fleet valley, which are identified as areas suitable for tall buildings.*

*The unique character of different parts of the City, including the area’s rich heritage (which includes nearly 600 listed buildings, 27 conservation areas, 48 scheduled ancient monuments*



and four historic parks and gardens) will be celebrated and enhanced, and help to shape new development in the Square Mile.”

48. Figure 3 below shows how these are presented in the Key Diagram in City Plan 2040.

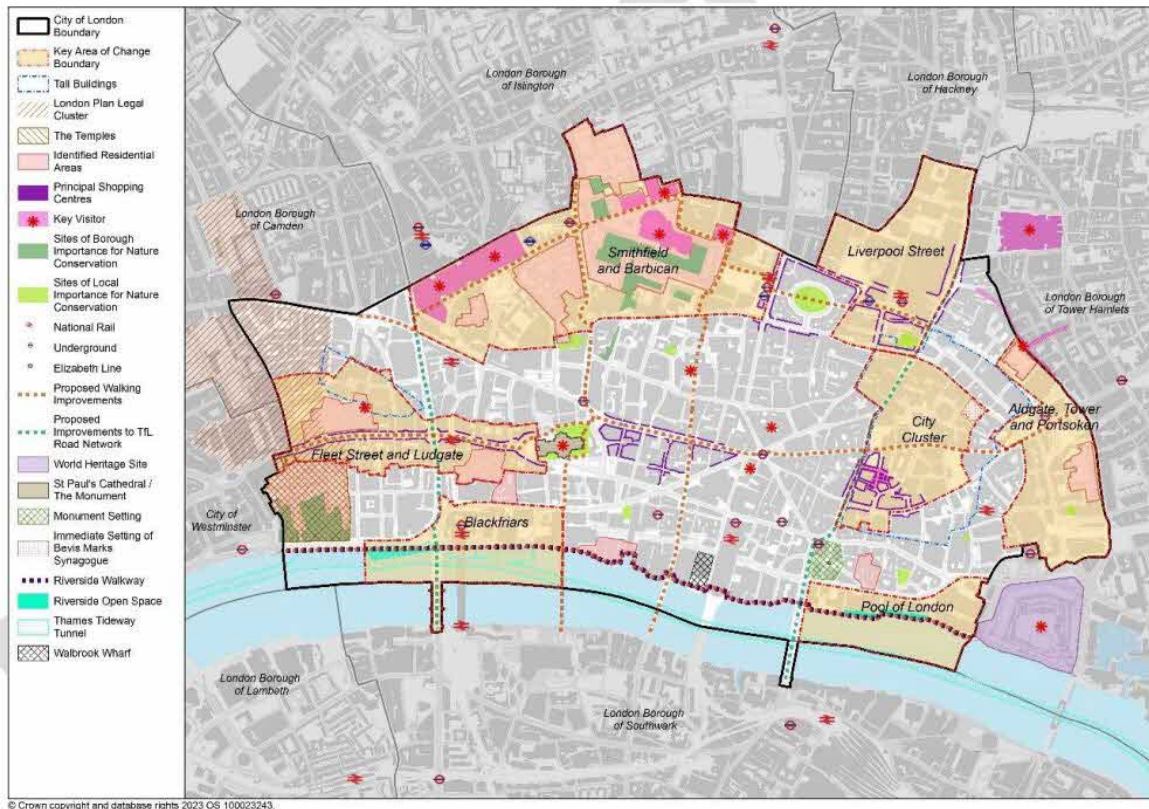


Figure 3. Key Diagram – City Plan 2040

49. The LWW Site falls within the Smithfield and Barbican KAOC and is adjacent to an identified residential area and draft Strategic Policy S23 (see below) sets out how the CoLC intend to improve the area. The supporting text to the policy highlights the Smithfield and Barbican KAOC as a vibrant, mixed-use area which is to undergo significant change and development over the life of the plan – specifically with reference to the relocation of the Museum of London to its new location at Smithfield.

**Draft Strategic Policy S23: Smithfield and Barbican<sup>2</sup>**

*“The City Corporation will improve the Smithfield and Barbican area by:*

1. *implementing the Culture Mile initiative, encouraging culture-led mixed-use development on major sites in the area as well as cultural infrastructure and complementary uses, and delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy;*

<sup>2</sup> Draft policy wording as reported to Local Plans Sub (Planning and Transportation Committee) 18 October 2023.





2. *ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican whilst seeking to preserve privacy, security and noise abatement for residents and businesses;*
  3. *ensuring future alternative uses appropriate to the listed status of the market buildings in Smithfield if the existing uses are relocated;*
  4. *supporting and enabling residential development in appropriate locations;*
  5. *identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;*
  6. *making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;*
  7. *seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;*
  8. *requiring improvements to pedestrian and cycle routes for all within and through the north of the City;*
  9. *supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network;*
  10. *supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role;*
  11. *encouraging a diverse leisure, retail, food and beverage offer, particularly along the route between the London Museum and the Barbican;*
  12. *encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists, including meanwhile use of vacant premises; and*
  13. *enhancing the special character of the area through sensitive change."*
50. CarneySweeney, on behalf of the BQA highlight that this draft strategic vision once again does not focus on the delivery of office growth but encourages culture led mixed-use development, supports residential development in appropriate locations and seeks to enhance the special character of the area.
51. Whilst it is material to consider the extent to which emerging policies and evidence also accord with existing adopted policies, particularly those of the London Plan, the weight accorded to different policies will be a matter for the decision maker, but policies will generally gain weight as they progress through the process of consultation and examination process through to adoption, particularly where they do not attract objections. Policies that closely accord with adopted policy in the existing Local Plan or London Plan may also merit more weight.
52. The BQA are aware that City Plan 2040 is being taken through committee approval for consultation between January and March 2024 and that consultation on Revised Proposed Submission Draft City Plan 2040 is anticipated to take place in spring 2024. In this regard the BQA reiterate this is a



draft Local Plan and reserves the right to comment separately on these emerging policies and the strategic vision for Smithfield and Barbican KAOC.

### *Land uses proposed*

53. In terms of the land uses proposed the LWW Proposals comprise of:

<b>Land Use</b>	<b>Proposed (GIA sqm)</b>
Office (Class E(g(i)))	56,211
Retail / Restaurant (Class E(b))	1,112.4
Cultural (Sui Generis)*	8,182.9
Livery Hall (Sui Generis)	480.0
Public Car Park (Sui Generis)	594.2
Cycle Hub (Sui Generis)	703.0
<b>Total</b>	<b>67,283.5</b>

\* Cultural uses being further broken down into;

Food & Beverage/Retail	968.5sqm
Event/Exhibition/Venue	7,214.4sqm

54. By comparison the existing land uses at the LWW Site comprise of:

<b>Land Use</b>	<b>Existing (GIA sqm)</b>
Office (Class E(g(i)))	16,887
Retail / Restaurant (Class E(b))	0
Cultural (Sui Generis)	0
Livery Hall (Sui Generis)	439
Museum (Class F1(c))	15,188
Bar (Sui Generis)	287
Public Car Park (Sui Generis)	1,458
Cycle Hub (Sui Generis)	0
<b>Total</b>	<b>34,259</b>

### *Office Floorspace*

55. In terms of office floorspace there will be a significant net uplift of 39,324sqm (GIA). It is recognised that the LWW Site is located within the CAZ and therefore the principle of protecting existing office space alongside the provision of new office floorspace is supported. However, given the strategic vision for the 'North of the City' Key City Place area, as set out in the adopted local plan, CarneySweeney, on behalf of the BQA, raise objection to this increased level of office provision on the LWW Site, primarily due to concern that such growth in this location will have a detrimental



impact on the distinct character, environment and heritage of this part of the CAZ, in conflict with Policy SD4 (Part C) of the London Plan and the NPPF.

56. Further details relating to the office needs within the City of London are set out in the Office Market Research Report, prepared by JLL (“OMRR”) and submitted in support of the application. The BQA have reviewed this report and raise the following key concerns;
57. The Terms of Reference set out at paragraph 1.1 in the OMRR are biased in favour of development. There is no meaningful economic analysis of construction cost / achievable rent / return on capital employed. There is no assessment of alternative economic scenarios, e.g. downturn / prolonged period of high borrowing costs.
58. Reference is made at paragraph 2.2.4 of the OMRR that future long-term demand will be boosted by occupiers displaced by older stock not meeting future minimum energy efficiency standards, however, no data is provided in relation to the percentage of office stock affected by the change in regulation.
59. More evidence is provided to support the statement at paragraph 2.25 of the OMRR that companies have been more footloose across central London, and focussing more on the quality of the building, connectivity, and immediate environment rather than traditional areas for industry.
60. The statement is made at paragraph 2.2.9 of the OMRR that *“TMT and general business services have grown, while the legal sector has seen a renaissance since the pandemic but prior to this had been an insignificant source of demand in the City. It is clear these sectors are still vital to market performance and are likely to do so moving forwards.”* The BQA contest that there is no analysis of the needs of these specific sectors and no indication of the likely source of tenants. The resurgence of traditional sectors is contradicted by the report taken to the Local Plans Sub (Planning and Transportation) Committee in June 2023 (“PCT Report”) which discusses the evidence base report “Future of Office Use” which was commissioned from ARUP to support the office policies review for City Plan 2040 and which states at paragraph 5: *“In 2023, 29% of take-up of office floorspace in the City of London was from “Media and Tech” firms, compared to 19% from “Financial” companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers”*
61. The OMRR advises that there were three transactions over 100,000 sqft completed since the beginning of 2021, and all were pre-lets. The BQA highlight that given 100,000 sqft equates to 9,259 sqm, there would need to be six such transactions to fully occupy the LWW Proposals. Given that there were only three such transactions in a period of 2.75 years, it could take two years to find such ‘large tenants’ and so the demand would need to come from smaller occupants. No evidence is provided to suggest sufficient demand for “prime” in the lower size transactions. Furthermore, of the list of largest transactions given in Table 4 of the OMRR, the BQA highlight that at 25.185 sqm this is roughly the size of the new Rotunda building. The OMRR provides no evidence of demand from an individual tenant for a building as large as New Bastion House (which at 35,523 sqm GIA,





is almost 40% bigger than the largest transaction). Again, this indicates that this will have to be a multi-tenant building.

62. At paragraph 4.2.1 of the OMRR it is noted that JLL's Future of Work survey found that when asked about their attitudes towards space, 92% of those surveyed based in London said that investing in quality space is a more significant priority for their company than expanding the total occupied footprint. The BQA consider this to be an unbalanced analysis of demand as it suggests no increase in demand but provides no information about the willingness / ability to relocate to a higher quality office vs. refurbish existing space occupied. The PTC Report paints a more complex picture and states at paragraph 9: *"Grade B office take-up is predominantly by creative and emerging-office based firms who are interested in enhanced amenities. The protection of existing office space is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential occupiers. However, there are challenges facing Grade B office space. In 2022, take-up of second-hand Grade B space in the City was 10,000m2, accounting for only 2.2% of all leasing market transactions in the City. Pre-pandemic, Grade B office stock provided an affordable workspace option for small businesses but this market area has not recovered after the pandemic. There are challenges for retrofitting Grade B space but there are successful examples in the City, including Millennium Bridge House, 81 Newgate Street and Ibex House."*
63. Paragraph 5.1.1 of the OMRR notes that there is a good level of demand for office space in the City of London, but occupiers are demanding the best space in which to create modern working environments. The BQA consider this to be a vague comment but is understood to refer to current demand rather than future demand. The PTC Report from June 2023 notes at paragraph 18 that *"Additional technical work is underway to better understand not just the potential demand for office floorspace, but the capacity to accommodate additional floorspace, having regard to other policy constraints including strategic and local views protection and heritage assets."* It is not clear whether the CoLC as Local Planning Authority has provided input to the CoLC as applicant in the light of this technical work.
64. The BQA consider the statement at paragraph 5.1.3 of the OMRR that office space around Farringdon and Barbican stations is particularly sought after with creative occupiers favouring the mixed-use environment over the more corporate City Core is not evidenced in the OMRR. That it should be examined is again highlighted by the June 2023 PTC Report which states at paragraph 8 that *"As emerging office-based firms tend to value different typologies of office spaces compared to traditional office-based firms, their growing number and size might imply a new shift in the market in terms of demand for best-in-class office spaces, with the fastest growing firms over-representing in the micro and small categories."*
65. The BQA highlights the statement made at paragraph 5.1.3 of the OMRR that *"The existing Museum building and road configuration currently create a visual barrier between these two sub-markets. London Wall West is an opportunity to link these two sub-markets with a purpose-built mixed-use office scheme."* This does not appear credible as there remains a significant visual



barrier in the form of 200 Aldersgate Street. Similarly, the benefits of the LWW Proposals listed at paragraph 5.1.4 of the OMRR are not considered to be unique to the submitted proposals.

*Cultural floorspace*

66. In terms of the loss of the cultural floorspace on the LWW Site, both London Plan Policy HC5 and the CoLC adopted Local Plan Policies CS11 and DM 11.1 seek to protect existing cultural venues and facilities. Policy DM 11.1 further stipulates that such loss will be resisted unless replacement facilities are provided on site or within the vicinity or in other facilities without leading to a shortfall in provision or that there is no realistic prospect of the premises being used for a similar purpose. Any scheme that results in such loss also must be accompanied by evidence of the lack of need (including marketing evidence to demonstrate the existing floorspace has been actively marketed). For the LWW Site, the Museum of London is being relocated to another site within the City and in close proximity, nevertheless, given the strategic vision for this part of the City, it is considered that it should be demonstrated that there is no demand for a similar level of need given the vision for the 'North of the City' Key City Place area in which the LWW Site is located. This policy approach is repeated in City Plan 2040 through Draft Policy CV1, and with reference to the issue of retrofit/re-use, CarneySweeney highlight that the strategic policy direction set out in City Plan 2040 in Draft Strategic Policy S6 refers to protecting areas of cultural significance including cultural buildings where they provide an anchor for cultural regeneration.
67. The application is supported by a Culture Plan (and Culture Needs Assessment) which has been reviewed by the BQA. The BQA raise concern that the Culture Plan is vague and speculative with a weak vision and with no sense of a coordinated strategy. No specific cultural partnerships have been identified. There are no defined capital/revenue models and no business models presented. The BQA are concerned it will therefore be left to any future developer to interpret as they wish and therefore the generic arts, culture and creative features of the LWW Proposals as referred to in the Culture Plan will be value engineered down or scoped out. Furthermore, the Culture Plan draws heavily on the CoLC flagship Destination City strategy, including the statement that the programme and events "will be led by Destination City". The BQA wish to highlight that the Destination City strategy is acknowledged by the CoLC as requiring a 're-set' and, as of January 2024, is currently under comprehensive external review (the terms of reference for which were discussed at the Culture, Heritage and Libraries Committee meeting of 20 November 2023).

*Residential floorspace*

68. Returning to the criticisms raised by the BQA on the pre-application consultation process and the evolution of the LWW Proposals, given the strategic vision for the North of the City as set out in the adopted Local Plan, the question is asked as to the decision to promote an office led redevelopment of the LWW Site. Whilst the policy requirement to ensure the reprovision of office floorspace and cultural floorspace is recognised, CarneySweeney, on behalf of the BQA, query why the CoLC have



ignored the opportunity to also deliver much needed housing in a part of the City that is considered compliant with Policy DM 21.1 of the CoLC adopted Local Plan which states that new housing will be provided in the City in or adjacent to identified residential areas (such as the Barbican) but this should not prejudice the business function of the City (as per Policy DM1.1).

**Retrofit and Re-use vs Demolition – Embodied Carbon Review**

- 69. The NPPF states at paragraph 157 that the planning system should support a transition to a low carbon future in by ‘encouraging the reuse of existing resources, including the conversion of existing buildings’ – conversely it is recognised that the NPPF also provides clear policy guidance on making the most effective use of land and requires local planning authorities to take a proactive role in bringing forward land that may be suitable for meeting development needs.
- 70. The London Plan provides the most up to date adopted strategic policy direction (together with related SPGs/LPGs) and also promotes the effective use of land through its ‘Good Growth’ policies which seek to optimise the redevelopment and re-use of brownfield land. Whilst retrofit and the re-use of buildings can contribute to carbon reduction, and both the Mayor’s WLC Assessment LPG and Circular Economy LPG advise that priority should be given to the re-use/retrofitting of buildings, neither policies SI2 or SI7 of the London Plan prohibit demolition (albeit that the policies do require development proposals referable to the Mayor to undertake a WLC Assessment and demonstrate the actions take to reduce life-cycle carbon emissions as well as to produce a Circular Economy Statement).
- 71. The adopted CoLC Local Plan states in Policy CS15 that demolition should be avoided through the re-use of existing buildings and the CoLC Carbon Options Guidance PAN provides the most recent intermediate position on how this will be considered by the CoLC as LPA. The CoLC emerging policy in City Plan 2040 also favours an embedded strategy of retrofit and the re-use of existing buildings.
- 72. As set out earlier in this statement, an interim WLC Assessment report (May 2022) was undertaken at pre-application stage to assess the existing buildings on the LWW Site. This WLC Assessment stated that a high-level engineering review of the existing buildings had been undertaken and highlighted there are three key challenges that would need to be addressed in any retention proposals. This includes material design life, fire integrity and design for disproportionate collapse. This WLC Assessment was undertaken based on two design options, subsequently eliminating any further discussions regarding the re-use of existing buildings despite the results indicating that the absolute Whole Life-Cycle Carbon emissions for the re-use of the existing buildings are approximately 20 million kilograms’ lower when compared to a redeveloped LWW Site. The WLC Assessment dismissed the option of retrofitting the existing buildings based on viability and feasibility.



73. The BQA instructed Simon Sturgis of Targeting Zero LLP to undertake a review of the LWW Proposals in relation to matters pertaining to the circular economy, the reduction of carbon and meeting net zero. Their full review is at Appendix B to this statement and their main conclusions are summarised below, as follows:

The proposals are not optimising the carbon emissions impacts and as a result are in direct opposition to UK National policies, GLA policies and the City's policies. These include the City's new sustainable guidance for developers dated 12 December 2023, covering retrofit and reuse, energy and whole life carbon and the circular economy. Their conclusion is that the planning application proposals ignore this new guidance.

There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to six options selected for detailed examination. These six options excluded 'option two' for a 'Major Refurbishment', which is the option that is most consistent with the approach favoured by the commercial bids in this City's market testing exercise.

The conclusion of the planning application submission reports is exactly the same as previous reports in May 2022, namely that a 'Major Refurbishment' approach is to be rejected in favour of 'new build'. This appears to demonstrate that the latest optioneering exercise is purely 'window dressing' to prove a pre-ordained choice 'new build', and that a 'major refurbishment' option has not been seriously investigated by the design team in detail as 'new build' was always the intended outcome.

74. Notwithstanding the conclusions above, Targeting Zero also comment that in the event of the LWW Proposals being approved, unless the levels of carbon emissions achieved are 'locked into' the scheme and become secured by way of legal agreement or planning condition, they are likely to be abandoned by any future purchaser, meaning that the figures achieved are effectively meaningless.

75. As a result, it is reasonable to conclude that there are failings in the approach to the Whole Life Cycle Carbon Assessment of the LWW Proposals. The CoLC Whole Life-Cycle Carbon Options PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emissions. It states that optioneering is required for all major schemes before the application is submitted and furthermore advises *"If substantial demolition is proposed, applicant will need to demonstrate that benefits of the demolition would clearly outweigh the benefits of retaining the existing building or part of the structure."* This approach reinforces the Mayor's WLC Assessment LPG by requiring developers to consider alternatives to demolition at the earliest stages of planning and in this regard, the BQA consider the failings highlighted by the group to the CoLC at pre-application stage relating to the option of retrofit and reuse of the buildings on the LWW Site have equally been dismissed in the appraisal of options assessed at planning application stage.



**Design, Public Realm and Landscaping**

76. Chapter 12 of the NPPF focuses on achieving well designed places and recognises that good design is a key aspect of sustainable development and creates better places in which to live and work and helps make development acceptable to communities. Paragraph 135 emphasises that planning policies and decisions should ensure that developments:

*“Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*Establish or maintain a strong sense place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

77. Furthermore paragraph 137 states: *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*

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



**Townscape and Views**

79. Mr Petroschka has also reviewed the submitted TVBHIA and his conclusions are attached to this statement at Appendix D. Again, Mr Petroschka concludes that a number of statements and conclusions in the assessment are incorrect, flawed, misleading and are strongly contested.
80. In particular, Mr Petroschka states that while many of the post-war office blocks on London Wall have been replaced and the density of the urban fabric increased, all new office blocks strictly follow the perpendicular grid of the post-war plan, continue to contain and define the urban street space and public realm, break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context and their immediate neighbours, including the Barbican Estate. All developments place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks.
81. None of the above prevailing qualities were applied to the two proposed development blocks. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining Conservation Areas, but also to the setting of the immediate and wider neighbourhood.
82. The BQA further highlight that the CoLC adopted Local Plan does not place the LWW Site in an area deemed to be inappropriate for tall buildings and as such Policy CS14 advises that within such areas, proposals for tall buildings will be considered suitable having regard to a variety of design considerations. The London Plan Policy D9 provides the more recent policy position in relation to tall buildings and sets out a much wider assessment of the impacts to be considered where development proposals include tall buildings. Policy D9 also requires development plans to identify the locations and building heights considered appropriate for tall buildings and states that tall buildings should only be developed in such suitable locations. The BQA are aware that Draft Strategic Policy S12 in City Plan 2040 defines a tall building as being over 75m AOD (therefore applicable to two of the buildings included in the LWW Proposals) but does not identify the LWW Site as being one of the tall building areas that are proposed to be identified as suitable for tall buildings. The BQA do not consider that the LWW Proposals respond to the LWW Site's existing character, or respect and enhance identified heritage assets and architectural features. Further commentary on heritage matters is provided below.

**Heritage**

83. The BQA instructed Alec Forshaw a highly experienced specialist heritage consultant to assess the heritage impacts of the LWW Proposals. He has considered the impacts within the local and immediate area, and left the potential impacts on long-distance views of St Paul's Cathedral or the riverside to Historic England and the GLA, who have particular remit and expertise in this field. Mr Forshaw's full report is at Appendix E to this statement.



84. Mr Forshaw questions the reliability of the submission material: Architect's sketches and artistic illustrations give inaccurate impressions of the proposals with stretched and distorted perspectives; and photographs use wide angle-lenses, a technique used by estate agents in sales brochures to make internal rooms seem bigger than they are.
85. He strongly opposes the applicant's consistent claims that the proposals, by virtue of their size, contrasting design and materials will enhance local views and settings.
86. Mr Forshaw concludes that the proposals cause widespread harm to a large number of heritage assets. This includes the complete loss of two undesignated heritage assets, and less than substantial harm, but nevertheless considerable harm to and erosion of significance of several Grade I, Grade II, Grade II\* scheduled monuments, some directly abutting, and the setting of three Conservation Areas. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm, requiring the balance of harm against public benefits in line with Paragraph 202 of NPPF. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere, nor other public benefits which would offset the great weight that must be given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

#### **Biodiversity and Ecology**

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

#### **Transport, Access, and Servicing**

88. The LWW Site is highly accessible by public transport. However, issues relating to vehicle access, highway safety, highway and public transport capacity, design of the public realm, and pedestrian connectivity and permeability are key considerations for the BQA.
89. The planning application is supported by the following documents which relate to the consideration of transport, access and servicing matters; Environmental Statement Chapter 6 'Traffic and Movement' along with Appendices 6A 'Transport Assessment' and 6B 'Travel Plan & Cycle Promotion Plan'; Draft Construction Environmental Management Plan; Delivery and Servicing Management Plan. Having reviewed each of these documents, the BQA wish to highlight three significant areas of concern:





- a. The operational impact of the LWW Proposals with three new buildings and a changed Ironmonger's Hall.
  - b. The impact of Phase 2 works relating to the removal of the St. Paul's Gyrotory system.
  - c. The impacts relating to the demolition of the existing buildings and the construction of the LWW Proposals on residents and other sensitive receptors (schools, businesses, Barbican Centre, St Giles Church and public and private gardens) within close vicinity to the LWW Site.
90. A fundamental concern relates to the proposed access and egress arrangements for vehicles to the redeveloped LWW Site. At present, access to service the buildings on the site is via a one-way system with access from London Wall and egress via the Aldersgate Street ramp. The latter is used primarily by residents accessing the TMH car park along with service and delivery vehicles supporting the residential community. The proposed development will abandon this 'through route' with all vehicles entering and exiting via the Aldersgate Street ramp.

*Operational impacts*

91. The Delivery and Service Plan (DSP) submitted with the application sets out the proposal that, on completion of the proposed development, all service vehicles as well as Barbican residents will use the Aldersgate Street ramp. The service vehicles will be held at a barrier on the ramp with an intercom to await instructions. Traffic will include vehicles accessing Bastion and Rotunda Yards at 10-11 servicing vehicles per hour, Barbican traffic at 10 - 15 vehicles per hour, with the addition of further servicing vehicles to the new North Office building and Ironmongers Hall. The ramp will thus need to provide for:
- All deliveries and services to and from the three new buildings.
  - All deliveries and services to and from Ironmongers' Hall.
  - All deliveries and services to and from the Barbican residents' car park (affecting Seddon, Thomas More, Lauderdale, Mountjoy and Lambert Jones Mews).
  - Emergency fire and ambulance access to and from Barbican residents' car park (there is no alternative access proposed in the scheme from the south of the site).
  - Barbican residents entering and exiting the car park.
  - Contractors, postal services, grocery deliveries and taxis entering and exiting the car park.
  - Pedestrians and cyclists (residents and deliveries) entering and exiting the residents' car park.
92. The DSP also provides a number of diagrams showing that there is inadequate width for two-way traffic at several points and thus proposes a traffic light control system for all servicing vehicles. It also proposes use of the TMH Service Yard as part of the route without any explanation of where the current activities at the Service Yard will be relocated.
93. The BQA consider this to be a significant design weakness for the following reasons:
- Residents' use of the Thomas More car park will be severely impacted from the outset and for the indefinite future once the buildings are completed.



There is significant likelihood of congestion on the ramp, in the single-lane sections of the proposed route and in the underground service yards.

The large increase in traffic on the ramp and lower levels resulting from this design proposal will have a significant adverse effect on noise and air pollution for residents in nearby residential blocks and on the CLSG sports field.

There will be frequent occasions when vehicles entering the ramp will be queued at the intercom barrier and backing onto Aldersgate Street, thus jeopardising safety for all road users at the top of the ramp onto Aldersgate Street.

It will create delay for emergency vehicles entering via ramp and exiting onto Aldersgate Street.

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

*Impact of Phase 2 of the St Pauls Gyratory works*

95. The Transport Assessment (TA) makes clear that demolition and construction on the LWW site and the highway scheme are interdependent - see paragraphs 6.4.49 and 6.4.50. Phase 2 of the Gyratory works is intended to happen when construction commences at the rotunda. The demolition of the rotunda and construction of the new highway layout cannot begin before 2028 in order to allow time for the many governance and consent processes that will need take place both within the CoLC and by TfL to have been completed - see paragraph 6.4.50 of the TA. The implication is also that the sale of the LWW Site must be completed by this time in order that the applicant can enter into the required section 278 agreement with the highway authority for the necessary highway works.
96. Earlier traffic modelling in connection with the St Paul's Gyratory proposals indicated that this change could result in a significant increase in delays to bus journeys as well as cars, taxis and other vehicles. In paragraph 6.4.32 of the TA it states *that "The junction modelling for the St Paul's Gyratory Transformation Project (Phases 1 and 2) is being undertaken by Norman Rourke Pryne and it is envisaged that TfL's Model Auditing Process (MAP) process for Phase 2 would be concluded after the planning application is submitted for the proposed development, as part of the s278 process"*.
97. The BQA raise concern that there is no up-to-date modelling of the likely traffic flows, travel times, congestion etc when the LWW Proposals are complete. This is particularly important given the removal of the Rotunda roundabout and its conversion to a signal-controlled junction with two-way traffic lanes. The BQA contend that the data underlying the traffic forecasts is disparate and out of date, and that more traffic modelling will be required in connection with obtaining TfL's consent to the removal of the rotunda roundabout. The BQA position on the impact of this removal is therefore reserved until this new traffic modelling has been undertaken and public consultation has taken place.



*Impacts during construction on residents and adjoining residential properties*

98. An initial review of the Draft Construction Environmental Management Plan (CEMP) has been undertaken by the BQA and the following comments are made. The BQA raise concern that almost no discussion or consultation with the local community has been undertaken in relation to the management and mitigation of construction impacts taking place over the course of a five-year period. The single exception to this was the opportunity to meet members of the LWW project team on 11 January 2024 at the London Centre. On raising concerns with the project team manager about the CEMP, the BQA were advised that *“it has been prepared by Multiplex who are unlikely to work on the construction project, and everything in it can be changed”*. BQA would like to express major concern at this apparent cavalier and dismissive approach on a matter that will affect the lives of many hundreds of residents over a period of at least five years.
99. A fundamental point of concern is the proposal that - from the commencement of development onwards - vehicles requiring direct access to the LWW Site will enter and exit via the existing ramp on Aldersgate Street. Furthermore, on page 36 of the CEMP, it is stated: *“Meanwhile, for safety reasons and to minimise construction delays, residents and service vehicles should access the car park using the back exit which can be found c.90m north of the rear service yard ramp along Aldersgate Street. This entrance provides access to the entire car park. Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however [it] should only be utilised when absolutely necessary”*.
100. This would be a major disruption to all current users of TMH car park and Lauderdale car park, and it is proposed to be in place for at least 5 years. The ‘back exit’ on Aldersgate St can only be accessed by a 180 degree turn from the road. The entrance height into the underground car park is too low for vans and possibly SUVs. The route through the Lauderdale car park to the TMH car park is very narrow, it has several hairpin bends and would become seriously congested.
101. The BQA consider this proposed re-routing to be impractical and unacceptable and that it should be prohibited.
102. Further concerns during the construction phase are the suspension of bus stops and cycle bays where these are heavily used by residents and those attending/working at St. Bart’s Hospital. Furthermore, it is considered that the impact of suspending public transport facilities for a 5+ year period on people with disabilities has not been assessed and is likely to be significant. Whilst commitment is made to contractors being part of the nationwide Considerate Contractors Scheme, the CoLC has its own Code of Practice for Deconstruction and Construction Sites (Ninth Edition) – January 2019 which should equally be met.
103. A further concern raised by the CEMP relates to the proposals for staff welfare facilities. in section 3.2.4 on page 61 it is stated: *“Staff Welfare - For the main construction and fitting out phases, a large set up will be required to accommodate up to an estimated 900 operatives and staff. It is proposed that the new concrete infill structure is constructed above the north service yard early in the programme to provide space for a multi-level accommodation building”*.



104. This would be a huge temporary structure which would overlook the CLSG sports field and most residents' flats in Thomas More House and Mountjoy House for at least a 5-year period. The BQA considers this to be totally unacceptable and that it should be prohibited by means of an appropriate planning condition.

**Daylight, Sunlight and Overshadowing and Solar Glare**

105. Anstey Horne were instructed by the BQA to review the submitted assessment in relation to daylight, sunlight, overshadowing, solar glare and light spillage within the Environmental Statement. Anstey Horne's report is at Appendix F to this statement. Their main conclusions are that there will be significant impact in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight. They further conclude there will be significant VSC daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant NSL daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight. Additionally, they conclude that there will be major adverse and significant incidences of solar glare to residents within Monkwell Square.
106. They also consider that further information is required to be submitted, as follows:
- VSC daylight results on a room by room basis;
  - VSC daylight results on a room by room basis without balconies;
  - NSL contour plots to establish the layout used within the analysis;
  - 'A clear sky' solar glare analysis to fully understand the potential for solar reduction at key road junctions;
  - An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP '2011' Guidance Notes; and
  - Confirmation of the location of the areas of additional light spill on the façade of Mountjoy House and that they do not coincide with the location of windows serving habitable rooms.
107. In addition Anstey Horne request that the following points be clarified:
- To verify the accuracy of the 3D modelling and analysis, confirm which properties are modelled from measured survey and which are modelled from photogrammetric survey;
  - Confirm how the windows and their locations have been modelled where photogrammetric survey has been used; and
  - Confirm the solar glare results within Appendix 13-F, including the angles on the field of vision on the solar glare result drawings.



108. Once the above information has been submitted, and made public, Anstey Horne will review and provide further conclusions to the BQA which may then be the subject of further submissions to the City of London Corporation as local planning authority.

**Archaeology**

109. The BQA are aware that the LWW Site is within an archaeologically sensitive area. The Planning application is supported by Environmental Statement Chapter 10 ‘Archaeology’ which assesses the likely environmental effects of the LWW Proposals with respect to archaeology. A review of this chapter of the Environmental Statement has been undertaken by Cathy Ross, an Honorary Research Fellow at the Museum of London, a resident of the Barbican Estate and member of the BQA. Having reviewed the chapter, her comments are as follows:

110. The archaeology scoping document and desk-based assessment (on which the chapter is based) both fail to consider the heritage assets of the Aldersgate side of the LWW Site, particularly any potential remains of Thanet House, one of the City’s grand Stuart mansions and a key site of interest for Britain’s political history. The evidential and historical potential of a site should be taken into account when considering the value of a heritage asset, and in this respect the documents are lacking. Thanet House and its gardens / environs have significant historical, political and architectural interest but are here ignored. More specifically:

111. At paragraph 15.2.2 and with reference to the remains of a Jewish Cemetery within the LWW Site - Nowhere is it made clear who actually owns the land between the Museum and the remains of the City wall. The BQA understand that the CoLC do have title to this piece of land. The report seems to assume that this land forms part of the Barbican’s group of gardens but this is clearly not the case (there are locked gates preventing public access to the Barbican’s territory).

112. At paragraph 15.2.4 – the BQA understand that any EIA has to evaluate ‘... *the significance of buried heritage assets, based on existing designations and professional judgment where such resources have no formal designation, and considering evidential, historical, aesthetic and communal value.*’ This is not considered to be the case here: the focus is entirely on the Roman remains and the much rebuilt City Wall. Other areas threatened with disturbance by this proposal have not been considered.

113. At paragraph 15.4.3 - as per paragraph 15.2.2, this implies the land is part of the Barbican estate and under City ownership. The BQA consider this point should be clarified.

114. At paragraph 15.4.20 – the BQA consider this section of the report to be completely inadequate as a summary of the whole site’s post-medieval significance. As mentioned above, Thanet House and the Aldersgate frontage must be included in any detailed consideration of the LWW Site’s ‘archaeological and historical context’, particularly given that the sites of these politically-charged 17th century buildings lie directly beneath the development. Nor is there any mention of the



Victorian development of the site (most of the standing remains of the City Wall are in fact Victorian or later). No mention either of the site's interest to Wesleyan Methodists.

115. At paragraphs 15.4.27 to 15.4.29 - the inference in these sections is that the access roads have '*heavily truncated if not removed completely*' archaeological remains. The BQA consider this to be very disputable. It is more likely that, as it says in paragraph 15.4.30 '*Archaeological remains (primarily the City ditch) have been shown to survive beneath and possibly between this localised truncation.*'
116. At paragraphs 15.4.32 to 15.4.33 – the BQA consider that these sections do at least acknowledge that there were post-medieval buildings on the LWW Site, but – again - without proper consideration of the actual buildings on this particular site. The text here is considered to be generic and based on assumptions.
117. At paragraphs 15.4.34 to 5.4.38 – the BQA consider these statements of significance points relate entirely to the Roman remains and ignore any heritage assets, actual or potential, relating to other periods of the past – Tudor and Stuart in particular.
118. Paragraph 15.4.39 – the BQA contend that surely the area of the Jewish cemetery extends beyond the footprint of Bastion House. In which case the potential for the survival of remains is higher than suggested here.

**GLA Referral**

119. The Town and Country Planning (Mayor of London) Order 2008 states that applications of potential strategic importance ('PSI applications') need to be referred to the London Mayor for his/her consideration. The definition of a PSI application is set out in a Schedule attached to this legislation. Part 3 of the Schedule deals with development which may affect strategic policies and Category 3E states that PSI applications include those for development:
- (a) 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
  - (b) Comprises or includes the provision of more than 2,500 square metres of floor space for a use falling within any of the following classes in the Use Classes Order [these uses include Class B1 Business, which has now been included within the new Class E of the Use Classes Order.
120. In this statement, we conclude that the redevelopment proposals for London Wall West do not accord with one more provisions of the relevant development plan and thus the planning application is required to be referred to the London Mayor under the Town and Country Planning (Mayor of London) Order 2008. To not do so will mean that the application has not been subject to the correct legal procedures.



**Public Benefits**

121. The Planning Statement submitted with the application sets out the range of purported public benefits that are considered to be provided by the LWW Proposals as they relate to Economic, Social and Environmental matters. The BQA has considered each of these as listed in the submitted Planning Statement and comment specifically on those below.

*Economic Benefits*

122. **Creating a catalyst for change and wider regeneration of the Barbican and Smithfield as one of the seven key areas of change, by investing significantly to unlock this key Site within the heart of the Culture Mile:** The seven 'key areas of change' is a reference to the strategic policy direction proposed by the CoLC in the emerging City Plan 2040. This is subject to further public consultation and scrutiny as the draft local plan progresses through to adoption and therefore the status of this policy direction should not be accorded the same weight as the adopted local plan. The LWW Site is currently located in the 'North of the City' area as defined in the adopted local plan. Whilst the principle of this benefit is accepted, it could equally be true of any other reuse the LWW Site.

123. **Delivery of approximately 56,000sqm GIA of new high quality, sustainable office workspace to meet a range of business needs across the Square Mile to enrich the City of London as a primary business centre of national and international importance:** Given the spatial strategy for the 'North of the City' area, the BQA disagree that the LWW Site should be promoted for significant office growth. The detrimental impacts in terms of heritage, design and townscape that result from the LWW Proposals as identified by the BQA are set out in this statement.

124. **Optimising the use of this underdeveloped site to a commercially led development with significant cultural uses within the buildings and the public realm:** The BQA consider that the LWW proposals comprise overdevelopment (not optimisation) with resultant heritage, design, townscape and other impacts as identified by the BQA in this statement.

125. **The demolition and construction phase of the development is anticipated to provide a significant amount of jobs targeted at local people:** Whilst the principle of this benefit is accepted, the BQA consider this could equally be true of any other reuse or redevelopment of the LWW Site. Whilst the BQA do not contest the number of jobs to be created during the construction phase, this 'benefit' is not specific to this development in particular; a significant number of construction jobs would be created by another form of redevelopment or as a result of the retrofit and adaptation of the existing buildings on the LWW Site. Also, these jobs are only temporary.

126. **The employment density will increase as a result of the Proposed Development through more efficient floorplates:** Whilst the principle of this benefit is accepted, it could equally be true of any other redevelopment or reuse/adaptation of the existing buildings on the LWW Site.

127. **Provision of Section 106 and Community Infrastructure Levy contributions to support the City's infrastructure:** The NPPG advises that planning obligations are entered into to mitigate the impacts of a proposal whilst Community Infrastructure Levy ("CIL") is a charge which can be levied on new





development by local authorities to help them deliver the infrastructure needed to support development in their area. The BQA therefore consider these are 'requirements' resulting from the LWW Proposals rather than 'benefits'. The BQA consider the detrimental impacts of the LWW Proposals as set out in this statement are of greater significance.

*Social Benefits*

- 128. **Creation of a range of cultural uses (c. 8,000 sqm GIA) to activate the streetscape, facilitating the City's strategic objective to implement Destination City:** The LWW Proposals do not deliver a like for like replacement of cultural floorspace on the LWW Site. The BQA highlight in this statement that Destination City is currently under review.
- 129. **The overall quality of the development and proposals offer would attract visitors, increase tourism, support and improve worker productivity and enhance the image of the area.** The BQA query how this statement can be qualified/evidenced by the CoLC. This statement could equally be true of any other reuse or redevelopment of the LWW Site.

*Environmental Benefits*

- 130. **Delivery of world class public realm and new open spaces:** The BQA do not consider the public realm and new open spaces to be provided by the LWW Proposals to be 'world class'. The BQA note that no environmental benefits are promoted in relation to the design of the new buildings within the LWW Proposals. The BQA consider that the design is not beautiful or attractive as sought by the NPPF and indeed the design is flawed as set out in this statement.
- 131. **Deliver highly sustainable development targeting BREEAM "Outstanding", delivering significant carbon dioxide reductions through implementing new efficient all electric plant and renewable technologies to improve energy efficiency and reduce greenhouse gas emissions:** The BQA consider this to be a planning policy requirement. Reduced impacts on the environment could similarly be achieved through the retrofit and reuse of the existing buildings or through reduced development of the LWW Site.
- 132. **Helping to facilitate the implementation of the fifth generation Citigen Network by providing space at basement level for new equipment to unlock the upgraded heating network:** The BQA query why this could not be delivered now, given that the CoLC are landowner.
- 133. **Implementation of Air Quality Positive measures within the scheme design in order to maximise benefits to local air quality in and around the site whilst also minimising exposure to existing sources of poor air quality:** The BQA consider this to be a planning policy requirement. Detrimental impacts of the development relating to air quality must be mitigated.



134. **Implementing a net waste positive approach to demolition of the buildings to support the circular economy:** The BQA consider this to be a planning policy requirement. A greater net waste positive approach would be to retrofit and reuse the existing buildings on the LWW Site.
135. **Delivering substantial new areas of public realm within the masterplan, including the landscaped Glade, including soft landscaping (including 98 trees, a net uplift of 71) and green open spaces; and as a result significantly increasing biodiversity and ecology across the site:** The quality of the open areas and landscaping proposals is not agreed by the BQA.
136. **Delivering significant urban greening measures on the buildings themselves.** The BQA consider the requirement to achieve urban greening improvements a planning policy requirement. Whilst the principle of this benefit is accepted, there is no assessment of the UGF score for the LWW Site as it exists compared to the UGF score of 0.41 for the LWW Proposals.
137. **Provision of alterations to the roadway to create a better experience for pedestrians and cyclists and provision of a short stay cycle hub. It would deliver growth in a highly sustainable location which will assist in the delivery of the City of London’s Transport Strategy, assisting in creating sustainable patterns of transport:** The BQA have identified significant concerns with the proposed transport proposals.
138. **Delivering a sustainable servicing strategy which includes off site consolidation:** The BQA raise significant concern in relation to the servicing strategy for the LWW Proposals and consider the use of the Aldersgate Street ramp as a single entry/exit route to be a design flaw that will have serious detrimental impact on the local residential community as users of this access.

**Planning Balance**

139. The NPPF (December 2023) states (at paragraph 11):  
*“Plans and decisions should apply a presumption in favour of sustainable development..... for decision-taking this means:*
- c) *Approving development proposals that accord with an up to date development plan without delay; or*
  - d) *Where there are no relevant development plan policies or the policies which are important for determining the application or are out of date, granting permission unless:*
    - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
    - ii. *Any adverse impacts of doing so would significantly and demonstrable outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*
140. At paragraph 20.13 of the Planning Statement submitted with the planning application for London Wall West, Gerald Eve comment:



*“It is considered that the Proposed Development complies with the Development Plan when considered as a whole and that other material considerations weigh in favour of the scheme. Any perceived harm arising from the Proposed Development is greatly outweighed by the public benefits. Accordingly, it is considered that the planning permission and listed building consent should be granted for the Proposed Development.”*

141. It is our view that this is not a full and considered planning balance assessment and as such cannot be relied upon. A full and proper planning balance assessment would thoroughly consider the following six questions:

Do the proposals comply with the Development Plan?

Do the proposals give rise to any harm to heritage assets, having applied a heritage balance?

Do the proposals give rise to any other harm?

Are there material considerations which should be weighed in the balance?

Do the benefits of the proposals outweigh any harm that has been identified?

Considering the Development Plan and the NPPF as a whole, are there factors to bring about a different conclusion?

142. Appendix G to this statement sets out the relevant planning policies of the Development Plan which are not referenced at all within the submitted Planning Statement and so have not been considered. This statement has already set out that the LWW Proposals do not comply with the Development Plan in a significant number of areas.

143. Mr Forshaw has concluded that the proposals cause widespread harm to a large number of heritage assets, including the complete loss of two undesignated heritage assets. He explains that harm to these assets, whilst less than substantial, is to such a degree that it will considerably erode and harm their significance. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere.

144. This statement has also identified a number of other harms as follows:

Impacts to the daylight levels received by neighbouring buildings;

Harm to the area’s prevailing character and setting;

The loss of cultural facilities;

Significant and avoidable increases in carbon emissions;

Impacts on townscape;

Impacts on local amenities by way of transport movements;

Overshadowing of public realm.

145. Other material considerations that we have identified to be weighed in the balance are as follows:

There is no adopted vision to promote significant office growth within this part of the City.

The emerging City Local Plan is at an early stage and therefore its policies only have limited weight at this stage.



There is a housing crisis and the opportunity to deliver much needed housing in this part of the City has been lost. This area is considered compliant with Policy DM21.2 of the adopted Local Plan which states that new housing will be provided in the City in or adjacent to identified residential areas, such as the Barbican, provided that this does not prejudice the business function of the City.

Market testing has identified other options for the LWW Site which would avoid the need for demolition, the identified harms and the increase in carbon emissions which the planning application proposals would create.

146. In the section above, we have commented on the public benefits, as identified in the submitted Planning Statement. In short, we do not agree with many of the asserted benefits.
147. Overall, we do not consider that the public benefits outweigh the harm that the proposals would bring to heritage assets and in relation to other matters, the failure to comply with a number of policies of the adopted Development Plan and the clear guidance in the NPPF as a whole to deliver beautiful and attractive development, in accordance with the prevailing character of an area.
148. As a result, it is our overall conclusion that planning permission should be refused for this proposed development.

## **Conclusions**

149. In light of the comments set out above, the BQA object to the planning applications and consider the applications should be refused.
150. As referred to above, this statement (and appendices) set out BQA's concerns and objections to these planning applications to date. The planning application documentation is extensive and detailed and so BQA may submit further comments. They will, however, not procrastinate in this regard, and will ensure that any follow-up comment is submitted as soon as they are able. In addition and notwithstanding, the comments below refer to the inadequacy of some of the planning application documentation, and so BQA will wish to review and potentially comment on any further amended documentation submitted to rectify these inadequacies.

**Appendix A: BQA letters submitted to the CoLC at pre-application stage**

**Appendix B: Embodied Carbon Review by Targeting Zero**

**Appendix C: BQA review of DAS by Jan-Marc Petroschka**

**Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka**

**Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw**

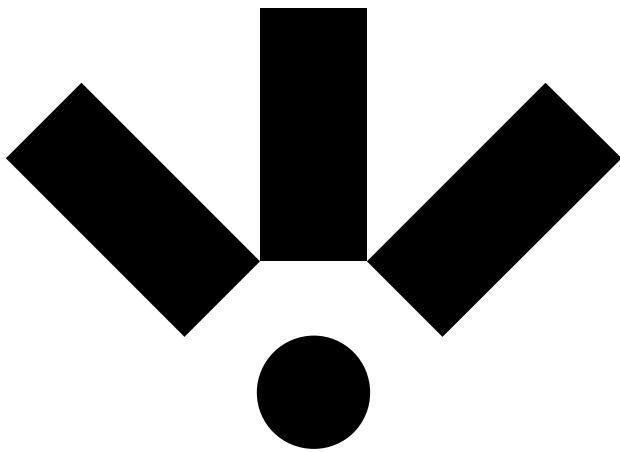
**Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Horne**

**Appendix G: Planning Policy Review table by CarneySweeney**



APPENDIX A





# BARBICAN QUARTER ACTION

On 24<sup>th</sup> October a letter was sent to many residents from Christopher Hayward, Chair of the Policy and Resources Committee of the City of London. In this letter, he maintains that the decision to marginally reduce the size of the London Wall West development is a response to 'consultation'.

Barbican Quarter Action (BQA) is publishing this open letter as a response and rebuttal of most of the content of Mr Hayward's missive. Please take a moment to read this and also to visit [www.londonstartshere.co.uk](http://www.londonstartshere.co.uk) where you can sign up to the campaign and see Mr Hayward's letter.

If you have skills and time to offer, especially in web updating (Square Space), social media, planning and architecture, the time to deliver messages like this through letter boxes, please get in touch via the website. We welcome your support.

## OPEN LETTER FROM BQA TO POLICY CHAIR, CHRISTOPHER HAYWARD

Dear Mr Hayward,

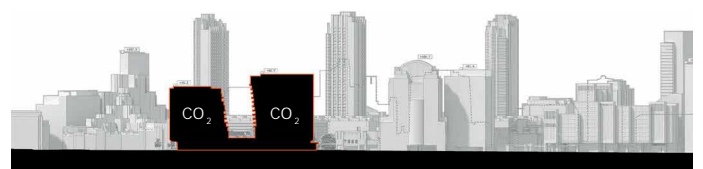
We refer to your letter to residents dated 24<sup>th</sup> October 2022. In line with previous communications from your office, there are a number of issues in this letter which are misleading or misguided. In the interests of clarity, we have highlighted below claims made by you and/or your advisors which simply do not stand up to scrutiny.

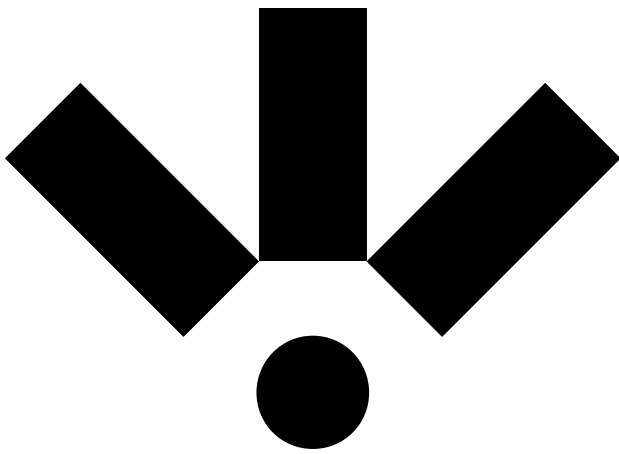
## CONSULTATION AND CONCERNS

You write that following consultations, the width of the proposed buildings has been reduced by two and three metres respectively. By omission you imply that mass and scale are the sole grounds for the hundreds of objections you received. However, many of the comments submitted were copied to our campaign email address. Those comments focus, amongst others, on the environmental impact, on damage to town and streetscape and adjacent listed heritage assets, and on lack of a cultural strategy. The barely perceptible reduction in girth does nothing to reduce the actual impact of the scheme and nor will it address real concerns raised in consultation.

## SUSTAINABILITY

Furthermore, it is perplexing that you would describe the new office space as sustainable. The 40,000kts of CO<sub>2</sub> undermine the accuracy of that claim. The 'demolition first' approach adopted by your office is, however, unsustainable and will contribute to global heating. Your officers and engineering advisors, Buro Happold, have accepted that your Whole Life Carbon Assessment Report (May 2022) which set out to justify the decision to demolish, is misleading and should be rewritten. The faulty report should be withdrawn.





# STOP. RETHINK. RESET.

## THE CITY'S EXPLORATION OF RETENTION OF EXISTING BUILDINGS

The City has not considered retention and retrofitting of all buildings. This was confirmed in the Stagg/Sturgis reports and by your advisors. All buildings at some point require work to bring them up to modern standards and these fine buildings, designed by world leading architects, will respond very successfully to retrofit as Bob Stagg confirmed in his report. Therefore, it is clear from independent experts that the buildings on the site could be retrofitted and repurposed.

## FEASIBILITY OF THE SCHEME AND FINANCIAL PLANNING

Given that no economic appraisals for any of the City's major projects have been carried out, it is difficult to claim that unless the building is of a minimum size that it is not feasible. The £50m sum raised will have little impact on the black hole in the City's finances and its attempt to fund its current projects. That £50m fails to take into account the demolition costs. Apparently reckless financial planning and over-committing to projects have resulted in claims at the Court of Common Council on 13<sup>th</sup> October 2022 that the City is at risk of going bankrupt. This is an unprecedented situation, the responsibility for which lies squarely with those continuing to promote these schemes without a comprehensive business plan or risk assessment. The waste of funds in pursuing these schemes suggests that the decision-making process in the Guildhall is contributing to the gaping hole in the City's coffers.

## A VIABLE FUTURE AND A CULTURAL STRATEGY

On 21<sup>st</sup> July 2022, you confirmed that no other cultural option for the site had been considered since the Centre for Music. What was to be a world class concert hall became overnight an office development. The element that you claim will be dedicated cultural space is not guaranteed. The City requires footfall seven days a week. Office workers have not returned to pre-Covid levels. However, small and medium-sized enterprises will not survive if footfall does not return. The LWW site seems an obvious site for a major cultural anchor that will see visitors from far and wide, generation after generation making multiple visits. Whatever the future of this strategic site, it must play a key role in any cultural strategy for the City. The City is falling behind its global competitors. This City needs a visionary cultural strategy now.

Again we ask the City to stop, rethink and reset plans for London Wall West. Do not demolish - retrofit and repurpose based on expert advice. This makes sense financially and environmentally and can make the City more competitive.

Adam Hogg and Averil Baldwin, Co-Chairs of Barbican Quarter Action

<https://www.londonstartshere.co.uk>

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To Chris Hayward  
Chairman of the Policy and Resources Committee  
City of London Corporation  
Guildhall  
Aldermanbury  
London EC2V 7HH

23 June 2022

LONDON WALL WEST – RESPONSE TO PROPOSALS PUBLISHED 18 JUNE  
2022

OVERALL COMMENT

We are dismayed that the fundamentals of the proposed design remain the same as those we saw last December. The scheme proposes the demolition of Bastion House and the Museum of London. In their place is planned a huge office-led development of some 780,000 sq. ft, including two massive new towers, with limited cultural and green space. The scheme is wholly inappropriate for a site of such significance, both in its physical form and in terms of its proposed usage. Moreover, it undermines the City's desire, as expressed in Destination City, to be one of the world's premier destinations through its cultural offerings.

OUR OBJECTIONS

We have been told repeatedly that the principal objective of the proposed development is to raise funds – for the move of the Museum of London and other City projects. By focusing on this objective, the City will:

Ignore the site's rich history, which features the Romans, Shakespeare, and John Wesley and many other historical features. The opening up of the Roman Fort Gate will be severely diminished by its commercial setting.

Sacrifice the site's public cultural heritage: as the home of the Museum of London for 50 years and the previously intended location of the world-class Centre for Music. It remains the Southern gateway to Culture Mile linking the South Bank and Tate Modern to St. Paul's Cathedral and beyond.

Confront visitors instead with a huge commercial development, with a cultural offering representing just over one per cent of its space.

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Compromise the nature and architectural integrity of the Barbican Quarter. The Barbican is world-renowned and one of the City's major post-war achievements. The Museum complements the public benefit of the Barbican while Bastion House reflects its admired Brutalist design. The new proposals include little in the way of public benefit while the height and mass of the buildings will dominate and diminish the surrounding neighbourhood.

Undermine many of its own policies and statements: the draft City Plan; the Open Space, Responsible Business and Climate Change strategies; the aims expressed in Destination City and the desire for the City to be a cultural hub, as expressed in the Barbican/Golden Lane Strategy .

There are also questions concerning the scheme's compatibility with the National Plan and the National Planning Framework . How can the City ask others to respect its policies if it fails to do so itself?

#### THE CITY'S CLIMATE CHANGE STRATEGY

It is now widely agreed that, because of the devastating impact of carbon emissions on global warming, and the large proportion of carbon emissions resulting from major construction projects, serviceable buildings should not be demolished if re-fitting them is a feasible alternative. Our polling showed that 88% of Barbican residents opposed demolition of Bastion House and the Museum of London. However, the Whole Life Carbon Assessment report prepared by the City's project team dismisses the option of retaining Bastion House without providing the necessary factual evidence. The judgement is based on a hypothetical assessment of risk rather than a full structural survey.

Moreover, if the scheme were to go ahead in its current proposed form, it would add over 45,000 tonnes of CO<sub>2</sub> to the atmosphere during the demolition and construction phases. This is more than the entire CO<sub>2</sub> annual output of the City Corporation's operational activities. How would this be compatible with the City's stated aim of achieving Net Zero in its own operations by 2027?

#### THE CONSULTATION PROCESS

The City has stated its *commitment to transparency and delivering a robust consultation process*. We have commented elsewhere that this is far removed from our experience. Above all, the City has failed to engage with local stakeholders



on the fundamental issues about the site as recommended by the National Planning Policy Framework.

While the Project Team has specified the nature of the consultation undertaken to date and highlighted the key concerns that arose (the height and mass of the proposed buildings, and issues of sustainability) they have provided *no information whatsoever* on the extent of those concerns, and why so little has been done to address them. We can only assume that the City's failure to provide us with detailed information is because there is widespread opposition to these proposals.

In addition, the Project Team's graphics are selective and misleading. There is little assessment of the scheme's impact on the Barbican Estate and neighbouring conservation area. No 3D models demonstrating the full scale of what is proposed have been made available although we know they exist and their availability for stakeholders is encouraged in the London Plan .

We urge the City to live up to its commitment to transparency and consult meaningfully with the local community. The current process falls far short.

### CONCLUSION

This remains a short-sighted proposal, lacking vision and apparently driven solely by the desire to raise money. Furthermore, the intention to enter into a long lease with a developer carries the risk that even the limited public benefits of the proposal would later be jettisoned by the developer.

As our polling showed, there is no evidence the scheme has the support of the local community. It is contrary to many of the City's own policies. This is an outstanding site crying out for an imaginative scheme respecting its heritage and location. We once more invite the City to stop, think again, and work with us and the wider community to develop a scheme worthy of the site, the City and London itself.

Adam Hogg and Averil Baldwin Joint Chairs Barbican Quarter Action

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To Policy Chairman  
Chris Hayward

Wednesday, 12 April 2023

Dear Chris,

#### EXPLORING THE POTENTIAL TO REFURBISH THE LONDON WALL WEST SITE

Thank you for your letter of 3 April stating that the City Corporation will explore the potential to refurbish the London Wall West (LWW) site. We very much welcome this move.

As you know we object to the demolition of the former Museum of London and Bastion House on a number of grounds. Foremost amongst these is climate change. The demolition of the existing buildings and consequent redevelopment of the site would result in more carbon emissions than other options. Exploring alternatives is not only in line with your new guidance to developers, but essential in our view.

We also object to demolition because these are fine buildings, of pioneering design and high quality, capable of being successfully adapted and retrofitted. You refer in your letter to “a real desire locally for these buildings to be retained” but of course objection is not confined to the locality. Significantly, the Twentieth Century Society has included these buildings in its list of the 2023 top ten most threatened buildings across the UK. It calls for them to be retained, refurbished and adapted.

We question, however, whether by seeking interest in LWW on its own, an opportunity to maximise interest and value might be lost. The New Museum, The Arts Centre renewal, and the potential afforded by Smithfield East and LWW, provide the City with an opportunity to create a world-leading centre for the creative industries. Seeking interest to develop Smithfield East and LWW, with clarity on dates for vacant possession, might have greater appeal to prospective developers.

Finally, there is the time-scale. Seven weeks which include four Bank Holidays seems a short period in which to ask for expressions of interest. This is a site with complex buildings in a difficult urban setting. Retention of buildings may require significant adaptation, and targeted demolition and extension. We have never argued that narrow refurbishment is the only solution. More time and encouragement to develop alternative creative options for the buildings, the site and its surroundings might be desirable.

Thank you for the invitation to meet. Averil and I welcome the opportunity to discuss in detail the points raised above. Can you offer us some dates in the near future?

Yours sincerely,

Averil Baldwin, Adam Hogg  
Co-Chairs Barbican Quarter Action

15 June 2023

To Chris Hayward, Policy Chairman City of London  
CC Paul Wilkinson, City Surveyor; Andrien Meyers, Chairman Investment Committee

## LONDON WALL WEST

We are writing to congratulate you, and the officers involved, on the recent soft market test to establish the level of interest in repurposing the former Museum of London and Bastion House buildings for new uses. As you know we have long campaigned for the City Corporation to rethink its plans for this site and seriously consider retention and reuse options, not least in response to the City's bold net-zero commitments.

We celebrate the market testing and wholeheartedly endorse any responses to the redevelopment of this site that clearly demonstrate:

- a true sense of vision and imagination for this outstanding historic and cultural site,
- that the current buildings at London Wall West are adaptable to many uses,
- a track record in creative, sustainable and viable refurbishment.

While we celebrate the City's actions in creating the soft market testing, we believe the process to have been seriously constrained, not least in providing just 31 working days to meet an extremely demanding brief and submit proposals. So, we are delighted to learn that developers have enthusiastically seized the opportunity and created proposals despite these constraints. This surely demonstrates that there is an appetite for retaining, repurposing and refurbishing these fine buildings; now included in the Twentieth Century Society's 2023 Risk List of the top ten most threatened in the UK. Moreover, it also demonstrates that fuller and more proactive marketing should generate valuable interest.

We hope the City's Investment Committee will now give these proposals the due attention they deserve and acknowledge that there are viable alternatives for the development of this exceptional site. Proposals that:

- are fit for the future of an ambitious, vibrant and diverse Destination City,
- reflect the potential and opportunities for cultural, creative and learning use of the site,
- demonstrate commitment to climate action and publicly underline the City's own innovative environmental planning policies should be prioritised.

We believe that retention and reuse options can represent best value for the City and enhance its reputation on the national and world stage.

We also hope that the next stage of decision making for options for the site will meaningfully involve the local community, in establishing any developer brief as well as the process for development. This would greatly enhance the intentions of the Residential Reset that you have championed. As you know, we have repeatedly said this campaign is not anti-development and is keen to offer our skills, insights and experience to work with you and your colleagues to create a valuable and truly future facing possibility for the site.

Adam Hogg  
Co-Chair, Barbican Quarter Action

7 November 2023

Chris Hayward  
Policy Chairman  
City of London Corporation.

Dear Chris,

### OPEN REPLY TO YOUR LETTER OF 29 SEPTEMBER 2023

We refer to your letter dated 29 September 2023 which you sent by email to us on 4 October 2023. There are substantive issues raised in your letter which merit further clarification. We make the following observations on the statements in your letter, with references being to paragraphs therein:

1. We note your intention to submit a planning application for the redevelopment of London Wall West and associated listed building consent (paragraph 1).
2. You claim that the decisions of the Policy and Resources Committee on 21 September 2023 and the Investment Committee meeting on 22 September 2023 to proceed with a planning application are in keeping with your *"duty to achieve best consideration"* (paragraph 2). Please provide without delay a copy of the background papers which informed those decisions. Given that the papers relate to the development of land owned by the Corporation we are advised that the Corporation is not entitled to withhold disclosure of the background papers on the grounds that they contain commercially sensitive information.
3. At the City-wide residents' meeting on 15 June 2023, you publicly stated that when assessing best value for the site a range of factors in addition to financial would be taken into account, including sustainability and the quality of the buildings. Please set out how you have taken these factors into account in your decision to proceed with the scheme.
4. You claim that the City Corporation is under a legal obligation to extract *"the maximum financial return"* for the site and that this equates to the *"best consideration"* (paragraph 3). Please explain how the City Corporation has on this occasion reduced the definition of best consideration to just the financial return. We note that this narrow interpretation was not applied in 2015 when the City Corporation agreed in principle to make the site available for a new Centre for Music, at the same time commenting on the site's strong cultural potential. Similarly, the vast sums spent on the development of the Justice Quarter were committed without an economic appraisal.
5. We note that while you rely on legislation in relation to your *"best consideration"* argument, that you fail to address the other element which the legislation imposes on local authorities, namely *"the best use of the land"*. The legislation does not allow local authorities to cherry-pick its provisions to promote its own schemes. We note that you do not mention that environmental issues have been considered at this or at any stage of the decision-making process. We challenge your contention that building more massive glass office blocks is the best use of the land. Working habits including working from home mean that office workers no longer come into the City five days a week. This does little to regenerate areas and promote footfall 5-7 days a week. The absence of a coherent current culture strategy for the City means that the use of the site as a cultural hub is not being considered as an alternative to a space that is office-led.
6. We note it is your intention to obtain planning permission from your own Planning & Transportation Committee before selling the site on for development by a third party (paragraph 4).



7. You claim to have listened to concerns about your proposal to demolish the buildings (paragraph 5) and that you have reduced the scale of the scheme accordingly. Your scheme is supported by a report by Buro Happold (and others) that claims that the buildings are at risk of disproportionate collapse. We note that you have not withdrawn that report despite its findings being discredited by BOA expert, Bob Stagg. We also note that the carbon emissions calculations set out in that same report were also discredited by BOA's carbon expert, Simon Sturgis. We note that no independent third-party review of the Buro Happold report has yet been published in line with the City's much hyped Carbon Options Guidance Advice Note.
8. We note that you confirm that the soft market test carried out this year proved successful. The credible responses (your words) were submitted despite the mere 31 working days available to applicants to complete a detailed proposal (paragraph 5). We note that you have decided not to pursue these credible responses and let the market decide the future of the site (paragraph 5). We remind you that earlier this year you wrote to residents, acknowledging a real desire locally for the former Museum of London and Bastion House to be retained. You said that you had listened to them and wanted to explore the possibility of a viable alternative to demolition. Having explored this possibility and, despite credible responses, you have decided once again to not seriously consider full retention options.
9. In explaining your decision to proceed, you make no reference to the recent shifts in planning policy at both national and local level prioritising retention of buildings for re-use and retrofit above demolition. For example, the Corporation's own Whole Life-Cycle Carbon Optioneering Planning Advice Note, and its draft City Plan 2040, which states (paragraph 12.1.15) *"As new developments are large consumers of resources and materials the possibility of sensitively refurbishing or retrofitting buildings should be considered in preference to demolition..."*.
10. Similarly, your explanation fails to take into account the decision by the Secretary of State, Michael Gove, on 20 July 2023 to refuse planning permission for the demolition of 456-472 Oxford Street. There are many parallels with London Wall West (environmental and heritage impact). A key consideration in his decision is whether retention options had been fully explored. We note that in the case of London Wall West full retention options have not and are not being actively considered.
11. Your explanation fails to take into account the heritage value of the two non-designated assets on the site. The inclusion of both buildings by Powell & Moya on the Twentieth Century Society's (the statutory consultee) 2023 buildings at risk register on account of the quality of their design and construction is significant. We note that at no point do you address the impact of demolition on these heritage assets.
12. You state that all options remain on the table and that ultimately it will be the market that will decide the optimum use of the buildings and occupancy mix. For the reasons set out above, we question the decision to proceed with a planning application allowing demolition. There already appears to be sufficient market interest to retain and retrofit these buildings in a manner reflecting the location and history of the site, at the same time securing a decent financial return for the City.

We therefore look forward to learning more about the rationale behind a decision which appears to contradict earlier commitments, disregards current planning policy and precedent, and ignores evidence of an appetite to retain and adapt the former Museum of London building and Bastion House.

Best wishes,

Adam Hogg and Averil Baldwin  
Co-Chairs, Barbican Quarter Action



22 November 2023

Christopher Hayward  
Policy Chairman  
City of London Corporation

Cc: Paul Wilkinson, City Surveyor;  
Gwyn Richards, [Planning and Development Director](#)<sup>1</sup>.

Dear Chris,

**LONDON WALL WEST (LWW)**  
**PRE-APPLICATION: A GLARING LACK OF CONSULTATION AND TRANSPARENCY**

## SUMMARY

The purpose of this letter is to ask you to withdraw the planning application for LWW because the City has failed to:

- Consult properly in line with both National Planning Guidance and your own Statement of Community Engagement;
- Fulfil the specific commitments you made in 2022 for further engagement in advance of the submission of the planning application;
- Follow the City's own [Carbon Options Guidance PAN](#)<sup>2</sup>.

We note that you have now submitted full planning applications for LWW to your Planning Department, which you state follows over two years of consultation. We have also seen the recent exchange of correspondence with Fred Rodgers, City resident, in which Paul Wilkinson, City Surveyor, claimed that the City considers it *"has engaged extensively with residents and key stakeholders."*

We are advised that these engagements to date fail to fulfil your obligations regarding consultation on the submission of this planning application. We ask that you review this application immediately to ensure that genuine *"ongoing consultation"* in pre-application is respectful, open, reasoned, and meaningful engagement and to fulfil previous public commitments you have made.

## HOW THE CITY CLAIMS THAT IT COMMITS TO CONSULT ON PLANNING APPLICATIONS

*"The City is committed to early and ongoing consultation engagement on planning applications. This means working with developers, local residents and other stakeholders from the earliest possible stage of the development process until the submission of an application to shape and guide the development proposals that are most suitable in their context. The pre-application process requires respect and understanding for stakeholders' interests, open, accessible and reasoned communication, and informative and meaningful engagement."* (The City's Statement of Community Involvement, May 2023, Pre-Application Advice, Consultation and Engagement, Paragraph 4.8 ff.)

## WHAT “CONSULTATION” HAS ACTUALLY TAKEN PLACE

There were just two rounds of public consultation. A two-day exhibition of sketch proposals took place in December 2021. In June 2022 the second and last consultation on the same scheme with more detail included a two-day exhibition at Frobisher Crescent, a one hour-long pop up event at One New Change on a day of industrial action, and another one at St. Luke’s Community Centre.

The quality of the presentation material resulted in obfuscation of the proposed development, contrary to good practice as outlined in the City’s own Statement of Community Involvement and Developer Engagement Guidance. In particular:

- Despite repeated requests for a physical model to allow an assessment of the impact of the impact of the scheme, no model was ever produced or shared;
- No material other than sketches, artists’ impressions and a computer-animated 3D fly-through were presented;
- Despite repeated requests to show the scheme in context, no scaled architectural drawings of the proposal in relation to adjoining buildings and especially the listed buildings of the conservation area were ever shown whether in plan, section or elevation.

## WHAT WAS THE RESULT OF THIS CONSULTATION?

We see no evidence of the City using resident feedback to shape and guide the development proposals. We were told by the communications agency that managed the initial, extremely limited consultations that the responses were overwhelmingly negative and this was confirmed by the series of very well-attended public meetings convened by BQA. Thus “*consultation*” has not been open, accessible and reasoned communication nor informative and reasoned engagement.

On the other hand, too often it has been inadequate and misleading, as instanced by:

- The consultation response, which resulted in marginal reduction in girth of the two towers but failed to address widespread criticisms of the scheme’s fundamental nature, made both locally and in the national press and media. These criticisms included environmental impact, damage to town and street-scape, impact on adjacent heritage assets and conservation areas and a lack of cultural strategy.
- No further consultation on the detailed design of the marginally modified scheme as promised. Indeed, no further engagement whatsoever, despite a City press release of 20 October 2022 announcing - “*The scheme’s design team will now amend the design and prepare a 3D model so a final proposal for London Wall West can be presented next year, ahead of submitting a planning application*”.
- No direct communication with residents since April 2023, when you acknowledged a real desire locally for the retention of the former Museum of London building and Bastion House. You said that you had listened to these calls and wanted to explore the possibility of a viable alternative to demolition. You referred in that letter to the City’s new policies urging developers to consider alternatives to demolition.
- No feedback on the results of the subsequent soft market test, in which developers were afforded a mere 30 days to respond, other than comments that it had been successful and that there had been what you described in a public meeting as “credible” expressions of interest. Where is the evidence

that options for retaining existing buildings have been fully explored before proposing substantial demolition? Where have you shown that the benefits of demolition clearly outweigh the benefits of retaining the existing buildings? These requirements are described in your own planning advice note on Whole Life-Cycle Carbon Optioneering (Pre-Application stage, page 16 ff.).

## CONCLUSION

The timing of the submission of this planning application is indicative of the City's approach to consultation and avoidance of scrutiny: over the festive holiday season levels of engagement with stakeholders including City residents will be predictably at their lowest.

A Barbican resident has just commented to us that in his view *"the process of consultation has been dead for over a year"*. We question whether it ever properly existed. We now call on you to withdraw the planning application in order to fulfil:

- The consultation commitments made in the City's Statement of Community Engagement; and
- The specific promises you made last year to present the final proposals for LWW, to include a 3D model, ahead of submitting a planning application.

We look forward to your urgent response.

Best wishes,

Adam Hogg and Averil Baldwin  
Co-Chairs, Barbican Quarter Action

Corrections post submission:

1. Gwyn Richards is Planning and Development Director, not Interim Chief Planning Officer as in original letter.
2. Carbon Options Guidance PAN superseeds the Whole Life Carbon Optioneering Policy mentioned in the original letter.

APPENDIX B



# London Wall West – Museum of London and Bastion House

Planning Submission Ref: 23/01304/FULEIA

## Embodied Carbon Review

*on behalf of*

## Barbican Quarter Action

17 January 2024

**Contents:**

- 1. Executive Summary and Key Findings**
- 2. UK National, GLA, and City of London Planning Policies**
- 3. Conclusions on Planning Issues**
- 4. Options Appraisal**
- 5. Conclusions on Optioneering**

## 1. Executive Summary and Key Findings:

- 1.1. This report examines the City of London Corporation's (CoLC) planning submission for London Wall West, the Museum of London and Bastion House (23/01304/FULEIA) examining in particular at the carbon/net zero and circular economy issues. The submission proposals follow the initial CoLC London Wall West Whole Life Carbon Assessment of May 2022. The submission represents a modification of the May 2022 proposals.
- 1.2. In April/May 2023, the CoLC undertook a Soft Market Test, inviting developers to put forward detailed proposals that would retain and adapt the existing buildings on the London Wall West, the Museum of London and Bastion House site. The CoLC received a number of credible and viable proposals for a '**major refurbishment**' of the existing buildings. These proposals not only met the CoLC's commercial requirements, but also met a whole range of UK, GLA and CoLC net zero, retrofit, and carbon policies for this site. (see section 2 below).
- 1.3. This report looks at the policy environment in which the submission has been made in respect of the UK's commitments to achieve net zero by 2050, 78% reductions (compared to 1990 levels) by 2035, and 68% reductions (compared to 1990 levels) by 2030.
- 1.4. **Key Finding:** There are significant and growing policy requirements at UK National, GLA and CoLC levels to assist the UK meet its net zero carbon targets and move towards a circular economy. The submitted proposal is not optimising the carbon emissions impacts of developing this site, and as a result is in direct opposition to UK National, GLA policies, as well as the CoLC's own policies. (see sections 2.1-2.7 below)
- 1.5. **Key Finding:** As recently as 12<sup>th</sup> December 2023 the CoLC approved new sustainability guidance for developers in a 'huge step' towards net zero, covering retrofit and reuse, energy and whole life carbon, the circular economy. This proposal effectively ignores this new guidance (see section 2.7 below)
- 1.6. **Key Finding:** There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to 6 options selected for detailed examination. These 6 options excluded 'Option 2', for a 'Major Refurbishment'. This is 'Option 2 is the option that is most consistent with the approach favoured by the commercial bids in the City's market testing exercise. **Why was this then excluded?**
- 1.7. **Key Finding:** The conclusion of the current 2023 submission and the associated optioneering studies is exactly the same as the May 2022 proposal, i.e. that a 'major refurbishment' approach is to be rejected in favour of 'new build'. This demonstrates that the latest optioneering exercise is purely 'window dressing' to prove a pre-



ordained choice (new build), and that a ‘major refurbishment’ option has not been seriously investigated by the design team in detail as ‘new build’ was always the intended outcome.

- 1.8. **Key Finding:** If the CoLC proceeds with this new build development proposal, at the expense of the refurbishment route for which they have received viable commercial proposals, then the CoLC will be in direct conflict with their own latest guidance and policies. (see sections: 2.4.4 - 2.4.8, 2.6, below).
- 1.9. **Key Finding:** By ignoring their own policies and guidance with respect to net zero, the CoLC is demonstrating to the global commercial property and investment market that they do not consider these issues to be important which puts the CoL at a commercial disadvantage to European competitors who take carbon reduction more seriously.
- 1.10. **Key Finding:** Unless the levels of carbon emissions achieved and reported in the submission’s GLA reporting template are ‘locked into’ the scheme and become legally binding they are likely to be abandoned by any site purchaser, which means that the figures achieved by the proposal are effectively meaningless.

## 2. UK National, GLA, and City of London Planning Policies

This section identifies those key policies at National, GLA and City of London level that prioritise retention and reuse, i.e. resource efficiency, circular economy and retrofit vs demolition, disposal as waste, and new build. It is important to note that at all these levels of national and local government, change is happening fast to ensure legislation and regulation adapt to meet the overarching requirements of a net zero and circular economy.

The proposed scheme has a current completion date of 2033 which is 9 -10 years away, and we can expect that the level of regulation in relation to the Government’s legally binding commitments on climate change will only increase.

### Government Trajectory to Net Zero

- 2.1.1. The UK Government is legally committed to achieving Net Zero by 2050, 78% reductions by 2035, and 68% reductions by 2030, both compared to 1990 levels. These are already demanding with the completion date well after the first

milestone. **Already the pressure to retrofit rather than to build new is increasing and this is likely to accelerate, e.g. Secretary of State decision on M&S, Oxford Street.**

2.1.2. In support of the UK's downward carbon emissions trajectory, the 'Industrial Decarbonisation Strategy 2021', Action 5.5: Page 64, States the following:  
*"Increasing resource and material efficiency in practice means keeping products and materials in circulation for longer through circular economy approaches such as reuse, repair, recycling and reducing the quantity of materials used within manufacturing. This transformative approach, tackling both consumption and production related efficiency, reduces emissions at all stages of a product's lifetime."*

2.1.3. The UK Government's 'Net Zero Strategy: Build Back Greener', Department for Business, Energy and Industrial Strategy (BEIS) 2021 states the following:

Technical Annex, Item 81 states: *"Resource efficiency policies will have a net benefit to pressures on raw material availability, reducing raw material demand and consumption. Moving towards a circular economy, where priority is placed on extending the lifetime and lifecycle of a product through sharing, reusing, repairing, redesign and recycling, is likely to have a positive impact"*.

Resources and Waste, Item 47 p180. states: *"Government is committed to moving to a more circular economy. This means keeping built assets, products, and materials in use for longer, including through repair and reuse, and making greater use of secondary materials, thus reducing waste arising."*

Resource Efficiency, Item 47 p130. states: *"Resource efficiency measures reduce emissions from industrial processes by keeping products and materials in circulation for longer by way of reuse, repair, remanufacture and recycling as well as reducing material usage. These activities enable the retention of value, and in some cases the creation of new value for both the producer and customer, at a much-reduced environmental impact."*

Resource Efficiency Item 53 states p130: *"To realise the wider emissions saving potential of resource efficiency measures will require establishing frameworks which minimise virgin resource use and maximise recycled, reused, or remanufactured content."*

**All of the above four extracts are clear about: "minimise virgin resource use" "extending the lifetime of a product" through "reusing, repairing" and keeping "materials in use for longer". This is a clear and unambiguous call for a change in direction where existing buildings are involved.**

## 2.2. National Planning Policy Framework

- 2.2.1. Chapter 2 of the NPPF advises that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 2.2.2. Paragraph 8 of the NPPF confirms that there are three dimensions to sustainable development – economic (building a strong, responsive and competitive economy); social (providing a sufficient number and range of homes to meet the needs of present and future generations and fostering well-designed, beautiful and safe places); and environmental (**protect and enhance our natural, built and historic environment**).
- 2.2.3. Paragraph 157 states that the planning system should support the move to a low carbon future in a changing climate and that: *“It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; **encouraging the reuse of existing resources, including the conversion of existing buildings**”*.

## 2.3. GLA London Plan and Policies SI2; Whole Life Carbon, and SI7 Circular Economy (CE):

- 2.3.1. GLA Policy SI2, Principle No.1 p4: ***“Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option”***.
- 2.3.2. The submission quotes GLA Policy SI7, for example: *“Resource conservation, waste reduction, increases in material reuse and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration”*,
- 2.3.3. But the submission, unsurprisingly, does NOT quote GLA Policy SI7 para 1.1.3: ***“prioritising the reuse and retrofit of existing structures, can promote CE outcomes.”***
- 2.3.4. The submission also quotes the following from GLA Policy SI7: *“Meet or exceed the targets for each of the following waste and material streams:  
Construction and demolition – 95% reuse, recycling or recovery  
Excavation – 95% beneficial use”*.

**It should be noted that these commitments are routine from most contractors and do not therefore represent anything additionally beneficial.**

2.3.5. The submission states the following (Circular Economy Statement, p18):

*“Overall, there are strong aspirations to adopt circular economy principles in development projects including its operations, therefore the Applicant is committed to circular economy principles within the Site and to lead by example”.*

*This is ironic as the most ‘circular’ activity possible on this site is to reuse and refurbish the existing buildings, so the ‘Applicant’ i.e. the CoLC, is NOT meeting these requirements nor can it be said to be ‘committed to circular economy principles or leading by example’.*

2.3.6. GLA Policy SI2, Item 3.1.3: *“If substantial demolition is proposed, applicants will need to demonstrate that the benefits of demolition would clearly outweigh the benefits of retaining the existing building or parts of the structure. **Retention should be seen as the starting point; this will usually be the most sustainable option as it can make an immediate contribution toward the Mayoral objective of London becoming a zero carbon city by 2030**, as well as reflecting the need to both move towards a low-carbon circular economy (set out in Good Growth objective GG6 – Increasing efficiency and resilience) and to push development up the waste and energy hierarchies (see Policy SI 2 – minimising greenhouse gas emissions; and Policy SI 7 – reducing waste and supporting the circular economy)”.* *This has not been done, see section 4 below.*

2.3.7. GLA Policy SI2 Item 3.2.2.: Box 4, item 5: *“Confirmation that options for retaining existing buildings and structures have been **fully explored before considering substantial demolition**, including incorporating the fabric of existing buildings into the new development. See paragraph 3.1.3 for further guidance.”* *This has not been done, see section 4 below.*

## 2.4. Emerging Local Plan City Plan 2040

2.4.1. As set out earlier in this report the City of London Corporation (CoLC) is currently in the process of producing a new Local Plan covering the period to 2040, setting out what type of development the CoLC expects to take place and where. Once adopted, it will replace the current adopted local plan.

2.4.2. Paragraph 48 of the NPPF advises that *‘local planning authorities may give weight to relevant policies in emerging local plans’.*

2.4.3. In terms of strategic priorities, the plan sets out overarching economic, social and environmental objectives. Those that are of key importance to the LWW Site and LWW. Proposals include:

The 'Environmental Section' includes the statement: *"The need to shift the culture away from 'demolition first' to 'retrofit first'". Not achieved, see section 4 below.*

And also that *"Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development". Not achieved, see section 4 below.*

2.4.4. In terms of the economic objectives of City Plan 2040, draft Strategic Policy S4: Offices, updates adopted Policy CS1 Offices, notably through the policy, promotes the retrofitting of existing office buildings for office use as well as upgrades to their environmental performance and quality of accommodation. This is expanded upon by draft Policy OF1: Office Development which states that office development should prioritise the retrofitting of existing buildings. **Not achieved, see section 4 below.**

2.4.5. The retrofit first approach is further embedded in draft Strategic Policy S8: Design, with the aim of prioritising the retention of and retrofit of existing buildings which should be informed by an appraisal of the development options. (NB See Section 4 below). Such refurbishments should improve the environmental performance of existing buildings and minimise whole lifecycle carbon emissions. **Not achieved, see section 4 below.**

2.4.6. Further detail is then set out in draft Policy DE1: Sustainable Design, which requires a retrofit first approach and that all major development should undertake an assessment of options for the site in line with the CoLC Carbon Options Guidance PAN. **Not achieved, see section 4 below.**

2.4.7. Also referenced is Policy CE1 where the submission quotes as follows: *"This policy states that developments should be designed to promote circular economy principles throughout the life-cycle of the building, as established in the GLA's CES guidance. Examples include re-use and refurbishment of existing buildings, structures, and materials to reduce reliance on virgin resources". Not achieved.*

2.4.8. The submission also references policy CE1 as follows: *"Figure 2-4 which shows the circular economy hierarchy for building developments with retaining existing buildings as the preferred option. Retention serves as the starting point*

in redevelopment schemes and should be maximised before considering refurbishment and reuse through to the least preferable option of recycling materials from demolition works”.

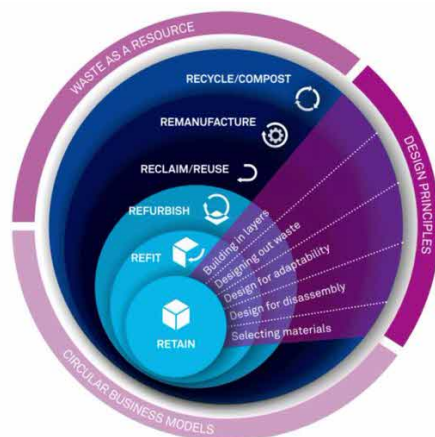


Figure 2-4 Circular economy hierarchy for building approaches as shown in Policy D3 of the London Plan. References Building Revolutions (2016), David Cheshire, RIBA Publishing.

Although referenced, this policy has not been followed.

2.4.9. Optioneering has NOT been correctly examined as ‘Option 2’ (see ‘Carbon Optioneering Study, including Dashboard 1 and Dashboard 2’), which aligns with the CoLC’s ‘Soft Market Test’ was rejected without being examined in detail. Not achieved, see section 4 below.

## 2.5. Planning Policy – Principles of Redevelopment

2.5.1. As noted, the NPPF states in paragraph 157 that the planning system should support a transition to a low carbon future in by ‘encouraging the reuse of existing resources, including the conversion of existing buildings’. Not achieved, see section 4 below.

2.5.2. The adopted CoLC Local Plan supports this and states in Policy CS15 that demolition should be avoided through the re-use of existing buildings and the CoLC Carbon Options Guidance PAN provides the most recent intermediate position on how this will be considered by the CoLC as LPA. It is clear, however, that the CoLC emerging policy in City Plan 2040 favours an embedded strategy of retrofit and the re-use of existing buildings. Whilst these policies do not yet have significant weight given the status of the emerging local plan, given that CoLC are also applicant it would seem inappropriate for this



emerging policy approach to not be adhered to without clear explanation and justification. **Not achieved, see section 4 below.**

2.5.3. The CoLC Whole Life-Cycle Carbon Options PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emissions. It states that optioneering is required for all major schemes before the application is submitted and furthermore advises “If substantial demolition is proposed, applicant will need to demonstrate that benefits of the demolition would clearly outweigh the benefits of retaining the existing building or part of the structure.” This approach reinforces the Mayor’s WLC Assessment LPG by requiring developers to consider alternatives to demolition at the earliest stages of planning and in this regard, the current interim WLC Assessment undertaken for the LWW Proposals will need to be reviewed and reconsidered (including options for part retention). **Not achieved, see section 4 below.**

2.5.4. As Section 4 below demonstrates the submitted Optioneering Appraisal is fundamentally flawed as it does not include a basic ‘Major Refurbishment’ as outlined in ‘Option 2’ which has been disregarded in the detailed optioneering process.

**2.6. The City of London on the 12<sup>th</sup> December 2023 approved new sustainability guidance for developers in a ‘huge step’ towards net zero.** Five key considerations are identified in the guidance for developers, in order to set exemplary standards for sustainability, without undermining the economic viability of planning applications. These include the following three relevant to this proposal:

2.6.1. **Retrofit and reuse** - Outlining the ‘retrofit first’ approach, promoting the reuse of existing buildings where this is the most sustainable and suitable approach for a site, in line with the City Corporation’s adopted Carbon Options Guidance. **Not achieved, see section 4 below.**

2.6.2. **Energy use and ‘Whole Life-Cycle’ carbon emissions** - Providing guidance on reducing and mitigating emissions from construction and the use of a building over its entire life, including demolition and disposal. **Not achieved, see section 4 below.**

2.6.3. **Circular Economy in Construction and Operation** - Demonstrating how developers should shift from a linear to a more circular construction model, where a long-life, loose-fit, low-energy approach is taken to all new and existing



buildings and materials, with focus then switching to reducing and treating waste produced by occupants. **Not achieved, see section 4 below.**












### 3. Conclusions on Planning issues:

- 3.1. The above Section 2 shows that at UK national level, GLA level and at City of London level there is ample policy that specifically prioritises the reuse of resources, circularity and retrofit over demolition and new build. **By proceeding with this submission, the CoLC is in direct conflict with their own current policies and guidance, as well as GLA policies and guidance and the UK national trajectory to net zero.**
- 3.2. That such demolition is against the UK national interest with respect to moving towards Net Zero by 2050, as well as to a Circular economy.
- 3.3. The submitted proposals have included optioneering, but as shown in Section 4 below, the most realistic refurbishment option, and the approach favoured by the commercial bids to refurbish with minimum new construction (called 'Option 2' in the submission) has been effectively ignored.
- 3.4. **Unless the carbon emissions levels proposed by the new scheme are effectively 'locked in' in any consent, in a similar way to GIA, massing etc, then the WLC levels achieved in the submission and reported in the GLA Spreadsheet showing the meeting or exceeding of GLA carbon targets will in effect be meaningless.**
- 3.5. By ignoring their own policies and guidance with respect to net zero, the CoLC is demonstrating to the global commercial property and investment market that they do not consider these issues as important. This puts the CoLC at a commercial disadvantage to European competitors who take this more seriously.

### 4. Options Appraisal

- 4.1. As part of the submission an 'Options Appraisal' or 'Evaluation of the Design Scenarios' was done within the 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2'. This shows that 11 options for the site were initially considered from Option 0, 'Do Nothing' to Option 9, a full redevelopment. Of these initial 11 Options the analysis focuses on 6 Options, Options 1, 3a, 3b, 5, 6, and 9, (numbers shown in green on diagram below).

4.2. Option 2: 'Major Refurbishment' is notably missing from this more detailed investigation, the reason given being that it is essentially an extension of a minor refurbishment (see diagram below, red box)

Scenario	Do Nothing	Minor Refurbishment	Major Refurbishment	Major Refurbishment with Extensions						Redevelopment	
	0	1	2	3a	3b	4	5	6	7	8	9
											
Selection of scenarios to be quantitatively assessed and main reasons for discounting	Considered not feasible due to current low energy performance, challenges with thermal comfort, low ceiling heights. Investment needed for carbonation, repair, fire risk, and structural robustness. Public realm redevelopment limited.	To be further analysed qualitatively and quantitatively	This scenario has been integrated to option 1 as a major refurbishment is considered necessary to be done to option 1 after 15 years of further operation.	To be further analysed qualitatively and quantitatively	To be further analysed qualitatively and quantitatively	Peninsula change limited by the areas of the Museum of London Building retained. Public realm redevelopment limited. Investment needed for carbonation, repair, fire risk, and structural robustness.	To be further analysed qualitatively and quantitatively	To be further analysed qualitatively and quantitatively	Peninsula change limited by the areas of the Museum of London Building retained. Public realm redevelopment limited. Challenges with the integration of new buildings into existing substructure of the Museum of London Building.	Size of the new buildings limited by the existing substructure or extensive reinforcement needed to increase it. Public realm redevelopment limited. Investment needed for carbonation, repair, fire risk, and structural robustness.	To be further analysed qualitatively and quantitatively

After the qualitative assessment of the 10 scenarios, and the "Do Nothing" baseline required by the Carbon Options Guidance document, cases 1, 3a, 3b, 5, 6 and 9 were selected for further qualitative and quantitative assessment. The extent of intervention per scenario has been defined in detail.

Diagram from page 17: 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2'.

- 4.3. This omission is significant as a 'Major Refurbishment' is the most plausible alternative low impact approach to the site in order to achieve a scheme that is also commercially viable. This has been proven by the City's decision to offer the site to potential bidders for 'major refurbishment' proposals by way of market testing.
- 4.4. The fact that a number of developers submitted design and commercial proposals that can be described as 'major refurbishment' demonstrates that this approach has both practical and commercial merit, yet it was specifically excluded from the detailed options appraisal.
- 4.5. The Submission's Options Appraisal or 'Evaluation of the Design Scenarios' is therefore fundamentally flawed and cannot be seen as a reliable examination of the options for the site.
- 4.6. The diagrams below (Figure 10-2 and 10-3), 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2', p35, show respectively for the 6 Options selected for detailed study; the carbon intensity (kgCO<sub>2</sub>e/m<sup>2</sup> GIA), and the total whole life carbon emissions (tCO<sub>2</sub>e) for each option.

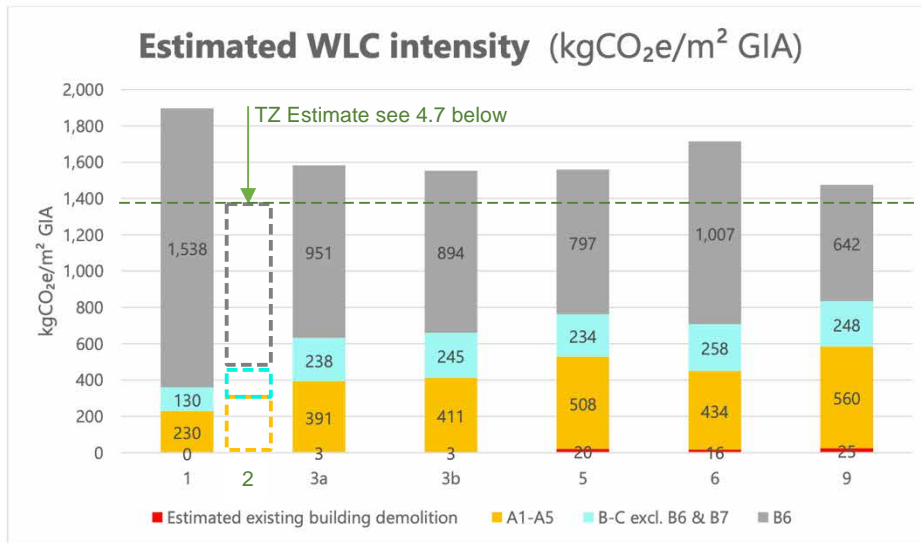


Figure 10—2 Estimated WLC Intensity Per Scenario Analysed



Figure 10—3 Whole Life Carbon Scenarios Comparison in Total Tonnes of CO<sub>2</sub> Per Scenario Analysed

4.7. Shown, dotted, is an estimate by the author of this report of what ‘Option 2’ might look like in comparison. This is based on the following assumptions:

That A1-A5 (yellow box) will be slightly more than Option 1, but less than Option 3A. This is reasonable as Option 1, described as a ‘minor refurbishment’ involves very little new work, whereas Option 3A ‘major work with extensions’ involves significant new construction not included in the ‘major refurbishment’ for ‘Option 2’.

The same logic applies to B-C excl. B6, B7 (blue box).

B6, Operational energy use (grey box) should, within a ‘major refurbishment’ be to current environmental standards, and therefore at least as good on a m2 basis

as Option 3b, even if possibly not quite as good as a new build Option 9. On a total basis operational energy use would be less than the other major works options due to the smaller area, GIA.

These assumptions would have to be verified through actual analysis of the major refurbishment proposals, but nevertheless represent a reasonable estimate of carbon emissions on a comparative basis.

- 4.8. The TZ additions to the submission diagrams 10-2 and 10-3 (Carbon Optioneering Study p35) show that on a carbon intensity basis ( $\text{kgCO}_2\text{e}/\text{m}^2$  GIA) a major refurbishment is the best option, and better than the new build. This is because the embodied emissions for refurbishment would be significantly lower than for new build, and even if the operational emissions were to be slightly higher on a  $\text{m}^2$  basis, the combination would be lower.
- 4.9. On a total carbon emissions basis ( $\text{tCO}_2\text{e}$ ), the major refurbishment would be the best overall, better even than a 'minor refurbishment'. This is because although the embodied carbon expenditure is more than a minor refurbishment, the improvement in operational performance would more than outweigh this.
- 4.10. The diagram below from the submission (Carbon Optioneering Study p34) compares the 6 options selected for more detailed analysis over a 60 year period. It should be noted that these trajectories (from the submission) should be treated with caution as they are only very indicative of what is likely to happen in reality. Nevertheless onto this diagram TZ has overlaid a yellow dotted line showing what an 'Option 2' might look like by way of comparison.

10.1.1 Cumulative Carbon Emissions Graph

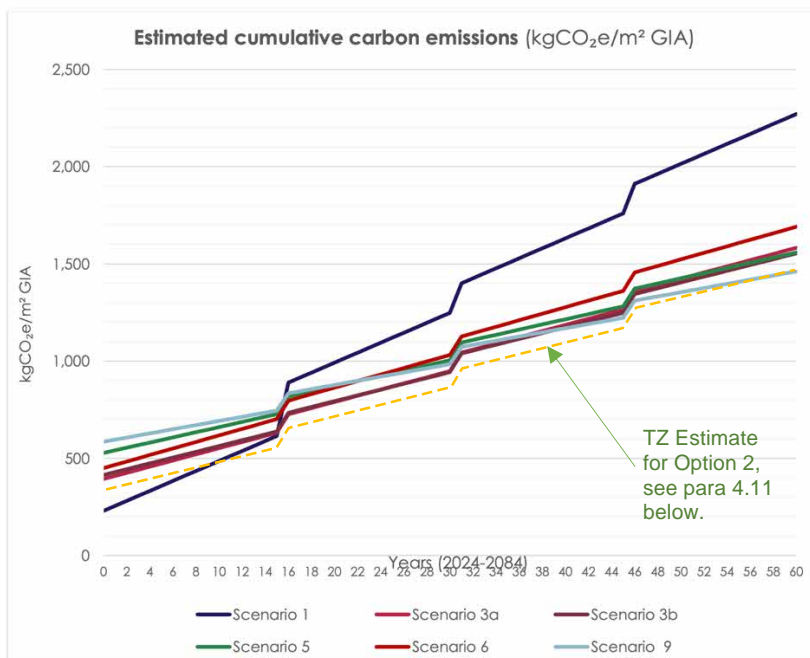
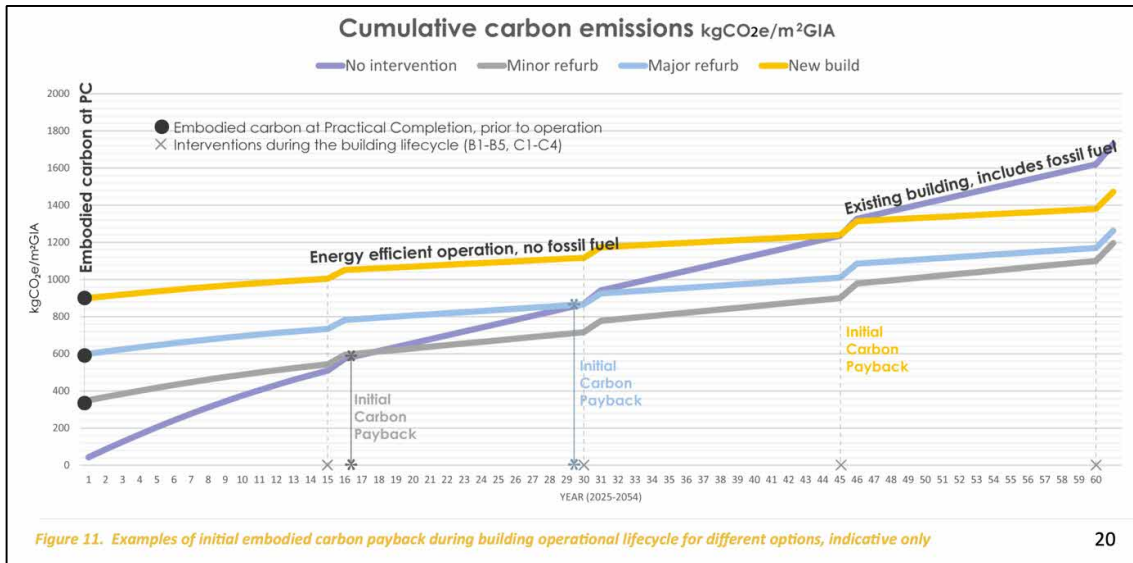


Figure 10—1 Estimated Cumulative Carbon Emissions (kgCO<sub>2</sub>e/m<sup>2</sup> GIA) Over A 60-Year Period, Including Whole Life-Cycle Carbon (Embodied and Operational) Emissions

4.11. The yellow dotted line, the assumed Option 2, starts above Option 1, but below the other options as per Figure 10.2 above. The trajectory is assumed to be similar to options 3a and 3b. This is because the Option 2 ‘major refurbishment’ would bring the buildings up to a good standard equivalent to Options 3a and 3b. As noted above in 3.10 this diagram should be treated with caution. However what is shown, is that the resulting trajectory over 60 years is better than the other refurbishment options, and about the same as the new build.

4.12. It should be noted that in the May 2022, ‘*Planning Advice Note; Whole Life Cycle Carbon Optioneering*’ by Hilson Moran for the City of London the following diagram ‘*Figure 11*’, shows the typical relative trajectories for various options see in particular ‘major refurb (blue line)’ vs ‘new build (yellow line)’. This shows that typically major refurbishment has a lower WLC life cycle over 60 years than new build. This is of significance as it clearly supports GLA ‘Policy Principle No 1’ (see section 2.3.1 above) to prioritise retrofit and illustrates that to achieve its net zero objectives, the City of London should be following this route.



## 5. Conclusions on Optioneering

- 5.1. The Optioneering study is fundamentally flawed as it does not include 'Option 2' 'Major Refurbishment' which is essentially what the City's market testing exercise covered. The study is not therefore a reliable source of information on optioneering.
- 5.2. The proposals therefore do not comply with draft Strategic Policy S8 and other relevant policies.

APPENDIX C





11	The CoL highways team identified the LWW site as providing the potential opportunity to transform the existing roundabout arrangement to create a consolidated peninsular site and improved public realm at the north end of the gyratory project.	It does not seem logical that the peninsular scheme diverting the traffic around the proposed building is driven by highways when a simple intersection with clear views and overview from all streets would be the safest option – for motorists, cyclists and pedestrians. The traffic scheme seems to be driven by the desire to maximise the footprint of buildings and therefore includes the area of the roundabout, including street and sidewalks within the site boundary.
24 ff	2.6 Site Historic Context	The historic context analysis fails or omits to mention the Roman and later Saxon gate (Aldersgate) in the City Wall to the south of the site and the importance of the historic route Aldersgate Street as the beginning of the A1, longest numbered road in the UK, connecting London towards Edinburgh.
32 6 <sup>th</sup> ¶	The Museum of London and Bastion House were a separate project from the Barbican development, however the intention was to connect into the pedway network of the Barbican, which was realised to one location to the north, and to the highwalk adjacent to London Wall, but not to the full extent that was originally planned.	Reductive presentation: the link between the Barbican Estate and the MoL/Bastion House goes far beyond the pedway system. The Museum of London and Bastion House were part of commercial Barbican South, the Barbican Estate formed residential Centre Barbican. The whole area, subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards, was laid out on an orthogonal grid. The areas were planned in response to each other, with open spaces contained in between the two developments and building volumes aligned, in proportion to each other, and all linked by an extensive network of pedways.
33 2 <sup>nd</sup> ¶	The majority of the Museum building is clad in a white rectangular tile in a simple stacked pattern. The massing of the buildings is monumental with exposed concrete columns, exposed concrete soffits and ribbon windows in the modernist style. A dark brick tiled flooring unifies the floorscape.	The description of the museum's massing as monumental is emotive and is contested. The Museum is a four-storey block of similar height as the historic buildings that survived the blitz (now mostly demolished and replaced by much taller buildings).
34 1 <sup>st</sup> ¶	Bastion House Bastion House was developed as part of the masterplan for the extension of London Wall, and was originally one of six similar office blocks that lined the new road. Bastion House is the only remaining building standing of this original context, which has all been lost.	Factually incorrect. While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived. City Tower on the south side of London Wall, designed by Sir John Burnet, Tait & Partners, built 1962-4, was first reclad by GMW Partnership in 1985, and comprehensively refurbished by ORMS in 2013. Another important building of the commercial South Barbican plan is Britannic Tower, former headquarters of BP. Designed by F. Milton Cashmore and H. N. W. Grosvenor, and built 1964-7, the building was successfully refurbished by Sheppard Robson and renamed Citypoint in 2000.
34 3 <sup>rd</sup> ¶	The floor to ceiling heights are 2.5m, which is low by modern office standards.	According to the approved plans, held by both LMA – file references COL/PL/01/168/B/001-023 - and City Corporation – planning file 4648, the floor-to-floor height is 11 feet - 3.35 metres - with a floor-to-ceiling height of 10 feet 2 inch – 3.10 metres – and a floor to false ceiling height of 9 feet – 2.74 metres. The floor to false ceiling height may be significantly increased with the use – as many modern office blocks do – of exposed services.
42, 43	Ar facts of interest on the site	Print mistake, pages double printed and not intelligible
60	Scenarios selected/not selected for whole life cycle carbon analysis.	Option 1, minor refurbishment, replacement of some of the MEP items, minor upgrade to the façade, is taken forward in the WLC assessment. This, however, is the most unlikely scenario.

		<p>Op on 2, major refurbishment of the existing building is excluded from the evaluation. However, any repurposing of the former museum and Bas on House will most likely involve a change of use and require substantial works to adapt the buildings, including changes to the interior and exterior.</p> <p>Op on 2 would have been the route progressed by the developers of the so market test in May/June 23, all of which have proposed the conversion of Bas on House from office use to hotel use.</p> <p>The options seem to be chosen to lead to the foregone conclusion and selection of op on 9, demolition and new build.</p>
66	<p>4.2 Urban Strategy - Urban and Cultural Axes</p> <p>Furthermore, the site lies on a North-South axis which connects the South Bank and Tate Modern to St. Paul's Cathedral, and the Barbican Centre and London Symphony Orchestra St. Luke's Venue to the North.</p>	<p>The diagram of connecting urban and cultural routes is a misinterpretation of factual movement through the area. The Barbican Highwalks are labyrinth-like and difficult to navigate. With only few access points they do not work as thoroughfare for the wider public.</p> <p>Moreover, this is deliberate – like all housing estates the internal routes are largely for access for residents and their visitors – they are not to provide major thoroughfares for through pedestrians – in order to maintain the residential nature of the estate.</p> <p>The main routes are at street level. The vast majority of visitors of the Barbican Centre use Beech Street as thoroughfare and not the Barbican podium. Aldersgate Street is the main route north from St Paul's. On the diagram the route from St Paul's terminates at the site. However, it continues past the site to the east-west axis of the new London Museum and Barbican Centre (Long Lane and Beech Street), past Barbican tube station and far beyond.</p> <p>A baseline study (by e.g. Spacy Syntax) looking at spatial accessibility, local route hierarchy, from high, medium to low would have shown how people move through the area.</p>
76 2 <sup>nd</sup> ¶	<p>Alternative Massing Strategies</p> <p>After finalising the site brief and laying out the road junction, key townscape guidelines were implemented to shape the size and placement of the buildings. A primary consideration was ensuring that the buildings would not obstruct the view of St. Paul's Cathedral from Millennium Bridge. Initially, there was an assumption that taller buildings could work if not directly behind the cathedral. With this in mind, various massing options were explored based on typical floor plate depth constraints, and their pros and cons were assessed.</p>	<p>While it is commendable that long distance views were considered, this should not absolve the design team from paying regard to medium-distance and close-up views of the development, nor other site constraints and urban design considerations.</p> <p>A carefully developed response would have analysed, understood and addressed the rich history of the site and area, pre- and post-war, the current specific urban context, its character, scale and grain, vistas, desire lines, and specifically the sensitivity of listed buildings and CAs. For example: the obvious alternative of turning the Rotunda into a public square and placing the building mass along the perimeter, similar to 200 Aldersgate and One London Wall, has not been assessed. Sketch 3 leaves a gaping hole in the middle where space defining building mass should be.</p> <p>For a strategic site of this importance this restricted options appraisal without a detailed townscape analysis but with a foregone conclusion in mind falls far short of the requirement to seriously evaluate alternative development options.</p> <p>Not mentioned is the fact that the proposed massing actually obscures access to one of the area's cultural icons. At present one of the Barbican towers is visible to anyone approaching from the south up St Martin Le Grand. The proposed Rotunda building blocks that view (impeding access to the iconic estate and replacing a</p>

		recognisable architectural landmark with a building of questionable design quality.
77 2 <sup>nd</sup> ¶	The building element on the Rotunda site creates a terminus of the Aldersgate Street Axis. The floor plates of the individual towers are appropriate for an efficient core and depth for daylighting.	As above, Aldersgate Street is an over 1600-year-old historic Roman route in and out of London. There is neither a historic nor an urban justification nor any benefit in creating a terminus in the middle of this important north-south axis and at the junction with London Wall.
77 3 <sup>rd</sup> ¶	This is also a significant benefit of the revised roadway configuration. The low podium also maximizes the openness and porosity of the site providing the potential to connect the North-South axis of movement in a clear intuitive manner.	To the contrary: The north-south axis is Aldersgate Street and not the meandering Barbican highwalks. Blocking Aldersgate Road with a terminus building is counterintuitive. This physically and visually splits and disconnects the north-south axis and represents a fundamental urban design flaw. The terminus building, blocking the junction, will be disorienting for pedestrian and vehicular movement along Aldersgate Street, St. Martin's Le Grand and London Wall.
77 4 <sup>th</sup> ¶	Lastly, Ironmongers' Hall is not cut off from the street, and has an improved relationship to the street from its current situation.	Historically the building sat on the inside of an urban block, within dense urban fabric, therefore only partially visible. Access was from Aldersgate Street via a small archway within the row of buildings along the street. Ironmongers Hall will now stick out like a sore thumb, like a relic, similar to the ruins of London Wall. This looks like Disneyfication of urban planning. Alec Forshaw will be a better judge. Please refer to image: Fig. 4.12: Superimposed sketch design for Ironmongers' Hall in the TVBHIA, page 21
78 1 <sup>st</sup> ¶	Having established the initial block massing part, the proposed building massing was refined through a series of operations responsive to micro-climate within the public spaces - by opening up the central public spaces - by opening up the central public spaces, along with further considerations of the strategic views of the development with the townscape context, and residential amenity considerations.	This is urban planning by deduction. The sole ambition of the massing exercise seems is to push the quantum of developable area to legally unchallengeable limits. The scheme represents a total disregard for the historic and urban context, the scale and grain of the area, and the visual and physical impact on its immediate surrounding, listed buildings and CAs. It is a self-serving development which looks at optimising the semi-public realm at its heart while turning its back onto its neighbours and public street space, specifically the main north-south route Aldersgate Street.
82	Design Sketch Studies: Public Realm A series of design sketches and studies helped evolve the public realm design into the final proposals as shown later in this document. A selection of these sketches focused on the different aspects of the public realm are included here.	No consideration has been given to the quality of Aldersgate Street; it is treated as the back of the development. Instead of reinforcing and improving the historic north-south axis of, the diagram omits this main and direct route. The movement from Aldersgate Street south, up onto and across the glade and then back onto Aldersgate Street north is a diversion and does not follow a natural desire line.
85	Feedback Summary	To be addressed by AB's SCI review.
86	Across the course of the evolution of the Proposed Development, feedback on the height and massing proposed was received from both the consultation process and pre-application meetings with planning officers. Multiple approaches to reducing the building massing were studied and implemented.	No other points raised at the public consultations were addressed.
94 4 <sup>th</sup> ¶	The overall curved forms of the buildings help reconcile the multiple site orientations and geometries between the City urban grid, the Barbican urban grid, and the Rotunda which is angled at odds relative to the rest of the context.	The only reference is to opposite equally curved One London Wall. The curved forms are at odds and do not relate to the strictly orthogonal grid of Centre Barbican (Barbican Estate) and South Barbican (London Wall). They stand in

		stark contrast and opposition and therefore do not reconcile.
95 1 <sup>st</sup> ¶	The pair of buildings seen as forming a gateway in the City - recalling the historic function of this location as a gate in the City Wall - is again apparent from the North, with a greatly increased public realm connectivity and porosity to view at the pedestrian levels.	The semi-public glade is not a gateway. The proposed scheme does exactly the opposite of a gateway: it blocks the public realm and views by placing a terminus building in the middle of Aldersgate Street. A gate places a marker on both sides of a road, not in the middle.
95 3 <sup>rd</sup> ¶	The solar shading screen of the outer facades wraps onto the North facades as well to perform a different function: to create the sense of the buildings closing their facades in the direction of adjacent residential buildings.	This gesture does not prevent direct overlooking of the bedrooms of Montjoy House, nor the only external amenity the City of London School of Girls.
108	Public spaces. The Glade Garden is located at the Highwalk level, projecting over the Central Plaza. It creates a surreal garden environment that is detached from the lively activity of the streets below, a green space for contemplation at the heart of the development, surrounded by banks of lush planting that also extend up the planted terraced facades of the buildings that flank it.	The current highwalks and the Rotunda, roads and sidewalks are public thoroughfares. In contrast, who will own, control and maintain the glade? Since the site will be disposed of, it seems that the buyer and developer would own this area. This would turn currently public space into semi-public /semi-private space. As this space is little overlooked at night, will it be closed after office hours? Will there be private security?
		The quality of the central garden space as outdoor amenity will be limited due to the tall buildings surrounding it. During spring, summer and autumn the glade will only receive around two hours/day of sunshine, and none during winter. Please refer to Environmental Statement Volume III: Technical Appendices, APPENDIX 13-D, Transient Shadow Results
110	Culture Space	As the CoL will not develop the scheme but sell it to the highest bidders who will likely redesign the scheme to suit their needs, this part is aspirational only.
121	West Side Elevation	The uniformity of the outer façade, its lack of detail, its scale and grain bear no relation to the listed Barbican Estate.
122	East Side Elevation	The uniformity of the outer façade, its lack of detail, its scale and grain bear no relation to the listed Barbican Estate. The east elevation makes opposite 1 London Wall look small in comparison. This view demonstrates how the Rotunda building terminates the view of this important junction.

APPENDIX D



20 (4.17)	<p>The Barbican Estate was of importance to the redevelopment of the site: the highwalk, or pedway as it was known at the time, was a crucial element of the site's design. However, the buildings on site – the Museum of London and Bastion House – were not designed in conjunction with the Barbican Estate. The only requirement for development on the site was that the buildings should connect into the Barbican Estate and City wide network of pedestrian highwalks. The Museum of London was conceived as a sprawling, low-lying mass, predominantly clad in white tiles, and with a dark brick rotunda at its southwestern tip.</p>	<p>Reducive presentation: the link between the Barbican Estate and the MoL/Bastion House goes far beyond the pedway system:</p> <p>The entire Barbican area, devastated by heavy bombing during WWII, was subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards. "A powerful motivation in the preparation of the various post-war reconstruction plans was a desire to prevent uncontrolled piecemeal development with no aesthetic coherence." (Barbican Penthouse over the City, David Heathcote, page 72.)</p> <p>The Museum of London and Bastion House were part of commercial Barbican South, the Barbican Estate formed residential Centre Barbican. The whole area was laid out on an orthogonal grid.</p> <p>As condition for the Centre Barbican development the architects Chamberlain, Powell &amp; Bon had to integrate the LCC and Planning Committee's Commercial Barbican plan.</p> <p>The two areas were planned on the same perpendicular grid and in response to each other, with streets and open spaces contained in between the two developments and building volumes aligned, in proportion to each other, and all linked by an extensive network of pedways.</p>
20 (4.17)		<p>Philip Powell and Geoffrey Powell were firm friends and knew each other well from university days, even sharing the same house.</p> <p>The choice of the same materials of the two cultural buildings, the Barbican Centre and the Museum of London is not by coincidence: The galleries at the later Barbican Centre were clad in white rectangular tiles just as the earlier Museum of London. Similar to the residential buildings of the Barbican Estate, the museum itself is supported by pick-hammered concrete columns, as is Bastion House, while the office block's façade followed the planning authority's strict design brief for the six London Wall towers for uniform appearance and inspired by latest office blocks in New York.</p>
20 (4.17)	<p>Bastion House was one of a number of commercial slab blocks which were designed to line the main route of London Wall, the rest of which have since been redeveloped. The 1970s OS map shows the site boundary empty (with the exception of the fragments of historic City wall), awaiting development to the south of the part completed Barbican Estate (Fig. 4.9).</p>	<p>Factually incorrect:</p> <p>While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived.</p> <p>City Tower on the south side of London Wall, designed by Sir John Burnet, Tait &amp; Partners, built 1962-4, was first re-clad by GMW Partnership in 1985, and comprehensively refurbished by ORMS in 2013.</p> <p>Another important building of the commercial South Barbican South is Britannic Tower, former headquarters of BP. Designed by F. Milton Cashmore and H. N. W. Grosvenor, and built 1964-7, the building was successfully refurbished by Sheppard Robson and renamed Citypoint in 2000.</p>
23 (4.22)	<p>Bastion House is the only remaining office block associated with the post-war masterplan for London Wall, which envisaged the construction of six curtain-walled office blocks, arranged equidistantly to either side of the widened road.</p>	<p>Factually incorrect:</p> <p>While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived.</p>
23 (4.22)	<p>Whilst there is some historic interest associated with Bastion House for these reasons, little else of the masterplan remains today beyond the broad roadway and hard edges of Route XI. The walkway has been fragmented and bypassed by further</p>	<p>It is misleading and factually incorrect to claim walkways being fragmented and bypassed by further development, diluting of the aspirations of the plan, when the opposite is the case:</p>

	development of London Wall, diluting the aspirations of the plan.	Along the north side of London Wall, the replacement schemes Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE, and Foster's Moor House on More Lane Ave have adhered to the principles of the original masterplan. All schemes have maintained, continued and celebrated the highwalk connections, while bringing the buildings down to street level. Buildings follow the perpendicular grid of the original plan, and continue to frame existing streets, external spaces and gardens. The highwalks continue to be highly popular and their extend, with smaller and larger circuits, serve many as a measure of daily exercise, especially for joggers, the older generation.
23 (4.24)	The 2019 HE COI report notes the mundane appearance of Bastion House and its lack of architectural quality when compared to other commercial buildings of a contemporary date, several of which are listed in recognition of their innovation and design quality.	In contrast, the 20 <sup>th</sup> Century Society has added the building to their 2023 Risk List: "The first post-war museum to be built in London and the largest urban history museum in the world, the Museum of London was designed when architects Powell & Moya were at the height of their reputation and prestige. Best known for the Skylon at the Festival of Britain they were one of the most significant practices in post-war Britain. Housed within an angular and robust white-tiled concrete structure, the museum is skilfully placed on a considerably constrained site. Its solidity protects the interiors from the traffic noise outside and shelters a quiet courtyard garden, while a great dark brick-clad rotunda – referencing the nearby Roman city walls – rises from the centre of a busy roundabout, acting as an arrival point to the complex. To the east is Bastion House, also by P&M, built as a speculative office development above the podium, as part of the new museum scheme. Standing on piers of biscuit-coloured concrete with Miesian bronzed curtain walling, it is now a rare survivor of a hugely important part of the City of London's post-war planning history."
		The COI was granted on the back of the proposals for the Centre of Music to replace the buildings. The public benefit of a grand concert hall for the LSO would have outweighed the loss of the MoL and Bastion House. The only person ever consulted on the special interest of the MoL and Bastion house is Kenneth Powell, who wrote the Powell and Moya article in Architects' Journal in 1996, and book in 2009. His negative views of the buildings are widely known. Another and younger architectural historian might take a different view.
23 (4.29)	It has been established that the Museum of London does not possess the special interest required for statutory listing. The reasonings for which are fully outlined in the Historic England COI advice reports in 2015 and 2019 respectively (Ref. 1-19 and Ref. 1-20).	See response to 4.24 above.
24 (4.32)	Just beyond Alban Gate, MAKE's London Wall Place scheme (2016) refurbished a section of highwalk and introduced landscaped public space at street level around remnants of the City wall (St Alphage Gardens). Generally, recent development along London Wall has entailed the removal of remnants of the pedway and the reintroduction of pedestrian routes and entrances at street level.	Claiming that generally recent development has entailed the removal of remnants of the pedway system is therefore factually incorrect, the opposite is the case: The latest scheme, Deutsche Bank, located between Moor Lane and Moorfields, continues the old highway link from the Barbican Estate to Moorgate Station. The large office block, owing to the tube station entrance at ground, has its main at highwalk level. MAKE's London Wall Place, one of the most recent schemes, replaced the original St Alphage House and surrounding podium. The buildings successfully celebrate



		<p>the highwalk theme with new sculptural bridges retracing all original links, including the pedestrian bridge across London Wall.</p> <p>Foster's More House replaced the most eastern tower and is linked at high level to Deutsche Bank and London Wall Place.</p> <p>The highwalk from 1 London Wall Place across London Wall is temporarily closed due to the demolition and redevelopment of the opposite office block City Place on Basinghall Street. Once completed, the highwalk, which connects the ground floor of City Tower to the Guildhall and the Barbican, will be reinstated.</p> <p>As not all highways are visible on Google, it may have helped the assessor to go beyond a simple desk top study and pay the area a visit.</p>
24 (4.34)	<p>When assessed for statutory listing, Bastion House was acknowledged as the <i>first</i> commercial work undertaken by Powell and Moya, and the only remaining, largely externally unaltered, commercial <i>office</i> associated with the post-war masterplan for London Wall. There is some historic interest associated with Bastion House for these reasons, but the fragmentation of the walkway and redevelopment on London Wall has largely eroded the aspirations of the masterplan, therefore limiting the historic interest of Bastion House.</p>	<p>It is therefore incorrect to talk about fragmentation and erosion of the aspirations of the masterplan, therefore limiting the historic interest of Bastion House:</p> <p>Four of the original London Wall towers stood on the north side of the street. Three of these have been replaced, Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE and Moor House by Foster and Partners. All of these replacement schemes have continued and celebrated the highwalk connections, while bringing the buildings down to street level – one does not preclude the other.</p>
24 (4.35)	<p>Whilst there is a Miesian quality to Bastion House, it was described in the Architects Journal of 1996 as 'in anonymous Miesian mode', and when compared to listed post-war <i>office</i> buildings it appears mundane and somewhat old-fashioned in its treatment, lacking in architectural quality and innovation.</p>	<p>The article in the Architect's Journal from 4 July 1996, An architecture of continuity, We celebrate the <i>first</i> 50 year of Powell Moya Partnership – a practice whose work represents the best social values of post-war Britain, is again written by Kenneth Powell. He seems to be the only authority ever written, or ever to be quoted or consulted on the scheme. His negative views of the buildings are widely known but may not be representative.</p> <p>The C20 board is meeting this week to consider their view.</p>
25	Townscape Character Area Diagram	<p>The London Wall TCA should include the area in between Moore Land, Moorfields and Ropemaker Street. This area forms part of the original Barbican South area and masterplan.</p>
30 (5.5)	<p>New Bastion House</p> <p>... the proposed building has a slightly larger footprint, which would result in a slight increase of visibility in views from the south bank ...</p>	<p>Misleading.</p> <p>The footprint of the proposed building measures between two and a half metres and three metres that of the original Bastion House</p>
30 (5.5)	<p>While the tonality and opacity of the outer elevations will embed the building into the architecture of the Barbican Estate, the <i>fin</i> vertical expression of the outer 'husk' will have a much lighter visual character than the over-scaled, concrete expression of the Barbican, legibly placing these new buildings within an existing urban backdrop in views from within the Estate.</p>	<p>The exact opposite is the case:</p> <p>The description suggests that the proposed Bastion House, due to its detailing, will appear lighter than its neighbour, the over-scaled Barbican.</p> <p>A view of the east elevation (DAS, page 122, 5.11 Site East Elevation) demonstrates that the vast volume of the proposed tower will appear oversized and, in such close proximity, dwarf the adjacent Mountjoy House.</p> <p>Instead of forming a backdrop the proposed buildings will visually encroach and dominate the southern perimeter of the conservation area.</p>
31 (5.12)	<p>... the pedestrian experience along Aldersgate Street and London Wall significantly enhanced.</p>	<p>The enhancement of the street environment would be welcomed. However:</p> <p>The tall Rotunda building and 200 Aldersgate will create a tight, lightless and canyon-like street environment.</p> <p>The placing of a terminus building at this important road junction, blocking views and diverting the street, will be disorientating for pedestrians and motorists alike.</p>

31 (6.12)	The scale and design character of the proposed buildings would complement the existing townscape character of the site. The high-quality of the architectural treatment and the enhancement to the quality of the public realm on site would result in an enhancement to townscape character and quality. This will result in <i>beneficial effects</i> to TCA 1, TCA 3, TCA 4 and TCA 6 and <i>neutral effects</i> to TCA 2 and TCA 5, where the <i>effects</i> are negligible in scale. There would be no adverse <i>effects</i> on TCAs.	Exactly the opposite: The development is out of scale, lacks grain. The overly large and amorphous volumes bear little relation to the post-war masterplan with its perpendicular grid and synergy between Barbican South and Centre Barbican area. By placing a large terminus building on top of the road junction, the proposed scheme does not respect the historic route and important axis of north-south vehicular and pedestrian movement. What is interpreted as neutral and beneficial is in fact harmful to a large number of heritage assets, CAs and to the townscape in general.
89	View 12, St Martin's Le Grand, outside entrance to no.16. The glimpsed view of the distant Lauderdale Tower and opaque presence of the existing Rotunda (former Museum of London) would be replaced with a building of an appropriate scale and high design quality, providing an interesting and complementary focal point to the view. Sensitivity: medium Scale and Nature of <i>Effect</i> : moderate, <i>beneficial</i>	This is contested: St Martin's Le Grand and Aldersgate Street (south) are framed by a mix of four to nine-storey high buildings of various styles and eras, however, consistent in their materiality (largely Portland Stone). The large and prominent neo-classical No.1 St Martin's Le Grand (Nomura House) covers the entire block along Angel Street. Together with the adjacent Grade I listed St. Botolph's church it forms the eastern perimeter of the Postman's Park Conservation Area. View 12 clearly demonstrates that the proposed Rotunda building, due to its encroaching position, its height, grain and materiality will dominate the street scene, appear overpowering and dwarf the buildings along the street, specifically the Grade I listed church and even the substantial Nomura House of the CA. This view is too far away to show the impact of the proposed development on much smaller St. Botolph's without Aldersgate. Note: the two tall buildings at the street junction, 200 Aldersgate Street and One London Wall, both step down to the prevailing height of their neighbours. One of the stated aims of this development is to enable access to the City's cultural facilities. But by obscuring an existing view of the Barbican's Lauderdale Tower from the south (one of the few remaining medium-distance views of the estate from the south), this proposal reduces access to a longstanding cultural asset in the City (the listed Barbican estate, an internationally renowned icon of 20 <sup>th</sup> century urban planning) in favour of an office block with an uncertain cultural offering.
107	View 17, Aldersgate: west pavement. This will be an exceptionally high-quality development, with coherent and visually engaging buildings and spaces at this important and historic City gateway location. Magnitude of Impact: high Scale and Nature of <i>Effect</i> : moderate, <i>beneficial</i>	The placing of this tall terminus building in the middle of Aldersgate Street, blocking views and circulation, just meters away from the historic location of the former Roman and later Saxon city gate and the beginning of the A1 route to Edinburgh, will cause substantial harm to the existing and historic townscape.
132	View 24, Barbican Estate: St Giles Terrace New Bastion House and Rotunda building would have a light appearance, clearly positioned in the background of the view. The proposed development would be a high-quality secondary background element in the view, with the foreground forming the principal focus. The proposed development would not detract from the townscape and visual qualities of the foreground, and would form a sensitive, high-quality, and well-considered addition to the	This view is considered harmful to the Barbican Estate, the setting and character of the CA: As the Centre Barbican plan had to incorporate the South Barbican plan, the buildings were designed in proportion and aligned with each other. The current Bastion House has the same depth as Mountjoy House, the buildings were initially planned aligned but were later staggered along the same axis. The footprint of New Bastion House will increase by two and a half to three-fold. This vast volumetric increment and swelling across the axis, coupled with the reduction

	<p>setting of the Estate which, as seen in this view, is already characterised by tall modern buildings.</p> <p>Magnitude of Impact: high</p> <p>Scale and Nature of Effect: major, beneficial</p>	<p>of distance from approximately 30 to 20 metres to Montjoy House will appear overly close, imposing and disproportionate.</p>
137	<p>View 26, Barbican Estate: Thomas More Highwalk terrace, west end, overlooking tennis courts.</p> <p>Magnitude of Impact: high</p> <p>Scale and Nature of Effect: major, beneficial</p>	<p>This view is considered harmful to the amenity of the school, the Barbican Estate, the setting and character of the CA:</p> <p>Comments as above.</p> <p>In addition, there will be considerable overlooking of Mountjoy House, and of City of London School of Girls' external amenity and sports ground.</p> <p>Coupled with the North Building and the Rotunda building, there is a significant loss of sky and sense of enclosure.</p>
161 (12.2)	<p>Neither the former Museum of London or Bastion House, nor any other buildings on the site, have been identified by CoLC officers as non-designated heritage assets (NDHAs).</p>	<p>Who gets to decide what a NDHA is? There is no Local List.</p>
161 (12.3)	<p>Externally, the former Museum forms somewhat of a barrier within the local townscape, particularly the vast blank frontage of the rotunda which forms a harsh environment which is not pedestrian-friendly.</p>	<p>Correct.</p> <p>The Rotunda is the result of a much too small site for the MoL, and the post-war concept of separation of vehicular traffic at street level and pedestrian movement on pedways above. The Rotunda is a public space and garden with views in all directions, it was once to become the heart of the pedway system.</p> <p>From today's perspective, the Rotunda is certainly a mistake: It blocks views and movement along Aldersgate Street.</p> <p>As the applicant is proposing complete redevelopment, why not mend, but reinforce the blockage of this important street with a 14-storey tower?</p> <p>The proposed development exasperates the blockage of the historic route and will create a canyon-like street environment between the tall Rotunda building and 200 Aldersgate Street.</p> <p>Apart from the sheer mass created, there is no benefit and only harm to the immediate and wider urban setting.</p>
161 (12.3)	<p>In regard to Bastion House, it is acknowledged that it is the only commercial building designed by Powell and Moya and externally is largely unaltered which gives the building a degree of interest, however, the building has a restrained form and treatment lacking the innovation and quality of listed examples of its type and date.</p>	<p>Together with the St Helen's (previously known as the Aviva Tower or the Commercial Union building) at 1. Undershaft, soon to be demolished to make place for a taller tower, Bastion House is the City's only remaining and unaltered Miesian tower of that era.</p>
161 (12.3)	<p>Bastion House has some historic interest for its part in London's post-war masterplan, but this is overshadowed by the redevelopment of London Wall which has eroded the town-planning aspirations of the plan.</p>	<p>Emotive language. Neither Bastion House nor its historic interest are overshadowed by recent redevelopment.</p> <p>Four of the original London Wall towers stood on the north side of the street. Three of these have been replaced, Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE and Moor House by Foster and Partners.</p> <p>The airiness of initial concept of six towers on two-storey podia has been lost. However, all replacement schemes follow the orthogonal grid of the original plan, and together with the Barbican Estate continue to frame existing streets, external spaces and gardens, and retain the highwalk connections around and across the site.</p>

167 (12.56)	A key characteristic of the Barbican Estate is that the residential accommodation is privately owned, as originally intended.	The Barbican Estate was originally built for rent for middle to high income earners. Most flats and houses have been sold following the introduction of RTB with the 1980 Housing Act.
167 (12.60)	The Estate has predominantly flat roofs of asphalt.	Wrong. All lower blocks of the Barbican have barrel vaulted roofs throughout, which are a striking and instantly recognisable motif of the estate. It appears that the author has never been to site.
167/8 (12.66)	There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. That includes the slab block Bastion House, on the site, which was conceived as part of a separate masterplan for commercial development along London Wall, rather than in conjunction with the Barbican Estate.	As explained under above point 20 (4.17), the Museum of London, Bastion House, the Barbican Estate and the Barbican Centre share the same palette of materials and repeat architectural elements and language.
167/8 (12.66)	As such, tall and large modern commercial buildings form a well-established part of the Barbican Estate's setting. Their scale and proximity further contribute towards a sense of enclosure and segregation which is characteristic of the Barbican Estate and forms part of its significance. The Barbican Estate buildings are appreciable against this background of tall buildings within its close setting, and, despite the proximity of the modern commercial buildings, there remains a clear sense of separation between the heritage asset and its urban surroundings.	This approach and justification are highly contested. This is key to this highly subjective interpretation of the TVBHIA. New building on the perimeter of the site contribute to the setting of the Barbican by virtue of their contrasting large scale and proximity leading to a high degree of enclosure?
		Over the past 30 years, four of the six original 1960s London Wall office blocks have been replaced. The density of the urban fabric has significantly increased, with height and volume extending into the area of the former two-storey podium. These tall and large modern office blocks, however, have a few things in common. They all: Strictly follow the perpendicular grid of the post-war South and Centre Barbican plan. Continue to contain, define and reinforce the urban street space and public realm. Break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context, their immediate neighbours, including the Barbican Estate. Place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks. None of the above prevailing qualities were applied to the two proposed developments. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining CAs, but also to the setting of the immediate and wider neighbourhood.
		On the east side of the Barbican area, replacement blocks of the post-war development along Moor Lane generally follow the shoulder height of the Barbican Estate. From here the height and massing increases, away from the Estate and towards Moorfields. What were once two point-blocks, Britannic Tower and More House, with lower blocks in between, is de facto

		<p>morphing into an approximate 20-storey continuous high wall.</p> <p>The result represents the piecemeal approach the original masterplan sought to avoid. The haphazard and jugged wall of buildings is not a redeeming quality. On the contrary, it is judged to be harmful to the setting of the Barbican, the CA, and the residential amenities, specifically of listed Willoughby House.</p>
174 (14.15)	<p>Due to the scale and type of the existing commercial blocks to the south of the Conservation Area, including the existing Bastion House, the proposed development would be in keeping with the character of this part of the setting of the Conservation Area. New Bastion House broadly the same height as the existing Bastion House and is visible to a similar degree but would bring a noticeable improvement to that part of the site in terms of its design and materials. The proposed Rotunda Building would be noticeably taller than the existing buildings on that part of the site, however it would be lower than Bastion House, with more limited visibility in the Conservation Area and, when seen, it would complement New Bastion House in terms of its design, and it would be seen and understood within the existing large scale commercial development which already characterises the southern setting of the Conservation Area.</p>	<p>In contrast to the proposed buildings other developments adjacent to the Postman's Park, and Barbican Estate and Golden Lane CAs with their listed buildings, attempt to respond to its specific urban context of their immediate neighbours:</p> <p>200 Aldersgate steps down to adjacent London House and Little Britain, where the building is successively broken down in scale.</p> <p>One London Wall steps down to 10 Aldersgate Street, aligning it with the roofline of its neighbours along Aldersgate Street.</p> <p>88 Wood Street is in height aligned with its smaller scale neighbours along Wood Street.</p> <p>London Wall Place breaks down its mass into proportionate sections and places height in a careful composition and in response to the buildings of the Barbican Estate, allowing for sufficient breathing space.</p> <p>Developments along Moor Lane reduce the height along the street to that of the Barbican Estate.</p> <p>The proposed development consists of two massive volumes that are alien to the grain established by neighbouring buildings, dwarfing even the large structures of Alban Gate and One London Wall. The proposed development, due to its proximity encroaches on the CA.</p> <p>The enormous (Pevsner) Alban Gate is one of the least successful buildings along London Wall, specifically its London Wall bridging half creating a dark, windy and hostile street environment. It should not serve as precedent.</p>
175 (14.19)	<p>The slight erosion to the backdrop of the bell tower of St Botolph's in some views from within the Park (View 14B) would be balanced by the high quality design and materials of the proposals and the scale, type and location of the proposed buildings, which would be in keeping with that part of the setting of the Conservation Area, and the substantial improvement to the quality of the setting of the Conservation Area and the Church at the north end of Aldersgate Street (View 13).</p>	<p>This interpretation is challenged.</p> <p>The view of St Bride's spire shall be protected, however, not the bell tower of Grade I listed St Botolph's?</p> <p>The encroachment of the Rotunda building on Postman's Park and the loss of sky will be harmful to the setting of the church, the park and the conservation area.</p>
176 (14.31)	<p>The Barbican Lauderdale tower would be obscured by the proposed Rotunda Building in views north along St Martin's Le Grand (View 12), however this view is incidental and not part of the heritage significance of the Barbican Estate; the visibility and prominence of the Barbican towers in other views will remain.</p>	<p>Lauderdale Tower represents an important view for wayfinding from Tate to St Paul's to Barbican Centre.</p>
176 (14.33)	<p>The proposed development, in its scale and design, would be in accordance with the established character of the south part of the setting of the</p>	<p>This is contested.</p> <p>With 60- to 70-meter-long elevations of monotonous fins, the proposed development consists of two massive</p>

	Estate and would enhance the skyline through high-quality architectural design.	volumes that are alien to the grain established by neighbouring buildings, dwarfing even the large structures of Alban Gate and One London Wall. Please refer to drawings: DAS, page 121, 5.11 Site West Elevation DAS, page 122, 5.11 Site East Elevation
199	A5, Bridge above Aldersgate from Barbican Station	This is one of the harmful views of the proposed development. The proposed Rotunda building will close the gap between the east and west sides of Aldersgate Street, creating one continuous wall of development, and visually turning the street towards St Paul's into a dead-end road. Not mentioning the actual building into the photomontage by solely a blue dotted outline seems intentionally deceptive.

APPENDIX E





**MUSEUM OF LONDON AND BASTION HOUSE  
140 & 150 LONDON WALL EC2Y 5DN & EC2Y 5HN**

**LONDON WALL WEST REDEVELOPMENT**

**PLANNING APPLICATION 23/01304/FULEIA  
LBC APPLICATIONS 23/01276/LBC & 23/01277/LBC**

**HERITAGE ASSESSMENT ON BEHALF OF BARBICAN  
QUARTER ACTION**

**SCOPE OF REPORT**

1. This report, prepared on behalf of Barbican Quarter Action, focusses on the heritage impacts of the proposals within the local and immediate area. It does not consider the potential impacts on long-distance views of St Paul's Cathedral or the riverside. These matters are left to Historic England and the Greater London Authority who have a particular remit and expertise in this field, or to other London boroughs such as Lambeth and Islington whose own protected local views may potentially be affected.

**DESCRIPTION OF PROPOSALS**

2. Planning permission is sought for:

“Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office, cultural uses, food and beverage/café, access, car parking, cycle parking and highway work; part demolition of reconfiguring of the Ironmongers' Hall, creation of new Ancient Monument viewing area, public realm alterations to Plaisterer's Highwalk, John Wesley Highway, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the voids, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of the new City Walkway and hard and soft landscaping; and associated and ancillary works, structures and highway works.”

3. Listed Building Consent is sought for:

“External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of the new highwalks, hard and soft landscaping, and works associated with the

construction of new buildings with the development proposed at London Wall West (140 & 150 London Wall), Shaftesbury Place, and London Wall car park”.

“Demolition of Ferroners’ House alongside external alterations to the façade and roof level of Ironmongers’s Hall, internal reconfiguring to cores and back of house areas and works associated with the development proposed at London Wall West, Shaftesbury Place and London Wall car park”.

## **GENERAL COMMENTS ON PRESENTATION MATERIALS**

4. The architect’s sketches and artistic illustrations contained within the applicant’s Design & Access Statement, and displayed for public view in the London Centre, generally give an unreliable impression of the proposals with stretched and distorted perspectives. A simple examination of the model shows, for example, that Approach View 1 is not correct in terms of showing the true height of the Rotunda Building, the ‘Glade’ in View 4 appears far larger than it will actually be in reality, and View 6 of the ‘Aldersgate Plaza’ has a similarly enlarged perspective.

5. The applicant’s Townscape, Visual and Built Heritage Impact Assessment (TVBHIA) is more rigorously prepared. However, while the ‘existing’ and ‘proposed’ comparative images may be accurate in their own right, according to the methodology set out, the photographs generally use a wide-angle lens which does not always reflect what is seen or sensed by the human eye. In the photographic images middle-distance objects appear to be farther away, and hence smaller and diminished in context. It is similar to the technique often used by estate agents in sales brochures to make internal rooms seem bigger than they are.

## **POLICIES TO PROTECT THE HISTORIC ENVIRONMENT**

6. The National Planning Policy Framework, the London Plan (2021), the City of London Plan (2015) and the emerging City Plan 2040 all contain numerous policies for the preservation and enhancement of the historic environment. These are set out in the applicant’s submissions and do not need to be repeated here. While they provide a framework for decision-making, they also rely on an understanding of the significance of the assets which are affected and how the proposals potentially impact on that significance.

## **IMPACT ON HERITAGE ASSETS**

### **Existing buildings on the site**

7. The existing buildings proposed for demolition are not designated heritage assets. However, they directly abut a Scheduled Ancient Monument, Ironmongers' Hall (Grade II Listed), the Barbican (Grade II Listed), and the Barbican Park and Garden (Grade II\* Listed). The site also directly abuts the Barbican and Golden Lane Conservation Area and lies close to Postman's Park Conservation Area and Foster Lane Conservation Area, all of which contain Grade I Listed Buildings.
8. A Certificate of Immunity from Listing was issued in 2015 and renewed in 2019 for both the existing Museum of London building and Bastion House. This COIL expires in August 2024.
9. The City Corporation does not have a register of locally listed buildings or non-designated heritage assets.
10. The Museum and Bastion House were designed as one scheme by the highly respected architectural practice of Powell and Moya. Historic England's assessment as part of its consideration of the application for a Certificate of Immunity from Listing in 2014 and its renewal in 2019 stated the following: "Whether considered individual buildings or as two elements of one entity, it is acknowledged that both buildings have a degree of architectural and historic interest, but they do not meet the very high bar set for buildings of their date and type and should not be added to the statutory list".
11. The Principles of Selection for Listed Buildings (March 2010) states that "particularly careful selection is required for buildings from the period after 1945".

### **The Museum of London**

12. According to Historic England's assessment, the stellar reputation of Powell and Moya confers some significance of the Museum of London building, although it falls short of the required architectural interest and is too altered to meet the criteria for listing. Historically, it has interest as the first post-war museum to be built in London and, at the time, the largest urban history museum in the world. On these grounds it should therefore be classified as a non-designated heritage asset.
13. Powell and Moya's design for the Museum has always attracted interest as an example of non-grandiose modernism. The building's thoughtful reticence was noted on its opening. In 1982 the architectural critic Bryan Appleyard

praised the new Museum building as ‘brilliant’; its ‘beautiful variations and careful detailing are demonstrations of late modernism at its cool and satisfying best’ (*The Times*, 26 November 1982, see Appendix 1). The contrast with the more robust style of the Barbican Estate was seen as rewarding. While the 1982 article was written before the new entrance was built in 2010 this too was designed by Wilkinson Eyre in a ‘cool’ and undemonstrative manner that complimented Powell and Moya’s original plans and the Barbican Estate beyond.

14. The original Rotunda of the Museum of London was placed in the middle of Aldersgate Street, which marks the start of the ancient Roman Road to the north, now known as the A1 and the longest numbered road in the UK. While the Rotunda blocks the road, this was done at a time when there were extensive plans to separate pedestrians from vehicular circulation, intended to cross the whole of the City of London. The Rotunda was envisioned as a central hub of the proposed pedway system from where the pedestrian had an elevated vantage point with views in all directions, including south towards St Paul’s. These features also arguably contribute towards its significance as a heritage asset.

15. While the Museum and its Rotunda are not actually part of the Barbican Estate they were intended to integrate and connect into the Barbican’s network of public pedways and highways, and designed with a high degree of architectural sympathy and synergy with the Barbican.

16. The proposal involves the total loss of the Museum and its Rotunda. Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of the harm and the significance of the heritage asset. The replacement of the existing Rotunda with a commercial building will cement the blocking of this vital and historic artery of Aldersgate Street, and furthermore demolish and privatise these important existing public views.

### **Bastion House**

17. Bastion House forms part of the post-war masterplan for the Barbican South Development, as shown in Figure 1. The six office blocks along London Wall, four on the north side and two on the south, plus the development to the east of the Barbican, including Britannic House, were all based on the same orthogonal grid of the Barbican Estate. This grid was set up to be parallel with Moorgate to the east, and then rigorously applied up to Beech Street/Chiswell Street in the

north, to Aldersgate Street in the west, and straddling both sides of the new dual-carriageway section of London Wall (Route XI). Historic England's assessment notes that Bastion House possesses particular historic interest for its part in this post-war masterplan.

18. The 1959 plan (Figure 1) predates the Museum and shows the potential position of Bastion House as a direct continuation of Mountjoy House. In the event, to accommodate the Museum, Bastion House was constructed marginally to the east, but still on the same orientation. It is consciously set at an angle to London Wall so that it aligns precisely with the grid of the Barbican blocks to the north. It is also a very similar width to Mountjoy House.

19. Designed in a strongly Miesian form sitting above its plinth it is carefully proportioned and detailed. It is the only unaltered (externally) survival of the six similar office blocks that flanked the northern vehicular bypass for the City. Together with the Commercial Union Building (the Aviva Tower), soon to be demolished for the development of No.1 Undershaft, it is the last surviving example of its type in the City of London.

20. It has been suggested by the applicant that Bastion House suffers from structural defects that constrain its retention and reuse, but these have been strongly rebutted by independent experts. It does not reduce its heritage significance.

21. As with the Museum the proposal involves total demolition, and Paragraph 203 of NPPF must be therefore considered and give due weight to the total loss of the non-designated heritage.

22. The applicant's claim (for example in the analysis of View 15 in the applicant's TVBHIA,) that the demolition of Bastion House is a heritage benefit and that new Bastion House is a 'major beneficial' townscape enhancement compared to the existing is strongly challenged. Many of the THBVIA views show how much more prominent and dominant the new buildings will be, with no regard whatsoever for their context.

23. It is important to note that when four of the original six towers to the east of Bastion House fronting London Wall were subsequently demolished, all the replacement development schemes followed the same perpendicular grid, as can be clearly seen in Terry Farrell's Alban Gate and MAKE's London Wall Place.

**Setting of the Barbican Grade II Listed (Ref. 1352667)**

**Setting of the Barbican Park and Garden Grade II \* Listed (Ref. 10001668)**

**Setting of the Barbican and Golden Lane Conservation Area**

24. These separately designated heritage assets overlap considerably in terms of their heritage significance, and the impact of the proposals is therefore assessed together.

25. Bastion House was designed with clear reference to and continuation of the strictly orthogonal grid layout of the Barbican. Powell and Moya were completely aware of the design rationale of Chamberlain Powell and Bon in their layout of the Barbican complex. Bastion House aligns precisely with the adjacent Mountjoy House, and indeed picks up on the rhythm of its fenestration. The external plain white tiling of the Museum complex has close synergy with that in the contemporary Barbican Arts Centre.

26. The western edge of the Barbican estate, fronting onto Aldersgate Street and continued by the Golden Lane Estate fronting Goswell Road, is low-rise, providing a human scale to the eastern side of this important north-south thoroughfare. The towers of the Barbican are set back from the edges of the podium deck. The existing Museum of London complex respects and continues this modest scale to the junction with London Wall and incorporates the low-level rotunda in the centre of the vehicular roundabout.

27. The demolition of the Museum and Bastion House will erode and isolate the historic contextual setting of the Barbican complex. The scale, mass and form of the proposed Rotunda Building and New Bastion House will radically change the setting of the Barbican on its southern and western side. The applicant's TVBHIA consistently and wrongly claims that the proposals will enhance the setting of the Barbican, based on the premise that, despite being bigger, the contrasting design and materials will be less intrusive. The opposite will be the case. The amorphous, bloated shape of the new buildings proposed, combined with their scale, footprint and materials, will jar with the orthogonal nature of the Barbican to its north.

28. The Barbican Estate Listed Buildings Management Guidelines Volume II SPD (October 2012) notes in Paragraph 2.2.7 that controlling and limiting alterations to the exterior spaces within the Barbican is of the utmost importance to preserving the special architectural and historic character of the Barbican Estate as a whole. Its setting, and the impact of changes to views into and out of the Barbican, are of great importance.

29. The proposed 14 storey height and mass of the proposed Rotunda Building radically alters the established townscape and introduces an entirely inappropriate scale on the east side of Aldersgate Street. Together with the highest part of the 200 Aldersgate Street (built in 1991) which lies directly opposite, the combination will create a canyon-like constriction in Aldersgate Street, clearly apparent on examination of the model. View 13 in the TVBHIA is very misleading as it neither includes the full height of the new buildings nor the relationship with 200 Aldersgate Street. The Rotunda Building will block views of the Barbican from the further south, notably the fine view from St Martin Le Grand of the pencil-thin Lauderdale Tower. It will radically alter and harm the setting of the Barbican from the south.

30. Similarly, the setting of the western side of the Barbican will be harmed in views from the north, particularly as illustrated in View A5 on the TVBHIA, taken from the public bridge to Barbican Station. View 17, taken from the western pavement of Aldersgate Street, similarly shows how the increased bulk of New Bastion house and the Rotunda Building will loom over the southernmost frontage of the Barbican to Aldersgate Street. The impact will be equally harmed in views from further north, near the junction with Long Lane, and from the eastern pavement.

31. The existing landscape of the Barbican has very high heritage significance, recognised through Grade II\* listing, and the existing Museum building and Bastion House contribute positively to its setting. Policy CS12.4 of the City of London Local Plan 2015 specifically seeks to safeguard the character and setting of the City's gardens of special historic interest.

32. The Barbican Listed Buildings Management Guidelines Volume IV SPD (2015) focusses on the listed landscape and notes in paragraph 1.4.11 that the podium and highwalks offer a continuous range of viewpoints from which to survey the surrounding city. The map of important views and vistas in the Appendix to Volume IV of the SPD identifies the view south from the Lakeside Terrace as the most important public panoramic view within the whole of the Barbican complex.

33. Similarly, the Barbican and Golden Lane Conservation Area SPD, adopted on 1<sup>st</sup> February 2022, describes the character of the south Barbican sub-area on page 27. "At the southernmost end of the estate are the 'foothills' of the Barbican, where the scale is lowest and closest to more traditional forms of building, which are illustrated by the remnants of the Roman and medieval City wall and the church of St Giles Cripplegate. The street level podium, the park and the raised walkways all offer a multitude of important views across and



beyond the Barbican. The SPD selects several views of particular importance on pages 31 and 32, notably Nos. 12, 16, 21 and 26 which all comprise views to the south with Bastion House in the background.

34. The applicant's TVBHIA illustrates some of these views. From the Lakeside Terrace Views 19, 20 and 21 all show that the wider massing of New Bastion House will be a larger incursion into the backdrop view than the existing. From the western end of St Giles' Terrace, View 24 shows that the Rotunda Building impinges on the existing clean outline of Mountjoy House. The view out of the Barbican to the south from the Wallside Highwalk will be fundamentally changed for the worse, as shown in View 27. View A7 further illustrates how the existing clean gap between the slim orthogonal mass of Bastion House and Mountjoy House will be eroded by the proposals.

35. From a continuum of publicly accessible areas the two new tall buildings will become very prominent background features, filling areas of existing sky, and providing a muddled silhouette to the Barbican buildings. This will harm the existing character and appearance of the Barbican and Golden Lane Conservation Area and the setting of the Barbican complex as a listed building.

#### **Setting of St Giles Cripplegate Grade I Listed (Ref. 1359183)**

36. This is a building of the highest heritage significance and its retention and repair after war damage was a key element incorporated into Chamberlin Powell and Bon's design for the Barbican. Its setting comprises a major part of its heritage significance.

37. There are fine existing views of the church from the public podium areas immediately adjacent to the north side of the church, from the extensive terrace on the north side of the lake and from the entire length of Gilbert Bridge. In this continuum of views the slim and restrained outline of Bastion House is often visible, but the majority of the silhouette of the church, its tower and crenelated nave parapet is seen against clear sky. This will be greatly changed by the two tall buildings proposed. The impact will harm the setting of the church and hence its significance.

38. In the 'as existing' View 21 of the TVBHIA the right-hand side of the tower of St Giles is clearly defined against sky; in the proposal the rotunda will fill in and spoil that clean outline. The applicant's claim that the impact is beneficial is strongly challenged. Similarly in View 22 from Andrewes Highwalk the gap between the tower of St Giles and the existing Bastion House is effectively filled in by the new development. It should be noted that there is a continuum of views along this highwalk beneath Gilbert House in which 200 Aldersgate is

often completely masked by the church. The new Rotunda Building, owing to its width and height, will be continually visible.

39. From St Giles Terrace, which is effectively the modern ‘churchyard’ and integral to the significance of the church, View 23 in the TVBHIA takes just one position in this important public space but it illustrates how the wider massing of New Bastion House and its fussy architectural treatment will impact negatively on the backdrop of the church and harm its setting.

### **Setting of Ironmongers’ Hall Grade II Listed (Ref. 145812)**

40. Ironmongers’ Hall (excluding Ferroners’ House) was statutorily listed on 20<sup>th</sup> April 2023. This is an important change to its heritage status and its heritage significance since pre-application discussions and public consultation for the redevelopment proposals. Dating from 1923-25 (with a 1975 extension by Fitzroy Robinson that is not included in the listing), it is one of the few buildings in the area that survived wartime destruction and post-war clearance. It has been listed because of its distinctive Tudor/Jacobean Revival architecture, its historic interest as the purpose-built home of the Worshipful Company of Ironmongers and the only livery company hall built between the wars, and for its group value lying next to the Grade II listed Barbican.

41. Historic England’s very thorough listing description notes that “the hall is reached via Shaftesbury Place, off Aldersgate Street. Always hemmed in by surrounding buildings, it now occupies a tight site enclosed by the Museum of London and the Barbican”.

42. Powell and Moya were deeply aware of the constraints placed by the existence of the Ironmongers’ Hall on their designs for the Museum of London. While they and the City Corporation might have preferred at the time for it to be demolished and relocated, Powell and Moya accepted its retention and skilfully designed a setting that respected its scale and historic setting.

43. Shaftesbury Place is an ancient alley off Aldersgate Street, as shown on historic maps (Figure 2), and was one of several on both sides of the street, some associated with old coaching inns. Shaftesbury Place, however, was associated with Shaftesbury House, a mansion attributed to Inigo Jones in Chapter XXVI of Walter Thornbury’s *Old and New London* (1878), and lived in by Anthony Ashley Cooper, Earl of Shaftesbury. Although the mansion had long disappeared, Shaftesbury Place was a long-established constraint when Ironmongers’ Hall was built in the early 20<sup>th</sup> century. Together with the Hall and frontage buildings to Aldersgate Street, Shaftesbury Place survived the war, as shown on the 1945 map (see Figure 3).

44. Powell and Moya retained the ancient configuration of Shaftesbury Place and recreated the historic arched entrance off Aldersgate Street and secluded forecourt. They respected and paid homage to the network of passageways, alleys and courtyards that had characterised the area before the war and which survives in some other historic parts of the City.

45. The City Corporation have policies to retain, and reinstate where possible, its historic street pattern of lanes, alleys and courtyards. Paragraph 3.12.6 of the Local Plan states that “the pattern of streets, lanes, alleyways and other open spaces such as squares and courts is a distinctive element of the City’s townscape and is of historic significance. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings”. The eradication of Shaftesbury Place would conflict with this policy.

46. Shaftesbury Place was paved in brick in order to be similar to the Barbican podium and pedways. The archway gives shelter and respite from the noise and pollution of the busy traffic on Aldersgate Street, and the yard provides a semi-private space which is well suited to wedding parties and other such functions which hire the Livery Hall.

47. Historically Ironmongers’ Hall was always approached through an archway beneath a continuous run of buildings along the east side of Aldersgate Street. The proposals will radically change the setting of the Ironmongers’ Hall by exposing it to much greater public view and activity. This is heralded by the applicant as a major heritage benefit, but this is considered highly debatable. This existing and historic intimacy and secluded nature of its setting is part of its significance, and its radical alteration will be harmful. The proposed ‘Aldersgate Plaza’ bears little resemblance to the historic form of Shaftesbury Place. Moreover, the exposure of Ironmongers’ Hall will be compounded by the overwhelming scale of the north end and street frontage of the Rotunda Building, which presents a cliff onto Aldersgate Street. View 18 of the applicant’s TVHBIA is telling. The frame of the ‘existing’ photograph contains the whole of the existing frontage buildings to Aldersgate Street while the ‘proposed’ image omits the vast scale of the new buildings, so huge that they cannot be fitted into the frame.

48. Some of the best existing views of Ironmongers’ Hall are from the high walks of the Barbican. View 26 is from the Thomas More Highwalk in which the slim lines and simple geometry of the existing Bastion House provide a dignified background to the hipped roofs, gables and chimneys of Ironmongers’

Hall, together with ample areas of sky. Much of this sky will be filled in by the new Bastion House and Rotunda Building which will provide a high wall of development behind. View A8 shows the impact even more alarmingly; the cantilevered form of the new Bastion House ‘leans’ over the roofs of Ironmongers’ Hall while the Rotunda Building looms behind the chimneys and blocks the existing view of the top of the dome of St Paul’s Cathedral. View A9, taken from the Thomas More Highwalk near Mountjoy House shows how the wider footprint of new Bastion House and the massing of the Rotunda Building, together with their uncontextual architectural treatment, will radically alter what at present is a very fine and unspoilt view of Ironmongers’ Hall.

**Setting of Roman and Medieval Wall and Bastions, west and north of Monkswell Square Scheduled Ancient Monument (Ref. 1018888)**  
**Setting of Barber-Surgeon’s Hall and Physic Garden**

49. The existing podium element of Bastion House and the flank wall of the Museum form the western edge and immediate setting for the remarkable surviving above-ground sections of Roman and Medieval wall and bastions which run from London Wall to the Barbican lake. These are set in public gardens which contain mature planting. This Scheduled Ancient Monument is of the highest heritage significance. The greatly increased bulk of the proposed development in terms of its footprint and solidity will have an overwhelming and harmful impact on the setting of the Ancient Monument and the amenity of the public open space. The curving bulbous design is a marked contrast to the restraint and discipline that characterised Bastion House and the Museum and the southern edge of the Barbican.

50. View 27 in the TVBHIA taken from the Wallside Highwalk indicates a massive and deleterious change in the existing townscape and setting for the Ancient Monument and public gardens which will be overwhelmed by the scale and form of the new development.

51. To the east the neo-Georgian post-war Barber-Surgeon’s Hall (built in 1969) is a non-designated heritage asset, together with its Physic Garden, one of ten livery company gardens surviving in the City, which is also of historic interest in its own right. The greatly increased massing of the proposal will harm the setting of these non-designated heritage assets.

52. View 28 in the TVHBIA shows the increased impact of the greater bulk of New Bastion House on the setting of Barber-Surgeon’s Hall as seen from Monkswell Square to the east.

## **Setting of St Botolph Aldersgate Grade I Listed (Ref. 1064732)**

### **Setting of Postman's Park Conservation Area**

53. St Botolph's Aldersgate Church is a building of the highest heritage significance, Grade I listed. It sits within its former churchyard, now known as Postman's Park. At the western end of the church the low square tower, built of brick, with a lead dome and a small bellcote is a distinctive feature. There is a continuum of fine views of the church from the middle and southern side of Postman's Park. The low massing of the existing buildings on the north side of Little Britain and the south-east part of 200 Aldersgate results in existing views of the tower bellcote silhouetted against open sky. The proposed development will fill this existing area of sky and will alter and harm the setting of St Botolph Aldersgate.

54. The proposal will also harm the character and appearance of Postman's Park. Already enclosed by substantial buildings on its southern flank (Namura House) and the block of flats comprising 75 Little Britain (built 1996), the existing view of sky to the north above the range of buildings on the north side of Britain Street is extremely important to the character and appearance of Postman's Park. It contributes to its sense of 'openness' which is noted as being an integral component of its character in the Conservation Area Character Appraisal and Management Guidelines (SPD). The proposal will seriously curtail these sky views to the detriment of its character and its amenity. The proposal will loom above the terrace of buildings on the north side of Little Britain. It will reduce the amount of natural light to the Watts Memorial plaques. The view of St Botolph's Church is specifically identified (3B) in the Conservation Area Management Guidelines.

55. Views 14A, 14B and A4 provided in the applicant's TVHBIA show some of the impact of the Rotunda Building. However, no view is provided from the pathway along the south side of Postman's Park which provides a continuum of views to the north.

56. The Rotunda Building will also appear above 75 Little Britain in views from King Edward Street. View B17 in the TVHBIA is not taken from the best position. Examination of the model shows that the impact on the skyline looking east from the west side of King Edward Street will be considerable, including views down Little Britain itself.

57. It should be noted that the Draft City Local Plan 2040 does not identify London Wall West as an area that is appropriate for tall buildings. While it will no doubt be argued by the applicant that the northern section of 200 Aldersgate

Street already sets a precedent for tall buildings, there is no doubt that its height detracts from the character and appearance of Postman's Park. An additional tall building, closer and with a bigger footprint than the tall section of 200 Aldersgate Street, will exacerbate this harm. Two 'wrongs' will not make a 'right' in this situation. It is frankly extraordinary that the applicant's assessment of the impact of the Rotunda Building is 'moderately beneficial'.

58. There will also be a harmful impact on the southern section of Aldersgate Street. The existing Museum Rotunda provides a low-rise termination to the view north along St Martin Le Grand and the southern section of Aldersgate Street. The 1990s development immediately north of Little Britain was carefully restricted to six storeys in height in order to protect the setting of the east end elevation and nave of St Botolph's Church, and the backdrop of views of the western spire and south elevation from Postman's Park. The proposed 14 storey tower of the new Rotunda Building will radically alter this view and the harm setting of the church and the eastern edge of the Postman's Park Conservation Area.

### **Setting of St Anne and St Agnes Church Grade I listed Ref. 1286384 Setting of Foster Lane Conservation Area**

59. The Church of St Anne and St Agnes on the north side of Gresham Street is a building of the highest heritage significance. There are important views of the church from the south and east. In these views the charming and diminutive belfry is visible against sky, and it is notable that the scale of modern development to the north has been restrained in order not to overpower the setting of the church. The new Rotunda Building will be clearly visible rising above these buildings, particularly from the north-eastern end of Foster Lane, which is arguably the best view of the church. The view of the tower and belfry will be harmed by this intrusive backdrop. View B18 in the applicant's TVHBIA fails to encompass this view, and is oriented to look down Noble Street, conveniently excluding the church.

60. The western boundary of the Foster Lane Conservation Area directly abuts the Postman's Park Conservation Area at St Martin Le Grand. Immediately to the north of the Conservation Area, Castle House, 4-6 Aldersgate Street (built in 1999) and the corner of Aldersgate Street and London Wall, part of Foster's One London Wall (completed in 2005), respect the prevailing townscape context with five/six storey scale, and the setting of St Botolph's Church opposite, and St Anne and St Agnes to its south. The low scale of the existing Museum

Rotunda provides a very modest and unassuming background. This view and the wider townscape context will be significantly altered by the scale of the new Rotunda Building. Its scale will become a very prominent and obtrusive feature which will harm the setting of the Foster Lane Conservation Area.

61. The Foster Lane Conservation Area Character Summary and Management Strategy SPD 2015 identifies important views of the 19<sup>th</sup> century townscape at the corner of Gresham Street and Aldersgate Street. The applicant's TVHBIA fails to include this view of the corner of Gresham Street. View 13 is too close, taken from the south side of the existing roundabout, albeit the scale of the new Rotunda Building will be overwhelming. View 12 taken towards the southern end of St Martin Le Grand is too far south.

### **Wider Impacts on other Heritage Assets**

62. The applicant's TVHBIA includes dozens of 'before' and 'after' images from distant viewpoints. It will be for others to comment on these impacts, such as the incursion into the existing backdrop views of the tiered spire of St Bride's Church, Fleet Street, evident in Views 1 and 2 of the TVHBIA, or potential views from parts of Charterhouse Square or The Charterhouse itself, not considered in View B23.

### **OVERALL ASSESSMENT OF HARM**

63. The proposal involves the complete loss of two non-designated heritage assets, namely the former Museum of London building and Bastion House. There is substantial harm to these heritage assets.

64. The proposal involves less than substantial harm to the setting of several listed buildings, a Registered Park and Garden, a Scheduled Ancient Monument, and the setting of three conservation areas.

65. The most damaging impacts on designated heritage assets are the background views of the church of St Giles Cripplegate from within the Barbican, and the views of the spires of St Botolph Aldersgate from Postman's Park and St Anne and St Agnes from Gresham Street, both currently silhouetted against sky. While this is less-than-substantial harm, as defined in National Planning Policy Framework and Guidance, it lies potentially at the middle-to-upper range of less-than-substantial harm, given that the heritage assets are Grade I buildings of the highest significance of which their setting is a major contributor.



66. There is also less-than-substantial harm to the setting of Ironmongers' Hall and the Barbican, to the setting of the London Wall Scheduled Ancient Monument and to the character and appearance of the Postman's Park and Foster Lane Conservation Areas. These come at the lower-to mid-range of the scale.

67. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm. Paragraph 202 of NPPF is thus relevant, requiring the balance of harm against public benefits.

## **HERITAGE BENEFITS**

68. The applicant's claim that the proposals contain considerable heritage benefits is strongly challenged and disputed. The opening up of the setting of Ironmongers' Hall to wider public view and exposure, as explained above, is not considered to be a benefit. The claim made by the applicant throughout the TVBHIA that the new development will have only beneficial impacts on the historic environment is strongly refuted.

## **BALANCING HARM AGAINST PUBLIC BENEFITS**

69. Paragraph 202 of NPPF states that "where a development proposal will lead to less than substantial harm to the significance of the heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

70. Paragraph 203 of NPPF requires that "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

71. Paragraph 199 of NPPF requires that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Given the considerable degree of less-than-substantial harm that is caused to designated assets of very high heritage significance, this must be given great weight.

72. Paragraph 200 of NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”. It is not at all clear from the current proposals that such justification exists.

73. During the developer’s application for a Certificate of Immunity from Listing in 2014 and 2019 considerable emphasis was placed on proposals at the time to develop the site for a new concert hall and music centre, as a key component in the aim to create a Cultural Mile along the northern edge of the City. It was suggested that it would be impossible to adapt the existing structures of the Museum to create the large concert hall then envisaged, and that the large public benefit from the new concert hall would therefore justify comprehensive demolition. The COIL would ensure that the balance of heritage harm against public benefit would not be altered by the increased heritage significance that statutory listing would confer. However, the concert hall and music centre have now been abandoned and replaced by a commercial scheme with less definite cultural public benefit. Indeed, one of the benefits now muted by the applicant is that profits from the development will help to pay for the relocation of the Museum to Smithfield, which is happening in any event.

74. The proposals, promoted by the owner of the land, are speculative, with no pre-let or funding provision, likely intended to maximise the value of the site with a view to disposal to a developer. It seems probable that there are alternative options which could retain at least some of the existing fabric of both the Museum and Bastion House. Such alternatives would likely cause less heritage harm and might also provide a variety of uses, some of which could construe public benefit, whilst also achieving a positive value for the owner. The optimum viable use for the site might not be that which achieves the highest value in purely monetary terms.

## **CONCLUSION**

75. The proposals cause widespread harm to a large number of heritage assets, including the complete loss of two undesignated heritage assets. Harm to designated heritage assets is less than substantial, but nevertheless of such degree that will considerably erode and harm their significance. This harm is not outweighed by heritage benefits elsewhere, nor do there appear to be other outstanding public benefits which would offset the great weight that must be

given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

Barbican Quarter Action

December 2023

### **Author of this report**

Alec Forshaw worked for 35 years as a conservation and urban design officer in local government. As a specialist heritage and planning consultant he has presented evidence at major Public Inquiries including Smithfield (2014), Liverpool Welsh Streets (2014), New River Head (2017), Norwich Anglia Square (2020), Custom House (2021), and M&S Oxford Street (2022). He contributed to the designation of the Barbican and Golden Lane Conservation Area, and has been heavily involved in the very recent designation of the Creechurch/Bevis Marks Conservation Area. He is the co-author of *The Barbican: Architecture and Light* (2015) and *New City: Contemporary Architecture in the City of London* (2013).

### **APPENDIX**

*From God's house to Bauhaus and back again* Bryan Appleyard, published in *The Times* 26 November 1982

### **LIST OF FIGURES**

Figure 1 Map of South Barbican Development Masterplan 1959

Figure 2 Alleys off Aldersgate c.1840

Figure 3 Ordnance Survey Map 1945

20-26 November 1982

Bryan Appleyard, complete with Pevsner's writings and architect Will Alsop, appraises a selection of modern buildings

# From God's house to Bauhaus and back again

Should the appreciation of post-war architecture be left to the experts or can the public at large raise their eyes skyward in admiration rather than conventional condemnation? A leisurely weekend walk through the City of London can confound the sceptics and provide a real insight into the best of modern buildings

Modern architecture requires some explanation. Its post-war reputation in this country has been appalling and the buildings of the seventies, designed in reaction to the public's disgust, have done little to improve the popular standing of the art. It is not enough to complain, as architects persistently do, about cowardly clients, inept planners and mindlessly difficult local protest groups. That is merely to compound the incomprehension. It would be far better for architects to own up to the immensity of the mistakes and to the mediocre mediocrity of most modern developments; then to spend the rest of the time drawing attention to the best that has been achieved.

Post-war British architecture has thrown up a number of fine buildings, some with the confident air of near-masterpieces. But the strength of the reaction against the failures has meant that most people no longer bother to look.

They are there, however, and the City of London is as good a place as any to walk around and look for them. But first it is necessary to understand a few of the reasons for the peculiar nature of modern architecture. Of all the arts, architecture is the one in which the artist aspires most literally to the condition of the deity. Sir John Soane's Bank of England presupposes a God as surely as Lewis Gubbitt's King's Cross presupposes a train.

A building is centred on the human function which it performs, the rain out and providing decent plumbing, the architect, however, requires it to be beautiful. In a theoretical sense he is simply playing at God's creation is supremely functional and yet it is also beautiful. The beauty is provided as a beneficent embellishment by the architect. Decorative elements in architecture are no more than such an embellishment; indeed, it was essential if the architect was to fulfil his god-like function of providing "expressed structure" or "form-following function" whether we like it or not. Gradually it began to emerge that we did not want the anti-property developer fury of the sixties spilled over into anti-architect fury.

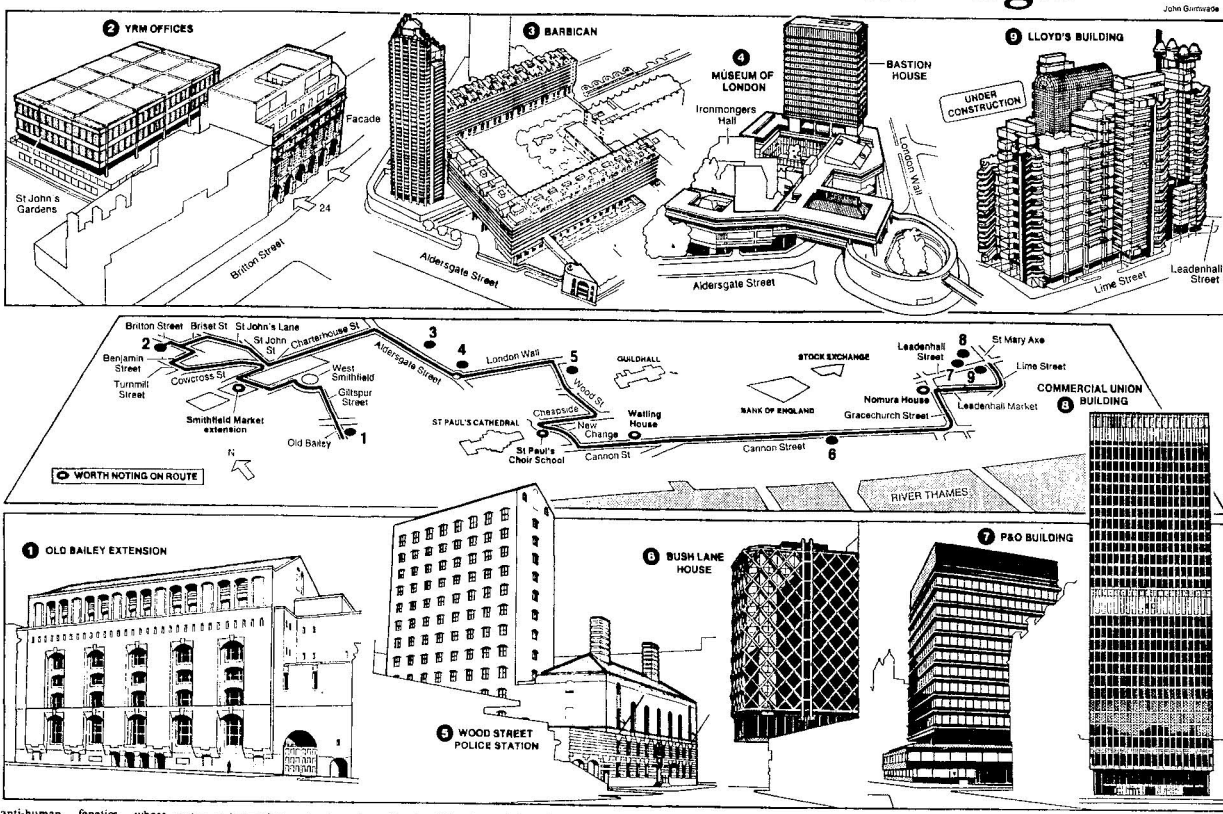
The Victorians' profound belief in that view led to such extravagant masterpieces as St Francis Station. Form and function and applied decoration were part of the transcendent and moral significance attached to commerce. Even the most Victorian house would be endowed with decorative mouldings.

At the height of this decorative extravaganza, though, a few people decided that God had died. The carnival continued into this century, but decorative gaudiness was *à la mode* - but then the crisis came. Valuably, the decorative had to be abandoned by the First World War, in reality that was only a symptom, and the trend was discernible long before.

In the godless post-war world a generation of prodigiously-gifted architects went back to basics. In the mind of Walter Gropius at the Bauhaus or of Le Corbusier or Mies van der Rohe, a profound style was conceived with the idea of decoration was abandoned. A new conceptual centre had to be found for their art to replace the decayed metaphysics. For Mies this new centre was an ethical perfection of abstract form, for Le Corbusier it was a visionary determination to transform the world - "architecture or revolution," he said and for Gropius it was a new proletarian functionalism.

The notion of "expressed structure" was conceived, it meant that the final appearance of a building should be dependent on its construction. Decoration or disguise was an offence against the clear light of the new Utopia.

It is easy now to mock the idealism which characterized these visionaries. With hindsight we can blame them for the horror executed by lesser talents. Tom Wolfe's *From Bauhaus to our House* (Cape) does just that but, in doing so, he fails to grasp the creative power they possessed. Without that, modern architects can be portrayed all too simply as slavish acolytes of a gang of



anti-human fanatics whose antics are laughable when they are not destroying our cities. But Mies' buildings are beautiful, and Le Corbusier did possess an astonishingly fertile and varied visual imagination. Wolfe's verbal acrobatics at the expense of an aesthetic he perceives as anti-life are less impressive if reduced to their essence - a banal, noisy exercise in philistinism.

British building in the fifties and sixties was conceived under the modernist spell. The steel and glass towers that began to appear in the sixties were "expressed structure" or "form-following function" whether we like it or not. Gradually it began to emerge that we did not want the anti-property developer fury of the sixties spilled over into anti-architect fury.

The profession lost its nerve and a regressive retro-architecture based on pitched, tiled roofs and affected use of brickwork. Hilltop Town Hall became the apotheosis of the "new vernacular" with its pusillanimous attempt to reflect the styles of the acres of semis around it.

But, in the wake of that failure, there are now signs of a new brand of post-modernism based upon a more courageous eclecticism. Significantly the iron tracery and extravagant camouflage of Victorian railway stations are playing a large part in that revival.

My companion on this walk - a young architect named Will Alsop - is part of a new, more rigorous reaction. He won the competition for the design of the new Westminster Pier and he is the architect for the new Riverside scheme in Hammersmith. While he is very much of the next step after modernism, he is not foolish enough to dismiss its products, making him the ideal judge of the work of the past 35 years. He also happens to agree with me. I had another companion - Nikolaus Pevsner's first volume on London from his essential work *The Buildings of England*. While he is very much of the next step after modernism, he is not foolish enough to dismiss its products, making him the ideal judge of the work of the past 35 years. He also happens to agree with me. I had another companion - Nikolaus Pevsner's first volume on London from his essential work *The Buildings of England*.

Our walk begins at the Central Criminal Court - or rather at its modern extension southwards down Old Bailey. This is the first of two buildings by the firm of McMorran & Whitby on our route and both can fairly claim to be among the best.

Built in 1967-69, the Old Bailey extension was well ahead of its time in the abandonment of modernist conventions, not for the new vernacular, but for a far more coherent and radical style. The frontage on to Old Bailey itself is brilliant with its massive sheet of Portland stone interrupted by recessed windows with flat arches and by vertical projections which sweep smoothly back into the wall just above street level. At the top there is a haunting row of arches, some blanked off, while the entrance is an understated and surprisingly small doorway after the drama of the rest of the frontage.

The architects wisely decided to attempt to blend with the neo-baroque extravagance of Mountford's original building. Indeed the clear line of their shallow-pitched roof looks suitably like an ironic comment on its somewhat empty rhetoric. But the overall effect is breathtaking while the avoidance of any grand entrance permits it to be human as well.

Heading northwards through Smithfield and a maze of streets we arrive at 24 Briton Street - the first truly classic piece of modern architecture on the way. These are the offices of the architect's York. Rosenbergs, Mardall. They are behind the Victorian street frontage which the firm has restored and converted into shops and flats. The arch in the centre leads into a brick courtyard in which rests with perfect simplicity a three-story steel and glass structure, exuding an almost oriental, meditative calm.

The effect of such stunning simplicity is not easily achieved. Note especially the carefully-noticed relationship of the block as a whole to its surrounding space. But note especially the rigour of the detailing: the revolving door entrance, for example, is prevented from creating a nasty bulge by being set back slightly more than usual. The doors thus provide a satisfying shape into the facade. Note also the tone of the red steel facings - a heightened version of the usual colour of the treated steel used in the building.

It is a building which challenges our anger at the relentless simplifying tendency of modernism. It reveals that simplification can attain harmony rather than monotony. Mies' tired mad that is bad but here at least his purism and

rigour found sufficiently careful disciplines.

Returning to Charterhouse Street we head east towards the unavoidable Barbican. Like the West End's Centre Point this is a development which is likely to draw people to nail their colours to the mast on the subject of modern architecture. For a start it is intended to be lived rather than worked in and for people living reluctantly in tower blocks it is the popular image of everything that is vile about architecture.

However, people do choose to live in the Barbican and ironically they might resent the higher up the towers they go. Alsop's main criticism is the lack of colour though he defends vigorously the care which has gone into the shaping of the towers. But he admits that the development as a whole suffers from being too large for one firm of architects - Chamberlin, Powell & Bon had their scheme accepted in 1959 but the architects centre was only finished last year.

The date of the scheme's acceptance is important because it means that the Barbican concept began to age damagingly in the midst of the late modernist idealism. The realization that a raised podium and apparently endless dripping concrete corridors may be intimidating rather than welcoming slowly began to dawn on people as crime and vandalism became an ever increasing iron council block after another. Ironic comparisons with Le Corbusier's "Ville Radieuse" - never actually built - are inevitable when confronted with such strict anti-individual idealism.

Pevsner rightly described the design of the Barbican's immediate neighbour in Aldersgate Street as "brilliant". It is Powell & Moy's Museum of London, begun in 1972 whose beautiful variations and careful detailing are demonstrations of late modernism at its cool and satisfying best.

Its problem lay in crossing the road to the brick mound at the centre of the roundabout at the junction with London Wall. Powell & Moy achieved this by projecting the ribbon windows further than their vertical lines, the finely composed arm which expels the usual melodramatic associated with such attempts.

"Expressed structure" is even handled with unusual sensitivity in the rough concrete pillars which rise through the facade of the building, cutting through tiles and even through windows. The effect is complex and yet clean and the rhythm of the movement across the road

endows an unexpected ethereal quality to the composition seen from the west.

Powell & Moy also designed the office block, known as Bastion House, which grows out of the museum development. This was the last in the series of blocks that run dramatically the length of the dual carriageway section of London Wall. The others are somewhat anonymous sixties products, very much representative of post-war British modernism. Bastion House, however, is given a more massive look by its brown colouring, yet the effect is softened by the way the whole is raised from the building below on concrete pillars and blocks. The building itself is perhaps a routine expression of slightly-elaborated modernism but it is

building completely lack the oppressive quality of the borrowings of the "new vernacular".

In contrast, 80 Cannon Street - Bush Lane House - whose place in the mainstream of architectural thinking is evident from the moment you catch a glimpse of the black block encased in its massive steel lattice. Rarely can the doctrine of "expressed structure" have been taken so literally. The steel tubes carry water as a fire precaution and structurally were intended as a means of preventing vibrations from tube trains. In reality, as Alsop points out, there are many ways of doing that and the real reason was probably that the architects just wanted to build their huge lattice.

The effect from a distance is of a somewhat crude outcrop but at street level the empty space left by the raised first floor creates a surprisingly attractive effect. The block is raised with sufficient care and to a sufficient height to prevent any oppressive effect for the pedestrian. Its clumsiness prevents it being any more than an interesting building but it is worth noting as yet another variation on the simple modernist theme.

Through to Gracechurch Street where number 3 - Nomura House - has an elegant Italian feel with its arched windows, and then through the superb Victorian Leadenhall Market opposite. With its magnificent ironwork - so beloved of young architects today - this is an appropriate way to reach the climax of the walk: the junction of Leadenhall Street, St Mary Axe and Lime Street.

This promises to be an intersection which will stand as a monument to the achievements of modernism. On one side Richard Rogers' new Lloyd's building is slowly rising to its climax in a 290 foot glass-roofed atrium. In spite of the current vogue for Rogers work largely based on the popular success of his Centre Pompidou in Paris, it is important to remember that he is in effect no more than a late modernist. He is still in the business of "expressed structure" even if he has added a somewhat baroque twist to the ideology. In the wake of Rogers' failure to make the shortlist for the National Gallery extension, it is some consolation and Lloyd's had already given him this opportunity for another major London building.

Opposite is the Commercial Union building, built in 1964. 69 by George Melvin, Ward & Partners. This is perhaps the

most uncompromising application of Mies' idealism in London. The delicacy of its construction is stunning and the way the piazza in front dips down from street level has the effect of presenting the entire 387-foot frontage to us in one breathtaking sweep. The P&O building next door is a reasonably worthy companion but lacks the uncompromising grace of the CU.

The climax of the walk is thus a suitably commercial one; for Mies, modernism was the style of architecture which defined the modern, corporate look. It was a look based upon a clean, abstract ideal form which reached its apotheosis in his own magnificent but chilling Seagram Building in New York. In the last analysis, however, it

was only one idea among many. But it was an idea that insisted on its own superiority and spiritual purity. The shock of the CU building in the midst of the City arises from its contrast with the general jumble and stylistic cacophony which surrounds it.

It is a worthwhile shock but it would be insane to attempt to suppress that plurality in favour of a modernist singularity. That is what Le Corbusier wanted to do in Paris and it is what the Brazilians have done - disastrously - in Brasilia. Happily Alsop and his contemporaries have emerged from such Utopian dreams. They may not have reinstated God in the process but at least they have restored messy, unpredictable, unplanable man.

saved by the proportions and the raised level which achieves what many a development has attempted - the effect of floating.

Turning right off London Wall into Wood Street we come to the police station which is McMorran & Whitby's second building on this walk. Completed in 1965, it shows once again how the firm appears to have stepped effortlessly beyond modernism without the struggles and indecision which have characterized the same step among others.

Again, using Portland stone, they have this time produced an initially conventional-looking frontage which is rusticated (blocks separated by joint lines) at ground floor level and then smooth above. You first begin to realise there is something unusual in this building when you notice the rustication returning in the extraordinarily massive chimney stacks. Then looking up again, the smooth stone returns for a brilliant, slightly tapered, tower with a central shaft even if it has hark back to the Old Bailey.

This is a relatively unknown building - indeed, Alsop was completely unaware of its existence - but it is an important one. The initial sense of oddness gives way to admiration at the coherence of the development. Only at the back does this break down slightly where the tower meets the lower stage slightly clumsily. The references to older styles of

building completely lack the oppressive quality of the borrowings of the "new vernacular".

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2 Travel: Guide to the best of shopping in Hongkong

3 On the road, The Times Cook, In the garden and Eating Out

4 Values: How to personalize your presents at Christmas

5 Review: Video Preview: Theatre, Festivals and Galleries

7 Preview: Music, Dance, London films and films on TV

8 Calendar, Drink, Bridge, Chess, Collecting and Family events



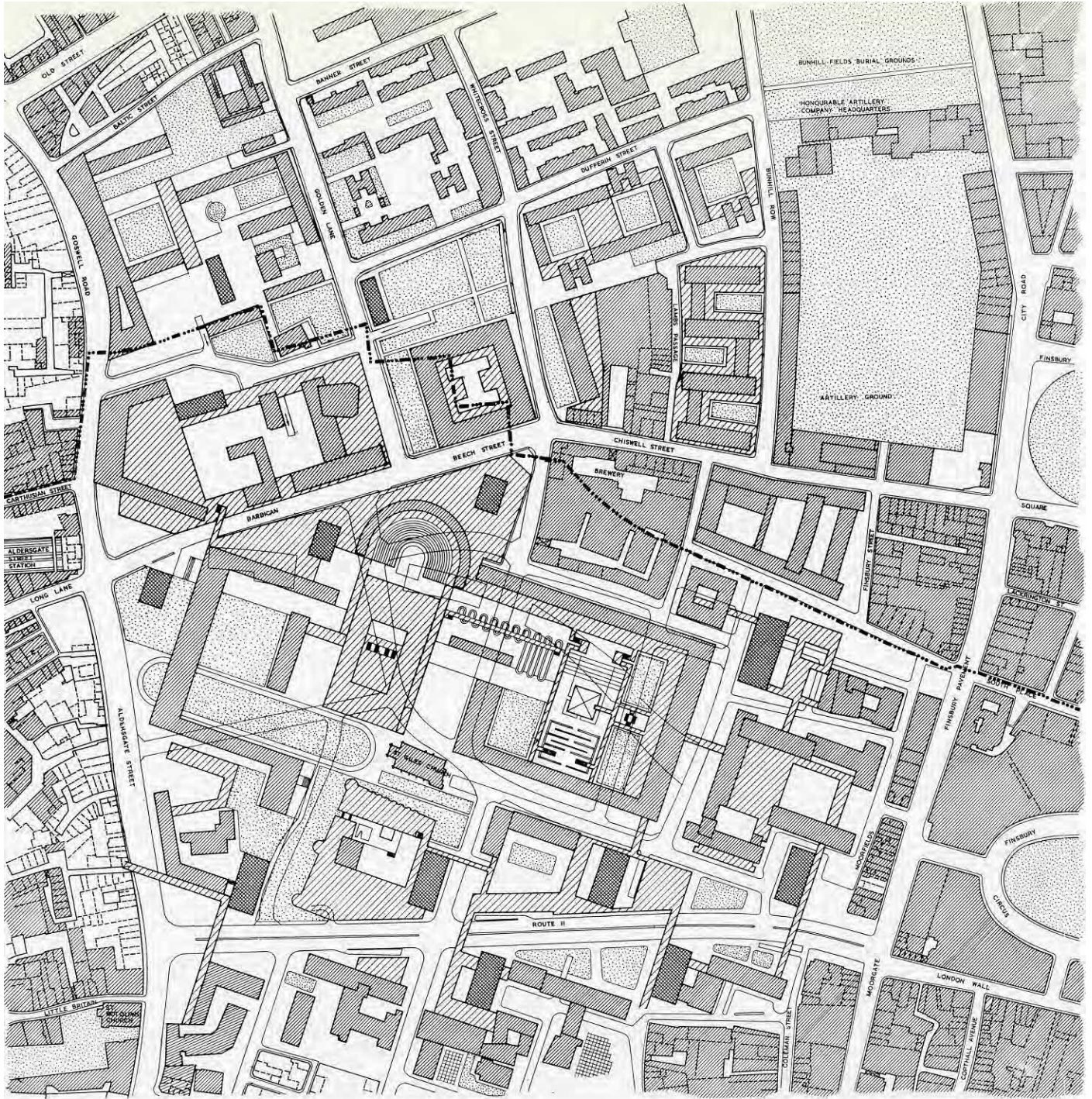


FIGURE 1 MASTERPLAN 1959



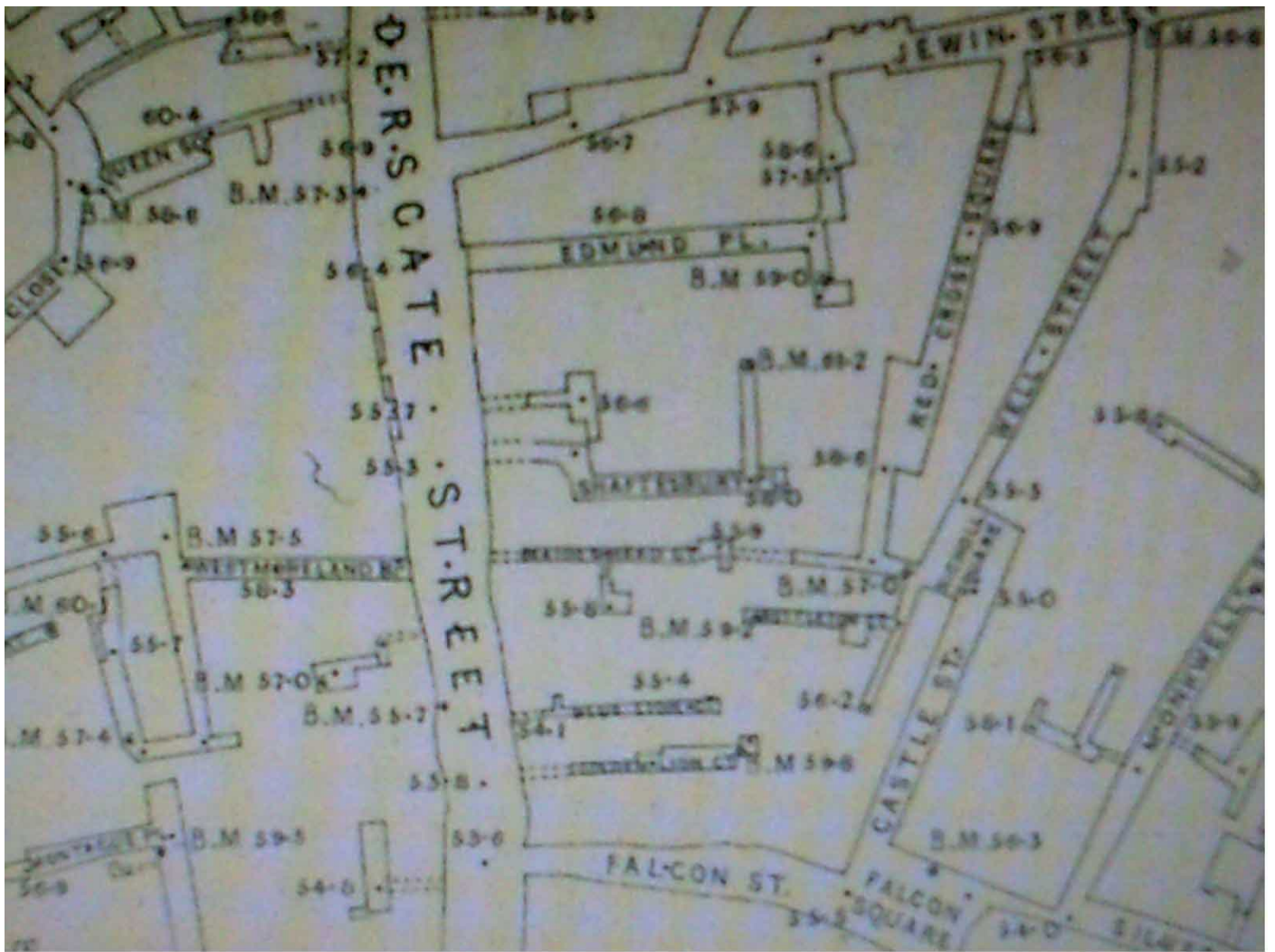


FIGURE 2 ALLEYS OFF ALDRSGATE c.1840



FIGURE 3 1945 OS MAP



APPENDIX F



29 January 2024

By Email only: [REDACTED]

Dear Brenda,

**RE: (ROL01285) Redevelopment of 140 & 150 London Wall and its effect upon the Barbican Estate residents Monkwell Square and London House – Daylight and sunlight**

Anstey Horne has been instructed by the Barbican Quarter Action group to review the ES chapter report on Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage that accompanies the planning application for 140 & 150 London Wall (planning application 23/01304/FULEIA).

As part of the review, we have been asked to comment upon the methodology adopted for the various assessments and upon the overall impact that the proposed scheme will have upon the residents of the Barbican, Monkwell Square and London House. This letter sets out our observations.

## **Review of methodology**

### 3D Contextual Model

The 3D computer model of the existing site and surrounding context upon which the assessments are based, has been constructed using “*photogrammetric survey, site photography and OS information*” and has subsequently “*been updated using measured survey of the adjacent properties to the site*” (paragraph 13.2.7).

Photogrammetric survey does not establish the location of windows on a façade and has a built-in tolerance of up to 300mm. Measured survey provides greater accuracy of modelling and results.

The City of London as the Local Planning Authority should request confirmation as to which properties are modelled from measured survey and which are modelled from photogrammetric survey. In addition, confirmation as to how the windows and their locations have been modelled where photogrammetric survey has been used.

Until it is confirmed which properties are modelled from measured survey and which are modelled from photogrammetric survey, the overall accuracy of the modelling and analysis results cannot be commented upon.

## Daylight and Sunlight Assessment (Impact upon neighbours)

The BRE guidance sets out the tests that should be adopted when assessing the impact upon existing neighbours under section 2.2 of the document. The guidance states that the vertical sky component (VSC), no sky line (NSL) and annual probable sunlight hours (APSH) tests should be used.

Comparative daylight illuminance analysis ('illuminance method') has been undertaken for the surrounding properties (paragraph 3.2.17). Daylight illuminance is an absolute assessment of the daylight performance within a proposed scheme as set out within section 2.1 of the BRE guidance.

The appendices do not include any NSL contour plots. Therefore, it is not possible to see what layouts Waldrams' have used for each of the neighbouring properties. It would be helpful to review these to establish how the internal configurations of neighbours have been modelled, particularly where assumed layouts have been applied, as this can heavily influence the findings of the NSL test.

## Solar Glare Assessment

The solar glare analysis has been undertaken using climate based data (paragraph 13.2.44). We request that a supplementary assessment of solar glare on a 'clear sky' basis be provided to fully understand the potential for solar reflection at key road junctions.

The report states that "incidence of proposed glare arising from the proposed development.....is likely to be major adverse and significant" for the residents of Monkwell Square (paragraph 13.6.180). It would therefore be helpful for the number of tested viewpoints to be expanded to also include windows to the north and south ends of the elevation (either side of the currently tested viewpoints).

It would also be helpful to see the angles on the field of vision illustrations on the appendix 13-F solar glare results drawings. It is assumed that the angles are 3°, 10°, 20°, 30°, 40° etc.

## Light Spillage Assessment

The report states that "there are only small areas of low additional light spill, the impact at Mountjoy House is therefore negligible and the effect not significant, particularly as any of these small areas do not appear to coincide with windows serving habitable space" (paragraph 13.6.125)

No clear indication of where the additional light spill occurs to the facade of Mountjoy House has been provided. A drawing should be provided which overlays the light spill analysis and the facade of Mountjoy House to confirm the areas of additional light spill do not coincide with windows serving habitable rooms.

In addition, the City of London as the Local Planning Authority should request that the analysis for the site be rerun without the light spill from the existing neighbouring buildings being considered in the baseline scenario.

This will determine the effect of the proposed scheme in isolation and whether the proposed scheme meets the pre and post curfew targets of 25 and 5 Lux as set out within the ILP (2011) Guidance Notes.

#### Review of results for Impact Upon Neighbours

The VSC daylight results have been run on a room-by-room basis as well as a window-by-window basis (Table 13-22 and paragraph 13.6.40). The room-by-room results do not appear to be appended to the report. It is therefore not possible to comment upon this assessment.

Reference is made to a without balconies assessment as justification for the impact upon Mountjoy House (paragraph 13.6.40). These results do not appear to be appended to the report. It is therefore not possible to comment upon this assessment.

The results for Mountjoy House, show that there will be significant (moderate or major) VSC daylight impacts to 12 bedrooms on the 1<sup>st</sup> to 6<sup>th</sup> floors. Nine of these bedrooms will also experience a significant reduction in annual sunlight. The remaining three bedrooms will experience a minor reduction in annual sunlight outside of the BRE guidance target.

The results for London House (172 Aldersgate Street), show that seven windows will experience significant (moderate) VSC daylight impacts. Five of these windows serve living/dining rooms or living/kitchen/dining rooms. A further eight rooms will experience significant (moderate or major) NSL daylight impacts. Two of these rooms are living/dining rooms.

With regard sunlight for London House, paragraph 13.6.64 states that “in sunlight terms, 46 of 47 living rooms with windows that face within 90° of due south meet the target value for APSH with the proposal in place. The impact to these windows is therefore considered negligible”. The results in the appendices appear to list seven living rooms with windows that face within 90° of due south (pages 44 to 47). Three of the windows serving these living rooms experience significant (major) impacts in both annual and winter sunlight, two of which are located with no winter sunlight (R1 on the eighth and ninth floors). A further three windows experience significant (major) impacts in winter sunlight.

We have reviewed the sun-on-ground overshadowing analysis and while there is a reduction in sunlight, these are within the BRE guidelines. We therefore have no further comment.

With regard solar glare, paragraph 13.6.180 states that there will be major adverse and significant incidence of solar glare to Monkwell Square, and that “mitigation measures including the use of non-reflective glass coatings or fritting will be required”. Such measures need to be specified by the architect at the design stage to avoid “major adverse and significant” and therefore unacceptable levels of solar glare.

## Review of results for Internal Daylight Assessment

The report concludes that the scheme will not achieve the BREEAM daylighting credits. The report goes further to state that achieving BREEAM daylight credits is difficult in urban locations and lists the competing requirements of the design scheme. We therefore have no further comment.

## Conclusion and Recommendations

There will be significant impacts in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight.

There will be significant VSC daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant NSL daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight.

There will be major adverse and significant incidences of solar glare to residents within Monkwell Square.

The City of London as the Local Planning Authority should request that the following points be clarified:

- To verify the accuracy of the 3D modelling and analysis, confirmation of which properties are modelled from measured survey, and which are modelled from photogrammetric survey should be requested;
- Confirm how the windows and their locations have been modelled where photogrammetric survey has been used; and,
- To confirm the solar glare results within appendix 13-F, include the angles on the field of vision on the solar glare results drawings.

In addition, the following information and assessments should be provided:

- VSC daylight results on a room-by-room basis;
- VSC daylight results on a room-by-room basis without balconies;
- NSL contour plots to establish the layout used within the analysis;
- A 'clear sky' solar glare analysis to fully understand the potential for solar reflection at the points assessed;
- Expanded the number of tested viewpoints for solar glare for Monkwell Square;
- An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP (2011) Guidance Note; and

- Confirm the location of the areas of additional light spill on the façade of Mountjoy House to show that they do not coincide with the location of windows serving habitable rooms.

Kind regards



Anstey Horne

APPENDIX G





London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

The London Plan 2021	
POLICY	Referenced in Planning Statement?
Policy GG1 Building Strong and Inclusive Communities	Y
Policy GG2 Making the Best Use of Land	Y
Policy GG5 Making the Best Use of Land	Y
Policy GG6 Increasing Efficiency and Resilience	Y
Policy SD4 The Central Activities Zone	Y
Policy SD5 Offices, other Strategic Functions and Residential Development in the CAZ	Y
Policy D2 Infrastructure requirements for sustainable densities	Y
Policy D3 Optimising site Capacity through the Design-led Approach	Y
Policy D4 Delivering Good Design	Y
Policy D5 Inclusive Design	Y
Policy D6 Housing quality and standards	Y
Policy D8 Public Realm	Y
Policy D9 Tall Buildings	Y
Policy D11 Safety, Security and Resilience to Emergency	N
Policy D12 Fire Safety	Y
Policy E1 Offices	Y
Policy E2 Providing Suitable Business Space	N
Policy E3 Affordable Workspace	N
Policy E10 Visitor infrastructure	N
Policy HC1 Heritage conservation and growth	Y
Policy HC3 Strategic and Local Views	Y
HC4 London View Management Framework	Y
Policy H5 Supporting London’s culture and creative industries	N
Policy G1 Green Infrastructure	Y
Policy G4 Open Space	Y
Policy G5 Urban greening	Y
Policy G6 Biodiversity and Access to Nature	Y
Policy G7 Trees and Woodlands	Y
Policy SI 1 Improving Air Quality	Y
Policy SI 2 Minimising Greenhouse Gas Emissions	Y
Policy SI 7 Reducing Waste and Supporting the Circular Economy	N
Policy SI 12 Flood Risk Management	Y
Policy SI 13 Sustainable Drainage	Y
Policy T1 Strategic Approach to Transport	Y
Policy T2 Healthy Streets	Y
Policy T4 Assessing and Mitigating Transport Impacts	Y
Policy T5 Cycling	Y
Policy T6 Car parking	Y
Policy T7 Protecting and enhancing London’s Waterways	Y

London Wall West (ref: 23/01304/FULEIA)  
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The City of London Local Plan 2015	
POLICY	Referenced in Planning Statement?
Policy CS1 Offices	Y
Policy DM 1.1 Protection of office accommodation	
Policy DM 1.2 Assembly and protection of large office development sites	Y
Policy DM 1.3 Small and medium sized business units	Y
Policy DM 1.5 Mixed uses in commercial areas	Y
Policy CS3 Security and Safety	
Policy DM 3.1 Self-containment in mixed use developments	
Policy DM 3.2 Security measures in new developments around existing buildings	
Policy DM 3.3 Crowded places	
Policy DM 3.4 Traffic management	
Policy CS5 The North of the City	
Policy CS10 Design	Y
Policy DM 10.1 New development	Y
Policy DM 10.4 Environmental Enhancement	Y
Policy DM 10.7 Daylight and sunlight	Y
Policy DM 10.8 Access and inclusive design	Y
Policy CS11 Visitors, Arts and Culture	
Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities	
Policy DM 11.3 Hotels	
Policy CS12 Historic Environment	Y
Policy DM 12.1 Managing change affecting all heritage assets and spaces	
Policy DM 12.3 Listed buildings	
Policy DM 12.4 Ancient monuments and archaeology	Y
Policy DM 12.5 Historic parks and gardens	
Policy CS13 Protected views	Y
Policy CS14 Tall Buildings	
Policy CS15 Sustainable Development and Climate Change	Y
Policy DM15.1 Sustainability requirements	
Policy DM 15.2 Energy and CO2 emissions assessments	Y
Policy DM 15.3 Low and zero carbon technologies	
Policy DM 15.4 Offsetting of carbon emissions	Y
Policy DM 15.5 Climate change resilience and adaptation	
Policy DM 15.6 Air quality	Y
Policy DM15.7 Noise and light pollution	Y
Policy DM15.8 Contaminated land and water quality	
Policy CS16 Public Transport Streets and Walkways	Y
Policy DM 16.1 Transport impacts of development	
Policy DM 16.2 Pedestrian movement	
Policies DM 16.3 Cycle parking	
DM 16.4 Facilities to encourage active travel	
DM 16.5 Parking and servicing standards	Y
Policy CS17 Waste	
Policy DM 17.2 Designing out construction waste	Y

London Wall West (ref: 23/01304/FULEIA)  
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Policy CS19 Open Spaces and Recreation	N
Policy DM 19.1 Additional open space	N
Policy DM 19.2 Biodiversity and urban greening	Y
Policy DM 21.3 Residential environment	N
Policy CS22 Social Infrastructure and Opportunities	N

Emerging Local Plan City Plan 2040	
POLICY	Referenced in Planning Statement?
Draft Strategic Policy S1: Health and Inclusive City	Y
Draft Policy HL1: Inclusive buildings and spaces	N
Draft Policy HL2: Air quality	N
Draft Policy HL3: Noise	N
Draft Policy HL5: Contaminated land and water quality	N
Draft Policy HL6: Location and protection of social and community facilities	N
Draft Policy HL9: Play areas and facilities	N
Draft Policy HL10: Health Impact Assessments (HIA)	N
Draft Strategic Policy S2: Safe and Secure City	N
Draft Policy SA1: Crowded Places Publicly accessible locations	N
Draft Policy SA3: Designing in Security	N
Draft Strategic Policy S4: Offices	Y
Draft Policy OF1: Office Development	Y
Draft Policy OF2: Protection of Existing Office Floorspace	N
Draft Strategic Policy S6: Culture and Visitors	Y
Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities	N
Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities	Y
Draft Policy CV3: Provision of Visitor Facilities	N
Draft Strategic Policy S7: Infrastructure and Utilities	N
Draft Policy IN2: Infrastructure Capacity	N
Draft Strategic Policy S8: Design	Y
Draft Policy DE1: Sustainable Design	Y
Draft Policy DE2: Design Quality	Y
Draft Policy DE3: Public Realm	Y
Draft Policy DE5: Terraces and Elevated Public Spaces	Y
Draft Policy DE8: Daylight and Sunlight	N
Draft Policy DE9: Lighting	N
Draft Strategic Policy S9: Transport and Servicing	N
Draft Policy VT1: The impacts of development on transport	N
Draft Policy VT3: Vehicle Parking	N
Draft Strategic Policy S10: Active Travel and Healthy Streets	N
Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding	N
Draft Policy AT2: Active Travel including Cycling	N
Draft Policy AT3: Cycle Parking	N
Draft Strategic Policy S11: Historic Environment	Y
Draft Policy HE1: Managing Change to Historic Environment Development	Y

London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

Draft Policy HE2: Ancient Monuments and Archaeology	N
Draft Strategic Policy S12: Tall Buildings	N
Draft Strategic Policy S13: Protected Views	N
Draft Strategic Policy S14: Open Spaces and Green Infrastructure	Y
Draft Policy OS2: City Urban Greening	N
Draft Policy OS4: Biodiversity Net Gain	N
Draft Strategic Policy S15: Climate Resilience and Flood Risk	N
Draft Policy CR1: Overheating and Urban Heat Island Effect	N
Draft Strategic Policy S16: Circular Economy and Waste	N
Draft Strategic Policy S23: Smithfield and Barbican Key Area of Change	Y

City of London SPD/PAN	
POLICY	Referenced in Planning Statement?
Air Quality SPD, July 2017	Y
Archaeology and Development Guidance SPD, July 2017	Y
Barbican and Golden Lane Conservation Area SPD, February 2022	Y
Lighting SPD, October 2023	Y
Office Use SPD, January 2022	Y
Open Space Strategy SPD, January 2015	Y
Planning Obligations SPD, July 2014	Y
Protected Views SPD, January 2012	Y
Barbican Listed Building Management Guidelines, Volumes I, II and IV (2012-2015)	N
Archaeology in the City PAN,	N
Carbon Options Guidance PAN, March 2023	N
Developer Engagement Guidance PAN, May 2023	N
Preventing suicides in high rise buildings and structures PAN, November 2022	N
Solar Convergence PAN, July 2017	Y
Solar Glare PAN, July 2017	N
Sunlight PAN, July 2017	N
Wind Microclimate PAN, August 2019	Y

London Plan Guidance	
POLICY	Referenced in Planning Statement?
Planning for Equality and Diversity in London SPG, October 2007	N
All London Green Grid SPG, March 2012	N
London View Management Framework SPG, March 2012	Y
Play and Informal Recreation SPG, September 2012	N
The Control of Dust and Emissions during Construction and Demolition SPG, July 2014	N
Accessible London: Achieving an Inclusive Environment SPG, October 2014	Y
Social Infrastructure SPG, May 2015	N
Public London Charter LPG, October 2021	N
Circular Economy Statements LPG, March 2022	Y

London Wall West (ref: 23/01304/FULEIA)  
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Whole Life-Cycle Carbon Assessments LPG, March 2022	Y
Fire Safety LPG, draft June 2022	N
Sustainable transport, Walking and Cycling LPG, December 2022	N
Air Quality Positive LPG, February 2023	N
Air Quality Neutral LPG, February 2023	N
Urban Greening Factor LPG, February 2023	Y
Optimising Site Capacity: A Design-Led Approach LPG, June 2023	N

[REDACTED]

31 January 2024

Dear Gemma Delves

**London Wall West, Bastion House and Museum of London, 140-150 London Wall, EC2Y**

REF: 23/01304/FULEIA, 23/01277/LBC & 23/01276/LBC

The Twentieth Century Society has been notified of the above applications for the comprehensive redevelopment of the Museum of London and Bastion House site to provide three new buildings ('North Building', 'Bastion House' and 'Rotunda Building') providing office floorspace with a cultural and retail offering with a public plaza at street-level and 'the Glade', an elevated garden at highwalk level. The Society strongly objects to the scheme due to the loss of the two existing buildings, which should be identified as Non-Designated Heritage Assets (NDHAs), and on account of the substantial harm that would be caused by the development to the setting of the Grade II listed Ironmongers' Hall and to the Barbican Estate, which is Grade II listed, with a Grade II\* registered landscape and is set within the Barbican and Golden Lane Conservation Area.

**ASSESSMENT**

The Society strongly objects to the proposed redevelopment on account of the substantial harm that would be caused to the site's heritage assets. This includes:

Non-Designated Heritage Assets

The Museum of London and Bastion House

The Museum of London was built in 1971-76 to designs by Powell and Moya, one of the most significant practices in post-war Britain. It was the first post-war museum to be built in London, and is a robust and interesting response to the constrained and historic site. To the east is the 'Miesian' Bastion house also by Powell and Moya which was built as part of the new museum scheme and is a rare surviving example of the firm's commercial output. It is also an important survivor of the original post-war 'Route XI' LCC masterplan. Bastion House was the last of six office towers which were built along London Wall in the 1960s and 70s - only two survive and Bastion House is the best preserved of the two.

The Museum of London (MoL) and Bastion House should be identified as Non-Designated Heritage Assets. Planning Policy Guidance (PPG, 2019) identifies NDHAs as "buildings [...] identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets". This accurately describes the MoL and Bastion House which were turned down for inclusion on the national list but clearly have heritage significance in a local context for the reasons set out above. The PPG explains

that local planning authorities may identify NDHAs as part of the decision-making process and we urge you to do so here.

The proposed development would involve the full demolition of the MoL and Bastion House which should be treated as NDHAs. The National Planning Policy Framework (NPPF, 2023) includes a paragraph on NDHAs which states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset” (paragraph 209). The scale of harm or loss would be at the highest level as the buildings would be completely demolished.

The NPPF describes heritage assets as “an irreplaceable resource” (paragraph 195) and states that “In determining applications, local planning authorities should take account of [...] the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation” (paragraph 203). We have yet to see compelling evidence proving that refurbishing and repurposing the buildings would not be deliverable. In fact, we understand that the City received credible bids from a number of developers proposing schemes that involved the retention and reuse of the existing buildings. As such, it remains our understanding that the buildings are structurally sound and capable of being upgraded and adapted for reuse. There should be a strong presumption in favour of repurposing and reusing buildings, as outlined in paragraph 157 of the NPPF: “The planning system should support the transition to a low carbon future in a changing climate [...] [and] encourage the reuse of existing resources, including the conversion of existing buildings”.

#### Designated Heritage Assets:

##### The Barbican Estate

Developed on a site devastated by WWII bombing, the Barbican Estate was designed from 1955 and built between 1962 and 1982. The architects were Chamberlin, Powell and Bon, a leading post-war practice. The Barbican is an internationally celebrated work of British post-war Brutalist architecture and urban planning.

The Barbican Estate lies to the north of the proposed redevelopment site. The significance of the estate is recognised in its Grade II listing, in the registration of its landscape at Grade II\* and in its designation as the Barbican and Golden Lane Conservation Area.

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

Harm would be caused through the demolition of the MoL and Bastion House. Built contemporaneously with the estate, the MoL and Bastion House form part of the Barbican’s history and its architecture and highwalks relate and integrate it to the estate. It is our view that the MoL and Bastion House make an important and positive contribution to the setting of the designated estate. The proposed redevelopment would result in the loss of the existing buildings (which constitute high-quality, complementary contemporary development) in views towards and from the estate, but would also result in the loss of a site which contributes to the estate’s historic significance. As outlined in Historic England’s guidance, ‘The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (2017)’, ‘setting’ is experienced through views but also through “our understanding of the historic relationship between



places [...] For example, buildings that are in close proximity [...] may have a historic or aesthetic connection that amplifies the experience of the significance of each.” (p.2). The loss of this contemporary development built in the ‘70s in connection with the Barbican would serve to further disconnect the estate from its original post-war urban landscape - this landscape has already been eroded by recent development and would be further harmed by the proposed scheme.

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

- From St Paul’s Cathedral Golden Gallery (view 11 within the TVBHIA, part 14, pp.85-86). This view is from the highest viewing gallery of St Paul’s, a strategic heritage asset, which is regularly enjoyed by visitors and tourists. The Barbican is currently clearly legible in this view, but the proposed development (specifically the Rotunda) would substantially obscure the Barbican, particularly the estate’s Thomas More House. The Barbican is an important heritage asset which should remain fully on show in this key view.
- Looking north along St Martin’s Le Grand (view 12 in the TVBHIA, part 15, pp.88-89). The Barbican Estate’s Lauderdale Tower is currently appreciated as a landmark building that terminates this view down this major thoroughfare in the City of London. The proposed development (again, specifically the Rotunda) would completely block views of the tower. The applicant’s suggestion that the development, on account of its ‘high design quality’, would be an appropriate replacement in this view to an iconic designated heritage asset is erroneous.
- From views from Aldersgate (view 17 within the TVBHIA, part 22, pp.106-107). The proposed development would impact on the estate’s setting here, which is another key thoroughfare within the City. In current views, which take in both the MoL and Bastion House, the MoL is seen to be low-lying and its white tile-clad elevations distinguish the building from the Barbican while ensuring that it is a complementary neighbour. Built to five storeys and designed with highly-modelled brick elevations, the proposed ‘North Building’ would compete with the Barbican’s John Wesley Turret in this view.

The development would also impact on views from within the designated Barbican Estate. This is shown in the applicant’s TVBHIA in views:

- From the Lakeside Terrace (view 21 within the TVBHIA, part 26, pp.121-122) and from St Giles’ Terrace, outside St Giles Cripplegate (view 24 within the TVBHIA, part 29, pp.130-131). In both of these views, the proposed Rotunda would appear beside/behind the Barbican and would remove some of the clarity of the architectural expression of the roofline and elevations of the listed Mountjoy House.
- From views from the Thomas More Highwalk terrace (view 26 within the TVBHIA, part 31 & part 32, pp.136-137 and supplementary verified view A8 in the TVBHIA, PART 43, pp.207-208). Bastion House and the MoL are clearly seen within this view. With its low-lying, horizontal form and in the treatment of its tile-clad elevations which distinguish it from the concrete of the estate, the MoL complements the Barbican’s listed highwalk in this view. The proposed North Building would have a much more visually intrusive impact on this part of the estate on account of its bold modelling and tonally similar finishes.
- The new development would be highly visible in numerous other views from within the estate - for example, from the Highwalk from Wallside (which is a noted local view from the

Barbican and Golden Lane CAA, view 26) (view 27 within the applicant's TVBHIA, part 33, pp.142-143); from the western end of St Giles' terrace (another noted local view within the CAA, view 16) (supplementary verified view A7 within the TVBHIA, part 42, pp.204-205); from Monkwell Square (view 28 in the TVBHIA, part 34, pp.145-146); from Beech Gardens (supplementary non-verified view, B26, pp.264-265); and from the Defoe Highwalk (supplementary non-verified view, B27, pp.266-267). In all these views, Bastion House and the MoL provide an appropriate backdrop to the estate, on account of their simple, rectilinear profiles and restrained elevation treatments. The facade design of the proposed developments are complicated in their massing and expression and would serve to draw the eye away from the estate's designated architecture and landscape.

The applicant claims that the proposed development would be in keeping with the character and scale of the existing urban context to the south of the estate. While we accept that there has been tall development nearby, this does not justify further harmful encroaching development. As outlined in Historic England's guidance on setting, "Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting [...] consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the heritage asset" (p.4). The proposed development, particularly the Rotunda which would replace the low-rise MoL, would have a seriously detrimental impact on the setting of the designated estate.

#### The Ironmongers' Hall

The hall was built in 1922-25 by Sydney Tatchell for the Worshipful Company of Ironmongers. It is a rare example of an interwar livery hall, built in a Neo-Tudor/ Jacobean revival style with richly-decorated interiors that are remarkably well preserved. The building was threatened with demolition in the post-war period to facilitate the construction of the Museum of London, but the Minister of Housing and Local Government intervened, following a public inquiry, to ensure that the Ironmongers was saved and it was subsequently intelligently incorporated within the new development by Powell and Moya. The Ironmongers' Hall was recently Grade II listed, with the Society's support.

The Ironmongers' Hall is accessed off Aldersgate St, via the historic Shaftesbury Place. The applicant notes the hall's 'enclosed' setting, being enveloped by the MoL and approached by way of an opening off Aldersgate. It observes how the hall was hemmed in by buildings and accessed underneath an archway like this when it was built in the 1930s, prior to WWII bombing which cleared the site. The hall did not originally have a full street frontage, but was rather intended to be glimpsed from the street (as seen in the applicant's figure 4:12 within part 2 of the TVBHIA, p.21). When the architects incorporated the hall into the new MoL development, Powell and Moya retained this historic entrance sequence and spatial character. As demonstrated in view 18 from Aldersgate (TVBHIA, part 23, pp.109-110), the proposed development would open the hall up to the street. The applicant claims that 'the creation of new views of the Hall' from Aldersgate would contribute to 'an overall enhancement to the setting of the Hall, and [...] increased appreciation of the heritage significance of the listed building' (14.28 within the TVBHIA, part 36, 176) – the implication is that this opening up of the site would be a heritage benefit. It is our view that the enclosed character of the hall's setting and the way it is revealed through glimpses from the street contributes to its significance and the loss of this in the development would be detrimental, rather than positive or beneficial. It can hardly be claimed, as the applicant does, that the proposed highwalk would partly retain this enclosed character.

Not only would the sense of enclosure be lost, but the loss of the MoL and Bastion House buildings themselves would have a harmful impact on the hall's setting and significance. While not its original setting, the MoL development has become part of the hall's post-war history. As outlined in Historic England's guidance on setting, "Settings of heritage assets change over time [...] settings which have changed may [...] themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term." (p.4). It is our view that the existing buildings contribute positively to the setting of the Grade II hall and their loss would have a detrimental impact.

The proposed development would itself negatively impact on views of the Grade II listed Ironmongers' Hall, particularly from the Thomas More Highwalk. This is seen in the applicant's TVBHIA view 26 (parts 31 & 32 of the TVBHIA, pp.136-137) and supplementary verified view A9 (part 44 of the TVBHIA, pp.210-211). The clean rectilinear forms and simple, muted finishes of the existing buildings provide a harmonious contrast with the warmth and characterful roofline of the Ironmongers' Hall, with its gables and hipped roof with a gablet. The proposed buildings appear far more intrusive and overbearing, and their complicated massing and expression would visually compete with and distract from the hall. Their impact on views of the listed building would be detrimental.

#### Policy relating to Designated Heritage Assets

Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 state that 'In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and 'In the exercise, with respect to any buildings or other land in a conservation area [...] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

The NPPF (2023) states that

- 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).' (paragraph 205)
- 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.' (paragraph 206)
- 'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.' (paragraph 207)

The London Plan (2021) Policy HC1: Heritage conservation and growth (C) states that 'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative

impacts of incremental change from development on heritage assets and their settings should also be actively managed’.

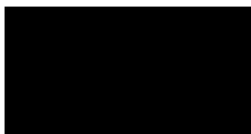
The adopted City of London Local Plan (2015) includes Policy DM 10.1: New development which states that ‘the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways’. Policy DM 12.1: Managing change affecting all heritage assets and spaces states that ‘4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.’

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

This substantial harm would not be outweighed by heritage benefits nor by the public benefits that would be delivered by the scheme. This is ultimately an office development, with some (albeit not substantial) public cultural offerings. Economic, social and environmental benefits could be achieved through a scheme which retained and revitalised the existing buildings on the site. Their demolition and the site’s redevelopment is not ‘necessary’ to provide these benefits.

It is our view that the scheme contravenes national and local policy regarding the conservation of heritage assets. We urge the local authority to refuse permission for the development.

We hope that these comments are of use to you. We would be grateful if you could please inform us of your decision on these applications.



Yours sincerely,

Coco Whittaker

**Senior Caseworker**

The Twentieth Century Society  
70 Cowcross Street  
London, EC1M 6EJ



**Remit:** The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



## Representing the interests of Barbican Residents

Barbican Association Planning Sub-Committee  
c/o 343 Lauderdale Tower  
Barbican  
London EC2Y 8NA

Department of the Built Environment  
City of London  
PO Box 270,  
Guildhall  
London EC2P 2EJ

11 February 2024

**For the attention of Ms Gemma Delves, Planning Officer**

Dear Ms Delves,

**Objection to applications 23/01304/FULEIA; 23/01276/LBC; 23/01277/LBC – London Wall West**

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to **object** to the above applications relating to the site at London Wall West. We endorse the objections submitted by the Barbican Quarter Action group, of which the BA is a member, but we make these additional points on behalf of our members. The grounds for objection include: significant loss of residential amenity, significant harm to heritage assets, paucity of perceived cultural benefits, and significantly harmful environmental impact. In addition, we point out that the access arrangements for the construction phase and servicing during the life of the building are unworkable, and that consultation on these aspects has been non-existent.

We are disappointed that the applicant has decided to overlook all the concerns and issues highlighted by the many residents and interested parties that live and work in the vicinity of the proposed development site during the consultation process. It is also disappointing to note that the City of London Corporation rejected several proposals to re-fit and re-purpose Bastion House and the Museum of London – offers it itself described as credible – in favour of the demolition of these two important examples of post war architecture and their replacement with oversized offices for which there is questionable demand, and in an area of the City prioritised for housing, not offices. This is also in contravention of the City's (and national) policy of "Retrofit and re-use".

In our view, the proposals are both unsympathetic and inappropriate in size for this sensitive and densely populated residential and mixed urban location and the massing would consequently bring both a serious loss of amenity to residents and loss of architectural coherence with little wider benefit to the City of London. The proposals will cause significant harm to the setting of Grade 1, Grade 2 and Grade 2\* heritage assets abutting as they do so closely to a number of key listed buildings and City Conservation

areas. These include the Grade 1 St Botolphs and St Giles churches, the Grade 2 and Grade 2\* listed Barbican Estate and landscape and the Barbican and Golden Lane Foster Lane and Postman's Park Conservation Areas.

### **Significant loss of residential amenity**

The proposed massing of the buildings will cause substantial loss of light to many residents in the neighbouring Barbican Estate, particularly those blocks nearest to the site, namely Seddon, Thomas More and Mountjoy Houses. The Daylight and Sunlight documents submitted with these applications suggest that *"the overall impact on daylight to Mountjoy House is considered to be negligible to minor adverse and thus the effect is not significant.....Overall, therefore, the impact on daylight and sunlight to Thomas Moore House is considered to be minor adverse and thus the effect is not significant.* The documentation comes up with a similar analysis with regard to light spill and solar glare.

The emerging Local Plan 2040 takes into account the cumulative effects of developments. The successive building of taller buildings in Aldersgate and on London Wall has already affected lighting levels in residents' flats. The massing of the proposed new Bastion House is 2.5x that of the existing building. The proposed new Rotunda building is planned to be 14 storeys high (vs the existing low-level Museum of London structure) and the new North building 5 storeys high. The loss of daylight and sunlight to all nearby premises will be significant to the residents concerned.

Residential amenity will be impacted not only by loss of daylight and sunlight but also by the attendant impacts of overshadowing, light spill, solar glare, and noise. The risk of night time light pollution is an additional concern.

Loss of privacy and overlooking are also issues of concern. The buildings not only overlook many residential properties but also that of the City of London School for Girls. In this latter regard, for example, we note that in addition to the many office windows overlooking the area, the proposed welfare block during the many years of construction is planned to be adjacent to and overlooking the school's sports pitches in addition to the many residents in Thomas More House, giving rise to additional concerns regarding the safeguarding of pupils.

The loss of light and privacy and the inevitable impact of noise and pollution from the demolition and construction of the site over many years will have seriously adverse effects on the health and well-being of residents, workers and visitors to the area from commencement of the works through to 2033.

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

In the emerging Draft City Plan 2040 in Policy HS3: Residential environment it states: *"The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements....* It goes on: **2. All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to**

***adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE9.***

Although not yet adopted, the emerging plan should take considerable weight, partly because it has been so long in production and the policies on residential protection have been there (unchallenged) since the first iteration. Moreover, Policy DM 21.3 Residential environment in the Local Plan 2015 is not even referenced in the planning statement, which is surprising given the extent to which the development impinges on the residential environment, including taking over some of its space.

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

The Barbican was deliberately designed to provide a tranquil residential place in the City. This development puts that tranquillity at risk – and the Agent of Change principle mentioned in the emerging Local Plan 2040 requires new developments to provide adequate mitigation or to be resisted.

It is also clear from the servicing and construction plans that the impact on residential amenity has not been taken seriously in these proposals.

Policy CS5 The North of the City in the Local Plan 2015 includes:

*4. Ensuring the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as Smithfield Market, Barbican, Golden Lane and Broadgate, **whilst preserving privacy, security and noise abatement for residents and businesses.***

*5. Identifying and meeting residents' needs in the north of the City, **including protection of residential amenity, community facilities and open space.***

Again we are not reassured that these proposals acknowledge the need to protect privacy, security, and noise abatement.

Moreover, it is clear from both the 2015 and 2040 plans that new housing in the City is intended to be built adjacent to the existing residential clusters. The use of the London Wall West site for offices removes the site as a prime candidate for housing, next to the City's largest residential cluster.

### **Significant harm to heritage assets**

These proposals will cause substantial harm to the heritage of the area and they ignore the cultural history of the site. The design and massing of the buildings sit totally out of character with both the listed Barbican Estate which it borders and the neighbouring buildings in Aldersgate Street, London Wall and St Martins le Grand.

These proposals would have a major negative impact on the surrounding area. The site marks an ancient gateway to the City on a thoroughfare that has been in constant use since Roman times and its planned re-routing would destroy the historic Roman street line. The



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

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

A view of one of the Barbican's iconic towers from St Martin Le Grand to the south would be completely obscured by the bulk of the Rotunda Building. Given the stated aim of the developers to provide a gateway to the cultural offerings of the area, it is ironic that one of the existing cultural offerings (namely the Barbican estate) should be obscured from view by what is just another office building, bearing no design relationship to the brutalist estate.

With specific regard to the Barbican and Golden Lane estates, the Barbican and Golden Lane Supplementary Planning Document (SPD) published in February 2022 states that the *"Barbican Estate is a unique example of coherent inner city planning of the post war era.....and goes on "the overall plan form of the Barbican, and the integrated relationship between buildings, spaces, lakes, podium walkways all contribute to the special value of the composition as a totality"*. The SPD also sets out the City of London Corporation's policies relating to this important conservation area. The document states that ***"Development should preserve and enhance the distinctive character and appearance of the Barbican and Golden Lane conservation area – as set out in this SPD – and the significance of individual heritage assets within the boundary. Where appropriate, development should seek to better reveal the significance of the conservation area and other individual heritage assets."***

The SPD goes on to state that *"Conservation area status, following designation in 2018, requires that in the exercise of planning functions, special attention must be paid to the desirability of **preserving or enhancing the character and appearance of the area**"*.

### **Where are the cultural benefits?**

The City is in the process of ramping up the concept of Destination City, replacing the previous Culture Mile initiative. The London Wall West site should surely act as a gateway to this significant cultural area and not act as a monolithic obstruction. The London Plan 2021 recognised this area as one of London's strategic cultural areas which went some way to supporting the City of London's previous plans to put a Centre for Music on the site. Once these plans were shelved it was not unreasonable that part of the site at least would be used for a meaningful cultural addition to the City (though that is arguable since the Museum is being replaced and enlarged on a site nearby). Or, more radically, the City could

have taken a strategic look at the site and considered what the City is most deficient in – the obvious alternatives being housing and green space.

We note that the cultural plans for the site are vaguely specified and uncertain. Only c12% of the total site is to be apportioned to culture (and of which c2% is to be apportioned to food and beverage spaces). The remaining space is to be apportioned (speculatively) to office use, thereby providing no significant addition to the cultural offerings of the area. Indeed, we argue that overall the proposals have an adverse effect on the existing cultural elements of the area: the new buildings block the visibility of the cultural events and exhibitions already on offer across the iconic Barbican estate and its Arts Centre. We would remind the committee that the Barbican was described by the government's Independent Panel on UNESCO World Heritage status *"As a masterpiece of brutalist architecture and town planning reflecting the standards of its time and arguably, one of the best examples of municipal urbanism, ....that has maintained its authenticity and integrity despite periods of adaptation and change"*.

At present someone coming north up St Martin Le Grand sees a large area of sky above the roundabout with a view of one of the Barbican towers (itself a cultural attraction). The proposals would completely block that view of the Barbican and of the sky, also obscuring wayfinding and the route to the north.

### **Servicing and construction plans unworkable**

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

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

Total predicted traffic flows will more than double and restrict access for residents, their deliveries and for emergency vehicles. Even Buro Happold, the consultant engineers, state that this plan is far from ideal given that *"the constraints of the existing site and Ironmongers Hall result in a layout where two way circulation is not possible for large good vehicles and refuse trucks, such that there are only limited passing opportunities. Furthermore, visibility is somewhat restricted especially around the retained Ironmongers Hall building such that vehicles travelling in opposite directions cannot easily see oncoming vehicles."*

#### *Construction phase*

The proposal that during the construction phase the ramp from Aldersgate Street to the Thomas More carpark should be restricted to construction traffic only is completely unrealistic. The only other vehicle access to that car park is down a narrow one way ramp with a 180 degree turn at the bottom. This is not navigable by anything larger than a medium sized car (and a skilled driver). The route is not wide enough for more than one

vehicle: backing up to let vehicles through would involve backing onto Aldersgate Street at one end and round an 180 degree turn at the other. The entrance will not accommodate the City's waste lorries that remove rubbish or vans larger than a car.

The Construction and Environmental Service Plan says at p 32 "*Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however this should only be utilised when absolutely necessary.*" Data from 2017 from an audit of the Thomas More car park showed over 100 vehicle movements a day. The number of deliveries is likely to have increased since then. About 33 of those a day were accounted for by residents with parking places. The others were contractors' vehicles for the estate and for residents and delivery vehicles. Access for these vehicles will be "absolutely necessary" many times in the day. Such mingling of construction vehicles and residential and other non-construction traffic is, as the Construction report implies, unsafe.

#### *During operation of the completed buildings*

The proposal is that all three new buildings - New Bastion House, the Rotunda, and the North building (plus Ironmongers) will be serviced via the ramp into Thomas More carpark. The service road from London Wall that exits onto the top part of the ramp currently will disappear.

The North building will not have enough space in its service area for vehicles to turn round so they will enter the area frontwards and have to backout onto the ramp (as shown in 23/01277/LBC). Thus obstructing all other incoming and outgoing traffic and contravening the City's servicing standards. Local Plan 2015 Policy **DM16.5** item 4 says "*On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear.*"

It is not clear whether and how the residents' use of the carpark will be reconfigured and there has been no consultation with residents or other stakeholders about this aspect of the plan.

The information in 23/01277/LBC shows that the areas of the carpark that currently

- allow deliveries for residents to be unloaded
- house the electric vehicle charging points,
- provide parking for Mountjoy House,
- provide an emergency exit from the Girls School
- provide facilities for long term estate contractors

will no longer be available: the space will be a traffic route to the new buildings' service areas.

There is no information on the implications of this traffic on access for emergency vehicles to the flats.

The application envisages between 104 and 174 vehicle movements (depending on how many are consolidated) a day to service the three buildings. That is on top of the current level of vehicle movements from residents' vehicles and the Thomas More Carpark is the busiest in the Barbican (2017 figures showed about 100 vehicle movements a day).

The proposed new buildings on the London Wall West site are considerably larger than the existing buildings on the site - and will therefore have greater servicing needs - yet the access for servicing is much less than that available for the older buildings.

These proposals for access are not fit for purpose and if this application is to go ahead need to be radically reworked to:

- provide an alternative access for construction vehicles
- provide additional access during the operation of the building. It cannot be acceptable for significantly increased levels of noisy and air polluting traffic to be placed near to a residential site.

Moreover, the proposal to remove the roundabout – which has not been subject to a full consultation – will force traffic exiting from the ramp from the Thomas More carpark that wants to go north and west to go some considerable way south and east before finding its correct route. This will only lead to further congestion on London Wall (which is likely to be busier because of any future restrictions to Beech Street).

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

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

The ARUP report supporting this application indicates that the growth area for office demand is in emerging businesses, which need cheaper, smaller, flexible spaces. There also remains significant uncertainty about the long-term demand for offices given that post-Covid patterns of work still do not appear to have been established.

Indeed, the ARUP report itself points to very diverse scenarios for the future. City Officers have advised that the expectation is that demand will lie between the in-person return and the hybrid ARUP scenarios, but without explaining the rationale for the choice. Given the amount of office space that the City already has in the pipeline, it remains questionable as to whether the proposed developments at London Wall West are critical to the City's overall office space targets.

### **Environmental impact**

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

In a press release issued by the City of London Corporation on 12<sup>th</sup> December 2023 it was announced that the City's Planning and Transport Committee had approved a new Sustainability Supplementary Planning Document (SPD). It went on to say that *"The move aligns with the organisation's Climate Action Strategy, which supports the achievement of net zero for the whole Square Mile by 2040. The SPD ... sets out what the City Corporation expects to see addressed through the developer's approach to their sites and the design and construction of buildings. The SPD aligns with the emerging City Plan 2040, expected to be approved and adopted in 2024. Five key considerations are identified in the guidance for*

*developers, in order to set exemplary standards for sustainability, without undermining the economic viability of planning applications. These include:*

***Retrofit and reuse*** - *Outlining the ‘retrofit first’ approach, promoting the reuse of existing buildings where this is the most sustainable and suitable approach for a site, in line with the City Corporation’s adopted Carbon Options Guidance.”*

Having publicly and repeatedly announced that “retrofit first” is to form the cornerstone of the City’s planning policy, we question why this policy was ignored in relation to the London Wall West site. This runs counter to all accepted sustainability considerations including at national level, notably NPPF 2023, section 14 as well as the City’s own.

The justification for demolishing Bastion House was that the building was structurally unstable. This has, however, been proven to be incorrect and supports the view that Bastion House – together with the Museum of London building - could and should be repurposed.

In this regard, the City Corporation’s soft market test for interested parties to express their interest in retaining and repurposing the site was flawed from the outset, being too short a period of time for any interested party to adequately assess the site. The three credible responses seem not to have been properly followed up.

### **Summary and conclusion**

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

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

It removes a major candidate site for housing – in an area of the City where more housing is part of the Local Plan.

It offers little extra green space.

This part of the City is not a key area for large offices, and it is not clear that another three office buildings will offer much benefit to the City

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-committee

Sue Cox – Deputy Chair, Barbican Association Planning Sub-committee

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**From:** Jane Smith  
**Sent:** Sunday, February 11, 2024 6:42 PM  
**To:** Hughes, Ian  
**Cc:** SMCX34; [chairbarbassociaation](#); [theszlesingers](#); Chair, Mountjoy House  
**Subject:** [Unsafe servicing proposals for London Wall West](#)

THIS IS AN EXTERNAL EMAIL

Dear Ian

I am writing to you as City Operations Director on behalf of the Barbican Association about our serious concerns about the access and servicing arrangements for the proposed development at London Wall West (planning applications 23/01304/FULEIA; 23/01276/LBC; 23/01277/LBC).

Irrespective of the merits or otherwise of the applications, we think the proposals for access during construction and for servicing during operation of the building are unsafe and unworkable.

We have not had a chance to make representations on them because we were not consulted on these aspects pre-application.

We are interested to know the observations of the transportation and roads team on these aspects.

Our concerns are set out below.

The proposed access to all the buildings of the London Wall West site for vehicles is via the ramp from Aldersgate Street to the Thomas More carpark that serves Seddon,

Mountjoy, and Thomas More Houses and Lauderdale Tower.

### **Construction phase**

The Construction and Environmental Management plan says on p 31

" It is assumed that the rear service yard will be restricted to construction traffic only from the commencement of the main demolition post museum closure and will remain restricted until the project's completion"

This is unrealistic.

The developer's proposed alternative for residential use of the car park is to use the entrance to Lauderdale Car park. But this is only accessible by small vehicles - and skilled drivers - and is only wide enough for a single vehicle on a steep ramp. Backing up to let vehicles through would involve backing onto Aldersgate Street at one end and round an 180 degree turn at the other. The entrance will not accommodate the City's waste lorries that remove rubbish or vans larger than a car.

p32 goes on to say

" Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however should only be utilised when absolutely necessary."

Data from 2017 from an audit of the Thomas More car park showed over 100 vehicle movements a day. The number of deliveries is likely to have increased since then.

About 33 of those a day were accounted for by residents with parking places. The others were contractors' vehicles for the estate and for residents and delivery vehicles. Access for these vehicles will be "absolutely necessary" many times in the day.

Such mingling of construction vehicles and residential and other non-construction traffic is, as the Construction report implies, unsafe.



## **During operation of the completed buildings**

The proposal is that all three new buildings - New Bastion House, the Rotunda, and the North building (plus Ironmongers) will be serviced via the ramp into Thomas More carpark. The service road from London Wall that exits onto the top part of the ramp currently will disappear.

The North building will not have enough space in its service area for vehicles to turn round so they will enter the area frontwards and have to backout onto the ramp (as shown in 23/01277/LBC) – which is against City policy

It is not clear whether and how the residents' use of the carpark will be reconfigured and there has been no consultation with residents or other stakeholders about this aspect of the plan.

The information in 23/01277/LBC shows that the areas of the carpark that

- Allow deliveries for residents to be unloaded
- house the electric vehicle charging points,
- provide parking for Mountjoy House,
- provide an emergency exit from the Girls School
- provide facilities for long term estate contractors

will no longer be available: the space will be a traffic route to the new buildings' service areas.

There is no information on the implications of this traffic on access for emergency vehicles to the flats.

The application envisages between 104 and 174 vehicle movements (depending on how many are consolidated) a day to service the three buildings. That is on top of the current level of vehicle movements from residents' vehicles and the Thomas More Carpark is the busiest in the Barbican (2017 figures showed about 100 vehicle movements a day).

The proposed new buildings on the London Wall West site are considerably larger than the existing buildings on the site - and will therefore have greater servicing needs - yet the access for servicing is much less than that available for the older buildings, and will have to share limited space with the existing residential traffic.

We would be interested in your observations.

Best wishes

Yours sincerely

Jane

Jane Smith

Chaire, Barbican Association planning subcommittee

**From:**

**To:**

**Subject:**

LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response

**Date:**

29 February 2024 15:19:28

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

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Ms Gemma Delves  
Corporation of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: **W:** L01570344

5 March 2024

Dear Ms Delves

**Arrangements for Handling Heritage Applications Direction 2021**

**LIVERY HALL IRONMONGERS' HALL SHAFTESBURY PLACE LONDON EC2Y  
8AA**

**Application No. 23/01276/LBC**

Thank you for your letter of 19 December 2023 regarding the above application for listed building consent made by your authority. On the basis of the information available to date, we do not wish to offer any comments. We suggest that this application should be determined in accordance with national and local policy guidance and that you seek the views of your specialist conservation adviser.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





Historic England



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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**From:**  
**To:**  
**Subject:** RE: Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 06 March 2024 16:50:00  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

Thank you for your re-consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*



Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** lpalondonwallwest  
**Sent:** 27 February 2024 14:15  
**To:** lpalondonwallwest  
**Subject:** Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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**From:**  
**To:**  
**Cc:**  
**Subject:** RE: Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 15 March 2024 16:02:59  
**Attachments:** [image001.png](#)

---

THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Thank you for your e-mail.

After reviewing the documents I can't see any relevant documents that changes our previous comments dated 19 December 2023. Therefore our water capacity condition still stands and we have no further comments to make.

Kind Regards,

**Saira Irshad**

Development Database Administrator

Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ



It's everyone's water

---

**From:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>  
**Sent:** Thursday, March 14, 2024 3:55 PM  
**To:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>  
**Cc:** Delves, Gemma  
**Subject:** Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

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Dear Consultee/Contributor,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall,

Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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Good Growth

Gemma Delves  
City of London Corporation  
By Email

**Our ref:** 2024/0150/S1  
**Your ref:** 23/01304/FULEIA  
**Date:** 15 March 2024

Dear Gemma Delves

**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 14 March 2024 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 reconsulted on the application under following category of the Mayor of London Order, as the site boundary encroaches into a small section of the Postman's Park Conservation Area:

**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 meters of floorspace for class B1 (business)”*

I have assessed the details of the application and, given the scale and nature of the proposals, conclude that the amendments do not give rise to any new strategic planning issues.

City Hall, Kamal Chunchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

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

Therefore, 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

**From:**

**To:**

**Subject:**

LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response

**Date:**

19 March 2024 08:40:33

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>



Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ ref:a0zTw0000000gvJIAQ;b3c56f02f4a11e1e428c463b924b69e0:ref ]



Ms Gemma Delves  
Corporation of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: **W:** L01570344

5 March 2024

Dear Ms Delves

### **Arrangements for Handling Heritage Applications Direction 2021**

**LIVERY HALL IRONMONGERS' HALL SHAFTESBURY PLACE LONDON EC2Y 8AA**

**Application No. 23/01276/LBC**

Thank you for your letter of 19 December 2023 regarding the above application for listed building consent made by your authority. On the basis of the information available to date, we do not wish to offer any comments. We suggest that this application should be determined in accordance with national and local policy guidance and that you seek the views of your specialist conservation adviser.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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Historic England

Gemma Delves  
Environment Department  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

Your Ref: 23/01276/LBC  
Our Ref: 218204

Contact:  
Helen Hawkins



2<sup>nd</sup> April 2024

Dear Ms Delves,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2021**

**Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA**

Reconsultation received - 27/02/24

*Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).*

**Recommend No Archaeological Requirement**

Thank you for your reconsultation received on 27<sup>th</sup> February.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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

The information provided in the reconsultation has not affected our previous advice.

Although the area for demolition is located in an area of known archaeology, the basement of Ferroner's House and the loading bay have already been excavated to c 11.50m OD which is likely to have removed the majority of any archaeological remains in this area. No development outside the footprint of the previous building is proposed and therefore the proposed development is unlikely to have an impact on archaeology of significance.

No further assessment or conditions are therefore necessary.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



**From:**  
**To:**  
**Cc:**  
**Subject:** RE: Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 03 April 2024 09:11:17  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good morning,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the façade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Thank you for your re-consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** lpalondonwallwest

**Sent:** 14 March 2024 15:55

**To:** lpalondonwallwest

**Cc:** Delves, Gemma

**Subject:** Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee/Contributor,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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Your ref:  
My ref: 24/01717/OBS

**Please reply to:** Nikki Mitchell  
Tel No: [REDACTED]  
Email: [REDACTED]

Gemma Delves  
City of London  
PO Box 270, Guildhall, London EC2P 2EJ

**Town Planning & Building Control**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

3 April 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

#### SCHEDULE

**Application No.:** 24/01717/OBS      **Application Date:**  
**Date Received:** 14.03.2024      **Date Amended:** 14.03.2024

**Plan Nos:** Letter from City of London dated 14 March 2024.

**Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers Hall, Shaftesbury Place, London Wall Car Park, City Of London, London,

**Proposal:** Planning permission for the following (ref 23/01304/FULEIA) Demolition of 140 and 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 and hard and soft landscaping; and associated and ancillary works, structures and highways works.

Listed Building Consent for the following (23/01277/LBC): External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y) Listed Building Consent for the following (23/01276/LBC):

Demolition of Ferroners House alongside external alterations to the facade and roof level of Ironmongers Hall, internal reconfiguring to cores and back of house areas and

associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Yours faithfully



**Deirdra Armsby**  
**Director of Town Planning & Building Control**

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



**Note:**

- 3f The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



**From:** [Active Travel England Planning](#)  
**To:** [lpalondonwallwest](#)  
**Subject:** LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response  
**Date:** 13 December 2023 16:29:18

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ ref:a0zTw0000000gvJIAQ;1645970a932a10efb55221c697112dee:ref ]

**From:** [Location Enquiries](#)  
**To:** [lpalondonwallwest](#)  
**Subject:** RE: Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 20 December 2023 16:55:38  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*



Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>

**Sent:** 12 December 2023 16:25

**Subject:** Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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[www.thegardenstrust.org](http://www.thegardenstrust.org)

22<sup>nd</sup> December 2023

Research - Conserve - Campaign

The City of London Corporation  
Guildhall  
PO Box 270  
London EC2P 2EK  
[plans@cityoflondon.gov.uk](mailto:plans@cityoflondon.gov.uk)

Dear Sir or Madam,

Ref : 23/01276/LBC - Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y); Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

23/01277/LBC - External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y); 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

23/01304/FULEIA - Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway; London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

Thank you for consulting The Gardens Trust (GT), in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. We have liaised with our colleagues in the London Parks & Gardens Trust (LPG) and their local knowledge informs this joint response.

We are considering all three of the above applications together and it is apparent that care has been taken to delineate the new landscape from the Barbican, whilst using an existing architectural feature to connect the walkway to Mount Joy House which is in line with the original design ethos of the estate, connecting walkways and social spaces.

We are supportive of the proposal to mediate between the Barbican Estate and the new environment, both being respectful to each other, but not perpetuating undesirable conditions; in particular the proposals at Highwalk and garden levels, where the uses and design are more focused on quiet activities, contemplation, and the enjoyment of the landscape itself. We are also supportive of the

proposal to create a continuous garden connector which both creates new garden spaces, and stitches together existing green space with enhanced accessibility between all public levels of the site.

Finally, we would like to endorse the landscape proposals by Nigel Dunnet, even though the landscape planting character has clearly changed over the decades since its inception. One thing we would like to suggest, however, is the creation of a garden maintenance plan for the Estate as there is a lot of new planting. Introducing a new set of 'gardens' comes with responsibility and its ultimate success lies with careful maintenance in the future.

Yours sincerely,

Margie Hoffnung  
Conservation Officer

# SOUTHWARK COUNCIL

LBS Registered Number: 23/OB/0074

Date of issue of this decision: 08/01/2024



www.southwark.gov.uk

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LBS Reg. No.: 23/OB/0074

Date of Issue of Decision: 08/01/2024

Your Ref No.:

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Applicant Gemma Delves  
City of London

## **NO COMMENTS made in reference to your consultation on the following development:**

Planning permission for the following (ref. 23/01304/FULEIA): Demolition of 140 and 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 Plaisterer's 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 and hard and soft landscaping; and associated and ancillary works, structures and highways works.

Listed Building Consent for the following (23/01277/LBC): External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Listed Building Consent for the following (23/01276/LBC): Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

At London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One

## DECISION NOTICE

**LBS Registered Number:** 23/OB/0074

**Date of issue of this decision:** 08/01/2024



[www.southwark.gov.uk](http://www.southwark.gov.uk)

London Wall).

In accordance with your letter received on 19 December 2023 and supporting documents.

Signed: *Stephen Platts*

Director of Planning and Growth

**By email only**

City of London Corporation

Direct Dial: 020 7650 1232

Your Ref: 23/01304/FULEIA,  
23/01277/LBC and 23/01276/LBC

Our Ref: RGA/LEL/00575807/1

Date: 31 January 2024

Dear City of London Corporation

**Proposed development of “London Wall West” site (application references 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC)**

We act for the Barbican Association, on behalf of Barbican Quarter Action (“BQA”). BQA, an unincorporated association formed to campaign for environmentally, ethically and socially responsible decision-making for the built environment in the City of London, strongly opposes the proposed “London Wall West” development and objects to the planning and listed building consent applications referred to above.

Please find enclosed a detailed objection prepared on behalf of BQA by CarneySweeney, along with the following appendices:

- Appendix A: BQA letters submitted to the CoLC at pre-application stage
- Appendix B: Embodied Carbon Review by Targeting Zero
- Appendix C: BQA review of DAS by Jan-Marc Petroschka
- Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka
- Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw
- Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Horne
- Appendix G: Planning Policy Review table by CarneySweeney



Separately, our clients have also asked us to express their concern regarding the ongoing technical issues with the Corporation's planning webpage, which periodically ceases to allow representations to be uploaded. Please confirm that the Corporation will investigate this issue as a matter of urgency and accept representations beyond today's advertised deadline.

Yours faithfully



**Leigh Day**

Enc

Our reference: CSL287

31 January 2024

**Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC**

**London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall), London EC2Y**

1. We have been instructed by the Barbican Quarter Action Group (“BQA”) pursuant to the following planning applications pertaining to the development of London Wall West; Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC (herein referred to as “the LWW Proposals”) on a site which comprises the current home of Bastion House and the Museum of London at 140 – 150 London Wall, EC2 (herein referred to as “the LWW Site”).
2. This statement sets out BQA’s concerns and objections to date to these planning applications. The planning application documentation is extensive and detailed and so BQA may submit further comments. They will, however, not procrastinate in this regard, and will ensure that any follow up comment is submitted as soon as they are able. In addition and notwithstanding, the comments below refer to the inadequacy of some of the planning application documentation, and so BQA will wish to review and comment on any further amended documentation submitted to rectify these inadequacies.

**Background to the Proposed Development**

3. Since the announcement in 2015 that the Museum of London would be moving, the LWW Site has been under consideration by the City of London Corporation (“CoLC”), the landowner of the LWW Site, for redevelopment and regeneration. Most significantly, the LWW Site had previously been considered for the Centre of Music for the Barbican London Symphony Orchestra (LSO), the Barbican Centre and the Guildhall School of Music and Drama (and it was in this context that the application for the Certificate of Immunity from Listing was made – see paragraphs 17-18 below) but these proposals were cancelled by the CoLC in February 2021 due to the impact of Covid-19 and the announcement by LSO’s conductor, Simon Rattle, one of the main driving forces behind the project, that he was leaving the organisation

*Public Consultation on the Emerging Proposals: May 2021 – June 2022*

4. In May 2021 early engagement with various stakeholder groups was conducted by the CoLC and later in December 2021 a consultation document was published by the CoLC Property Investment



Board setting out their emerging vision and plans for the LWW Site. The report - The Future of London Wall West (December 2021) begins by setting out what are considered to be the current limitations of the LWW Site, as well as the challenges in relation to the difficult to navigate public realm and the lack of access to the historic Roman Wall on site. The report notes that Bastion House and the Museum of London site are at the end of their design lives and no longer fit for purpose. The report further advises that studies were undertaken to assess the case for refurbishment, extension or partial redevelopment but that a full redevelopment of the LWW Site (with a responsible approach to re-purposing and re-using existing materials on site alongside highly sustainable design standards) would be the best approach. The report did not, however, provide any greater detail on the studies or the types of uses considered in relation to refurbishment and the BQA later submitted a Freedom of Information Act (“FOIA”) request in February 2022 to obtain details of the structural report and carbon assessment that was directly referenced in the December 2021 consultation. The FOIA included a request for environmental information under the Environmental Information Regulations 2004 (“EIR”).

5. The initial design concepts for the LWW Site consulted on in December 2021 revolved around the vision to make a *“vibrant, thriving, inclusive and sustainable place that the City can be proud of”*. A number of key benefits that the development could deliver were identified with the intention that these would align with the CoLC planning policies as set out in the emerging draft City Plan 2036, the Culture Mile Look & Feel Strategy and the Square Mile: Future City document as well as the CoLC Climate Action Strategy 2020 – 2027 which was adopted in 2020. The consultation document stated that such intended benefits include: Celebrating culture and the City’s heritage; Creating a sense of community; Creating new public spaces for people to enjoy; Meeting modern sustainability standards; Creating stunning architecture; and Delivering a range of high quality office spaces. In terms of land uses, there was no explanation as to the approach to potential land uses, other than to advise that the inclusion of flexible, high quality office space was in line with the draft City Plan 2036 which confirmed that a good supply of modern, sustainable office accommodation was needed to meet the needs of the City’s commercial occupiers and to keep pace with growing business needs.
6. Comments resulting from this consultation were later reported by the CoLC in their ‘London Wall West – Public consultation Round 1 Feedback Report’ and were considered by the CoLC to be focussed on a number of themes:

Height and massing of the buildings and the impact on light, views, security and footfall;

The demolition of existing buildings and associated embodied carbon;

The demand for new office space;

Walking and cycling routes; and

Maintaining access to the highwalks and fixing the lifts around the site.



7. Having reviewed all feedback given from the December public exhibitions the City Surveyors on behalf of the CoLC (as future applicant) launched a second public consultation in June 2022 on their developing plans for the LWW Site and several pop-up events and a further public exhibition were held. A key criticism raised by the BQA is that this consultation (as with the earlier December 2021 consultation) focused on a single option for redevelopment of the LWW Site and did not present any alternatives.
8. The CoLC June 2022 consultation pack set out the intention to deliver approximately 40,000sqm of new office space alongside affordable workspace and maker space, community and learning space for a variety of functions, new café and restaurant spaces, cultural spaces including for exhibitions, lecture/auditorium spaces along with a new 'culture cap' with views of St. Paul's Cathedral alongside a series of new interconnected landscaped open spaces and public realm. Information was also provided on the types of open spaces proposed, the culture, learning and community offer, the sustainability and energy strategy for the project and how the office space will meet current needs.
9. The consultation pack set out the design approach to the LWW Proposals and how the scheme would fit into the wider area; intended traffic safety improvements, new routes and improvements to the existing highwalks network alongside details of the proposed massing of the new buildings and the townscape and microclimate considerations. The proposed three new buildings were referenced in the consultation material as follows:
  - New Bastion House – at 17 storeys (86.7m AOD) and c. 38,000sqm – equivalent in height to the existing Bastion House;
  - Rotunda Building – at 14 storeys (75.3m AOD) and c. 31,000sqm – approximately 20m lower than the adjacent 200 Aldersgate Street; and
  - Northern Building – at 5 storeys (39.6m AOD) and c. 3,500sqm.
10. This second stage of consultation was supported by an interim Whole Life Carbon Assessment report dated May 2022, commissioned by the CoLC for consultation with stakeholders, and which was stated to provide a qualitative assessment of the existing buildings on the LWW Site along with a quantitative study of the carbon impacts of two tested development scenarios; Option 1 - which retains some of the existing building fabric and creates new development through new and retained building fabric and Option 2 - which is for the full demolition of the buildings on site and erection of new buildings. The BQA highlight that despite their earlier FOIA/EIR request made in February 2022 to obtain details of the structural report and carbon assessment that was directly referenced in the December 2021 consultation, this assessment was released by CoLC instead.
11. The Whole Life Carbon Assessment ("WLC Assessment") concluded that Bastion House could be retained as offices as a short- term solution but that the current building contained many considerable limitations including floor to floor heights, poor lift provisions, outdated fire safety



standards and poor energy performance. Bastion House was also identified as having several structural issues including the risk of disproportionate collapse, fire integrity and carbonation.

12. Due to the above, the WLC Assessment considered that a change of use to residential accommodation would be unfeasible and unviable. The Museum of London building was also deemed to be heavily constrained in design, structural and engineering terms) with similar issues relating to disproportionate collapse) giving limited scope for adaption to other uses. Overall, the assessment concluded that on a per-square metre basis Option 2 performed 10% better than Option 1. However, as Option 2 is larger, in absolute terms it has a higher Whole Lifecycle Carbon emission. The absolute carbon emissions for Option 1 are approximately 20 million kilograms, equating to just over 20% lower for Option 1 compared to Option 2.
13. In response to the WLC Assessment and the structural assessment assumptions which underpinned the report, the BQA presented the CoLC with two peer assessment reports in September 2022. The peer assessment reports were produced by two leading experts – Bob Stagg of Conisbee Structural Engineering and Simon Sturgis of Targeting Zero. The review undertaken by Consibee Structural Engineering considered the structural engineering aspects of the WLC Assessment and contradicted the assumption that Bastion House and the Museum of London building were at risk of disproportionate collapse. Since this was the basis on which CoLC only chose to compare Options 1 and 2, the WLC Assessment does not consider the option of retrofit. This is further highlighted in the report by Targeting Zero which advised that *“a more comprehensive retrofit approach than the one proposed, with Bastion House retained and retrofitted, would have far lower carbon emissions”*.
14. The peer assessment reports highlighted several fundamental flaws in the WLC Assessment and an evidenced request to the CoLC to reconsider the retention and retrofit of Bastion House was made by the BQA (with the intent that good practice would have commanded the WLC Assessment be withdrawn and the options appraisal re-evaluated/started again).
15. The CoLC set up a dedicated webpage for the LWW Proposals (<https://londonwallwest.co.uk/>) and it is here that feedback from the June 2022 round of consultation is reported as being focussed on the following themes:
  - Questions about the principle of redeveloping the site and the vision for the scheme;
  - Concerns over the scale of the design proposals;
  - The need for more office space;
  - The impact of the new buildings on locally listed assets; and
  - Distrust of the City of London Corporation.



16. In October 2022 it was announced that the CoLC Policy and Resources Committee had made the decision to reduce the size of the LWW Proposals in response to feedback from public consultation. It was confirmed that the width of the building proposed to replace the Museum of London would be reduced by 3 metres whilst the width of the building proposed to replace Bastion House would be reduced by 2 metres. The press release also noted that a 3D model of the final proposal for the LWW Proposals would be presented in 2023 ahead of the submission of a planning application. This commitment was never met.

*Immunity from Listing*

17. Alongside the consultation process set out above, a Certificate of Immunity from Listing was granted by the Secretary of State for Culture, Media and Sport, for Bastion House in August 2019 and this expires in August 2024. It is noted that an application to renew the certificate has recently been submitted to Historic England on the basis that no new evidence in favour of listing has come to light.
18. In contrast to the above, in 2023, The Twentieth Century Society published their latest 'Risk List' - a selection of ten twentieth-century buildings currently facing demolition or disfigurement. Eighth on the list is the Museum of London and Bastion House. Designed by architects Powell & Moya, the Museum of London is recognised as the first post-war museum to be built in London and the largest urban history museum in the world. Bastion House is also acknowledged by The Twentieth Century Society as a rare survivor of a hugely important part of the City of London's post-war planning history, and both buildings are identified as being under threat for total demolition due to the museum's move to Smithfield Market.

*Closure of Museum of London December 2022*

19. The Museum of London closed in December 2022, with the intention that it will re-open in 2026 in its new location at Smithfield Market. The costs of this relocation were originally estimated at £250 million and current estimates now place the cost at £337 million (source: Architects Journal, Museum of London on target for delayed 2026 opening, article by Anna Highfield, 2 May 2023.)

*CoLC Market Testing*

20. On 3 April 2023, a tender opportunity was listed on the procurement pages of the CoLC website allowing developers to express their interest in refurbishing the LWW Site. Whilst the results of this tender have not been publicly reported, Chris Hayward (Chairman of the Policy and Resources Committee at CoLC) stated at the City Question Time event held on 15 June 2023 that the CoLC had received expressions of interest that were considered to be credible (albeit commercially



confidential)<sup>1</sup>. In contrast, it is noted by the BQA that paragraph 5.5 of the Planning Statement submitted with the planning application advises that Bastion House is currently unoccupied following the primary lease expiring in 2023 and that the building and structure no longer meet the design needs and expectations of prospective office occupiers.

**Consultation and Engagement**

21. The paragraphs above summarise the pre-application consultation carried out by the CoLC as applicant. Throughout this process the BQA have consistently raised concerns about the proposals to redevelop the LWW Site and we note below the letters submitted to the CoLC by the BQA throughout this process (copies of which are attached at Appendix A to this statement) in addition to which eight FOIA requests were submitted to the CoLC, one of which included a request under the Environmental Information Regulations 2004;

03 November 2022, Open letter from the BQA to Chris Hayward

23 June 2022, Response to proposals published 18<sup>th</sup> June 2022

12 April 2023, Exploring the potential to refurbish the London Wall West Site

15 June 2023, London Wall West

7 November 2023, Open reply to your letter of 29 September 2023

22 November 2023, London Wall West (LWW) pre-application: A glaring lack of consultation and transparency

22. Fundamentally the BQA wish to highlight that at no stage did the consultation material allow a public debate on the fundamental question of redevelopment of the LWW Site versus a scheme which considered the retention and/or adaptation and retrofit of the existing buildings on the LWW Site. This is central to the consideration of development scenarios later to be reflected in the WLC Assessment undertaken both at pre-application stage and now later as submitted with the planning application. Similarly, alternative massing options were never shared with the community during the early stages of public consultation, nor was the commitment to share a 3D model of the proposal prior to the submission of the application met. Whilst the CoLC did make nominal reductions in the width of the buildings (the width of the building proposed to replace the Museum of London reduced by three metres and the width of the building proposed to replace Bastion House reduced by two metres), these are considered by the BQA to be minimal concessions and it is only now (post submission) that a model of the LWW Proposals has been made available for public viewing and the scheme’s true height and scale (and subsequent impact) can be fully appreciated. As such the BQA continue to express significant concerns at the massing of the LWW Proposals along with

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<sup>1</sup> Recorded event available to view at: <https://www.youtube.com/watch?v=EUOVSnkgOYs> (16:55 from start)





claims that the development will enhance the locality and its heritage assets (see paragraphs 79-82 and 83-86 below).

23. Criticism is also levied at the CoLC in relation to the market testing undertaken in April 2023. The CoLC advised that the purpose of the market testing was to respond to the local desire for the buildings to be retained and to explore a viable alternative to demolition. However, on 29 September 2023, the CoLC announced its intention to proceed with a planning application for the LWW Site which would include the demolition of the former Museum of London building and Bastion House. While stating that all options remained on the table, the CoLC argued that it had a duty to achieve “best consideration” and was under a “legal obligation to achieve maximum financial return”. The BQA make the following observations and criticisms in relation to this process:

there was no engagement on the decision to market test (a process only publicised on the CoLC’s own website); or the process itself which allowed a mere seven weeks (a period encompassing both school holidays and Easter) for developers to submit proposals;

the results of the market test exercise, which the CoLC subsequently described as credible and successful, were neither shared nor pursued;

the CoLC only later made explicit its true motives for pursuing the application as maximising financial return, stating that it had a legal duty to do so (and no further cost analysis has been shared by CoLC to evidence (if relevant) that demolition and redevelopment of the LWW Site is more profitable than a scheme involving retention and retrofit).

24. In conclusion the BQA consider that whilst the CoLC may consider that pre-application community engagement has been extensive, in fact the CoLC has:

Failed to involve the community in developing fundamental options for the future of the LWW Site once it had decided not to progress the Centre for Music. This is a major deficiency given the significant history and location of the site and the nature of its buildings.

Failed to adjust the proposals sufficiently to reflect the public feedback received.

Failed to share the results of the market testing or evidence that the buildings could not be successfully or viably retained and adapted.

Failed to keep the community updated on the evolution of the project. The last presentations to the community were June 2022 and the current LWW Proposals were not presented or consulted on in advance of submission – particularly on any matters relating to access and transport considerations.

Lacked transparency throughout e.g. its early whole life carbon assessment, including analysis of the re-use of the existing buildings and the results of the soft market test, have never been shared.



Not acted in accordance with national policy guidance in the NPPF to take account of the views of the community and to reconcile local interests.

### **Principle of Development and Land Uses Proposed**

25. The BQA instructed CarneySweeney to undertake a review of the principle of the proposed development and the land uses proposed.
26. For the purposes of Section 38 of the Planning and Compulsory Purchase Act (2004), which requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise, the development plan comprises the following documents:

London Plan (adopted March 2021)

City of London Local Plan (adopted January 2015)

27. Material considerations currently include the National Planning Policy Framework (December 2023) (“NPPF”) and National Planning Practice Guidance (“NPPG”). It is also appropriate to have regard to emerging policy, the following being a material consideration and a demonstration of ‘the direction of travel of policy’, albeit it does have limited weight at this stage:

City of London: Draft City Plan 2040

28. Whilst supplementary planning guidance (“SPG”), supplementary planning documents (“SPD”) and Planning Advice Notes (“PAN”) do not form part of the development plan, they assist interpretation of policy and are material considerations in the determination of planning applications.
29. In terms of the principle of redevelopment of the LWW Site, further consideration of this matter is set out below in relation to the discussion of retrofit and re-use vs demolition.
30. The planning application is supported by a Planning Statement which states at paragraph 5.6 that the development brief for the LWW Site is for a ‘commercial-led scheme, which aims to address the City’s strategic context and maximise the development potential for the Site’. Paragraph 5.6 goes on to advise that the City’s strategic context is considered to be formed of four main strands: Business, Culture and Leisure, Sustainability and Highways & Public Realm.
31. Chapter 9 of the Planning Statement considers the principle of the development. Reference is made to the NPPF and the presumption in favour of ‘sustainable development’ alongside the requirement that both planning policies and decisions should promote an effective use of land. This is further supported by reference to the London Plan Policies D3 (Part A) in seeking a design led approach to development and E1 (Part A) in terms of improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. Reference is then made to Strategic Objective 2 the City of London Local



Plan which seeks to ensure that challenges facing the five Key City Place are met, commenting that the area surrounding Cheapside and St. Paul's is identified as a vibrant office, retail and cultural destination for attracting visitors to the surrounding attractions.

32. Set against this background, BQA raise significant concern at the approach taken in defining the development brief for the LWW Site, and the lack of consideration that the CoLC as applicant has made to other strategic priorities set out in the NPPF and the development plan as a whole.
33. With regard to making effective use of land, this is addressed in Chapter 12 of the NPPF and Paragraph 124 advises that (our emphasis in bold); *“planning policies and decisions should support development that makes efficient use of land taking into account:*

*The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*Local market conditions and viability;*

*The availability and capacity of infrastructure and services-both existing and proposed as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

***The desirability of maintaining an area's prevailing character and setting** (including residential gardens or promoting regeneration and change); and*

***The importance of securing well designed, attractive and healthy places.”***

34. At a strategic level, the London Plan forms the Spatial Development Strategy for Greater London, setting out a framework for the city's development over the next 20 – 25 years. It is part of the development plan for London, and as such its policies inform decisions on planning applications within London boroughs. It is also the most up to date part of the development plan covering the City of London.
35. Chapter 2 of the London Plan sets out the overall spatial development pattern for London. In terms of key policy considerations, the BQA are aware that at a London wide spatial level the LWW Site is located within the Central Activity Zone (“CAZ”) which is described in the London Plan as *“the vibrant heart and globally-iconic core of London”*. The CAZ is considered to have several strategic functions which include, inter-alia, providing agglomerations of nationally and internationally significant offices and company headquarters; provision for arts, culture, leisure, entertainment; provision of tourism facilities and having a distinct heritage and built environment. The arts, culture, tourism and entertainment activities are stated within the London Plan as being a defining feature of the vibrant and distinctive character of the CAZ with its varied mix of daytime, evening and night-time uses, together making a vital contribution to London's culture and heritage. Noted within the London Plan are the locations considered to be rich in cultural activity, including the Barbican. The London Plan advises these areas and functions should be recognised, nurtured and supported in



line with the London Plan CAZ policy and other London Plan policies related to culture and supporting the evening and night-time economy.

36. Alongside such strategic functions, it is recognised that at a local level, the CAZ contains housing, social infrastructure and other community uses to address the needs of residents, visitors and workers. The London Plan advises that such locally orientated uses such as new residential are acceptable uses and are important to the character and function of the CAZ but should be complementary to and not compromise its strategic functions. To this end, Policy SD5 advises that offices and other CAZ strategic functions are to be given greater weight relative to new residential development except in certain locations, including predominantly residential neighbourhoods. The Mayor of London therefore advises that Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate.
37. The current City of London Local Plan was adopted in 2015 and explains the spatial strategy, vision and strategic objectives for the City of London, followed by the policies required to implement the strategy, set out though a series of five key themes. Each theme has a Core Strategy (“CS”) policy to address the strategic context followed by additional Development Management (“DM”) policies to be used when considering planning applications and other related consents.
38. At a strategic level the Local Plan highlights significant competing demands between the need to accommodate new office development alongside the need for new housing, social and community facilities and improved transport infrastructure. The plan is centred around five strategic objectives, the first of which is to maintain the City’s position as the world’s leading international financial and business centre. The remaining four relate to key City places, culture and heritage, environmental sustainability, and City communities. The table below taken from the Local Plan illustrates the overall scale and phasing of development that is anticipated by the plan to the period to 2026.

Land Use	2011-2016	2016-2021	2021-2026	Total 2011-2026
Offices	650,000m <sup>2</sup>	250,000m <sup>2</sup>	250,000m <sup>2</sup>	1,150,000m <sup>2</sup>
Retailing (A1-A5)	52,000m <sup>2</sup> * * Figures relate to the 2009-2016 period	44,000m <sup>2</sup>	40,000m <sup>2</sup>	136,000m <sup>2</sup>
Housing	667 units	430 units	550 units	1,647 units

Table 1. Indicative scale and phasing of growth in main land uses 2011-2026, CoLC Local Plan



39. In terms of distribution the plan highlights the scale of development that could take place in the five 'Key City Place' areas. These are identified in the plan's Key Diagram (see Figure 4 below) and include;

- The North of the City
- Cheapside and St Paul's
- Eastern Cluster
- Aldgate
- Thames and the Riverside

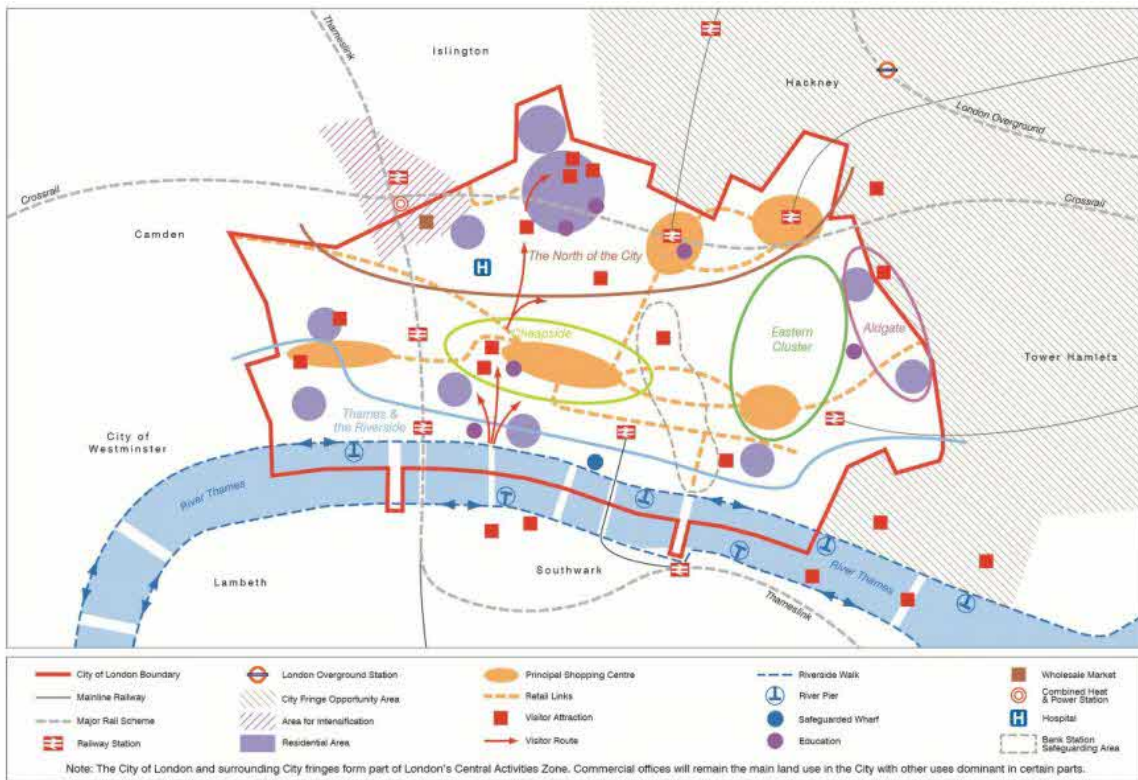


Figure 1. Key Diagram, CoLC Local Plan

40. Rather than placing the LWW Site in the area of Cheapside and St. Paul's (as is set out in the Planning Statement submitted with the application), CarneySweeney consider the LWW Site clearly falls within the 'North of the City' Key City Place area, the current spatial strategy for which is to address the impact of and accommodate growth resulting from Crossrail whilst maintaining the area's mix of uses, enhancing its cultural offer and delivering sustainable development. In terms of its capacity, the Local Plan anticipates the North of the City as indicatively accommodating 10-20% of the required office growth, 20-30% of the retail growth, 0-10% of the hotel growth and 60-70% of the housing growth. Whilst it is recognised that offices will be acceptable development across the City (unless indicated otherwise by policies in the Local Plan), this spatial strategy clearly identifies other uses as also being part of the vision.



41. In terms of maintaining the City's role as a world financial and business centre, the Local Plan advises that the North of the City contains a mix of uses, including the strategic cultural quarter centred on the Barbican and that careful planning is essential to retain the character and amenity of individual areas whilst managing growth.
42. The vision set out in the plan for the 'North of the City' is as follows:  
*"Passengers will emerge from new Crossrail stations to find a lively variety of restaurants and shops with attractive streetscapes and vistas. Attractive pedestrian routes will link pockets of well designed open space. Progressive building designs and sensitive refurbishments will mean residents, workers and visitors remain in a comfortable and safe environment that has adapted to climate change. The Barbican will form part of a wider strategic cultural quarter. Evening and night time activity will be well managed."*
43. Paragraphs 3.5.1 to 3.5.5 of the adopted Local Plan provide further background on the 'North of the City' Key City Place area noting that the area has the potential to lead the way as an 'eco design' district within the City and that the area is to deliver approximately 60-70% of the new residential development the City is expected to take. Reference is also made to the role of the cultural quarter focussed on the Barbican, whose offer and environment should be 'further enhanced'. The delivery strategy for this vision is guided by Core Strategy Policy CS5: The North of the City which states:

**Core Strategy Policy CS5: The North of the City**

*"To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure, by:*

1. *Ensuring that disruption to the City is minimised during construction of Crossrail and requiring the restoration of worksites to deliver enhancement of biodiversity, heritage assets and the public realm, open space provision and integration with other transport modes.*
2. *Implementing proposals for the rejuvenation of Farringdon, Moorgate and Holborn jointly with neighbouring boroughs in the Farringdon / Smithfield Area for Intensification, taking account of urban design studies, conservation area management strategies and area enhancement strategies.*
3. *Requiring improvements to pedestrian and cycle routes to maintain safe, effective and efficient pedestrian and cycle flows, including for disabled people, within and through the north of the City.*
4. *Ensuring the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as Smithfield Market, Barbican, Golden Lane and Broadgate, whilst preserving privacy, security and noise abatement for residents and businesses.*
5. *Identifying and meeting residents' needs in the north of the City, including protection of residential amenity, community facilities and open space.*





6. Safeguarding the Citigen combined cooling heating and power (CCHP) network and ensuring that, where feasible, all new development is designed to enable connection to the CCHP network.
7. Requiring the incorporation of sustainable drainage solutions (SuDS), such as green roofs, into development.
8. Requiring developers to make use of innovative design solutions to mitigate and adapt to the impacts of climate change, particularly addressing the challenges posed by heritage assets whilst respecting their architectural and historic significance.
9. Further enhancing the distinctive character of the Smithfield area by retaining a range of buildings suitable for accommodating a mix of uses, whilst recognising the particular challenges arising from the 24 hour character of the area.
10. Recognising and supporting the continued presence of both Smithfield Market and St Bartholomew's Hospital.
11. Promoting the further improvement of the Barbican area as a cultural quarter of London-wide, national and international significance."

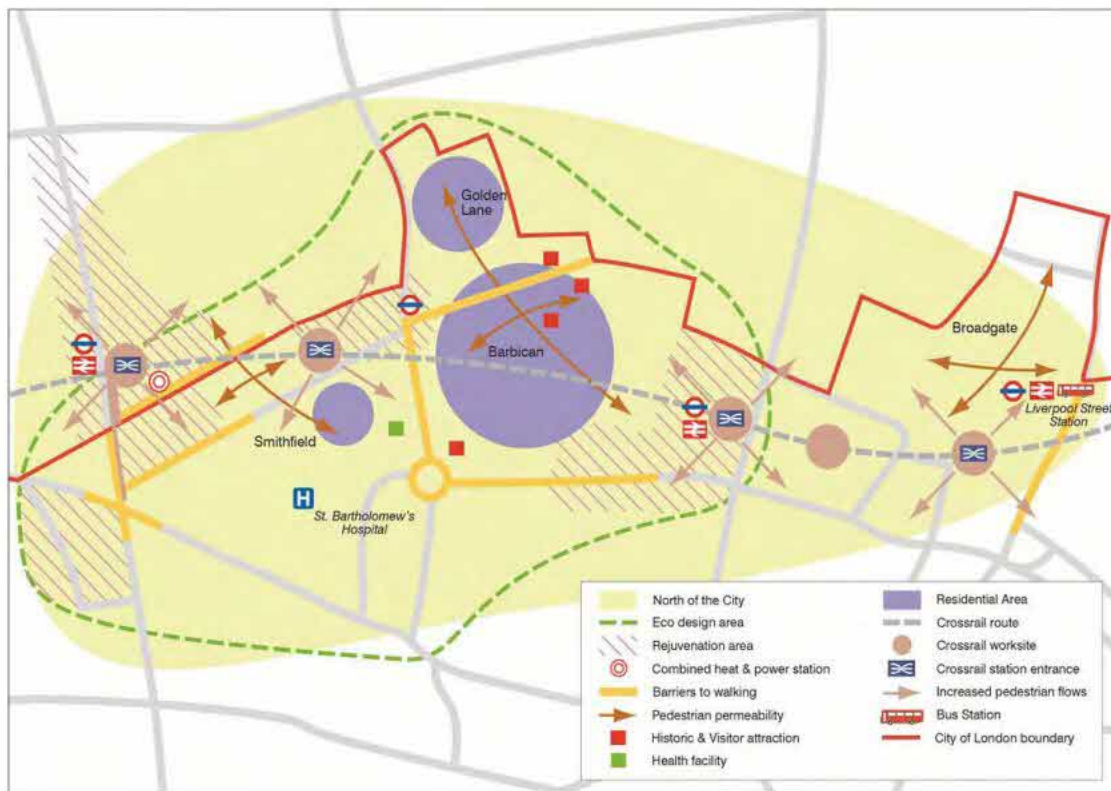


Figure 2. Strategic diagram representing the North of the City – CoLC Local Plan 2015.

44. CarneySweeney and the BQA are aware that the CoLC are currently in the process of producing a new Local Plan covering the period to 2040, setting out what type of development the CoLC expects to take place and where and that once adopted, it will replace the current adopted local plan. In





this regard, we refer to paragraph 48 of the NPFF which advises that “*local planning authorities may give weight to relevant policies in emerging local plans*” according to a number of factors, principally:

- their stage of preparation;
- the extent to which there are unresolved objections; and
- their consistency with the broader Framework.

45. Due to the early stage of preparation of the new Local Plan, whilst indicating a ‘direction of travel’, at the current time this plan can only be given limited weight in decision making.
46. The emerging draft local plan is titled ‘City Plan 2040’ and is intended to set out the vision and framework for future development in the City until 2040, outlining what type of development should take place and where, along with the policies and proposals that will guide decisions on planning applications.
47. A new Spatial Strategy is introduced by City Plan 2040 which highlights that different approaches to development and growth will need to be taken in different parts of the City to ensure a sustainable pattern of development in a way that enhances the unique character of the Square Mile. Whilst all parts of the Square Mile will continue to see growth and development over the lifetime of the plan, some areas are identified in the plan as Key Areas of Change (“KAOC”) and will see a greater proportion of net additional floorspace than other parts of the City or will undergo more significant change to their built form. In addition, and with reference to the LWW Proposals, the draft Spatial Strategy also notes:

*“Net additional office floorspace will primarily be delivered in the City Cluster KAOC, supplemented by floorspace in the Fleet Street and Ludgate KAOC and Liverpool Street KAOC. Office growth will be encouraged in all parts of the Square Mile.*

*Additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas.*

*Active frontages, with uses that are suitable for their context, will be delivered in all parts of the Square Mile, bringing vibrancy to the City and meeting the needs of people who live and work here and those who visit the area.*

*Focal areas for culture have been identified in the cultural planning framework, informed by the existing cultural character of different parts of the City and the potential for each area to contribute to the ongoing transformation of the City into a vibrant destination.*

*New hotels will be encouraged in suitable locations across the City, particularly in places near to transport hubs and where there is good access to visitor destinations in and outside the City.*

*Designated strategic and local views will inform development, with tall buildings focused in the City cluster and the Fleet valley, which are identified as areas suitable for tall buildings.*

*The unique character of different parts of the City, including the area’s rich heritage (which includes nearly 600 listed buildings, 27 conservation areas, 48 scheduled ancient monuments*



and four historic parks and gardens) will be celebrated and enhanced, and help to shape new development in the Square Mile.”

48. Figure 3 below shows how these are presented in the Key Diagram in City Plan 2040.

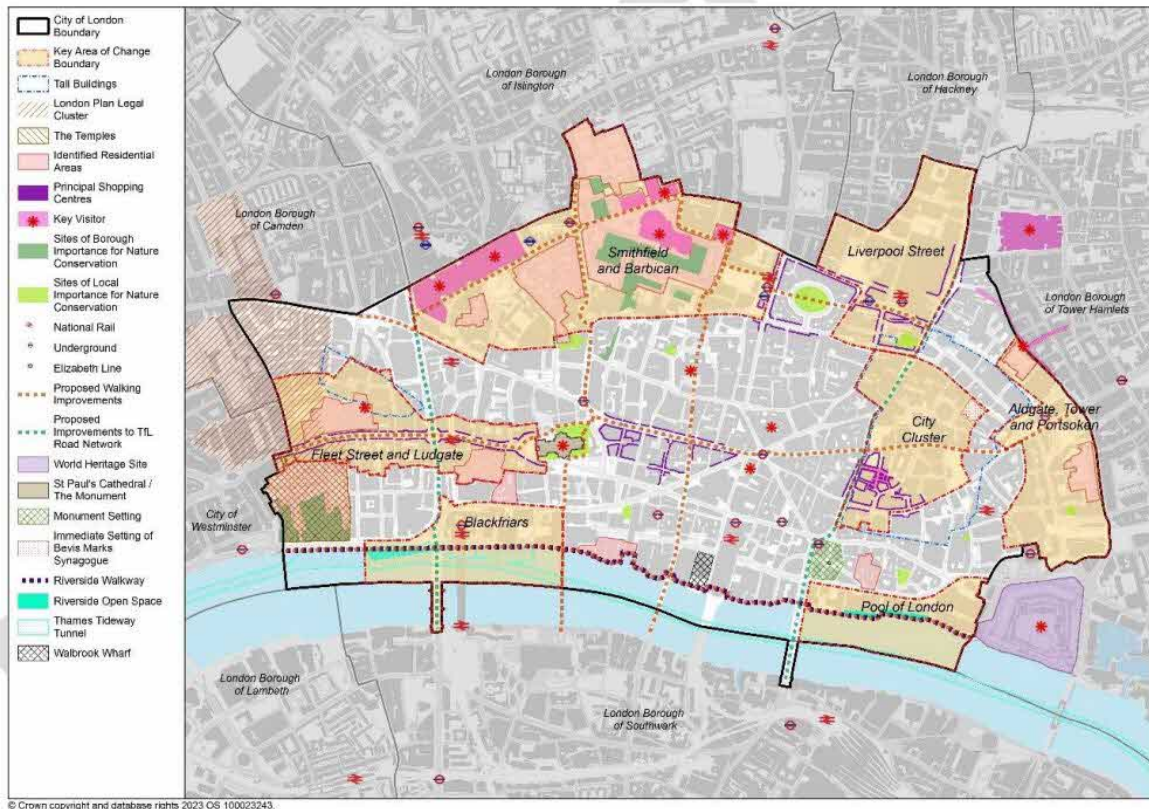


Figure 3. Key Diagram – City Plan 2040

49. The LWW Site falls within the Smithfield and Barbican KAOC and is adjacent to an identified residential area and draft Strategic Policy S23 (see below) sets out how the CoLC intend to improve the area. The supporting text to the policy highlights the Smithfield and Barbican KAOC as a vibrant, mixed-use area which is to undergo significant change and development over the life of the plan – specifically with reference to the relocation of the Museum of London to its new location at Smithfield.

**Draft Strategic Policy S23: Smithfield and Barbican<sup>2</sup>**

“The City Corporation will improve the Smithfield and Barbican area by:

1. implementing the Culture Mile initiative, encouraging culture-led mixed-use development on major sites in the area as well as cultural infrastructure and complementary uses, and delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy;

<sup>2</sup> Draft policy wording as reported to Local Plans Sub (Planning and Transportation Committee) 18 October 2023.



2. *ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican whilst seeking to preserve privacy, security and noise abatement for residents and businesses;*
  3. *ensuring future alternative uses appropriate to the listed status of the market buildings in Smithfield if the existing uses are relocated;*
  4. *supporting and enabling residential development in appropriate locations;*
  5. *identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;*
  6. *making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;*
  7. *seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;*
  8. *requiring improvements to pedestrian and cycle routes for all within and through the north of the City;*
  9. *supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network;*
  10. *supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role;*
  11. *encouraging a diverse leisure, retail, food and beverage offer, particularly along the route between the London Museum and the Barbican;*
  12. *encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists, including meanwhile use of vacant premises; and*
  13. *enhancing the special character of the area through sensitive change."*
50. CarneySweeney, on behalf of the BQA highlight that this draft strategic vision once again does not focus on the delivery of office growth but encourages culture led mixed-use development, supports residential development in appropriate locations and seeks to enhance the special character of the area.
51. Whilst it is material to consider the extent to which emerging policies and evidence also accord with existing adopted policies, particularly those of the London Plan, the weight accorded to different policies will be a matter for the decision maker, but policies will generally gain weight as they progress through the process of consultation and examination process through to adoption, particularly where they do not attract objections. Policies that closely accord with adopted policy in the existing Local Plan or London Plan may also merit more weight.
52. The BQA are aware that City Plan 2040 is being taken through committee approval for consultation between January and March 2024 and that consultation on Revised Proposed Submission Draft City Plan 2040 is anticipated to take place in spring 2024. In this regard the BQA reiterate this is a



draft Local Plan and reserves the right to comment separately on these emerging policies and the strategic vision for Smithfield and Barbican KAOC.

*Land uses proposed*

53. In terms of the land uses proposed the LWW Proposals comprise of:

<b>Land Use</b>	<b>Proposed (GIA sqm)</b>
Office (Class E(g(i)))	56,211
Retail / Restaurant (Class E(b))	1,112.4
Cultural (Sui Generis)*	8,182.9
Livery Hall (Sui Generis)	480.0
Public Car Park (Sui Generis)	594.2
Cycle Hub (Sui Generis)	703.0
<b>Total</b>	<b>67,283.5</b>

\* Cultural uses being further broken down into;

Food & Beverage/Retail	968.5sqm
Event/Exhibition/Venue	7,214.4sqm

54. By comparison the existing land uses at the LWW Site comprise of:

<b>Land Use</b>	<b>Existing (GIA sqm)</b>
Office (Class E(g(i)))	16,887
Retail / Restaurant (Class E(b))	0
Cultural (Sui Generis)	0
Livery Hall (Sui Generis)	439
Museum (Class F1(c))	15,188
Bar (Sui Generis)	287
Public Car Park (Sui Generis)	1,458
Cycle Hub (Sui Generis)	0
<b>Total</b>	<b>34,259</b>

*Office Floorspace*

55. In terms of office floorspace there will be a significant net uplift of 39,324sqm (GIA). it is recognised that the LWW Site is located within the CAZ and therefore the principle of protecting existing office space alongside the provision of new office floorspace is supported. However, given the strategic vision for the ‘North of the City’ Key City Place area, as set out in the adopted local plan, CarneySweeney, on behalf of the BQA, raise objection to this increased level of office provision on the LWW Site, primarily due to concern that such growth in this location will have a detrimental



impact on the distinct character, environment and heritage of this part of the CAZ, in conflict with Policy SD4 (Part C) of the London Plan and the NPPF.

56. Further details relating to the office needs within the City of London are set out in the Office Market Research Report, prepared by JLL (“OMRR”) and submitted in support of the application. The BQA have reviewed this report and raise the following key concerns;
57. The Terms of Reference set out at paragraph 1.1 in the OMRR are biased in favour of development. There is no meaningful economic analysis of construction cost / achievable rent / return on capital employed. There is no assessment of alternative economic scenarios, e.g. downturn / prolonged period of high borrowing costs.
58. Reference is made at paragraph 2.2.4 of the OMRR that future long-term demand will be boosted by occupiers displaced by older stock not meeting future minimum energy efficiency standards, however, no data is provided in relation to the percentage of office stock affected by the change in regulation.
59. More evidence is provided to support the statement at paragraph 2.25 of the OMRR that companies have been more footloose across central London, and focussing more on the quality of the building, connectivity, and immediate environment rather than traditional areas for industry.
60. The statement is made at paragraph 2.2.9 of the OMRR that *“TMT and general business services have grown, while the legal sector has seen a renaissance since the pandemic but prior to this had been an insignificant source of demand in the City. It is clear these sectors are still vital to market performance and are likely to do so moving forwards.”* The BQA contest that there is no analysis of the needs of these specific sectors and no indication of the likely source of tenants. The resurgence of traditional sectors is contradicted by the report taken to the Local Plans Sub (Planning and Transportation) Committee in June 2023 (“PCT Report”) which discusses the evidence base report “Future of Office Use” which was commissioned from ARUP to support the office policies review for City Plan 2040 and which states at paragraph 5: *“In 2023, 29% of take-up of office floorspace in the City of London was from “Media and Tech” firms, compared to 19% from “Financial” companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers”*
61. The OMRR advises that there were three transactions over 100,000 sqft completed since the beginning of 2021, and all were pre-lets. The BQA highlight that given 100,000 sqft equates to 9,259 sqm, there would need to be six such transactions to fully occupy the LWW Proposals. Given that there were only three such transactions in a period of 2.75 years, it could take two years to find such ‘large tenants’ and so the demand would need to come from smaller occupants. No evidence is provided to suggest sufficient demand for “prime” in the lower size transactions. Furthermore, of the list of largest transactions given in Table 4 of the OMRR, the BQA highlight that at 25.185 sqm this is roughly the size of the new Rotunda building. The OMRR provides no evidence of demand from an individual tenant for a building as large as New Bastion House (which at 35,523 sqm GIA,





is almost 40% bigger than the largest transaction). Again, this indicates that this will have to be a multi-tenant building.

62. At paragraph 4.2.1 of the OMRR it is noted that JLL's Future of Work survey found that when asked about their attitudes towards space, 92% of those surveyed based in London said that investing in quality space is a more significant priority for their company than expanding the total occupied footprint. The BQA consider this to be an unbalanced analysis of demand as it suggests no increase in demand but provides no information about the willingness / ability to relocate to a higher quality office vs. refurbish existing space occupied. The PTC Report paints a more complex picture and states at paragraph 9: *"Grade B office take-up is predominantly by creative and emerging-office based firms who are interested in enhanced amenities. The protection of existing office space is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential occupiers. However, there are challenges facing Grade B office space. In 2022, take-up of second-hand Grade B space in the City was 10,000m2, accounting for only 2.2% of all leasing market transactions in the City. Pre-pandemic, Grade B office stock provided an affordable workspace option for small businesses but this market area has not recovered after the pandemic. There are challenges for retrofitting Grade B space but there are successful examples in the City, including Millennium Bridge House, 81 Newgate Street and Ibex House."*
63. Paragraph 5.1.1 of the OMRR notes that there is a good level of demand for office space in the City of London, but occupiers are demanding the best space in which to create modern working environments. The BQA consider this to be a vague comment but is understood to refer to current demand rather than future demand. The PTC Report from June 2023 notes at paragraph 18 that *"Additional technical work is underway to better understand not just the potential demand for office floorspace, but the capacity to accommodate additional floorspace, having regard to other policy constraints including strategic and local views protection and heritage assets."* It is not clear whether the CoLC as Local Planning Authority has provided input to the CoLC as applicant in the light of this technical work.
64. The BQA consider the statement at paragraph 5.1.3 of the OMRR that office space around Farringdon and Barbican stations is particularly sought after with creative occupiers favouring the mixed-use environment over the more corporate City Core is not evidenced in the OMRR. That it should be examined is again highlighted by the June 2023 PTC Report which states at paragraph 8 that *"As emerging office-based firms tend to value different typologies of office spaces compared to traditional office-based firms, their growing number and size might imply a new shift in the market in terms of demand for best-in-class office spaces, with the fastest growing firms over-representing in the micro and small categories."*
65. The BQA highlights the statement made at paragraph 5.1.3 of the OMRR that *"The existing Museum building and road configuration currently create a visual barrier between these two sub-markets. London Wall West is an opportunity to link these two sub-markets with a purpose-built mixed-use office scheme."* This does not appear credible as there remains a significant visual



barrier in the form of 200 Aldersgate Street. Similarly, the benefits of the LWW Proposals listed at paragraph 5.1.4 of the OMRR are not considered to be unique to the submitted proposals.

*Cultural floorspace*

66. In terms of the loss of the cultural floorspace on the LWW Site, both London Plan Policy HC5 and the CoLC adopted Local Plan Policies CS11 and DM 11.1 seek to protect existing cultural venues and facilities. Policy DM 11.1 further stipulates that such loss will be resisted unless replacement facilities are provided on site or within the vicinity or in other facilities without leading to a shortfall in provision or that there is no realistic prospect of the premises being used for a similar purpose. Any scheme that results in such loss also must be accompanied by evidence of the lack of need (including marketing evidence to demonstrate the existing floorspace has been actively marketed). For the LWW Site, the Museum of London is being relocated to another site within the City and in close proximity, nevertheless, given the strategic vision for this part of the City, it is considered that it should be demonstrated that there is no demand for a similar level of need given the vision for the 'North of the City' Key City Place area in which the LWW Site is located. This policy approach is repeated in City Plan 2040 through Draft Policy CV1, and with reference to the issue of retrofit/re-use, CarneySweeney highlight that the strategic policy direction set out in City Plan 2040 in Draft Strategic Policy S6 refers to protecting areas of cultural significance including cultural buildings where they provide an anchor for cultural regeneration.
67. The application is supported by a Culture Plan (and Culture Needs Assessment) which has been reviewed by the BQA. The BQA raise concern that the Culture Plan is vague and speculative with a weak vision and with no sense of a coordinated strategy. No specific cultural partnerships have been identified. There are no defined capital/revenue models and no business models presented. The BQA are concerned it will therefore be left to any future developer to interpret as they wish and therefore the generic arts, culture and creative features of the LWW Proposals as referred to in the Culture Plan will be value engineered down or scoped out. Furthermore, the Culture Plan draws heavily on the CoLC flagship Destination City strategy, including the statement that the programme and events "will be led by Destination City". The BQA wish to highlight that the Destination City strategy is acknowledged by the CoLC as requiring a 're-set' and, as of January 2024, is currently under comprehensive external review (the terms of reference for which were discussed at the Culture, Heritage and Libraries Committee meeting of 20 November 2023).

*Residential floorspace*

68. Returning to the criticisms raised by the BQA on the pre-application consultation process and the evolution of the LWW Proposals, given the strategic vision for the North of the City as set out in the adopted Local Plan, the question is asked as to the decision to promote an office led redevelopment of the LWW Site. Whilst the policy requirement to ensure the reprovision of office floorspace and cultural floorspace is recognised, CarneySweeney, on behalf of the BQA, query why the CoLC have





ignored the opportunity to also deliver much needed housing in a part of the City that is considered compliant with Policy DM 21.1 of the CoLC adopted Local Plan which states that new housing will be provided in the City in or adjacent to identified residential areas (such as the Barbican) but this should not prejudice the business function of the City (as per Policy DM1.1).

**Retrofit and Re-use vs Demolition – Embodied Carbon Review**

- 69. The NPPF states at paragraph 157 that the planning system should support a transition to a low carbon future in by ‘encouraging the reuse of existing resources, including the conversion of existing buildings’ – conversely it is recognised that the NPPF also provides clear policy guidance on making the most effective use of land and requires local planning authorities to take a proactive role in bringing forward land that may be suitable for meeting development needs.
- 70. The London Plan provides the most up to date adopted strategic policy direction (together with related SPGs/LPGs) and also promotes the effective use of land through its ‘Good Growth’ policies which seek to optimise the redevelopment and re-use of brownfield land. Whilst retrofit and the re-use of buildings can contribute to carbon reduction, and both the Mayor’s WLC Assessment LPG and Circular Economy LPG advise that priority should be given to the re-use/retrofitting of buildings, neither policies SI2 or SI7 of the London Plan prohibit demolition (albeit that the policies do require development proposals referable to the Mayor to undertake a WLC Assessment and demonstrate the actions take to reduce life-cycle carbon emissions as well as to produce a Circular Economy Statement).
- 71. The adopted CoLC Local Plan states in Policy CS15 that demolition should be avoided through the re-use of existing buildings and the CoLC Carbon Options Guidance PAN provides the most recent intermediate position on how this will be considered by the CoLC as LPA. The CoLC emerging policy in City Plan 2040 also favours an embedded strategy of retrofit and the re-use of existing buildings.
- 72. As set out earlier in this statement, an interim WLC Assessment report (May 2022) was undertaken at pre-application stage to assess the existing buildings on the LWW Site. This WLC Assessment stated that a high-level engineering review of the existing buildings had been undertaken and highlighted there are three key challenges that would need to be addressed in any retention proposals. This includes material design life, fire integrity and design for disproportionate collapse. This WLC Assessment was undertaken based on two design options, subsequently eliminating any further discussions regarding the re-use of existing buildings despite the results indicating that the absolute Whole Life-Cycle Carbon emissions for the re-use of the existing buildings are approximately 20 million kilograms’ lower when compared to a redeveloped LWW Site. The WLC Assessment dismissed the option of retrofitting the existing buildings based on viability and feasibility.



73. The BQA instructed Simon Sturgis of Targeting Zero LLP to undertake a review of the LWW Proposals in relation to matters pertaining to the circular economy, the reduction of carbon and meeting net zero. Their full review is at Appendix B to this statement and their main conclusions are summarised below, as follows:

The proposals are not optimising the carbon emissions impacts and as a result are in direct opposition to UK National policies, GLA policies and the City's policies. These include the City's new sustainable guidance for developers dated 12 December 2023, covering retrofit and reuse, energy and whole life carbon and the circular economy. Their conclusion is that the planning application proposals ignore this new guidance.

There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to six options selected for detailed examination. These six options excluded 'option two' for a 'Major Refurbishment', which is the option that is most consistent with the approach favoured by the commercial bids in this City's market testing exercise.

The conclusion of the planning application submission reports is exactly the same as previous reports in May 2022, namely that a 'Major Refurbishment' approach is to be rejected in favour of 'new build'. This appears to demonstrate that the latest optioneering exercise is purely 'window dressing' to prove a pre-ordained choice 'new build', and that a 'major refurbishment' option has not been seriously investigated by the design team in detail as 'new build' was always the intended outcome.

74. Notwithstanding the conclusions above, Targeting Zero also comment that in the event of the LWW Proposals being approved, unless the levels of carbon emissions achieved are 'locked into' the scheme and become secured by way of legal agreement or planning condition, they are likely to be abandoned by any future purchaser, meaning that the figures achieved are effectively meaningless.

75. As a result, it is reasonable to conclude that there are failings in the approach to the Whole Life Cycle Carbon Assessment of the LWW Proposals. The CoLC Whole Life-Cycle Carbon Options PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emissions. It states that optioneering is required for all major schemes before the application is submitted and furthermore advises *"If substantial demolition is proposed, applicant will need to demonstrate that benefits of the demolition would clearly outweigh the benefits of retaining the existing building or part of the structure."* This approach reinforces the Mayor's WLC Assessment LPG by requiring developers to consider alternatives to demolition at the earliest stages of planning and in this regard, the BQA consider the failings highlighted by the group to the CoLC at pre-application stage relating to the option of retrofit and reuse of the buildings on the LWW Site have equally been dismissed in the appraisal of options assessed at planning application stage.



**Design, Public Realm and Landscaping**

76. Chapter 12 of the NPPF focuses on achieving well designed places and recognises that good design is a key aspect of sustainable development and creates better places in which to live and work and helps make development acceptable to communities. Paragraph 135 emphasises that planning policies and decisions should ensure that developments:

*“Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

*Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

*Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

*Establish or maintain a strong sense place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*

*Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*

*Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

77. Furthermore paragraph 137 states: *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*

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



**Townscape and Views**

79. Mr Petroschka has also reviewed the submitted TVBHIA and his conclusions are attached to this statement at Appendix D. Again, Mr Petroschka concludes that a number of statements and conclusions in the assessment are incorrect, flawed, misleading and are strongly contested.
80. In particular, Mr Petroschka states that while many of the post-war office blocks on London Wall have been replaced and the density of the urban fabric increased, all new office blocks strictly follow the perpendicular grid of the post-war plan, continue to contain and define the urban street space and public realm, break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context and their immediate neighbours, including the Barbican Estate. All developments place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks.
81. None of the above prevailing qualities were applied to the two proposed development blocks. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining Conservation Areas, but also to the setting of the immediate and wider neighbourhood.
82. The BQA further highlight that the CoLC adopted Local Plan does not place the LWW Site in an area deemed to be inappropriate for tall buildings and as such Policy CS14 advises that within such areas, proposals for tall buildings will be considered suitable having regard to a variety of design considerations. The London Plan Policy D9 provides the more recent policy position in relation to tall buildings and sets out a much wider assessment of the impacts to be considered where development proposals include tall buildings. Policy D9 also requires development plans to identify the locations and building heights considered appropriate for tall buildings and states that tall buildings should only be developed in such suitable locations. The BQA are aware that Draft Strategic Policy S12 in City Plan 2040 defines a tall building as being over 75m AOD (therefore applicable to two of the buildings included in the LWW Proposals) but does not identify the LWW Site as being one of the tall building areas that are proposed to be identified as suitable for tall buildings. The BQA do not consider that the LWW Proposals respond to the LWW Site's existing character, or respect and enhance identified heritage assets and architectural features. Further commentary on heritage matters is provided below.

**Heritage**

83. The BQA instructed Alec Forshaw a highly experienced specialist heritage consultant to assess the heritage impacts of the LWW Proposals. He has considered the impacts within the local and immediate area, and left the potential impacts on long-distance views of St Paul's Cathedral or the riverside to Historic England and the GLA, who have particular remit and expertise in this field. Mr Forshaw's full report is at Appendix E to this statement.



84. Mr Forshaw questions the reliability of the submission material: Architect's sketches and artistic illustrations give inaccurate impressions of the proposals with stretched and distorted perspectives; and photographs use wide angle-lenses, a technique used by estate agents in sales brochures to make internal rooms seem bigger than they are.
85. He strongly opposes the applicant's consistent claims that the proposals, by virtue of their size, contrasting design and materials will enhance local views and settings.
86. Mr Forshaw concludes that the proposals cause widespread harm to a large number of heritage assets. This includes the complete loss of two undesignated heritage assets, and less than substantial harm, but nevertheless considerable harm to and erosion of significance of several Grade I, Grade II, Grade II\* scheduled monuments, some directly abutting, and the setting of three Conservation Areas. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm, requiring the balance of harm against public benefits in line with Paragraph 202 of NPPF. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere, nor other public benefits which would offset the great weight that must be given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

#### **Biodiversity and Ecology**

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

#### **Transport, Access, and Servicing**

88. The LWW Site is highly accessible by public transport. However, issues relating to vehicle access, highway safety, highway and public transport capacity, design of the public realm, and pedestrian connectivity and permeability are key considerations for the BQA.
89. The planning application is supported by the following documents which relate to the consideration of transport, access and servicing matters; Environmental Statement Chapter 6 'Traffic and Movement' along with Appendices 6A 'Transport Assessment' and 6B 'Travel Plan & Cycle Promotion Plan'; Draft Construction Environmental Management Plan; Delivery and Servicing Management Plan. Having reviewed each of these documents, the BQA wish to highlight three significant areas of concern:



- a. The operational impact of the LWW Proposals with three new buildings and a changed Ironmonger's Hall.
  - b. The impact of Phase 2 works relating to the removal of the St. Paul's Gyrotory system.
  - c. The impacts relating to the demolition of the existing buildings and the construction of the LWW Proposals on residents and other sensitive receptors (schools, businesses, Barbican Centre, St Giles Church and public and private gardens) within close vicinity to the LWW Site.
90. A fundamental concern relates to the proposed access and egress arrangements for vehicles to the redeveloped LWW Site. At present, access to service the buildings on the site is via a one-way system with access from London Wall and egress via the Aldersgate Street ramp. The latter is used primarily by residents accessing the TMH car park along with service and delivery vehicles supporting the residential community. The proposed development will abandon this 'through route' with all vehicles entering and exiting via the Aldersgate Street ramp.

*Operational impacts*

91. The Delivery and Service Plan (DSP) submitted with the application sets out the proposal that, on completion of the proposed development, all service vehicles as well as Barbican residents will use the Aldersgate Street ramp. The service vehicles will be held at a barrier on the ramp with an intercom to await instructions. Traffic will include vehicles accessing Bastion and Rotunda Yards at 10-11 servicing vehicles per hour, Barbican traffic at 10 - 15 vehicles per hour, with the addition of further servicing vehicles to the new North Office building and Ironmongers Hall. The ramp will thus need to provide for:
- All deliveries and services to and from the three new buildings.
  - All deliveries and services to and from Ironmongers' Hall.
  - All deliveries and services to and from the Barbican residents' car park (affecting Seddon, Thomas More, Lauderdale, Mountjoy and Lambert Jones Mews).
  - Emergency fire and ambulance access to and from Barbican residents' car park (there is no alternative access proposed in the scheme from the south of the site).
  - Barbican residents entering and exiting the car park.
  - Contractors, postal services, grocery deliveries and taxis entering and exiting the car park.
  - Pedestrians and cyclists (residents and deliveries) entering and exiting the residents' car park.
92. The DSP also provides a number of diagrams showing that there is inadequate width for two-way traffic at several points and thus proposes a traffic light control system for all servicing vehicles. It also proposes use of the TMH Service Yard as part of the route without any explanation of where the current activities at the Service Yard will be relocated.
93. The BQA consider this to be a significant design weakness for the following reasons:
- Residents' use of the Thomas More car park will be severely impacted from the outset and for the indefinite future once the buildings are completed.



There is significant likelihood of congestion on the ramp, in the single-lane sections of the proposed route and in the underground service yards.

The large increase in traffic on the ramp and lower levels resulting from this design proposal will have a significant adverse effect on noise and air pollution for residents in nearby residential blocks and on the CLSG sports field.

There will be frequent occasions when vehicles entering the ramp will be queued at the intercom barrier and backing onto Aldersgate Street, thus jeopardising safety for all road users at the top of the ramp onto Aldersgate Street.

It will create delay for emergency vehicles entering via ramp and exiting onto Aldersgate Street.

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

*Impact of Phase 2 of the St Pauls Gyratory works*

95. The Transport Assessment (TA) makes clear that demolition and construction on the LWW site and the highway scheme are interdependent - see paragraphs 6.4.49 and 6.4.50. Phase 2 of the Gyratory works is intended to happen when construction commences at the rotunda. The demolition of the rotunda and construction of the new highway layout cannot begin before 2028 in order to allow time for the many governance and consent processes that will need take place both within the CoLC and by TfL to have been completed - see paragraph 6.4.50 of the TA. The implication is also that the sale of the LWW Site must be completed by this time in order that the applicant can enter into the required section 278 agreement with the highway authority for the necessary highway works.
96. Earlier traffic modelling in connection with the St Paul's Gyratory proposals indicated that this change could result in a significant increase in delays to bus journeys as well as cars, taxis and other vehicles. In paragraph 6.4.32 of the TA it states *that "The junction modelling for the St Paul's Gyratory Transformation Project (Phases 1 and 2) is being undertaken by Norman Rourke Pryne and it is envisaged that TfL's Model Auditing Process (MAP) process for Phase 2 would be concluded after the planning application is submitted for the proposed development, as part of the s278 process"*.
97. The BQA raise concern that there is no up-to-date modelling of the likely traffic flows, travel times, congestion etc when the LWW Proposals are complete. This is particularly important given the removal of the Rotunda roundabout and its conversion to a signal-controlled junction with two-way traffic lanes. The BQA contend that the data underlying the traffic forecasts is disparate and out of date, and that more traffic modelling will be required in connection with obtaining TfL's consent to the removal of the rotunda roundabout. The BQA position on the impact of this removal is therefore reserved until this new traffic modelling has been undertaken and public consultation has taken place.





*Impacts during construction on residents and adjoining residential properties*

98. An initial review of the Draft Construction Environmental Management Plan (CEMP) has been undertaken by the BQA and the following comments are made. The BQA raise concern that almost no discussion or consultation with the local community has been undertaken in relation to the management and mitigation of construction impacts taking place over the course of a five-year period. The single exception to this was the opportunity to meet members of the LWW project team on 11 January 2024 at the London Centre. On raising concerns with the project team manager about the CEMP, the BQA were advised that *“it has been prepared by Multiplex who are unlikely to work on the construction project, and everything in it can be changed”*. BQA would like to express major concern at this apparent cavalier and dismissive approach on a matter that will affect the lives of many hundreds of residents over a period of at least five years.
99. A fundamental point of concern is the proposal that - from the commencement of development onwards - vehicles requiring direct access to the LWW Site will enter and exit via the existing ramp on Aldersgate Street. Furthermore, on page 36 of the CEMP, it is stated: *“Meanwhile, for safety reasons and to minimise construction delays, residents and service vehicles should access the car park using the back exit which can be found c.90m north of the rear service yard ramp along Aldersgate Street. This entrance provides access to the entire car park. Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however [it] should only be utilised when absolutely necessary”*.
100. This would be a major disruption to all current users of TMH car park and Lauderdale car park, and it is proposed to be in place for at least 5 years. The ‘back exit’ on Aldersgate St can only be accessed by a 180 degree turn from the road. The entrance height into the underground car park is too low for vans and possibly SUVs. The route through the Lauderdale car park to the TMH car park is very narrow, it has several hairpin bends and would become seriously congested.
101. The BQA consider this proposed re-routing to be impractical and unacceptable and that it should be prohibited.
102. Further concerns during the construction phase are the suspension of bus stops and cycle bays where these are heavily used by residents and those attending/working at St. Bart’s Hospital. Furthermore, it is considered that the impact of suspending public transport facilities for a 5+ year period on people with disabilities has not been assessed and is likely to be significant. Whilst commitment is made to contractors being part of the nationwide Considerate Contractors Scheme, the CoLC has its own Code of Practice for Deconstruction and Construction Sites (Ninth Edition) – January 2019 which should equally be met.
103. A further concern raised by the CEMP relates to the proposals for staff welfare facilities. in section 3.2.4 on page 61 it is stated: *“Staff Welfare - For the main construction and fitting out phases, a large set up will be required to accommodate up to an estimated 900 operatives and staff. It is proposed that the new concrete infill structure is constructed above the north service yard early in the programme to provide space for a multi-level accommodation building”*.



104. This would be a huge temporary structure which would overlook the CLSG sports field and most residents' flats in Thomas More House and Mountjoy House for at least a 5-year period. The BQA considers this to be totally unacceptable and that it should be prohibited by means of an appropriate planning condition.

**Daylight, Sunlight and Overshadowing and Solar Glare**

105. Anstey Horne were instructed by the BQA to review the submitted assessment in relation to daylight, sunlight, overshadowing, solar glare and light spillage within the Environmental Statement. Anstey Horne's report is at Appendix F to this statement. Their main conclusions are that there will be significant impact in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight. They further conclude there will be significant VSC daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant NSL daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight. Additionally, they conclude that there will be major adverse and significant incidences of solar glare to residents within Monkwell Square.
106. They also consider that further information is required to be submitted, as follows:
- VSC daylight results on a room by room basis;
  - VSC daylight results on a room by room basis without balconies;
  - NSL contour plots to establish the layout used within the analysis;
  - 'A clear sky' solar glare analysis to fully understand the potential for solar reduction at key road junctions;
  - An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP '2011' Guidance Notes; and
  - Confirmation of the location of the areas of additional light spill on the façade of Mountjoy House and that they do not coincide with the location of windows serving habitable rooms.
107. In addition Anstey Horne request that the following points be clarified:
- To verify the accuracy of the 3D modelling and analysis, confirm which properties are modelled from measured survey and which are modelled from photogrammetric survey;
  - Confirm how the windows and their locations have been modelled where photogrammetric survey has been used; and
  - Confirm the solar glare results within Appendix 13-F, including the angles on the field of vision on the solar glare result drawings.



108. Once the above information has been submitted, and made public, Anstey Horne will review and provide further conclusions to the BQA which may then be the subject of further submissions to the City of London Corporation as local planning authority.

**Archaeology**

109. The BQA are aware that the LWW Site is within an archaeologically sensitive area. The Planning application is supported by Environmental Statement Chapter 10 ‘Archaeology’ which assesses the likely environmental effects of the LWW Proposals with respect to archaeology. A review of this chapter of the Environmental Statement has been undertaken by Cathy Ross, an Honorary Research Fellow at the Museum of London, a resident of the Barbican Estate and member of the BQA. Having reviewed the chapter, her comments are as follows:

110. The archaeology scoping document and desk-based assessment (on which the chapter is based) both fail to consider the heritage assets of the Aldersgate side of the LWW Site, particularly any potential remains of Thanet House, one of the City’s grand Stuart mansions and a key site of interest for Britain’s political history. The evidential and historical potential of a site should be taken into account when considering the value of a heritage asset, and in this respect the documents are lacking. Thanet House and its gardens / environs have significant historical, political and architectural interest but are here ignored. More specifically:

111. At paragraph 15.2.2 and with reference to the remains of a Jewish Cemetery within the LWW Site - Nowhere is it made clear who actually owns the land between the Museum and the remains of the City wall. The BQA understand that the CoLC do have title to this piece of land. The report seems to assume that this land forms part of the Barbican’s group of gardens but this is clearly not the case (there are locked gates preventing public access to the Barbican’s territory).

112. At paragraph 15.2.4 – the BQA understand that any EIA has to evaluate ‘... *the significance of buried heritage assets, based on existing designations and professional judgment where such resources have no formal designation, and considering evidential, historical, aesthetic and communal value.*’ This is not considered to be the case here: the focus is entirely on the Roman remains and the much rebuilt City Wall. Other areas threatened with disturbance by this proposal have not been considered.

113. At paragraph 15.4.3 - as per paragraph 15.2.2, this implies the land is part of the Barbican estate and under City ownership. The BQA consider this point should be clarified.

114. At paragraph 15.4.20 – the BQA consider this section of the report to be completely inadequate as a summary of the whole site’s post-medieval significance. As mentioned above, Thanet House and the Aldersgate frontage must be included in any detailed consideration of the LWW Site’s ‘archaeological and historical context’, particularly given that the sites of these politically-charged 17th century buildings lie directly beneath the development. Nor is there any mention of the



Victorian development of the site (most of the standing remains of the City Wall are in fact Victorian or later). No mention either of the site's interest to Wesleyan Methodists.

115. At paragraphs 15.4.27 to 15.4.29 - the inference in these sections is that the access roads have '*heavily truncated if not removed completely*' archaeological remains. The BQA consider this to be very disputable. It is more likely that, as it says in paragraph 15.4.30 '*Archaeological remains (primarily the City ditch) have been shown to survive beneath and possibly between this localised truncation.*'
116. At paragraphs 15.4.32 to 15.4.33 – the BQA consider that these sections do at least acknowledge that there were post-medieval buildings on the LWW Site, but – again - without proper consideration of the actual buildings on this particular site. The text here is considered to be generic and based on assumptions.
117. At paragraphs 15.4.34 to 5.4.38 – the BQA consider these statements of significance points relate entirely to the Roman remains and ignore any heritage assets, actual or potential, relating to other periods of the past – Tudor and Stuart in particular.
118. Paragraph 15.4.39 – the BQA contend that surely the area of the Jewish cemetery extends beyond the footprint of Bastion House. In which case the potential for the survival of remains is higher than suggested here.

#### **GLA Referral**

119. The Town and Country Planning (Mayor of London) Order 2008 states that applications of potential strategic importance ('PSI applications') need to be referred to the London Mayor for his/her consideration. The definition of a PSI application is set out in a Schedule attached to this legislation. Part 3 of the Schedule deals with development which may affect strategic policies and Category 3E states that PSI applications include those for development:
- (a) 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
  - (b) Comprises or includes the provision of more than 2,500 square metres of floor space for a use falling within any of the following classes in the Use Classes Order [these uses include Class B1 Business, which has now been included within the new Class E of the Use Classes Order.
120. In this statement, we conclude that the redevelopment proposals for London Wall West do not accord with one more provisions of the relevant development plan and thus the planning application is required to be referred to the London Mayor under the Town and Country Planning (Mayor of London) Order 2008. To not do so will mean that the application has not been subject to the correct legal procedures.



**Public Benefits**

121. The Planning Statement submitted with the application sets out the range of purported public benefits that are considered to be provided by the LWW Proposals as they relate to Economic, Social and Environmental matters. The BQA has considered each of these as listed in the submitted Planning Statement and comment specifically on those below.

*Economic Benefits*

122. **Creating a catalyst for change and wider regeneration of the Barbican and Smithfield as one of the seven key areas of change, by investing significantly to unlock this key Site within the heart of the Culture Mile:** The seven 'key areas of change' is a reference to the strategic policy direction proposed by the CoLC in the emerging City Plan 2040. This is subject to further public consultation and scrutiny as the draft local plan progresses through to adoption and therefore the status of this policy direction should not be accorded the same weight as the adopted local plan. The LWW Site is currently located in the 'North of the City' area as defined in the adopted local plan. Whilst the principle of this benefit is accepted, it could equally be true of any other reuse the LWW Site.

123. **Delivery of approximately 56,000sqm GIA of new high quality, sustainable office workspace to meet a range of business needs across the Square Mile to enrich the City of London as a primary business centre of national and international importance:** Given the spatial strategy for the 'North of the City' area, the BQA disagree that the LWW Site should be promoted for significant office growth. The detrimental impacts in terms of heritage, design and townscape that result from the LWW Proposals as identified by the BQA are set out in this statement.

124. **Optimising the use of this underdeveloped site to a commercially led development with significant cultural uses within the buildings and the public realm:** The BQA consider that the LWW proposals comprise overdevelopment (not optimisation) with resultant heritage, design, townscape and other impacts as identified by the BQA in this statement.

125. **The demolition and construction phase of the development is anticipated to provide a significant amount of jobs targeted at local people:** Whilst the principle of this benefit is accepted, the BQA consider this could equally be true of any other reuse or redevelopment of the LWW Site. Whilst the BQA do not contest the number of jobs to be created during the construction phase, this 'benefit' is not specific to this development in particular; a significant number of construction jobs would be created by another form of redevelopment or as a result of the retrofit and adaptation of the existing buildings on the LWW Site. Also, these jobs are only temporary.

126. **The employment density will increase as a result of the Proposed Development through more efficient floorplates:** Whilst the principle of this benefit is accepted, it could equally be true of any other redevelopment or reuse/adaptation of the existing buildings on the LWW Site.

127. **Provision of Section 106 and Community Infrastructure Levy contributions to support the City's infrastructure:** The NPPG advises that planning obligations are entered into to mitigate the impacts of a proposal whilst Community Infrastructure Levy ("CIL") is a charge which can be levied on new



development by local authorities to help them deliver the infrastructure needed to support development in their area. The BQA therefore consider these are 'requirements' resulting from the LWW Proposals rather than 'benefits'. The BQA consider the detrimental impacts of the LWW Proposals as set out in this statement are of greater significance.

*Social Benefits*

- 128. **Creation of a range of cultural uses (c. 8,000 sqm GIA) to activate the streetscape, facilitating the City's strategic objective to implement Destination City:** The LWW Proposals do not deliver a like for like replacement of cultural floorspace on the LWW Site. The BQA highlight in this statement that Destination City is currently under review.
- 129. **The overall quality of the development and proposals offer would attract visitors, increase tourism, support and improve worker productivity and enhance the image of the area.** The BQA query how this statement can be qualified/evidenced by the CoLC. This statement could equally be true of any other reuse or redevelopment of the LWW Site.

*Environmental Benefits*

- 130. **Delivery of world class public realm and new open spaces:** The BQA do not consider the public realm and new open spaces to be provided by the LWW Proposals to be 'world class'. The BQA note that no environmental benefits are promoted in relation to the design of the new buildings within the LWW Proposals. The BQA consider that the design is not beautiful or attractive as sought by the NPPF and indeed the design is flawed as set out in this statement.
- 131. **Deliver highly sustainable development targeting BREEAM "Outstanding", delivering significant carbon dioxide reductions through implementing new efficient all electric plant and renewable technologies to improve energy efficiency and reduce greenhouse gas emissions:** The BQA consider this to be a planning policy requirement. Reduced impacts on the environment could similarly be achieved through the retrofit and reuse of the existing buildings or through reduced development of the LWW Site.
- 132. **Helping to facilitate the implementation of the fifth generation Citigen Network by providing space at basement level for new equipment to unlock the upgraded heating network:** The BQA query why this could not be delivered now, given that the CoLC are landowner.
- 133. **Implementation of Air Quality Positive measures within the scheme design in order to maximise benefits to local air quality in and around the site whilst also minimising exposure to existing sources of poor air quality:** The BQA consider this to be a planning policy requirement. Detrimental impacts of the development relating to air quality must be mitigated.



134. **Implementing a net waste positive approach to demolition of the buildings to support the circular economy:** The BQA consider this to be a planning policy requirement. A greater net waste positive approach would be to retrofit and reuse the existing buildings on the LWW Site.
135. **Delivering substantial new areas of public realm within the masterplan, including the landscaped Glade, including soft landscaping (including 98 trees, a net uplift of 71) and green open spaces; and as a result significantly increasing biodiversity and ecology across the site:** The quality of the open areas and landscaping proposals is not agreed by the BQA.
136. **Delivering significant urban greening measures on the buildings themselves.** The BQA consider the requirement to achieve urban greening improvements a planning policy requirement. Whilst the principle of this benefit is accepted, there is no assessment of the UGF score for the LWW Site as it exists compared to the UGF score of 0.41 for the LWW Proposals.
137. **Provision of alterations to the roadway to create a better experience for pedestrians and cyclists and provision of a short stay cycle hub. It would deliver growth in a highly sustainable location which will assist in the delivery of the City of London’s Transport Strategy, assisting in creating sustainable patterns of transport:** The BQA have identified significant concerns with the proposed transport proposals.
138. **Delivering a sustainable servicing strategy which includes off site consolidation:** The BQA raise significant concern in relation to the servicing strategy for the LWW Proposals and consider the use of the Aldersgate Street ramp as a single entry/exit route to be a design flaw that will have serious detrimental impact on the local residential community as users of this access.

**Planning Balance**

139. The NPPF (December 2023) states (at paragraph 11):  
*“Plans and decisions should apply a presumption in favour of sustainable development..... for decision-taking this means:*
- c) *Approving development proposals that accord with an up to date development plan without delay; or*
  - d) *Where there are no relevant development plan policies or the policies which are important for determining the application or are out of date, granting permission unless:*
    - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
    - ii. *Any adverse impacts of doing so would significantly and demonstrable outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*
140. At paragraph 20.13 of the Planning Statement submitted with the planning application for London Wall West, Gerald Eve comment:





*“It is considered that the Proposed Development complies with the Development Plan when considered as a whole and that other material considerations weigh in favour of the scheme. Any perceived harm arising from the Proposed Development is greatly outweighed by the public benefits. Accordingly, it is considered that the planning permission and listed building consent should be granted for the Proposed Development.”*

141. It is our view that this is not a full and considered planning balance assessment and as such cannot be relied upon. A full and proper planning balance assessment would thoroughly consider the following six questions:

Do the proposals comply with the Development Plan?

Do the proposals give rise to any harm to heritage assets, having applied a heritage balance?

Do the proposals give rise to any other harm?

Are there material considerations which should be weighed in the balance?

Do the benefits of the proposals outweigh any harm that has been identified?

Considering the Development Plan and the NPPF as a whole, are there factors to bring about a different conclusion?

142. Appendix G to this statement sets out the relevant planning policies of the Development Plan which are not referenced at all within the submitted Planning Statement and so have not been considered. This statement has already set out that the LWW Proposals do not comply with the Development Plan in a significant number of areas.

143. Mr Forshaw has concluded that the proposals cause widespread harm to a large number of heritage assets, including the complete loss of two undesignated heritage assets. He explains that harm to these assets, whilst less than substantial, is to such a degree that it will considerably erode and harm their significance. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere.

144. This statement has also identified a number of other harms as follows:

Impacts to the daylight levels received by neighbouring buildings;

Harm to the area’s prevailing character and setting;

The loss of cultural facilities;

Significant and avoidable increases in carbon emissions;

Impacts on townscape;

Impacts on local amenities by way of transport movements;

Overshadowing of public realm.

145. Other material considerations that we have identified to be weighed in the balance are as follows:

There is no adopted vision to promote significant office growth within this part of the City.

The emerging City Local Plan is at an early stage and therefore its policies only have limited weight at this stage.



There is a housing crisis and the opportunity to deliver much needed housing in this part of the City has been lost. This area is considered compliant with Policy DM21.2 of the adopted Local Plan which states that new housing will be provided in the City in or adjacent to identified residential areas, such as the Barbican, provided that this does not prejudice the business function of the City.

Market testing has identified other options for the LWW Site which would avoid the need for demolition, the identified harms and the increase in carbon emissions which the planning application proposals would create.

146. In the section above, we have commented on the public benefits, as identified in the submitted Planning Statement. In short, we do not agree with many of the asserted benefits.
147. Overall, we do not consider that the public benefits outweigh the harm that the proposals would bring to heritage assets and in relation to other matters, the failure to comply with a number of policies of the adopted Development Plan and the clear guidance in the NPPF as a whole to deliver beautiful and attractive development, in accordance with the prevailing character of an area.
148. As a result, it is our overall conclusion that planning permission should be refused for this proposed development.

## **Conclusions**

149. In light of the comments set out above, the BQA object to the planning applications and consider the applications should be refused.
150. As referred to above, this statement (and appendices) set out BQA's concerns and objections to these planning applications to date. The planning application documentation is extensive and detailed and so BQA may submit further comments. They will, however, not procrastinate in this regard, and will ensure that any follow-up comment is submitted as soon as they are able. In addition and notwithstanding, the comments below refer to the inadequacy of some of the planning application documentation, and so BQA will wish to review and potentially comment on any further amended documentation submitted to rectify these inadequacies.

**Appendix A: BQA letters submitted to the CoLC at pre-application stage**

**Appendix B: Embodied Carbon Review by Targeting Zero**

**Appendix C: BQA review of DAS by Jan-Marc Petroschka**

**Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka**

**Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw**

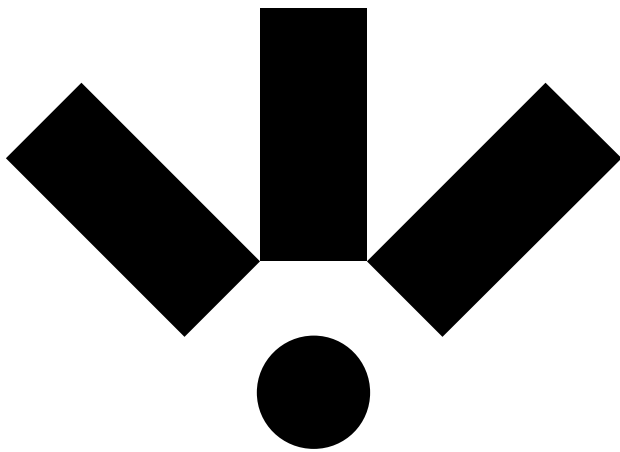
**Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Horne**

**Appendix G: Planning Policy Review table by CarneySweeney**



APPENDIX A





# BARBICAN QUARTER ACTION

On 24<sup>th</sup> October a letter was sent to many residents from Christopher Hayward, Chair of the Policy and Resources Committee of the City of London. In this letter, he maintains that the decision to marginally reduce the size of the London Wall West development is a response to 'consultation'.

Barbican Quarter Action (BQA) is publishing this open letter as a response and rebuttal of most of the content of Mr Hayward's missive. Please take a moment to read this and also to visit [www.londonstartshere.co.uk](http://www.londonstartshere.co.uk) where you can sign up to the campaign and see Mr Hayward's letter.

If you have skills and time to offer, especially in web updating (Square Space), social media, planning and architecture, the time to deliver messages like this through letter boxes, please get in touch via the website. We welcome your support.

## OPEN LETTER FROM BQA TO POLICY CHAIR, CHRISTOPHER HAYWARD

Dear Mr Hayward,

We refer to your letter to residents dated 24<sup>th</sup> October 2022. In line with previous communications from your office, there are a number of issues in this letter which are misleading or misguided. In the interests of clarity, we have highlighted below claims made by you and/or your advisors which simply do not stand up to scrutiny.

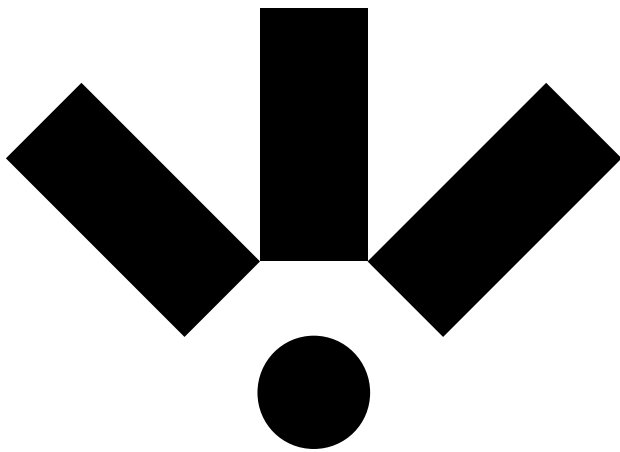
## CONSULTATION AND CONCERNS

You write that following consultations, the width of the proposed buildings has been reduced by two and three metres respectively. By omission you imply that mass and scale are the sole grounds for the hundreds of objections you received. However, many of the comments submitted were copied to our campaign email address. Those comments focus, amongst others, on the environmental impact, on damage to town and streetscape and adjacent listed heritage assets, and on lack of a cultural strategy. The barely perceptible reduction in girth does nothing to reduce the actual impact of the scheme and nor will it address real concerns raised in consultation.

## SUSTAINABILITY

Furthermore, it is perplexing that you would describe the new office space as sustainable. The 40,000kts of CO<sub>2</sub> undermine the accuracy of that claim. The 'demolition first' approach adopted by your office is, however, unsustainable and will contribute to global heating. Your officers and engineering advisors, Buro Happold, have accepted that your Whole Life Carbon Assessment Report (May 2022) which set out to justify the decision to demolish, is misleading and should be rewritten. The faulty report should be withdrawn.





# STOP. RETHINK. RESET.

## THE CITY'S EXPLORATION OF RETENTION OF EXISTING BUILDINGS

The City has not considered retention and retrofitting of all buildings. This was confirmed in the Stagg/Sturgis reports and by your advisors. All buildings at some point require work to bring them up to modern standards and these fine buildings, designed by world leading architects, will respond very successfully to retrofit as Bob Stagg confirmed in his report. Therefore, it is clear from independent experts that the buildings on the site could be retrofitted and repurposed.

## FEASIBILITY OF THE SCHEME AND FINANCIAL PLANNING

Given that no economic appraisals for any of the City's major projects have been carried out, it is difficult to claim that unless the building is of a minimum size that it is not feasible. The £50m sum raised will have little impact on the black hole in the City's finances and its attempt to fund its current projects. That £50m fails to take into account the demolition costs. Apparently reckless financial planning and over-committing to projects have resulted in claims at the Court of Common Council on 13<sup>th</sup> October 2022 that the City is at risk of going bankrupt. This is an unprecedented situation, the responsibility for which lies squarely with those continuing to promote these schemes without a comprehensive business plan or risk assessment. The waste of funds in pursuing these schemes suggests that the decision-making process in the Guildhall is contributing to the gaping hole in the City's coffers.

## A VIABLE FUTURE AND A CULTURAL STRATEGY

On 21<sup>st</sup> July 2022, you confirmed that no other cultural option for the site had been considered since the Centre for Music. What was to be a world class concert hall became overnight an office development. The element that you claim will be dedicated cultural space is not guaranteed. The City requires footfall seven days a week. Office workers have not returned to pre-Covid levels. However, small and medium-sized enterprises will not survive if footfall does not return. The LWW site seems an obvious site for a major cultural anchor that will see visitors from far and wide, generation after generation making multiple visits. Whatever the future of this strategic site, it must play a key role in any cultural strategy for the City. The City is falling behind its global competitors. This City needs a visionary cultural strategy now.

Again we ask the City to stop, rethink and reset plans for London Wall West. Do not demolish - retrofit and repurpose based on expert advice. This makes sense financially and environmentally and can make the City more competitive.

Adam Hogg and Averil Baldwin, Co-Chairs of Barbican Quarter Action

<https://www.londonstartshere.co.uk>

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To Chris Hayward  
Chairman of the Policy and Resources Committee  
City of London Corporation  
Guildhall  
Aldermanbury  
London EC2V 7HH

23 June 2022

## LONDON WALL WEST – RESPONSE TO PROPOSALS PUBLISHED 18 JUNE 2022

### OVERALL COMMENT

We are dismayed that the fundamentals of the proposed design remain the same as those we saw last December. The scheme proposes the demolition of Bastion House and the Museum of London. In their place is planned a huge office-led development of some 780,000 sq. ft, including two massive new towers, with limited cultural and green space. The scheme is wholly inappropriate for a site of such significance, both in its physical form and in terms of its proposed usage. Moreover, it undermines the City's desire, as expressed in Destination City, to be one of the world's premier destinations through its cultural offerings.

### OUR OBJECTIONS

We have been told repeatedly that the principal objective of the proposed development is to raise funds – for the move of the Museum of London and other City projects. By focusing on this objective, the City will:

Ignore the site's rich history, which features the Romans, Shakespeare, and John Wesley and many other historical features. The opening up of the Roman Fort Gate will be severely diminished by its commercial setting.

Sacrifice the site's public cultural heritage: as the home of the Museum of London for 50 years and the previously intended location of the world-class Centre for Music. It remains the Southern gateway to Culture Mile linking the South Bank and Tate Modern to St. Paul's Cathedral and beyond.

Confront visitors instead with a huge commercial development, with a cultural offering representing just over one per cent of its space.

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Compromise the nature and architectural integrity of the Barbican Quarter. The Barbican is world-renowned and one of the City's major post-war achievements. The Museum complements the public benefit of the Barbican while Bastion House reflects its admired Brutalist design. The new proposals include little in the way of public benefit while the height and mass of the buildings will dominate and diminish the surrounding neighbourhood.

Undermine many of its own policies and statements: the draft City Plan; the Open Space, Responsible Business and Climate Change strategies; the aims expressed in Destination City and the desire for the City to be a cultural hub, as expressed in the Barbican/Golden Lane Strategy .

There are also questions concerning the scheme's compatibility with the National Plan and the National Planning Framework . How can the City ask others to respect its policies if it fails to do so itself?

#### THE CITY'S CLIMATE CHANGE STRATEGY

It is now widely agreed that, because of the devastating impact of carbon emissions on global warming, and the large proportion of carbon emissions resulting from major construction projects, serviceable buildings should not be demolished if re-fitting them is a feasible alternative. Our polling showed that 88% of Barbican residents opposed demolition of Bastion House and the Museum of London. However, the Whole Life Carbon Assessment report prepared by the City's project team dismisses the option of retaining Bastion House without providing the necessary factual evidence. The judgement is based on a hypothetical assessment of risk rather than a full structural survey.

Moreover, if the scheme were to go ahead in its current proposed form, it would add over 45,000 tonnes of CO<sub>2</sub> to the atmosphere during the demolition and construction phases. This is more than the entire CO<sub>2</sub> annual output of the City Corporation's operational activities. How would this be compatible with the City's stated aim of achieving Net Zero in its own operations by 2027?

#### THE CONSULTATION PROCESS

The City has stated its *commitment to transparency and delivering a robust consultation process*. We have commented elsewhere that this is far removed from our experience. Above all, the City has failed to engage with local stakeholders





on the fundamental issues about the site as recommended by the National Planning Policy Framework.

While the Project Team has specified the nature of the consultation undertaken to date and highlighted the key concerns that arose (the height and mass of the proposed buildings, and issues of sustainability) they have provided *no information whatsoever* on the extent of those concerns, and why so little has been done to address them. We can only assume that the City's failure to provide us with detailed information is because there is widespread opposition to these proposals.

In addition, the Project Team's graphics are selective and misleading. There is little assessment of the scheme's impact on the Barbican Estate and neighbouring conservation area. No 3D models demonstrating the full scale of what is proposed have been made available although we know they exist and their availability for stakeholders is encouraged in the London Plan .

We urge the City to live up to its commitment to transparency and consult meaningfully with the local community. The current process falls far short.

### CONCLUSION

This remains a short-sighted proposal, lacking vision and apparently driven solely by the desire to raise money. Furthermore, the intention to enter into a long lease with a developer carries the risk that even the limited public benefits of the proposal would later be jettisoned by the developer.

As our polling showed, there is no evidence the scheme has the support of the local community. It is contrary to many of the City's own policies. This is an outstanding site crying out for an imaginative scheme respecting its heritage and location. We once more invite the City to stop, think again, and work with us and the wider community to develop a scheme worthy of the site, the City and London itself.

Adam Hogg and Averil Baldwin Joint Chairs Barbican Quarter Action

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To Policy Chairman  
Chris Hayward

Wednesday, 12 April 2023

Dear Chris,

#### EXPLORING THE POTENTIAL TO REFURBISH THE LONDON WALL WEST SITE

Thank you for your letter of 3 April stating that the City Corporation will explore the potential to refurbish the London Wall West (LWW) site. We very much welcome this move.

As you know we object to the demolition of the former Museum of London and Bastion House on a number of grounds. Foremost amongst these is climate change. The demolition of the existing buildings and consequent redevelopment of the site would result in more carbon emissions than other options. Exploring alternatives is not only in line with your new guidance to developers, but essential in our view.

We also object to demolition because these are fine buildings, of pioneering design and high quality, capable of being successfully adapted and retrofitted. You refer in your letter to “a real desire locally for these buildings to be retained” but of course objection is not confined to the locality. Significantly, the Twentieth Century Society has included these buildings in its list of the 2023 top ten most threatened buildings across the UK. It calls for them to be retained, refurbished and adapted.

We question, however, whether by seeking interest in LWW on its own, an opportunity to maximise interest and value might be lost. The New Museum, The Arts Centre renewal, and the potential afforded by Smithfield East and LWW, provide the City with an opportunity to create a world-leading centre for the creative industries. Seeking interest to develop Smithfield East and LWW, with clarity on dates for vacant possession, might have greater appeal to prospective developers.

Finally, there is the time-scale. Seven weeks which include four Bank Holidays seems a short period in which to ask for expressions of interest. This is a site with complex buildings in a difficult urban setting. Retention of buildings may require significant adaptation, and targeted demolition and extension. We have never argued that narrow refurbishment is the only solution. More time and encouragement to develop alternative creative options for the buildings, the site and its surroundings might be desirable.

Thank you for the invitation to meet. Averil and I welcome the opportunity to discuss in detail the points raised above. Can you offer us some dates in the near future?

Yours sincerely,

Averil Baldwin, Adam Hogg  
Co-Chairs Barbican Quarter Action

15 June 2023

To Chris Hayward, Policy Chairman City of London  
CC Paul Wilkinson, City Surveyor; Andrien Meyers, Chairman Investment Committee

## LONDON WALL WEST

We are writing to congratulate you, and the officers involved, on the recent soft market test to establish the level of interest in repurposing the former Museum of London and Bastion House buildings for new uses. As you know we have long campaigned for the City Corporation to rethink its plans for this site and seriously consider retention and reuse options, not least in response to the City's bold net-zero commitments.

We celebrate the market testing and wholeheartedly endorse any responses to the redevelopment of this site that clearly demonstrate:

- a true sense of vision and imagination for this outstanding historic and cultural site,
- that the current buildings at London Wall West are adaptable to many uses,
- a track record in creative, sustainable and viable refurbishment.

While we celebrate the City's actions in creating the soft market testing, we believe the process to have been seriously constrained, not least in providing just 31 working days to meet an extremely demanding brief and submit proposals. So, we are delighted to learn that developers have enthusiastically seized the opportunity and created proposals despite these constraints. This surely demonstrates that there is an appetite for retaining, repurposing and refurbishing these fine buildings; now included in the Twentieth Century Society's 2023 Risk List of the top ten most threatened in the UK. Moreover, it also demonstrates that fuller and more proactive marketing should generate valuable interest.

We hope the City's Investment Committee will now give these proposals the due attention they deserve and acknowledge that there are viable alternatives for the development of this exceptional site. Proposals that:

- are fit for the future of an ambitious, vibrant and diverse Destination City,
- reflect the potential and opportunities for cultural, creative and learning use of the site,
- demonstrate commitment to climate action and publicly underline the City's own innovative environmental planning policies should be prioritised.

We believe that retention and reuse options can represent best value for the City and enhance its reputation on the national and world stage.

We also hope that the next stage of decision making for options for the site will meaningfully involve the local community, in establishing any developer brief as well as the process for development. This would greatly enhance the intentions of the Residential Reset that you have championed. As you know, we have repeatedly said this campaign is not anti-development and is keen to offer our skills, insights and experience to work with you and your colleagues to create a valuable and truly future facing possibility for the site.

Adam Hogg  
Co-Chair, Barbican Quarter Action

7 November 2023

Chris Hayward  
Policy Chairman  
City of London Corporation.

Dear Chris,

### OPEN REPLY TO YOUR LETTER OF 29 SEPTEMBER 2023

We refer to your letter dated 29 September 2023 which you sent by email to us on 4 October 2023. There are substantive issues raised in your letter which merit further clarification. We make the following observations on the statements in your letter, with references being to paragraphs therein:

1. We note your intention to submit a planning application for the redevelopment of London Wall West and associated listed building consent (paragraph 1).
2. You claim that the decisions of the Policy and Resources Committee on 21 September 2023 and the Investment Committee meeting on 22 September 2023 to proceed with a planning application are in keeping with your *"duty to achieve best consideration"* (paragraph 2). Please provide without delay a copy of the background papers which informed those decisions. Given that the papers relate to the development of land owned by the Corporation we are advised that the Corporation is not entitled to withhold disclosure of the background papers on the grounds that they contain commercially sensitive information.
3. At the City-wide residents' meeting on 15 June 2023, you publicly stated that when assessing best value for the site a range of factors in addition to financial would be taken into account, including sustainability and the quality of the buildings. Please set out how you have taken these factors into account in your decision to proceed with the scheme.
4. You claim that the City Corporation is under a legal obligation to extract *"the maximum financial return"* for the site and that this equates to the *"best consideration"* (paragraph 3). Please explain how the City Corporation has on this occasion reduced the definition of best consideration to just the financial return. We note that this narrow interpretation was not applied in 2015 when the City Corporation agreed in principle to make the site available for a new Centre for Music, at the same time commenting on the site's strong cultural potential. Similarly, the vast sums spent on the development of the Justice Quarter were committed without an economic appraisal.
5. We note that while you rely on legislation in relation to your *"best consideration"* argument, that you fail to address the other element which the legislation imposes on local authorities, namely *"the best use of the land"*. The legislation does not allow local authorities to cherry-pick its provisions to promote its own schemes. We note that you do not mention that environmental issues have been considered at this or at any stage of the decision-making process. We challenge your contention that building more massive glass office blocks is the best use of the land. Working habits including working from home mean that office workers no longer come into the City five days a week. This does little to regenerate areas and promote footfall 5-7 days a week. The absence of a coherent current culture strategy for the City means that the use of the site as a cultural hub is not being considered as an alternative to a space that is office-led.
6. We note it is your intention to obtain planning permission from your own Planning & Transportation Committee before selling the site on for development by a third party (paragraph 4).

7. You claim to have listened to concerns about your proposal to demolish the buildings (paragraph 5) and that you have reduced the scale of the scheme accordingly. Your scheme is supported by a report by Buro Happold (and others) that claims that the buildings are at risk of disproportionate collapse. We note that you have not withdrawn that report despite its findings being discredited by BOA expert, Bob Stagg. We also note that the carbon emissions calculations set out in that same report were also discredited by BOA's carbon expert, Simon Sturgis. We note that no independent third-party review of the Buro Happold report has yet been published in line with the City's much hyped Carbon Options Guidance Advice Note.
8. We note that you confirm that the soft market test carried out this year proved successful. The credible responses (your words) were submitted despite the mere 31 working days available to applicants to complete a detailed proposal (paragraph 5). We note that you have decided not to pursue these credible responses and let the market decide the future of the site (paragraph 5). We remind you that earlier this year you wrote to residents, acknowledging a real desire locally for the former Museum of London and Bastion House to be retained. You said that you had listened to them and wanted to explore the possibility of a viable alternative to demolition. Having explored this possibility and, despite credible responses, you have decided once again to not seriously consider full retention options.
9. In explaining your decision to proceed, you make no reference to the recent shifts in planning policy at both national and local level prioritising retention of buildings for re-use and retrofit above demolition. For example, the Corporation's own Whole Life-Cycle Carbon Optioneering Planning Advice Note, and its draft City Plan 2040, which states (paragraph 12.1.15) *"As new developments are large consumers of resources and materials the possibility of sensitively refurbishing or retrofitting buildings should be considered in preference to demolition..."*.
10. Similarly, your explanation fails to take into account the decision by the Secretary of State, Michael Gove, on 20 July 2023 to refuse planning permission for the demolition of 456-472 Oxford Street. There are many parallels with London Wall West (environmental and heritage impact). A key consideration in his decision is whether retention options had been fully explored. We note that in the case of London Wall West full retention options have not and are not being actively considered.
11. Your explanation fails to take into account the heritage value of the two non-designated assets on the site. The inclusion of both buildings by Powell & Moya on the Twentieth Century Society's (the statutory consultee) 2023 buildings at risk register on account of the quality of their design and construction is significant. We note that at no point do you address the impact of demolition on these heritage assets.
12. You state that all options remain on the table and that ultimately it will be the market that will decide the optimum use of the buildings and occupancy mix. For the reasons set out above, we question the decision to proceed with a planning application allowing demolition. There already appears to be sufficient market interest to retain and retrofit these buildings in a manner reflecting the location and history of the site, at the same time securing a decent financial return for the City.

We therefore look forward to learning more about the rationale behind a decision which appears to contradict earlier commitments, disregards current planning policy and precedent, and ignores evidence of an appetite to retain and adapt the former Museum of London building and Bastion House.

Best wishes,

Adam Hogg and Averil Baldwin  
Co-Chairs, Barbican Quarter Action

22 November 2023

Christopher Hayward  
Policy Chairman  
City of London Corporation

Cc: Paul Wilkinson, City Surveyor;  
Gwyn Richards, [Planning and Development Director](#)<sup>1</sup>.

Dear Chris,

**LONDON WALL WEST (LWW)**  
**PRE-APPLICATION: A GLARING LACK OF CONSULTATION AND TRANSPARENCY**

## SUMMARY

The purpose of this letter is to ask you to withdraw the planning application for LWW because the City has failed to:

- Consult properly in line with both National Planning Guidance and your own Statement of Community Engagement;
- Fulfil the specific commitments you made in 2022 for further engagement in advance of the submission of the planning application;
- Follow the City's own [Carbon Options Guidance PAN](#)<sup>2</sup>.

We note that you have now submitted full planning applications for LWW to your Planning Department, which you state follows over two years of consultation. We have also seen the recent exchange of correspondence with Fred Rodgers, City resident, in which Paul Wilkinson, City Surveyor, claimed that the City considers it *"has engaged extensively with residents and key stakeholders."*

We are advised that these engagements to date fail to fulfil your obligations regarding consultation on the submission of this planning application. We ask that you review this application immediately to ensure that genuine *"ongoing consultation"* in pre-application is respectful, open, reasoned, and meaningful engagement and to fulfil previous public commitments you have made.

## HOW THE CITY CLAIMS THAT IT COMMITS TO CONSULT ON PLANNING APPLICATIONS

*"The City is committed to early and ongoing consultation engagement on planning applications. This means working with developers, local residents and other stakeholders from the earliest possible stage of the development process until the submission of an application to shape and guide the development proposals that are most suitable in their context. The pre-application process requires respect and understanding for stakeholders' interests, open, accessible and reasoned communication, and informative and meaningful engagement."* (The City's Statement of Community Involvement, May 2023, Pre-Application Advice, Consultation and Engagement, Paragraph 4.8 ff.)



## WHAT “CONSULTATION” HAS ACTUALLY TAKEN PLACE

There were just two rounds of public consultation. A two-day exhibition of sketch proposals took place in December 2021. In June 2022 the second and last consultation on the same scheme with more detail included a two-day exhibition at Frobisher Crescent, a one hour-long pop up event at One New Change on a day of industrial action, and another one at St. Luke’s Community Centre.

The quality of the presentation material resulted in obfuscation of the proposed development, contrary to good practice as outlined in the City’s own Statement of Community Involvement and Developer Engagement Guidance. In particular:

- Despite repeated requests for a physical model to allow an assessment of the impact of the impact of the scheme, no model was ever produced or shared;
- No material other than sketches, artists’ impressions and a computer-animated 3D fly-through were presented;
- Despite repeated requests to show the scheme in context, no scaled architectural drawings of the proposal in relation to adjoining buildings and especially the listed buildings of the conservation area were ever shown whether in plan, section or elevation.

## WHAT WAS THE RESULT OF THIS CONSULTATION?

We see no evidence of the City using resident feedback to shape and guide the development proposals. We were told by the communications agency that managed the initial, extremely limited consultations that the responses were overwhelmingly negative and this was confirmed by the series of very well-attended public meetings convened by BQA. Thus “*consultation*” has not been open, accessible and reasoned communication nor informative and reasoned engagement.

On the other hand, too often it has been inadequate and misleading, as instanced by:

- The consultation response, which resulted in marginal reduction in girth of the two towers but failed to address widespread criticisms of the scheme’s fundamental nature, made both locally and in the national press and media. These criticisms included environmental impact, damage to town and street-scape, impact on adjacent heritage assets and conservation areas and a lack of cultural strategy.
- No further consultation on the detailed design of the marginally modified scheme as promised. Indeed, no further engagement whatsoever, despite a City press release of 20 October 2022 announcing - “*The scheme’s design team will now amend the design and prepare a 3D model so a final proposal for London Wall West can be presented next year, ahead of submitting a planning application*”.
- No direct communication with residents since April 2023, when you acknowledged a real desire locally for the retention of the former Museum of London building and Bastion House. You said that you had listened to these calls and wanted to explore the possibility of a viable alternative to demolition. You referred in that letter to the City’s new policies urging developers to consider alternatives to demolition.
- No feedback on the results of the subsequent soft market test, in which developers were afforded a mere 30 days to respond, other than comments that it had been successful and that there had been what you described in a public meeting as “credible” expressions of interest. Where is the evidence



that options for retaining existing buildings have been fully explored before proposing substantial demolition? Where have you shown that the benefits of demolition clearly outweigh the benefits of retaining the existing buildings? These requirements are described in your own planning advice note on Whole Life-Cycle Carbon Optioneering (Pre-Application stage, page 16 ff.).

## CONCLUSION

The timing of the submission of this planning application is indicative of the City's approach to consultation and avoidance of scrutiny: over the festive holiday season levels of engagement with stakeholders including City residents will be predictably at their lowest.

A Barbican resident has just commented to us that in his view *"the process of consultation has been dead for over a year"*. We question whether it ever properly existed. We now call on you to withdraw the planning application in order to fulfil:

- The consultation commitments made in the City's Statement of Community Engagement; and
- The specific promises you made last year to present the final proposals for LWW, to include a 3D model, ahead of submitting a planning application.

We look forward to your urgent response.

Best wishes,

Adam Hogg and Averil Baldwin  
Co-Chairs, Barbican Quarter Action

Corrections post submission:

1. Gwyn Richards is Planning and Development Director, not Interim Chief Planning Officer as in original letter.
2. Carbon Options Guidance PAN superseeds the Whole Life Carbon Optioneering Policy mentioned in the original letter.

APPENDIX B



# London Wall West – Museum of London and Bastion House

Planning Submission Ref: 23/01304/FULEIA

## Embodied Carbon Review

*on behalf of*

## Barbican Quarter Action

17 January 2024

**Contents:**

- 1. Executive Summary and Key Findings**
- 2. UK National, GLA, and City of London Planning Policies**
- 3. Conclusions on Planning Issues**
- 4. Options Appraisal**
- 5. Conclusions on Optioneering**

## 1. Executive Summary and Key Findings:

- 1.1. This report examines the City of London Corporation's (CoLC) planning submission for London Wall West, the Museum of London and Bastion House (23/01304/FULEIA) examining in particular at the carbon/net zero and circular economy issues. The submission proposals follow the initial CoLC London Wall West Whole Life Carbon Assessment of May 2022. The submission represents a modification of the May 2022 proposals.
- 1.2. In April/May 2023, the CoLC undertook a Soft Market Test, inviting developers to put forward detailed proposals that would retain and adapt the existing buildings on the London Wall West, the Museum of London and Bastion House site. The CoLC received a number of credible and viable proposals for a '**major refurbishment**' of the existing buildings. These proposals not only met the CoLC's commercial requirements, but also met a whole range of UK, GLA and CoLC net zero, retrofit, and carbon policies for this site. (see section 2 below).
- 1.3. This report looks at the policy environment in which the submission has been made in respect of the UK's commitments to achieve net zero by 2050, 78% reductions (compared to 1990 levels) by 2035, and 68% reductions (compared to 1990 levels) by 2030.
- 1.4. **Key Finding:** There are significant and growing policy requirements at UK National, GLA and CoLC levels to assist the UK meet its net zero carbon targets and move towards a circular economy. The submitted proposal is not optimising the carbon emissions impacts of developing this site, and as a result is in direct opposition to UK National, GLA policies, as well as the CoLC's own policies. (see sections 2.1-2.7 below)
- 1.5. **Key Finding:** As recently as 12<sup>th</sup> December 2023 the CoLC approved new sustainability guidance for developers in a 'huge step' towards net zero, covering retrofit and reuse, energy and whole life carbon, the circular economy. This proposal effectively ignores this new guidance (see section 2.7 below)
- 1.6. **Key Finding:** There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to 6 options selected for detailed examination. These 6 options excluded 'Option 2', for a 'Major Refurbishment'. This is 'Option 2' is the option that is most consistent with the approach favoured by the commercial bids in the City's market testing exercise. **Why was this then excluded?**
- 1.7. **Key Finding:** The conclusion of the current 2023 submission and the associated optioneering studies is exactly the same as the May 2022 proposal, i.e. that a 'major refurbishment' approach is to be rejected in favour of 'new build'. This demonstrates that the latest optioneering exercise is purely 'window dressing' to prove a pre-

ordained choice (new build), and that a ‘major refurbishment’ option has not been seriously investigated by the design team in detail as ‘new build’ was always the intended outcome.

- 1.8. **Key Finding:** If the CoLC proceeds with this new build development proposal, at the expense of the refurbishment route for which they have received viable commercial proposals, then the CoLC will be in direct conflict with their own latest guidance and policies. (see sections: 2.4.4 - 2.4.8, 2.6, below).
- 1.9. **Key Finding:** By ignoring their own policies and guidance with respect to net zero, the CoLC is demonstrating to the global commercial property and investment market that they do not consider these issues to be important which puts the CoL at a commercial disadvantage to European competitors who take carbon reduction more seriously.
- 1.10. **Key Finding:** Unless the levels of carbon emissions achieved and reported in the submission’s GLA reporting template are ‘locked into’ the scheme and become legally binding they are likely to be abandoned by any site purchaser, which means that the figures achieved by the proposal are effectively meaningless.

## 2. UK National, GLA, and City of London Planning Policies

This section identifies those key policies at National, GLA and City of London level that prioritise retention and reuse, i.e. resource efficiency, circular economy and retrofit vs demolition, disposal as waste, and new build. It is important to note that at all these levels of national and local government, change is happening fast to ensure legislation and regulation adapt to meet the overarching requirements of a net zero and circular economy.

The proposed scheme has a current completion date of 2033 which is 9 -10 years away, and we can expect that the level of regulation in relation to the Government’s legally binding commitments on climate change will only increase.

### Government Trajectory to Net Zero

- 2.1.1. The UK Government is legally committed to achieving Net Zero by 2050, 78% reductions by 2035, and 68% reductions by 2030, both compared to 1990 levels. These are already demanding with the completion date well after the first

milestone. **Already the pressure to retrofit rather than to build new is increasing and this is likely to accelerate, e.g. Secretary of State decision on M&S, Oxford Street.**

2.1.2. In support of the UK's downward carbon emissions trajectory, the 'Industrial Decarbonisation Strategy 2021', Action 5.5: Page 64, States the following:  
*"Increasing resource and material efficiency in practice means keeping products and materials in circulation for longer through circular economy approaches such as reuse, repair, recycling and reducing the quantity of materials used within manufacturing. This transformative approach, tackling both consumption and production related efficiency, reduces emissions at all stages of a product's lifetime."*

2.1.3. The UK Government's 'Net Zero Strategy: Build Back Greener', Department for Business, Energy and Industrial Strategy (BEIS) 2021 states the following:

Technical Annex, Item 81 states: *"Resource efficiency policies will have a net benefit to pressures on raw material availability, reducing raw material demand and consumption. Moving towards a circular economy, where priority is placed on extending the lifetime and lifecycle of a product through sharing, reusing, repairing, redesign and recycling, is likely to have a positive impact"*.

Resources and Waste, Item 47 p180. states: *"Government is committed to moving to a more circular economy. This means keeping built assets, products, and materials in use for longer, including through repair and reuse, and making greater use of secondary materials, thus reducing waste arising."*

Resource Efficiency, Item 47 p130. states: *"Resource efficiency measures reduce emissions from industrial processes by keeping products and materials in circulation for longer by way of reuse, repair, remanufacture and recycling as well as reducing material usage. These activities enable the retention of value, and in some cases the creation of new value for both the producer and customer, at a much-reduced environmental impact."*

Resource Efficiency Item 53 states p130: *"To realise the wider emissions saving potential of resource efficiency measures will require establishing frameworks which minimise virgin resource use and maximise recycled, reused, or remanufactured content."*

**All of the above four extracts are clear about: "minimise virgin resource use" "extending the lifetime of a product" through "reusing, repairing" and keeping "materials in use for longer". This is a clear and unambiguous call for a change in direction where existing buildings are involved.**



## 2.2. National Planning Policy Framework

- 2.2.1. Chapter 2 of the NPPF advises that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 2.2.2. Paragraph 8 of the NPPF confirms that there are three dimensions to sustainable development – economic (building a strong, responsive and competitive economy); social (providing a sufficient number and range of homes to meet the needs of present and future generations and fostering well-designed, beautiful and safe places); and environmental (**protect and enhance our natural, built and historic environment**).
- 2.2.3. Paragraph 157 states that the planning system should support the move to a low carbon future in a changing climate and that: *“It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; **encouraging the reuse of existing resources, including the conversion of existing buildings**”*.

## 2.3. GLA London Plan and Policies SI2; Whole Life Carbon, and SI7 Circular Economy (CE):

- 2.3.1. GLA Policy SI2, Principle No.1 p4: ***“Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option”***.
- 2.3.2. The submission quotes GLA Policy SI7, for example: *“Resource conservation, waste reduction, increases in material reuse and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration”*,
- 2.3.3. But the submission, unsurprisingly, does NOT quote GLA Policy SI7 para 1.1.3: ***“prioritising the reuse and retrofit of existing structures, can promote CE outcomes.”***
- 2.3.4. The submission also quotes the following from GLA Policy SI7: *“Meet or exceed the targets for each of the following waste and material streams:  
Construction and demolition – 95% reuse, recycling or recovery  
Excavation – 95% beneficial use”*.

**It should be noted that these commitments are routine from most contractors and do not therefore represent anything additionally beneficial.**

2.3.5. The submission states the following (Circular Economy Statement, p18):

*“Overall, there are strong aspirations to adopt circular economy principles in development projects including its operations, therefore the Applicant is committed to circular economy principles within the Site and to lead by example”.*

*This is ironic as the most ‘circular’ activity possible on this site is to reuse and refurbish the existing buildings, so the ‘Applicant’ i.e. the CoLC, is NOT meeting these requirements nor can it be said to be ‘committed to circular economy principles or leading by example’.*

2.3.6. GLA Policy SI2, Item 3.1.3: *“If substantial demolition is proposed, applicants will need to demonstrate that the benefits of demolition would clearly outweigh the benefits of retaining the existing building or parts of the structure. **Retention should be seen as the starting point; this will usually be the most sustainable option as it can make an immediate contribution toward the Mayoral objective of London becoming a zero carbon city by 2030**, as well as reflecting the need to both move towards a low-carbon circular economy (set out in Good Growth objective GG6 – Increasing efficiency and resilience) and to push development up the waste and energy hierarchies (see Policy SI 2 – minimising greenhouse gas emissions; and Policy SI 7 – reducing waste and supporting the circular economy)”.* *This has not been done, see section 4 below.*

2.3.7. GLA Policy SI2 Item 3.2.2.: Box 4, item 5: *“Confirmation that options for retaining existing buildings and structures have been **fully explored before considering substantial demolition**, including incorporating the fabric of existing buildings into the new development. See paragraph 3.1.3 for further guidance.”* *This has not been done, see section 4 below.*

## 2.4. Emerging Local Plan City Plan 2040

2.4.1. As set out earlier in this report the City of London Corporation (CoLC) is currently in the process of producing a new Local Plan covering the period to 2040, setting out what type of development the CoLC expects to take place and where. Once adopted, it will replace the current adopted local plan.

2.4.2. Paragraph 48 of the NPPF advises that *‘local planning authorities may give weight to relevant policies in emerging local plans’.*

2.4.3. In terms of strategic priorities, the plan sets out overarching economic, social and environmental objectives. Those that are of key importance to the LWW Site and LWW. Proposals include:

The 'Environmental Section' includes the statement: *"The need to shift the culture away from 'demolition first' to 'retrofit first'".* **Not achieved, see section 4 below.**

And also that *"Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development"*. **Not achieved, see section 4 below.**

2.4.4. In terms of the economic objectives of City Plan 2040, draft Strategic Policy S4: Offices, updates adopted Policy CS1 Offices, notably through the policy, promotes the retrofitting of existing office buildings for office use as well as upgrades to their environmental performance and quality of accommodation. This is expanded upon by draft Policy OF1: Office Development which states that office development should prioritise the retrofitting of existing buildings. **Not achieved, see section 4 below.**

2.4.5. The retrofit first approach is further embedded in draft Strategic Policy S8: Design, with the aim of prioritising the retention of and retrofit of existing buildings which should be informed by an appraisal of the development options. (NB See Section 4 below). Such refurbishments should improve the environmental performance of existing buildings and minimise whole lifecycle carbon emissions. **Not achieved, see section 4 below.**

2.4.6. Further detail is then set out in draft Policy DE1: Sustainable Design, which requires a retrofit first approach and that all major development should undertake an assessment of options for the site in line with the CoLC Carbon Options Guidance PAN. **Not achieved, see section 4 below.**

2.4.7. Also referenced is Policy CE1 where the submission quotes as follows: *"This policy states that developments should be designed to promote circular economy principles throughout the life-cycle of the building, as established in the GLA's CES guidance. Examples include re-use and refurbishment of existing buildings, structures, and materials to reduce reliance on virgin resources"*. **Not achieved.**

2.4.8. The submission also references policy CE1 as follows: *"Figure 2-4 which shows the circular economy hierarchy for building developments with retaining existing buildings as the preferred option. Retention serves as the starting point*

in redevelopment schemes and should be maximised before considering refurbishment and reuse through to the least preferable option of recycling materials from demolition works”.

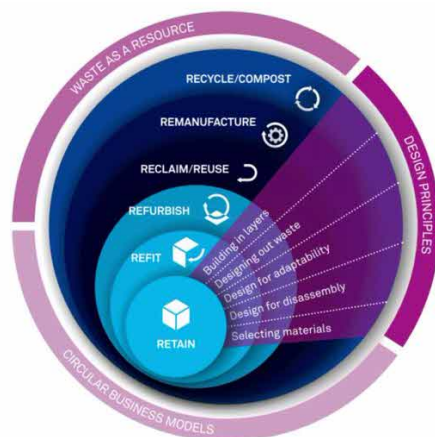


Figure 2-4 Circular economy hierarchy for building approaches as shown in Policy D3 of the London Plan. References Building Revolutions (2016), David Cheshire, RIBA Publishing.

Although referenced, this policy has not been followed.

2.4.9. Optioneering has NOT been correctly examined as ‘Option 2’ (see ‘Carbon Optioneering Study, including Dashboard 1 and Dashboard 2’), which aligns with the CoLC’s ‘Soft Market Test’ was rejected without being examined in detail. Not achieved, see section 4 below.

## 2.5. Planning Policy – Principles of Redevelopment

2.5.1. As noted, the NPPF states in paragraph 157 that the planning system should support a transition to a low carbon future in by ‘encouraging the reuse of existing resources, including the conversion of existing buildings’. Not achieved, see section 4 below.

2.5.2. The adopted CoLC Local Plan supports this and states in Policy CS15 that demolition should be avoided through the re-use of existing buildings and the CoLC Carbon Options Guidance PAN provides the most recent intermediate position on how this will be considered by the CoLC as LPA. It is clear, however, that the CoLC emerging policy in City Plan 2040 favours an embedded strategy of retrofit and the re-use of existing buildings. Whilst these policies do not yet have significant weight given the status of the emerging local plan, given that CoLC are also applicant it would seem inappropriate for this

emerging policy approach to not be adhered to without clear explanation and justification. **Not achieved, see section 4 below.**

2.5.3. The CoLC Whole Life-Cycle Carbon Options PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emissions. It states that optioneering is required for all major schemes before the application is submitted and furthermore advises “If substantial demolition is proposed, applicant will need to demonstrate that benefits of the demolition would clearly outweigh the benefits of retaining the existing building or part of the structure.” This approach reinforces the Mayor’s WLC Assessment LPG by requiring developers to consider alternatives to demolition at the earliest stages of planning and in this regard, the current interim WLC Assessment undertaken for the LWW Proposals will need to be reviewed and reconsidered (including options for part retention). **Not achieved, see section 4 below.**

2.5.4. As Section 4 below demonstrates the submitted Optioneering Appraisal is fundamentally flawed as it does not include a basic ‘Major Refurbishment’ as outlined in ‘Option 2’ which has been disregarded in the detailed optioneering process.

**2.6. The City of London on the 12<sup>th</sup> December 2023 approved new sustainability guidance for developers in a ‘huge step’ towards net zero.** Five key considerations are identified in the guidance for developers, in order to set exemplary standards for sustainability, without undermining the economic viability of planning applications. These include the following three relevant to this proposal:

2.6.1. **Retrofit and reuse** - Outlining the ‘retrofit first’ approach, promoting the reuse of existing buildings where this is the most sustainable and suitable approach for a site, in line with the City Corporation’s adopted Carbon Options Guidance. **Not achieved, see section 4 below.**

2.6.2. **Energy use and ‘Whole Life-Cycle’ carbon emissions** - Providing guidance on reducing and mitigating emissions from construction and the use of a building over its entire life, including demolition and disposal. **Not achieved, see section 4 below.**

2.6.3. **Circular Economy in Construction and Operation** - Demonstrating how developers should shift from a linear to a more circular construction model, where a long-life, loose-fit, low-energy approach is taken to all new and existing

buildings and materials, with focus then switching to reducing and treating waste produced by occupants. **Not achieved, see section 4 below.**

### 3. Conclusions on Planning issues:












- 3.1. The above Section 2 shows that at UK national level, GLA level and at City of London level there is ample policy that specifically prioritises the reuse of resources, circularity and retrofit over demolition and new build. **By proceeding with this submission, the CoLC is in direct conflict with their own current policies and guidance, as well as GLA policies and guidance and the UK national trajectory to net zero.**
- 3.2. That such demolition is against the UK national interest with respect to moving towards Net Zero by 2050, as well as to a Circular economy.
- 3.3. The submitted proposals have included optioneering, but as shown in Section 4 below, the most realistic refurbishment option, and the approach favoured by the commercial bids to refurbish with minimum new construction (called 'Option 2' in the submission) has been effectively ignored.
- 3.4. **Unless the carbon emissions levels proposed by the new scheme are effectively 'locked in' in any consent, in a similar way to GIA, massing etc, then the WLC levels achieved in the submission and reported in the GLA Spreadsheet showing the meeting or exceeding of GLA carbon targets will in effect be meaningless.**
- 3.5. By ignoring their own policies and guidance with respect to net zero, the CoLC is demonstrating to the global commercial property and investment market that they do not consider these issues as important. This puts the CoLC at a commercial disadvantage to European competitors who take this more seriously.

### 4. Options Appraisal

- 4.1. As part of the submission an 'Options Appraisal' or 'Evaluation of the Design Scenarios' was done within the 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2'. This shows that 11 options for the site were initially considered from Option 0, 'Do Nothing' to Option 9, a full redevelopment. Of these initial 11 Options the analysis focuses on 6 Options, Options 1, 3a, 3b, 5, 6, and 9, (numbers shown in green on diagram below).



4.2. Option 2: 'Major Refurbishment' is notably missing from this more detailed investigation, the reason given being that it is essentially an extension of a minor refurbishment (see diagram below, red box)

Scenario	Do Nothing	Minor Refurbishment	Major Refurbishment	Major Refurbishment with Extensions						Redevelopment	
	0	1	2	3a	3b	4	5	6	7	8	9
											
Selection of scenarios to be quantitatively assessed and main reasons for discounting	Considered not feasible due to current low energy performance, challenges with thermal comfort, low ceiling heights. Investment needed for carbonation, repair, fire risk, and structural robustness. Public realm redevelopment limited.	To be further analysed qualitatively and quantitatively	This scenario has been integrated to option 1 as a major refurbishment is considered necessary to be done to option 1 after 15 years of further operation.	To be further analysed qualitatively and quantitatively	To be further analysed qualitatively and quantitatively	Peninsula change limited by the areas of the Museum of London Building retained. Public realm redevelopment limited. Investment needed for carbonation, repair, fire risk, and structural robustness.	To be further analysed qualitatively and quantitatively	To be further analysed qualitatively and quantitatively	Peninsula change limited by the areas of the Museum of London Building retained. Public realm redevelopment limited. Challenges with the integration of new buildings into existing substructure of the Museum of London Building.	Size of the new buildings limited by the existing substructure or extensive reinforcement needed to increase it. Public realm redevelopment limited. Investment needed for carbonation, repair, fire risk, and structural robustness.	To be further analysed qualitatively and quantitatively

After the qualitative assessment of the 10 scenarios, and the "Do Nothing" baseline required by the Carbon Options Guidance document, cases 1, 3a, 3b, 5, 6 and 9 were selected for further qualitative and quantitative assessment. The extent of intervention per scenario has been defined in detail.

Diagram from page 17: 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2'.

4.3. This omission is significant as a 'Major Refurbishment' is the most plausible alternative low impact approach to the site in order to achieve a scheme that is also commercially viable. This has been proven by the City's decision to offer the site to potential bidders for 'major refurbishment' proposals by way of market testing.

4.4. The fact that a number of developers submitted design and commercial proposals that can be described as 'major refurbishment' demonstrates that this approach has both practical and commercial merit, yet it was specifically excluded from the detailed options appraisal.

4.5. The Submission's Options Appraisal or 'Evaluation of the Design Scenarios' is therefore fundamentally flawed and cannot be seen as a reliable examination of the options for the site.

4.6. The diagrams below (Figure 10-2 and 10-3), 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2', p35, show respectively for the 6 Options selected for detailed study; the carbon intensity (kgCO<sub>2</sub>e/m<sup>2</sup> GIA), and the total whole life carbon emissions (tCO<sub>2</sub>e) for each option.



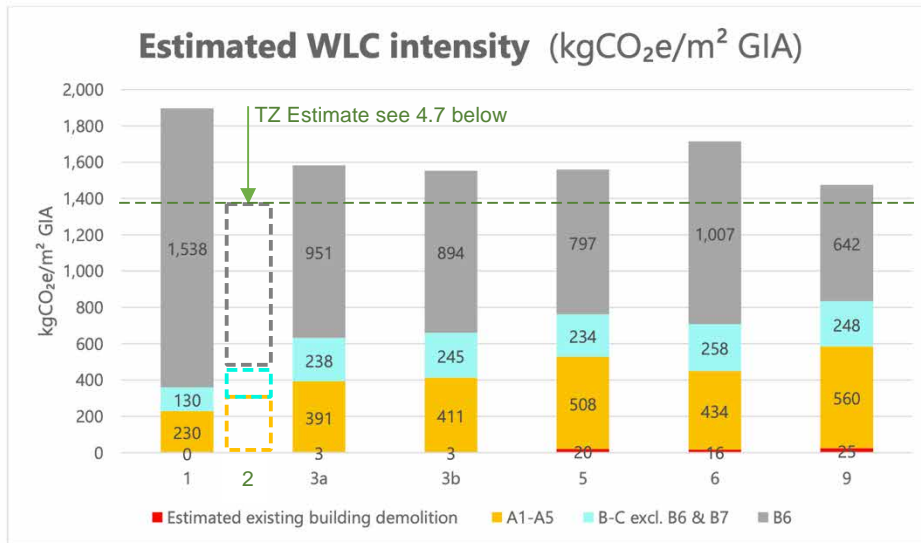


Figure 10—2 Estimated WLC Intensity Per Scenario Analysed

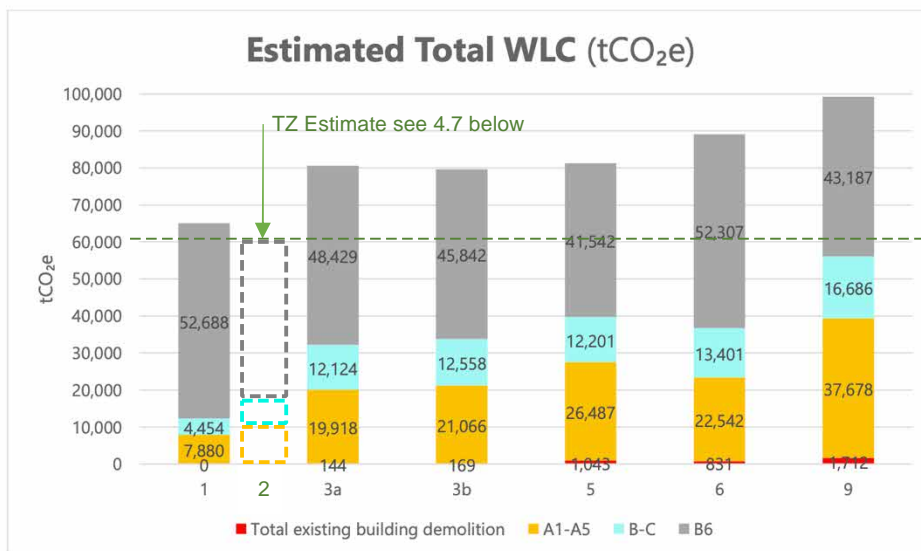


Figure 10—3 Whole Life Carbon Scenarios Comparison in Total Tonnes of CO<sub>2</sub> Per Scenario Analysed

4.7. Shown, dotted, is an estimate by the author of this report of what ‘Option 2’ might look like in comparison. This is based on the following assumptions:

That A1-A5 (yellow box) will be slightly more than Option 1, but less than Option 3A. This is reasonable as Option 1, described as a ‘minor refurbishment’ involves very little new work, whereas Option 3A ‘major work with extensions’ involves significant new construction not included in the ‘major refurbishment’ for ‘Option 2’.

The same logic applies to B-C excl. B6, B7 (blue box).

B6, Operational energy use (grey box) should, within a ‘major refurbishment’ be to current environmental standards, and therefore at least as good on a m2 basis

as Option 3b, even if possibly not quite as good as a new build Option 9. On a total basis operational energy use would be less than the other major works options due to the smaller area, GIA.

These assumptions would have to be verified through actual analysis of the major refurbishment proposals, but nevertheless represent a reasonable estimate of carbon emissions on a comparative basis.

- 4.8. The TZ additions to the submission diagrams 10-2 and 10-3 (Carbon Optioneering Study p35) show that on a carbon intensity basis ( $\text{kgCO}_2\text{e}/\text{m}^2$  GIA) a major refurbishment is the best option, and better than the new build. This is because the embodied emissions for refurbishment would be significantly lower than for new build, and even if the operational emissions were to be slightly higher on a  $\text{m}^2$  basis, the combination would be lower.
- 4.9. On a total carbon emissions basis ( $\text{tCO}_2\text{e}$ ), the major refurbishment would be the best overall, better even than a 'minor refurbishment'. This is because although the embodied carbon expenditure is more than a minor refurbishment, the improvement in operational performance would more than outweigh this.
- 4.10. The diagram below from the submission (Carbon Optioneering Study p34) compares the 6 options selected for more detailed analysis over a 60 year period. It should be noted that these trajectories (from the submission) should be treated with caution as they are only very indicative of what is likely to happen in reality. Nevertheless onto this diagram TZ has overlaid a yellow dotted line showing what an 'Option 2' might look like by way of comparison.

10.1.1 Cumulative Carbon Emissions Graph

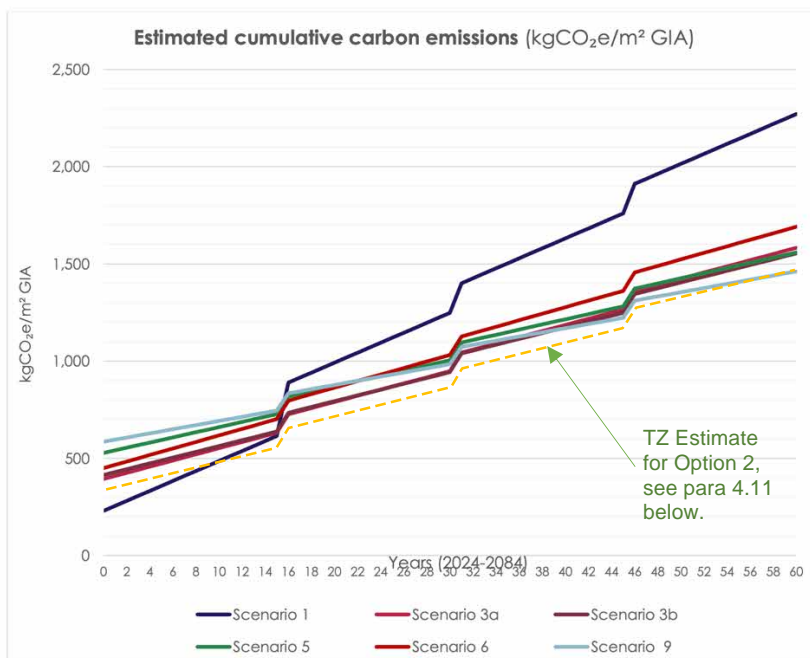
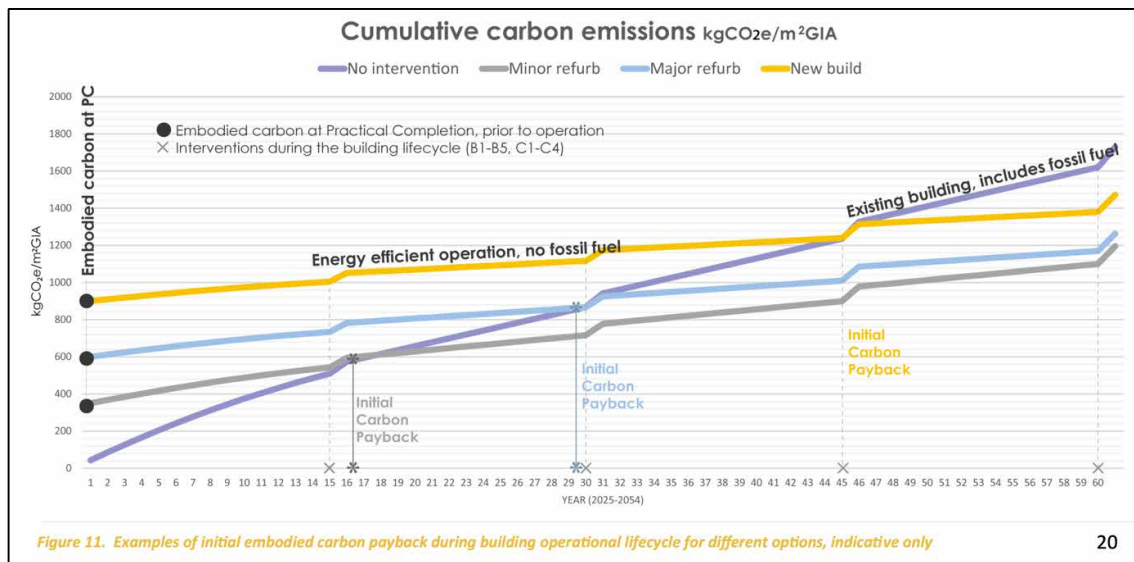


Figure 10—1 Estimated Cumulative Carbon Emissions (kgCO<sub>2</sub>e/m<sup>2</sup> GIA) Over A 60-Year Period, Including Whole Life-Cycle Carbon (Embodied and Operational) Emissions

4.11. The yellow dotted line, the assumed Option 2, starts above Option 1, but below the other options as per Figure 10.2 above. The trajectory is assumed to be similar to options 3a and 3b. This is because the Option 2 ‘major refurbishment’ would bring the buildings up to a good standard equivalent to Options 3a and 3b. As noted above in 3.10 this diagram should be treated with caution. However what is shown, is that the resulting trajectory over 60 years is better than the other refurbishment options, and about the same as the new build.

4.12. It should be noted that in the May 2022, ‘*Planning Advice Note; Whole Life Cycle Carbon Optioneering*’ by Hilson Moran for the City of London the following diagram ‘*Figure 11*’, shows the typical relative trajectories for various options see in particular ‘major refurb (blue line)’ vs ‘new build (yellow line)’. This shows that typically major refurbishment has a lower WLC life cycle over 60 years than new build. This is of significance as it clearly supports GLA ‘Policy Principle No 1’ (see section 2.3.1 above) to prioritise retrofit and illustrates that to achieve its net zero objectives, the City of London should be following this route.



## 5. Conclusions on Optioneering

- 5.1. The Optioneering study is fundamentally flawed as it does not include 'Option 2' 'Major Refurbishment' which is essentially what the City's market testing exercise covered. The study is not therefore a reliable source of information on optioneering.
- 5.2. The proposals therefore do not comply with draft Strategic Policy S8 and other relevant policies.

APPENDIX C



11	The CoL highways team identified the LWW site as providing the potential opportunity to transform the existing roundabout arrangement to create a consolidated peninsular site and improved public realm at the north end of the gyratory project.	It does not seem logical that the peninsular scheme diverting the traffic around the proposed building is driven by highways when a simple intersection with clear views and overview from all streets would be the safest option – for motorists, cyclists and pedestrians. The traffic scheme seems to be driven by the desire to maximise the footprint of buildings and therefore includes the area of the roundabout, including street and sidewalks within the site boundary.
24 ff	2.6 Site Historic Context	The historic context analysis fails or omits to mention the Roman and later Saxon gate (Aldersgate) in the City Wall to the south of the site and the importance of the historic route Aldersgate Street as the beginning of the A1, longest numbered road in the UK, connecting London towards Edinburgh.
32 6 <sup>th</sup> ¶	The Museum of London and Bastion House were a separate project from the Barbican development, however the intention was to connect into the pedway network of the Barbican, which was realised to one location to the north, and to the highwalk adjacent to London Wall, but not to the full extent that was originally planned.	Reductive presentation: the link between the Barbican Estate and the MoL/Bastion House goes far beyond the pedway system. The Museum of London and Bastion House were part of commercial Barbican South, the Barbican Estate formed residential Centre Barbican. The whole area, subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards, was laid out on an orthogonal grid. The areas were planned in response to each other, with open spaces contained in between the two developments and building volumes aligned, in proportion to each other, and all linked by an extensive network of pedways.
33 2 <sup>nd</sup> ¶	The majority of the Museum building is clad in a white rectangular tile in a simple stacked pattern. The massing of the buildings is monumental with exposed concrete columns, exposed concrete soffits and ribbon windows in the modernist style. A dark brick tiled flooring unifies the floorscape.	The description of the museum's massing as monumental is emotive and is contested. The Museum is a four-storey block of similar height as the historic buildings that survived the blitz (now mostly demolished and replaced by much taller buildings).
34 1 <sup>st</sup> ¶	Bastion House Bastion House was developed as part of the masterplan for the extension of London Wall, and was originally one of six similar office blocks that lined the new road. Bastion House is the only remaining building standing of this original context, which has all been lost.	Factually incorrect. While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived. City Tower on the south side of London Wall, designed by Sir John Burnet, Tait & Partners, built 1962-4, was first reclad by GMW Partnership in 1985, and comprehensively refurbished by ORMS in 2013. Another important building of the commercial South Barbican plan is Britannic Tower, former headquarters of BP. Designed by F. Milton Cashmore and H. N. W. Grosvenor, and built 1964-7, the building was successfully refurbished by Sheppard Robson and renamed Citypoint in 2000.
34 3 <sup>rd</sup> ¶	The floor to ceiling heights are 2.5m, which is low by modern office standards.	According to the approved plans, held by both LMA – file references COL/PL/01/168/B/001-023 - and City Corporation – planning file 4648, the floor-to-floor height is 11 feet - 3.35 metres - with a floor-to-ceiling height of 10 feet 2 inch – 3.10 metres – and a floor to false ceiling height of 9 feet – 2.74 metres. The floor to false ceiling height may be significantly increased with the use – as many modern office blocks do – of exposed services.
42, 43	Ar facts of interest on the site	Print mistake, pages double printed and not intelligible
60	Scenarios selected/not selected for whole life cycle carbon analysis.	Option 1, minor refurbishment, replacement of some of the MEP items, minor upgrade to the façade, is taken forward in the WLC assessment. This, however, is the most unlikely scenario.

		<p>Op on 2, major refurbishment of the existing building is excluded from the evaluation. However, any repurposing of the former museum and Bas on House will most likely involve a change of use and require substantial works to adapt the buildings, including changes to the interior and exterior.</p> <p>Op on 2 would have been the route progressed by the developers of the so market test in May/June 23, all of which have proposed the conversion of Bas on House from office use to hotel use.</p> <p>The options seem to be chosen to lead to the foregone conclusion and selection of op on 9, demolition and new build.</p>
66	<p>4.2 Urban Strategy - Urban and Cultural Axes</p> <p>Furthermore, the site lies on a North-South axis which connects the South Bank and Tate Modern to St. Paul's Cathedral, and the Barbican Centre and London Symphony Orchestra St. Luke's Venue to the North.</p>	<p>The diagram of connecting urban and cultural routes is a misinterpretation of factual movement through the area. The Barbican Highwalks are labyrinth-like and difficult to navigate. With only few access points they do not work as thoroughfare for the wider public.</p> <p>Moreover, this is deliberate – like all housing estates the internal routes are largely for access for residents and their visitors – they are not to provide major thoroughfares for through pedestrians – in order to maintain the residential nature of the estate.</p> <p>The main routes are at street level. The vast majority of visitors of the Barbican Centre use Beech Street as thoroughfare and not the Barbican podium. Aldersgate Street is the main route north from St Paul's. On the diagram the route from St Paul's terminates at the site. However, it continues past the site to the east-west axis of the new London Museum and Barbican Centre (Long Lane and Beech Street), past Barbican tube station and far beyond.</p> <p>A baseline study (by e.g. Spacy Syntax) looking at spatial accessibility, local route hierarchy, from high, medium to low would have shown how people move through the area.</p>
76 2 <sup>nd</sup> ¶	<p>Alternative Massing Strategies</p> <p>After finalising the site brief and laying out the road junction, key townscape guidelines were implemented to shape the size and placement of the buildings. A primary consideration was ensuring that the buildings would not obstruct the view of St. Paul's Cathedral from Millennium Bridge. Initially, there was an assumption that taller buildings could work if not directly behind the cathedral. With this in mind, various massing options were explored based on typical floor plate depth constraints, and their pros and cons were assessed.</p>	<p>While it is commendable that long distance views were considered, this should not absolve the design team from paying regard to medium-distance and close-up views of the development, nor other site constraints and urban design considerations.</p> <p>A carefully developed response would have analysed, understood and addressed the rich history of the site and area, pre- and post-war, the current specific urban context, its character, scale and grain, vistas, desire lines, and specifically the sensitivity of listed buildings and CAs. For example: the obvious alternative of turning the Rotunda into a public square and placing the building mass along the perimeter, similar to 200 Aldersgate and One London Wall, has not been assessed. Sketch 3 leaves a gaping hole in the middle where space defining building mass should be.</p> <p>For a strategic site of this importance this restricted options appraisal without a detailed townscape analysis but with a foregone conclusion in mind falls far short of the requirement to seriously evaluate alternative development options.</p> <p>Not mentioned is the fact that the proposed massing actually obscures access to one of the area's cultural icons. At present one of the Barbican towers is visible to anyone approaching from the south up St Martin Le Grand. The proposed Rotunda building blocks that view (impeding access to the iconic estate and replacing a</p>



		recognisable architectural landmark with a building of questionable design quality.
77 2 <sup>nd</sup> ¶	The building element on the Rotunda site creates a terminus of the Aldersgate Street Axis. The floor plates of the individual towers are appropriate for an efficient core and depth for daylighting.	As above, Aldersgate Street is an over 1600-year-old historic Roman route in and out of London. There is neither a historic nor an urban justification nor any benefit in creating a terminus in the middle of this important north-south axis and at the junction with London Wall.
77 3 <sup>rd</sup> ¶	This is also a significant benefit of the revised roadway configuration. The low podium also maximizes the openness and porosity of the site providing the potential to connect the North-South axis of movement in a clear intuitive manner.	To the contrary: The north-south axis is Aldersgate Street and not the meandering Barbican highwalks. Blocking Aldersgate Road with a terminus building is counterintuitive. This physically and visually splits and disconnects the north-south axis and represents a fundamental urban design flaw. The terminus building, blocking the junction, will be disorienting for pedestrian and vehicular movement along Aldersgate Street, St. Martin's Le Grand and London Wall.
77 4 <sup>th</sup> ¶	Lastly, Ironmongers' Hall is not cut off from the street, and has an improved relationship to the street from its current situation.	Historically the building sat on the inside of an urban block, within dense urban fabric, therefore only partially visible. Access was from Aldersgate Street via a small archway within the row of buildings along the street. Ironmongers Hall will now stick out like a sore thumb, like a relic, similar to the ruins of London Wall. This looks like Disneyfication of urban planning. Alec Forshaw will be a better judge. Please refer to image: Fig. 4.12: Superimposed sketch design for Ironmongers' Hall in the TVBHIA, page 21
78 1 <sup>st</sup> ¶	Having established the initial block massing part, the proposed building massing was refined through a series of operations responsive to micro-climate within the public spaces - by opening up the central public spaces - by opening up the central public spaces, along with further considerations of the strategic views of the development with the townscape context, and residential amenity considerations.	This is urban planning by deduction. The sole ambition of the massing exercise seems is to push the quantum of developable area to legally unchallengeable limits. The scheme represents a total disregard for the historic and urban context, the scale and grain of the area, and the visual and physical impact on its immediate surrounding, listed buildings and CAs. It is a self-serving development which looks at optimising the semi-public realm at its heart while turning its back onto its neighbours and public street space, specifically the main north-south route Aldersgate Street.
82	Design Sketch Studies: Public Realm A series of design sketches and studies helped evolve the public realm design into the final proposals as shown later in this document. A selection of these sketches focused on the different aspects of the public realm are included here.	No consideration has been given to the quality of Aldersgate Street; it is treated as the back of the development. Instead of reinforcing and improving the historic north-south axis of, the diagram omits this main and direct route. The movement from Aldersgate Street south, up onto and across the glade and then back onto Aldersgate Street north is a diversion and does not follow a natural desire line.
85	Feedback Summary	To be addressed by AB's SCI review.
86	Across the course of the evolution of the Proposed Development, feedback on the height and massing proposed was received from both the consultation process and pre-application meetings with planning officers. Multiple approaches to reducing the building massing were studied and implemented.	No other points raised at the public consultations were addressed.
94 4 <sup>th</sup> ¶	The overall curved forms of the buildings help reconcile the multiple site orientations and geometries between the City urban grid, the Barbican urban grid, and the Rotunda which is angled at odds relative to the rest of the context.	The only reference is to opposite equally curved One London Wall. The curved forms are at odds and do not relate to the strictly orthogonal grid of Centre Barbican (Barbican Estate) and South Barbican (London Wall). They stand in

		stark contrast and opposition and therefore do not reconcile.
95 1 <sup>st</sup> ¶	The pair of buildings seen as forming a gateway in the City - recalling the historic function of this location as a gate in the City Wall - is again apparent from the North, with a greatly increased public realm connectivity and porosity to view at the pedestrian levels.	The semi-public glade is not a gateway. The proposed scheme does exactly the opposite of a gateway: it blocks the public realm and views by placing a terminus building in the middle of Aldersgate Street. A gate places a marker on both sides of a road, not in the middle.
95 3 <sup>rd</sup> ¶	The solar shading screen of the outer facades wraps onto the North facades as well to perform a different function: to create the sense of the buildings closing their facades in the direction of adjacent residential buildings.	This gesture does not prevent direct overlooking of the bedrooms of Montjoy House, nor the only external amenity the City of London School of Girls.
108	Public spaces. The Glade Garden is located at the Highwalk level, projecting over the Central Plaza. It creates a surreal garden environment that is detached from the lively activity of the streets below, a green space for contemplation at the heart of the development, surrounded by banks of lush planting that also extend up the planted terraced facades of the buildings that flank it.	The current highwalks and the Rotunda, roads and sidewalks are public thoroughfares. In contrast, who will own, control and maintain the glade? Since the site will be disposed of, it seems that the buyer and developer would own this area. This would turn currently public space into semi-public /semi-private space. As this space is lit late overlooked at night, will it be closed after office hours? Will there be private security?
		The quality of the central garden space as outdoor amenity will be limited due to the tall buildings surrounding it. During spring, summer and autumn the glade will only receive around two hours/day of sunshine, and none during winter. Please refer to Environmental Statement Volume III: Technical Appendices, APPENDIX 13-D, Transient Shadow Results
110	Culture Space	As the CoL will not develop the scheme but sell it to the highest bidders who will likely redesign the scheme to suit their needs, this part is aspirational only.
121	West Side Elevation	The uniformity of the outer façade, its lack of detail, its scale and grain bear no relation to the listed Barbican Estate.
122	East Side Elevation	The uniformity of the outer façade, its lack of detail, its scale and grain bear no relation to the listed Barbican Estate. The east elevation makes opposite 1 London Wall look small in comparison. This view demonstrates how the Rotunda building terminates the view of this important junction.

APPENDIX D



20 (4.17)	<p>The Barbican Estate was of importance to the redevelopment of the site: the highwalk, or pedway as it was known at the time, was a crucial element of the site's design. However, the buildings on site – the Museum of London and Bastion House – were not designed in conjunction with the Barbican Estate. The only requirement for development on the site was that the buildings should connect into the Barbican Estate and City wide network of pedestrian highwalks. The Museum of London was conceived as a sprawling, low-lying mass, predominantly clad in white tiles, and with a dark brick rotunda at its southwestern tip.</p>	<p>Reducive presentation: the link between the Barbican Estate and the MoL/Bastion House goes far beyond the pedway system:</p> <p>The entire Barbican area, devastated by heavy bombing during WWII, was subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards. "A powerful motivation in the preparation of the various post-war reconstruction plans was a desire to prevent uncontrolled piecemeal development with no aesthetic coherence." (Barbican Penthouse over the City, David Heathcote, page 72.)</p> <p>The Museum of London and Bastion House were part of commercial Barbican South, the Barbican Estate formed residential Centre Barbican. The whole area was laid out on an orthogonal grid.</p> <p>As condition for the Centre Barbican development the architects Chamberlain, Powell &amp; Bon had to integrate the LCC and Planning Committee's Commercial Barbican plan.</p> <p>The two areas were planned on the same perpendicular grid and in response to each other, with streets and open spaces contained in between the two developments and building volumes aligned, in proportion to each other, and all linked by an extensive network of pedways.</p>
20 (4.17)		<p>Philip Powell and Geoffrey Powell were firm friends and knew each other well from university days, even sharing the same house.</p> <p>The choice of the same materials of the two cultural buildings, the Barbican Centre and the Museum of London is not by coincidence: The galleries at the later Barbican Centre were clad in white rectangular tiles just as the earlier Museum of London. Similar to the residential buildings of the Barbican Estate, the museum itself is supported by pick-hammered concrete columns, as is Bastion House, while the office block's façade followed the planning authority's strict design brief for the six London Wall towers for uniform appearance and inspired by latest office blocks in New York.</p>
20 (4.17)	<p>Bastion House was one of a number of commercial slab blocks which were designed to line the main route of London Wall, the rest of which have since been redeveloped. The 1970s OS map shows the site boundary empty (with the exception of the fragments of historic City wall), awaiting development to the south of the part completed Barbican Estate (Fig. 4.9).</p>	<p>Factually incorrect:</p> <p>While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived.</p> <p>City Tower on the south side of London Wall, designed by Sir John Burnet, Tait &amp; Partners, built 1962-4, was first re-clad by GMW Partnership in 1985, and comprehensively refurbished by ORMS in 2013.</p> <p>Another important building of the commercial South Barbican South is Britannic Tower, former headquarters of BP. Designed by F. Milton Cashmore and H. N. W. Grosvenor, and built 1964-7, the building was successfully refurbished by Sheppard Robson and renamed Citypoint in 2000.</p>
23 (4.22)	<p>Bastion House is the only remaining office block associated with the post-war masterplan for London Wall, which envisaged the construction of six curtain-walled office blocks, arranged equidistantly to either side of the widened road.</p>	<p>Factually incorrect:</p> <p>While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived.</p>
23 (4.22)	<p>Whilst there is some historic interest associated with Bastion House for these reasons, little else of the masterplan remains today beyond the broad roadway and hard edges of Route XI. The walkway has been fragmented and bypassed by further</p>	<p>It is misleading and factually incorrect to claim walkways being fragmented and bypassed by further development, diluting of the aspirations of the plan, when the opposite is the case:</p>

	development of London Wall, diluting the aspirations of the plan.	Along the north side of London Wall, the replacement schemes Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE, and Foster's Moor House on More Lane Ave have adhered to the principles of the original masterplan. All schemes have maintained, continued and celebrated the highwalk connections, while bringing the buildings down to street level. Buildings follow the perpendicular grid of the original plan, and continue to frame existing streets, external spaces and gardens. The highwalks continue to be highly popular and their extend, with smaller and larger circuits, serve many as a measure of daily exercise, especially for joggers, the older generation.
23 (4.24)	The 2019 HE COI report notes the mundane appearance of Bastion House and its lack of architectural quality when compared to other commercial buildings of a contemporary date, several of which are listed in recognition of their innovation and design quality.	In contrast, the 20 <sup>th</sup> Century Society has added the building to their 2023 Risk List: "The first post-war museum to be built in London and the largest urban history museum in the world, the Museum of London was designed when architects Powell & Moya were at the height of their reputation and prestige. Best known for the Skylon at the Festival of Britain they were one of the most significant practices in post-war Britain. Housed within an angular and robust white-tiled concrete structure, the museum is skilfully placed on a considerably constrained site. Its solidity protects the interiors from the traffic noise outside and shelters a quiet courtyard garden, while a great dark brick-clad rotunda – referencing the nearby Roman city walls – rises from the centre of a busy roundabout, acting as an arrival point to the complex. To the east is Bastion House, also by P&M, built as a speculative office development above the podium, as part of the new museum scheme. Standing on piers of biscuit-coloured concrete with Miesian bronzed curtain walling, it is now a rare survivor of a hugely important part of the City of London's post-war planning history."
		The COI was granted on the back of the proposals for the Centre of Music to replace the buildings. The public benefit of a grand concert hall for the LSO would have outweighed the loss of the MoL and Bastion House. The only person ever consulted on the special interest of the MoL and Bastion house is Kenneth Powell, who wrote the Powell and Moya article in Architects' Journal in 1996, and book in 2009. His negative views of the buildings are widely known. Another and younger architectural historian might take a different view.
23 (4.29)	It has been established that the Museum of London does not possess the special interest required for statutory listing. The reasonings for which are fully outlined in the Historic England COI advice reports in 2015 and 2019 respectively (Ref. 1-19 and Ref. 1-20).	See response to 4.24 above.
24 (4.32)	Just beyond Alban Gate, MAKE's London Wall Place scheme (2016) refurbished a section of highwalk and introduced landscaped public space at street level around remnants of the City wall (St Alphage Gardens). Generally, recent development along London Wall has entailed the removal of remnants of the pedway and the reintroduction of pedestrian routes and entrances at street level.	Claiming that generally recent development has entailed the removal of remnants of the pedway system is therefore factually incorrect, the opposite is the case: The latest scheme, Deutsche Bank, located between Moor Lane and Moorfields, continues the old highway link from the Barbican Estate to Moorgate Station. The large office block, owing to the tube station entrance at ground, has its main at highwalk level. MAKE's London Wall Place, one of the most recent schemes, replaced the original St Alphage House and surrounding podiums. The buildings successfully celebrate

		<p>the highwalk theme with new sculptural bridges retracing all original links, including the pedestrian bridge across London Wall.</p> <p>Foster's More House replaced the most eastern tower and is linked at high level to Deutsche Bank and London Wall Place.</p> <p>The highwalk from 1 London Wall Place across London Wall is temporarily closed due to the demolition and redevelopment of the opposite office block City Place on Basinghall Street. Once completed, the highwalk, which connects the ground floor of City Tower to the Guildhall and the Barbican, will be reinstated.</p> <p>As not all highways are visible on Google, it may have helped the assessor to go beyond a simple desk top study and pay the area a visit.</p>
24 (4.34)	<p>When assessed for statutory listing, Bastion House was acknowledged as the <i>first</i> commercial work undertaken by Powell and Moya, and the only remaining, largely externally unaltered, commercial <i>office</i> associated with the post-war masterplan for London Wall. There is some historic interest associated with Bastion House for these reasons, but the fragmentation of the walkway and redevelopment on London Wall has largely eroded the aspirations of the masterplan, therefore limiting the historic interest of Bastion House.</p>	<p>It is therefore incorrect to talk about fragmentation and erosion of the aspirations of the masterplan, therefore limiting the historic interest of Bastion House:</p> <p>Four of the original London Wall towers stood on the north side of the street. Three of these have been replaced, Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE and Moor House by Foster and Partners. All of these replacement schemes have continued and celebrated the highwalk connections, while bringing the buildings down to street level – one does not preclude the other.</p>
24 (4.35)	<p>Whilst there is a Miesian quality to Bastion House, it was described in the Architects Journal of 1996 as 'in anonymous Miesian mode', and when compared to listed post-war <i>office</i> buildings it appears mundane and somewhat old-fashioned in its treatment, lacking in architectural quality and innovation.</p>	<p>The article in the Architect's Journal from 4 July 1996, An architecture of continuity, We celebrate the <i>first</i> 50 year of Powell Moya Partnership – a practice whose work represents the best social values of post-war Britain, is again written by Kenneth Powell. He seems to be the only authority ever written, or ever to be quoted or consulted on the scheme. His negative views of the buildings are widely known but may not be representative.</p> <p>The C20 board is meeting this week to consider their view.</p>
25	Townscape Character Area Diagram	<p>The London Wall TCA should include the area in between Moore Land, Moorfields and Ropemaker Street. This area forms part of the original Barbican South area and masterplan.</p>
30 (5.5)	<p>New Bastion House</p> <p>... the proposed building has a slightly larger footprint, which would result in a slight increase of visibility in views from the south bank ...</p>	<p>Misleading.</p> <p>The footprint of the proposed building measures between two and a half metres and three metres that of the original Bastion House</p>
30 (5.5)	<p>While the tonality and opacity of the outer elevations will embed the building into the architecture of the Barbican Estate, the <i>fin</i> vertical expression of the outer 'husk' will have a much lighter visual character than the over-scaled, concrete expression of the Barbican, legibly placing these new buildings within an existing urban backdrop in views from within the Estate.</p>	<p>The exact opposite is the case:</p> <p>The description suggests that the proposed Bastion House, due to its detailing, will appear lighter than its neighbour, the over-scaled Barbican.</p> <p>A view of the east elevation (DAS, page 122, 5.11 Site East Elevation) demonstrates that the vast volume of the proposed tower will appear oversized and, in such close proximity, dwarf the adjacent Mountjoy House.</p> <p>Instead of forming a backdrop the proposed buildings will visually encroach and dominate the southern perimeter of the conservation area.</p>
31 (5.12)	<p>... the pedestrian experience along Aldersgate Street and London Wall significantly enhanced.</p>	<p>The enhancement of the street environment would be welcomed. However:</p> <p>The tall Rotunda building and 200 Aldersgate will create a tight, lightless and canyon-like street environment.</p> <p>The placing of a terminus building at this important road junction, blocking views and diverting the street, will be disorientating for pedestrians and motorists alike.</p>



31 (6.12)	The scale and design character of the proposed buildings would complement the existing townscape character of the site. The high-quality of the architectural treatment and the enhancement to the quality of the public realm on site would result in an enhancement to townscape character and quality. This will result in <i>beneficial effects</i> to TCA 1, TCA 3, TCA 4 and TCA 6 and <i>neutral effects</i> to TCA 2 and TCA 5, where the <i>effects</i> are negligible in scale. There would be no adverse <i>effects</i> on TCAs.	Exactly the opposite: The development is out of scale, lacks grain. The overly large and amorphous volumes bear little relation to the post-war masterplan with its perpendicular grid and synergy between Barbican South and Centre Barbican area. By placing a large terminus building on top of the road junction, the proposed scheme does not respect the historic route and important axis of north-south vehicular and pedestrian movement. What is interpreted as neutral and beneficial is in fact harmful to a large number of heritage assets, CAs and to the townscape in general.
89	View 12, St Martin's Le Grand, outside entrance to no.16. The glimpsed view of the distant Lauderdale Tower and opaque presence of the existing Rotunda (former Museum of London) would be replaced with a building of an appropriate scale and high design quality, providing an interesting and complementary focal point to the view. Sensitivity: medium Scale and Nature of <i>Effect</i> : moderate, <i>beneficial</i>	This is contested: St Martin's Le Grand and Aldersgate Street (south) are framed by a mix of four to nine-storey high buildings of various styles and eras, however, consistent in their materiality (largely Portland Stone). The large and prominent neo-classical No.1 St Martin's Le Grand (Nomura House) covers the entire block along Angel Street. Together with the adjacent Grade I listed St. Botolph's church it forms the eastern perimeter of the Postman's Park Conservation Area. View 12 clearly demonstrates that the proposed Rotunda building, due to its encroaching position, its height, grain and materiality will dominate the street scene, appear overpowering and dwarf the buildings along the street, specifically the Grade I listed church and even the substantial Nomura House of the CA. This view is too far away to show the impact of the proposed development on much smaller St. Botolph's without Aldersgate. Note: the two tall buildings at the street junction, 200 Aldersgate Street and One London Wall, both step down to the prevailing height of their neighbours. One of the stated aims of this development is to enable access to the City's cultural facilities. But by obscuring an existing view of the Barbican's Lauderdale Tower from the south (one of the few remaining medium-distance views of the estate from the south), this proposal reduces access to a longstanding cultural asset in the City (the listed Barbican estate, an internationally renowned icon of 20 <sup>th</sup> century urban planning) in favour of an office block with an uncertain cultural offering.
107	View 17, Aldersgate: west pavement. This will be an exceptionally high-quality development, with coherent and visually engaging buildings and spaces at this important and historic City gateway location. Magnitude of Impact: high Scale and Nature of <i>Effect</i> : moderate, <i>beneficial</i>	The placing of this tall terminus building in the middle of Aldersgate Street, blocking views and circulation, just meters away from the historic location of the former Roman and later Saxon city gate and the beginning of the A1 route to Edinburgh, will cause substantial harm to the existing and historic townscape.
132	View 24, Barbican Estate: St Giles Terrace New Bastion House and Rotunda building would have a light appearance, clearly positioned in the background of the view. The proposed development would be a high-quality secondary background element in the view, with the foreground forming the principal focus. The proposed development would not detract from the townscape and visual qualities of the foreground, and would form a sensitive, high-quality, and well-considered addition to the	This view is considered harmful to the Barbican Estate, the setting and character of the CA: As the Centre Barbican plan had to incorporate the South Barbican plan, the buildings were designed in proportion and aligned with each other. The current Bastion House has the same depth as Mountjoy House, the buildings were initially planned aligned but were later staggered along the same axis. The footprint of New Bastion House will increase by two and a half to three-fold. This vast volumetric increment and swelling across the axis, coupled with the reduction



	<p>setting of the Estate which, as seen in this view, is already characterised by tall modern buildings.</p> <p>Magnitude of Impact: high</p> <p>Scale and Nature of Effect: major, beneficial</p>	<p>of distance from approximately 30 to 20 metres to Montjoy House will appear overly close, imposing and disproportionate.</p>
137	<p>View 26, Barbican Estate: Thomas More Highwalk terrace, west end, overlooking tennis courts.</p> <p>Magnitude of Impact: high</p> <p>Scale and Nature of Effect: major, beneficial</p>	<p>This view is considered harmful to the amenity of the school, the Barbican Estate, the setting and character of the CA:</p> <p>Comments as above.</p> <p>In addition, there will be considerable overlooking of Mountjoy House, and of City of London School of Girls' external amenity and sports ground.</p> <p>Coupled with the North Building and the Rotunda building, there is a significant loss of sky and sense of enclosure.</p>
161 (12.2)	<p>Neither the former Museum of London or Bastion House, nor any other buildings on the site, have been identified by CoLC officers as non-designated heritage assets (NDHAs).</p>	<p>Who gets to decide what a NDHA is? There is no Local List.</p>
161 (12.3)	<p>Externally, the former Museum forms somewhat of a barrier within the local townscape, particularly the vast blank frontage of the rotunda which forms a harsh environment which is not pedestrian-friendly.</p>	<p>Correct.</p> <p>The Rotunda is the result of a much too small site for the MoL, and the post-war concept of separation of vehicular traffic at street level and pedestrian movement on pedways above. The Rotunda is a public space and garden with views in all directions, it was once to become the heart of the pedway system.</p> <p>From today's perspective, the Rotunda is certainly a mistake: It blocks views and movement along Aldersgate Street.</p> <p>As the applicant is proposing complete redevelopment, why not mend, but reinforce the blockage of this important street with a 14-storey tower?</p> <p>The proposed development exasperates the blockage of the historic route and will create a canyon-like street environment between the tall Rotunda building and 200 Aldersgate Street.</p> <p>Apart from the sheer mass created, there is no benefit and only harm to the immediate and wider urban setting.</p>
161 (12.3)	<p>In regard to Bastion House, it is acknowledged that it is the only commercial building designed by Powell and Moya and externally is largely unaltered which gives the building a degree of interest, however, the building has a restrained form and treatment lacking the innovation and quality of listed examples of its type and date.</p>	<p>Together with the St Helen's (previously known as the Aviva Tower or the Commercial Union building) at 1. Undershaft, soon to be demolished to make place for a taller tower, Bastion House is the City's only remaining and unaltered Miesian tower of that era.</p>
161 (12.3)	<p>Bastion House has some historic interest for its part in London's post-war masterplan, but this is overshadowed by the redevelopment of London Wall which has eroded the town-planning aspirations of the plan.</p>	<p>Emotive language. Neither Bastion House nor its historic interest are overshadowed by recent redevelopment.</p> <p>Four of the original London Wall towers stood on the north side of the street. Three of these have been replaced, Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE and Moor House by Foster and Partners.</p> <p>The airiness of initial concept of six towers on two-storey podiums has been lost. However, all replacement schemes follow the orthogonal grid of the original plan, and together with the Barbican Estate continue to frame existing streets, external spaces and gardens, and retain the highwalk connections around and across the site.</p>

167 (12.56)	A key characteristic of the Barbican Estate is that the residential accommodation is privately owned, as originally intended.	The Barbican Estate was originally built for rent for middle to high income earners. Most flats and houses have been sold following the introduction of RTB with the 1980 Housing Act.
167 (12.60)	The Estate has predominantly flat roofs of asphalt.	Wrong. All lower blocks of the Barbican have barrel vaulted roofs throughout, which are a striking and instantly recognisable motif of the estate. It appears that the author has never been to site.
167/8 (12.66)	There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. That includes the slab block Bastion House, on the site, which was conceived as part of a separate masterplan for commercial development along London Wall, rather than in conjunction with the Barbican Estate.	As explained under above point 20 (4.17), the Museum of London, Bastion House, the Barbican Estate and the Barbican Centre share the same palette of materials and repeat architectural elements and language.
167/8 (12.66)	As such, tall and large modern commercial buildings form a well-established part of the Barbican Estate's setting. Their scale and proximity further contribute towards a sense of enclosure and segregation which is characteristic of the Barbican Estate and forms part of its significance. The Barbican Estate buildings are appreciable against this background of tall buildings within its close setting, and, despite the proximity of the modern commercial buildings, there remains a clear sense of separation between the heritage asset and its urban surroundings.	This approach and justification are highly contested. This is key to this highly subjective interpretation of the TVBHIA. New building on the perimeter of the site contribute to the setting of the Barbican by virtue of their contrasting large scale and proximity leading to a high degree of enclosure?
		Over the past 30 years, four of the six original 1960s London Wall office blocks have been replaced. The density of the urban fabric has significantly increased, with height and volume extending into the area of the former two-storey podium. These tall and large modern office blocks, however, have a few things in common. They all: Strictly follow the perpendicular grid of the post-war South and Centre Barbican plan. Continue to contain, define and reinforce the urban street space and public realm. Break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context, their immediate neighbours, including the Barbican Estate. Place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks. None of the above prevailing qualities were applied to the two proposed developments. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining CAs, but also to the setting of the immediate and wider neighbourhood.
		On the east side of the Barbican area, replacement blocks of the post-war development along Moor Lane generally follow the shoulder height of the Barbican Estate. From here the height and massing increases, away from the Estate and towards Moorfields. What were once two point-blocks, Britannic Tower and More House, with lower blocks in between, is de facto

		<p>morphing into an approximate 20-storey continuous high wall.</p> <p>The result represents the piecemeal approach the original masterplan sought to avoid. The haphazard and jugged wall of buildings is not a redeeming quality. On the contrary, it is judged to be harmful to the setting of the Barbican, the CA, and the residential amenities, specifically of listed Willoughby House.</p>
174 (14.15)	<p>Due to the scale and type of the existing commercial blocks to the south of the Conservation Area, including the existing Bastion House, the proposed development would be in keeping with the character of this part of the setting of the Conservation Area. New Bastion House broadly the same height as the existing Bastion House and is visible to a similar degree but would bring a noticeable improvement to that part of the site in terms of its design and materials. The proposed Rotunda Building would be noticeably taller than the existing buildings on that part of the site, however it would be lower than Bastion House, with more limited visibility in the Conservation Area and, when seen, it would complement New Bastion House in terms of its design, and it would be seen and understood within the existing large scale commercial development which already characterises the southern setting of the Conservation Area.</p>	<p>In contrast to the proposed buildings other developments adjacent to the Postman's Park, and Barbican Estate and Golden Lane CAs with their listed buildings, attempt to respond to its specific urban context of their immediate neighbours:</p> <p>200 Aldersgate steps down to adjacent London House and Little Britain, where the building is successively broken down in scale.</p> <p>One London Wall steps down to 10 Aldersgate Street, aligning it with the roofline of its neighbours along Aldersgate Street.</p> <p>88 Wood Street is in height aligned with its smaller scale neighbours along Wood Street.</p> <p>London Wall Place breaks down its mass into proportionate sections and places height in a careful composition and in response to the buildings of the Barbican Estate, allowing for sufficient breathing space.</p> <p>Developments along Moor Lane reduce the height along the street to that of the Barbican Estate.</p> <p>The proposed development consists of two massive volumes that are alien to the grain established by neighbouring buildings, dwarfing even the large structures of Alban Gate and One London Wall. The proposed development, due to its proximity encroaches on the CA.</p> <p>The enormous (Pevsner) Alban Gate is one of the least successful buildings along London Wall, specifically its London Wall bridging half creating a dark, windy and hostile street environment. It should not serve as precedent.</p>
175 (14.19)	<p>The slight erosion to the backdrop of the bell tower of St Botolph's in some views from within the Park (View 14B) would be balanced by the high quality design and materials of the proposals and the scale, type and location of the proposed buildings, which would be in keeping with that part of the setting of the Conservation Area, and the substantial improvement to the quality of the setting of the Conservation Area and the Church at the north end of Aldersgate Street (View 13).</p>	<p>This interpretation is challenged.</p> <p>The view of St Bride's spire shall be protected, however, not the bell tower of Grade I listed St Botolph's?</p> <p>The encroachment of the Rotunda building on Postman's Park and the loss of sky will be harmful to the setting of the church, the park and the conservation area.</p>
176 (14.31)	<p>The Barbican Lauderdale tower would be obscured by the proposed Rotunda Building in views north along St Martin's Le Grand (View 12), however this view is incidental and not part of the heritage significance of the Barbican Estate; the visibility and prominence of the Barbican towers in other views will remain.</p>	<p>Lauderdale Tower represents an important view for wayfinding from Tate to St Paul's to Barbican Centre.</p>
176 (14.33)	<p>The proposed development, in its scale and design, would be in accordance with the established character of the south part of the setting of the</p>	<p>This is contested.</p> <p>With 60- to 70-meter-long elevations of monotonous fins, the proposed development consists of two massive</p>

	Estate and would enhance the skyline through high-quality architectural design.	volumes that are alien to the grain established by neighbouring buildings, dwarfing even the large structures of Alban Gate and One London Wall. Please refer to drawings: DAS, page 121, 5.11 Site West Elevation DAS, page 122, 5.11 Site East Elevation
199	A5, Bridge above Aldersgate from Barbican Station	This is one of the harmful views of the proposed development. The proposed Rotunda building will close the gap between the east and west sides of Aldersgate Street, creating one continuous wall of development, and visually turning the street towards St Paul's into a dead-end road. Not mentioning the actual building into the photomontage by solely a blue dotted outline seems intentionally deceptive.

APPENDIX E



**MUSEUM OF LONDON AND BASTION HOUSE  
140 & 150 LONDON WALL EC2Y 5DN & EC2Y 5HN**

**LONDON WALL WEST REDEVELOPMENT**

**PLANNING APPLICATION 23/01304/FULEIA  
LBC APPLICATIONS 23/01276/LBC & 23/01277/LBC**

**HERITAGE ASSESSMENT ON BEHALF OF BARBICAN  
QUARTER ACTION**

**SCOPE OF REPORT**

1. This report, prepared on behalf of Barbican Quarter Action, focusses on the heritage impacts of the proposals within the local and immediate area. It does not consider the potential impacts on long-distance views of St Paul's Cathedral or the riverside. These matters are left to Historic England and the Greater London Authority who have a particular remit and expertise in this field, or to other London boroughs such as Lambeth and Islington whose own protected local views may potentially be affected.

**DESCRIPTION OF PROPOSALS**

2. Planning permission is sought for:

“Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office, cultural uses, food and beverage/café, access, car parking, cycle parking and highway work; part demolition of reconfiguring of the Ironmongers' Hall, creation of new Ancient Monument viewing area, public realm alterations to Plaisterer's Highwalk, John Wesley Highway, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the voids, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of the new City Walkway and hard and soft landscaping; and associated and ancillary works, structures and highway works.”

3. Listed Building Consent is sought for:

“External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of the new highwalks, hard and soft landscaping, and works associated with the

construction of new buildings with the development proposed at London Wall West (140 & 150 London Wall), Shaftesbury Place, and London Wall car park”.

“Demolition of Ferroners’ House alongside external alterations to the façade and roof level of Ironmongers’s Hall, internal reconfiguring to cores and back of house areas and works associated with the development proposed at London Wall West, Shaftesbury Place and London Wall car park”.

## **GENERAL COMMENTS ON PRESENTATION MATERIALS**

4. The architect’s sketches and artistic illustrations contained within the applicant’s Design & Access Statement, and displayed for public view in the London Centre, generally give an unreliable impression of the proposals with stretched and distorted perspectives. A simple examination of the model shows, for example, that Approach View 1 is not correct in terms of showing the true height of the Rotunda Building, the ‘Glade’ in View 4 appears far larger than it will actually be in reality, and View 6 of the ‘Aldersgate Plaza’ has a similarly enlarged perspective.

5. The applicant’s Townscape, Visual and Built Heritage Impact Assessment (TVBHIA) is more rigorously prepared. However, while the ‘existing’ and ‘proposed’ comparative images may be accurate in their own right, according to the methodology set out, the photographs generally use a wide-angle lens which does not always reflect what is seen or sensed by the human eye. In the photographic images middle-distance objects appear to be farther away, and hence smaller and diminished in context. It is similar to the technique often used by estate agents in sales brochures to make internal rooms seem bigger than they are.

## **POLICIES TO PROTECT THE HISTORIC ENVIRONMENT**

6. The National Planning Policy Framework, the London Plan (2021), the City of London Plan (2015) and the emerging City Plan 2040 all contain numerous policies for the preservation and enhancement of the historic environment. These are set out in the applicant’s submissions and do not need to be repeated here. While they provide a framework for decision-making, they also rely on an understanding of the significance of the assets which are affected and how the proposals potentially impact on that significance.



## **IMPACT ON HERITAGE ASSETS**

### **Existing buildings on the site**

7. The existing buildings proposed for demolition are not designated heritage assets. However, they directly abut a Scheduled Ancient Monument, Ironmongers' Hall (Grade II Listed), the Barbican (Grade II Listed), and the Barbican Park and Garden (Grade II\* Listed). The site also directly abuts the Barbican and Golden Lane Conservation Area and lies close to Postman's Park Conservation Area and Foster Lane Conservation Area, all of which contain Grade I Listed Buildings.
8. A Certificate of Immunity from Listing was issued in 2015 and renewed in 2019 for both the existing Museum of London building and Bastion House. This COIL expires in August 2024.
9. The City Corporation does not have a register of locally listed buildings or non-designated heritage assets.
10. The Museum and Bastion House were designed as one scheme by the highly respected architectural practice of Powell and Moya. Historic England's assessment as part of its consideration of the application for a Certificate of Immunity from Listing in 2014 and its renewal in 2019 stated the following: "Whether considered individual buildings or as two elements of one entity, it is acknowledged that both buildings have a degree of architectural and historic interest, but they do not meet the very high bar set for buildings of their date and type and should not be added to the statutory list".
11. The Principles of Selection for Listed Buildings (March 2010) states that "particularly careful selection is required for buildings from the period after 1945".

### **The Museum of London**

12. According to Historic England's assessment, the stellar reputation of Powell and Moya confers some significance of the Museum of London building, although it falls short of the required architectural interest and is too altered to meet the criteria for listing. Historically, it has interest as the first post-war museum to be built in London and, at the time, the largest urban history museum in the world. On these grounds it should therefore be classified as a non-designated heritage asset.
13. Powell and Moya's design for the Museum has always attracted interest as an example of non-grandiose modernism. The building's thoughtful reticence was noted on its opening. In 1982 the architectural critic Bryan Appleyard

praised the new Museum building as ‘brilliant’; its ‘beautiful variations and careful detailing are demonstrations of late modernism at its cool and satisfying best’ (*The Times*, 26 November 1982, see Appendix 1). The contrast with the more robust style of the Barbican Estate was seen as rewarding. While the 1982 article was written before the new entrance was built in 2010 this too was designed by Wilkinson Eyre in a ‘cool’ and undemonstrative manner that complimented Powell and Moya’s original plans and the Barbican Estate beyond.

14. The original Rotunda of the Museum of London was placed in the middle of Aldersgate Street, which marks the start of the ancient Roman Road to the north, now known as the A1 and the longest numbered road in the UK. While the Rotunda blocks the road, this was done at a time when there were extensive plans to separate pedestrians from vehicular circulation, intended to cross the whole of the City of London. The Rotunda was envisioned as a central hub of the proposed pedway system from where the pedestrian had an elevated vantage point with views in all directions, including south towards St Paul’s. These features also arguably contribute towards its significance as a heritage asset.

15. While the Museum and its Rotunda are not actually part of the Barbican Estate they were intended to integrate and connect into the Barbican’s network of public pedways and highways, and designed with a high degree of architectural sympathy and synergy with the Barbican.

16. The proposal involves the total loss of the Museum and its Rotunda. Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of the harm and the significance of the heritage asset. The replacement of the existing Rotunda with a commercial building will cement the blocking of this vital and historic artery of Aldersgate Street, and furthermore demolish and privatise these important existing public views.

### **Bastion House**

17. Bastion House forms part of the post-war masterplan for the Barbican South Development, as shown in Figure 1. The six office blocks along London Wall, four on the north side and two on the south, plus the development to the east of the Barbican, including Britannic House, were all based on the same orthogonal grid of the Barbican Estate. This grid was set up to be parallel with Moorgate to the east, and then rigorously applied up to Beech Street/Chiswell Street in the

north, to Aldersgate Street in the west, and straddling both sides of the new dual-carriageway section of London Wall (Route XI). Historic England's assessment notes that Bastion House possesses particular historic interest for its part in this post-war masterplan.

18. The 1959 plan (Figure 1) predates the Museum and shows the potential position of Bastion House as a direct continuation of Mountjoy House. In the event, to accommodate the Museum, Bastion House was constructed marginally to the east, but still on the same orientation. It is consciously set at an angle to London Wall so that it aligns precisely with the grid of the Barbican blocks to the north. It is also a very similar width to Mountjoy House.

19. Designed in a strongly Miesian form sitting above its plinth it is carefully proportioned and detailed. It is the only unaltered (externally) survival of the six similar office blocks that flanked the northern vehicular bypass for the City. Together with the Commercial Union Building (the Aviva Tower), soon to be demolished for the development of No.1 Undershaft, it is the last surviving example of its type in the City of London.

20. It has been suggested by the applicant that Bastion House suffers from structural defects that constrain its retention and reuse, but these have been strongly rebutted by independent experts. It does not reduce its heritage significance.

21. As with the Museum the proposal involves total demolition, and Paragraph 203 of NPPF must be therefore considered and give due weight to the total loss of the non-designated heritage.

22. The applicant's claim (for example in the analysis of View 15 in the applicant's TVBHIA,) that the demolition of Bastion House is a heritage benefit and that new Bastion House is a 'major beneficial' townscape enhancement compared to the existing is strongly challenged. Many of the THBVIA views show how much more prominent and dominant the new buildings will be, with no regard whatsoever for their context.

23. It is important to note that when four of the original six towers to the east of Bastion House fronting London Wall were subsequently demolished, all the replacement development schemes followed the same perpendicular grid, as can be clearly seen in Terry Farrell's Alban Gate and MAKE's London Wall Place.

**Setting of the Barbican Grade II Listed (Ref. 1352667)**

**Setting of the Barbican Park and Garden Grade II \* Listed (Ref. 10001668)**

**Setting of the Barbican and Golden Lane Conservation Area**

24. These separately designated heritage assets overlap considerably in terms of their heritage significance, and the impact of the proposals is therefore assessed together.

25. Bastion House was designed with clear reference to and continuation of the strictly orthogonal grid layout of the Barbican. Powell and Moya were completely aware of the design rationale of Chamberlain Powell and Bon in their layout of the Barbican complex. Bastion House aligns precisely with the adjacent Mountjoy House, and indeed picks up on the rhythm of its fenestration. The external plain white tiling of the Museum complex has close synergy with that in the contemporary Barbican Arts Centre.

26. The western edge of the Barbican estate, fronting onto Aldersgate Street and continued by the Golden Lane Estate fronting Goswell Road, is low-rise, providing a human scale to the eastern side of this important north-south thoroughfare. The towers of the Barbican are set back from the edges of the podium deck. The existing Museum of London complex respects and continues this modest scale to the junction with London Wall and incorporates the low-level rotunda in the centre of the vehicular roundabout.

27. The demolition of the Museum and Bastion House will erode and isolate the historic contextual setting of the Barbican complex. The scale, mass and form of the proposed Rotunda Building and New Bastion House will radically change the setting of the Barbican on its southern and western side. The applicant's TVBHIA consistently and wrongly claims that the proposals will enhance the setting of the Barbican, based on the premise that, despite being bigger, the contrasting design and materials will be less intrusive. The opposite will be the case. The amorphous, bloated shape of the new buildings proposed, combined with their scale, footprint and materials, will jar with the orthogonal nature of the Barbican to its north.

28. The Barbican Estate Listed Buildings Management Guidelines Volume II SPD (October 2012) notes in Paragraph 2.2.7 that controlling and limiting alterations to the exterior spaces within the Barbican is of the utmost importance to preserving the special architectural and historic character of the Barbican Estate as a whole. Its setting, and the impact of changes to views into and out of the Barbican, are of great importance.

29. The proposed 14 storey height and mass of the proposed Rotunda Building radically alters the established townscape and introduces an entirely inappropriate scale on the east side of Aldersgate Street. Together with the highest part of the 200 Aldersgate Street (built in 1991) which lies directly opposite, the combination will create a canyon-like constriction in Aldersgate Street, clearly apparent on examination of the model. View 13 in the TVBHIA is very misleading as it neither includes the full height of the new buildings nor the relationship with 200 Aldersgate Street. The Rotunda Building will block views of the Barbican from the further south, notably the fine view from St Martin Le Grand of the pencil-thin Lauderdale Tower. It will radically alter and harm the setting of the Barbican from the south.

30. Similarly, the setting of the western side of the Barbican will be harmed in views from the north, particularly as illustrated in View A5 on the TVBHIA, taken from the public bridge to Barbican Station. View 17, taken from the western pavement of Aldersgate Street, similarly shows how the increased bulk of New Bastion house and the Rotunda Building will loom over the southernmost frontage of the Barbican to Aldersgate Street. The impact will be equally harmed in views from further north, near the junction with Long Lane, and from the eastern pavement.

31. The existing landscape of the Barbican has very high heritage significance, recognised through Grade II\* listing, and the existing Museum building and Bastion House contribute positively to its setting. Policy CS12.4 of the City of London Local Plan 2015 specifically seeks to safeguard the character and setting of the City's gardens of special historic interest.

32. The Barbican Listed Buildings Management Guidelines Volume IV SPD (2015) focusses on the listed landscape and notes in paragraph 1.4.11 that the podium and highwalks offer a continuous range of viewpoints from which to survey the surrounding city. The map of important views and vistas in the Appendix to Volume IV of the SPD identifies the view south from the Lakeside Terrace as the most important public panoramic view within the whole of the Barbican complex.

33. Similarly, the Barbican and Golden Lane Conservation Area SPD, adopted on 1<sup>st</sup> February 2022, describes the character of the south Barbican sub-area on page 27. "At the southernmost end of the estate are the 'foothills' of the Barbican, where the scale is lowest and closest to more traditional forms of building, which are illustrated by the remnants of the Roman and medieval City wall and the church of St Giles Cripplegate. The street level podium, the park and the raised walkways all offer a multitude of important views across and

beyond the Barbican. The SPD selects several views of particular importance on pages 31 and 32, notably Nos. 12, 16, 21 and 26 which all comprise views to the south with Bastion House in the background.

34. The applicant's TVBHIA illustrates some of these views. From the Lakeside Terrace Views 19, 20 and 21 all show that the wider massing of New Bastion House will be a larger incursion into the backdrop view than the existing. From the western end of St Giles' Terrace, View 24 shows that the Rotunda Building impinges on the existing clean outline of Mountjoy House. The view out of the Barbican to the south from the Wallside Highwalk will be fundamentally changed for the worse, as shown in View 27. View A7 further illustrates how the existing clean gap between the slim orthogonal mass of Bastion House and Mountjoy House will be eroded by the proposals.

35. From a continuum of publicly accessible areas the two new tall buildings will become very prominent background features, filling areas of existing sky, and providing a muddled silhouette to the Barbican buildings. This will harm the existing character and appearance of the Barbican and Golden Lane Conservation Area and the setting of the Barbican complex as a listed building.

#### **Setting of St Giles Cripplegate Grade I Listed (Ref. 1359183)**

36. This is a building of the highest heritage significance and its retention and repair after war damage was a key element incorporated into Chamberlin Powell and Bon's design for the Barbican. Its setting comprises a major part of its heritage significance.

37. There are fine existing views of the church from the public podium areas immediately adjacent to the north side of the church, from the extensive terrace on the north side of the lake and from the entire length of Gilbert Bridge. In this continuum of views the slim and restrained outline of Bastion House is often visible, but the majority of the silhouette of the church, its tower and crenelated nave parapet is seen against clear sky. This will be greatly changed by the two tall buildings proposed. The impact will harm the setting of the church and hence its significance.

38. In the 'as existing' View 21 of the TVBHIA the right-hand side of the tower of St Giles is clearly defined against sky; in the proposal the rotunda will fill in and spoil that clean outline. The applicant's claim that the impact is beneficial is strongly challenged. Similarly in View 22 from Andrewes Highwalk the gap between the tower of St Giles and the existing Bastion House is effectively filled in by the new development. It should be noted that there is a continuum of views along this highwalk beneath Gilbert House in which 200 Aldersgate is

often completely masked by the church. The new Rotunda Building, owing to its width and height, will be continually visible.

39. From St Giles Terrace, which is effectively the modern ‘churchyard’ and integral to the significance of the church, View 23 in the TVBHIA takes just one position in this important public space but it illustrates how the wider massing of New Bastion House and its fussy architectural treatment will impact negatively on the backdrop of the church and harm its setting.

### **Setting of Ironmongers’ Hall Grade II Listed (Ref. 145812)**

40. Ironmongers’ Hall (excluding Ferroners’ House) was statutorily listed on 20<sup>th</sup> April 2023. This is an important change to its heritage status and its heritage significance since pre-application discussions and public consultation for the redevelopment proposals. Dating from 1923-25 (with a 1975 extension by Fitzroy Robinson that is not included in the listing), it is one of the few buildings in the area that survived wartime destruction and post-war clearance. It has been listed because of its distinctive Tudor/Jacobean Revival architecture, its historic interest as the purpose-built home of the Worshipful Company of Ironmongers and the only livery company hall built between the wars, and for its group value lying next to the Grade II listed Barbican.

41. Historic England’s very thorough listing description notes that “the hall is reached via Shaftesbury Place, off Aldersgate Street. Always hemmed in by surrounding buildings, it now occupies a tight site enclosed by the Museum of London and the Barbican”.

42. Powell and Moya were deeply aware of the constraints placed by the existence of the Ironmongers’ Hall on their designs for the Museum of London. While they and the City Corporation might have preferred at the time for it to be demolished and relocated, Powell and Moya accepted its retention and skilfully designed a setting that respected its scale and historic setting.

43. Shaftesbury Place is an ancient alley off Aldersgate Street, as shown on historic maps (Figure 2), and was one of several on both sides of the street, some associated with old coaching inns. Shaftesbury Place, however, was associated with Shaftesbury House, a mansion attributed to Inigo Jones in Chapter XXVI of Walter Thornbury’s *Old and New London* (1878), and lived in by Anthony Ashley Cooper, Earl of Shaftesbury. Although the mansion had long disappeared, Shaftesbury Place was a long-established constraint when Ironmongers’ Hall was built in the early 20<sup>th</sup> century. Together with the Hall and frontage buildings to Aldersgate Street, Shaftesbury Place survived the war, as shown on the 1945 map (see Figure 3).



44. Powell and Moya retained the ancient configuration of Shaftesbury Place and recreated the historic arched entrance off Aldersgate Street and secluded forecourt. They respected and paid homage to the network of passageways, alleys and courtyards that had characterised the area before the war and which survives in some other historic parts of the City.

45. The City Corporation have policies to retain, and reinstate where possible, its historic street pattern of lanes, alleys and courtyards. Paragraph 3.12.6 of the Local Plan states that “the pattern of streets, lanes, alleyways and other open spaces such as squares and courts is a distinctive element of the City’s townscape and is of historic significance. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings”. The eradication of Shaftesbury Place would conflict with this policy.

46. Shaftesbury Place was paved in brick in order to be similar to the Barbican podium and pedways. The archway gives shelter and respite from the noise and pollution of the busy traffic on Aldersgate Street, and the yard provides a semi-private space which is well suited to wedding parties and other such functions which hire the Livery Hall.

47. Historically Ironmongers’ Hall was always approached through an archway beneath a continuous run of buildings along the east side of Aldersgate Street. The proposals will radically change the setting of the Ironmongers’ Hall by exposing it to much greater public view and activity. This is heralded by the applicant as a major heritage benefit, but this is considered highly debatable. This existing and historic intimacy and secluded nature of its setting is part of its significance, and its radical alteration will be harmful. The proposed ‘Aldersgate Plaza’ bears little resemblance to the historic form of Shaftesbury Place. Moreover, the exposure of Ironmongers’ Hall will be compounded by the overwhelming scale of the north end and street frontage of the Rotunda Building, which presents a cliff onto Aldersgate Street. View 18 of the applicant’s TVHBIA is telling. The frame of the ‘existing’ photograph contains the whole of the existing frontage buildings to Aldersgate Street while the ‘proposed’ image omits the vast scale of the new buildings, so huge that they cannot be fitted into the frame.

48. Some of the best existing views of Ironmongers’ Hall are from the high walks of the Barbican. View 26 is from the Thomas More Highwalk in which the slim lines and simple geometry of the existing Bastion House provide a dignified background to the hipped roofs, gables and chimneys of Ironmongers’

Hall, together with ample areas of sky. Much of this sky will be filled in by the new Bastion House and Rotunda Building which will provide a high wall of development behind. View A8 shows the impact even more alarmingly; the cantilevered form of the new Bastion House ‘leans’ over the roofs of Ironmongers’ Hall while the Rotunda Building looms behind the chimneys and blocks the existing view of the top of the dome of St Paul’s Cathedral. View A9, taken from the Thomas More Highwalk near Mountjoy House shows how the wider footprint of new Bastion House and the massing of the Rotunda Building, together with their uncontextual architectural treatment, will radically alter what at present is a very fine and unspoilt view of Ironmongers’ Hall.

**Setting of Roman and Medieval Wall and Bastions, west and north of Monkswell Square Scheduled Ancient Monument (Ref. 1018888)**  
**Setting of Barber-Surgeon’s Hall and Physic Garden**

49. The existing podium element of Bastion House and the flank wall of the Museum form the western edge and immediate setting for the remarkable surviving above-ground sections of Roman and Medieval wall and bastions which run from London Wall to the Barbican lake. These are set in public gardens which contain mature planting. This Scheduled Ancient Monument is of the highest heritage significance. The greatly increased bulk of the proposed development in terms of its footprint and solidity will have an overwhelming and harmful impact on the setting of the Ancient Monument and the amenity of the public open space. The curving bulbous design is a marked contrast to the restraint and discipline that characterised Bastion House and the Museum and the southern edge of the Barbican.

50. View 27 in the TVBHIA taken from the Wallside Highwalk indicates a massive and deleterious change in the existing townscape and setting for the Ancient Monument and public gardens which will be overwhelmed by the scale and form of the new development.

51. To the east the neo-Georgian post-war Barber-Surgeon’s Hall (built in 1969) is a non-designated heritage asset, together with its Physic Garden, one of ten livery company gardens surviving in the City, which is also of historic interest in its own right. The greatly increased massing of the proposal will harm the setting of these non-designated heritage assets.

52. View 28 in the TVHBIA shows the increased impact of the greater bulk of New Bastion House on the setting of Barber-Surgeon’s Hall as seen from Monkswell Square to the east.

## **Setting of St Botolph Aldersgate Grade I Listed (Ref. 1064732)**

### **Setting of Postman's Park Conservation Area**

53. St Botolph's Aldersgate Church is a building of the highest heritage significance, Grade I listed. It sits within its former churchyard, now known as Postman's Park. At the western end of the church the low square tower, built of brick, with a lead dome and a small bellcote is a distinctive feature. There is a continuum of fine views of the church from the middle and southern side of Postman's Park. The low massing of the existing buildings on the north side of Little Britain and the south-east part of 200 Aldersgate results in existing views of the tower bellcote silhouetted against open sky. The proposed development will fill this existing area of sky and will alter and harm the setting of St Botolph Aldersgate.

54. The proposal will also harm the character and appearance of Postman's Park. Already enclosed by substantial buildings on its southern flank (Namura House) and the block of flats comprising 75 Little Britain (built 1996), the existing view of sky to the north above the range of buildings on the north side of Britain Street is extremely important to the character and appearance of Postman's Park. It contributes to its sense of 'openness' which is noted as being an integral component of its character in the Conservation Area Character Appraisal and Management Guidelines (SPD). The proposal will seriously curtail these sky views to the detriment of its character and its amenity. The proposal will loom above the terrace of buildings on the north side of Little Britain. It will reduce the amount of natural light to the Watts Memorial plaques. The view of St Botolph's Church is specifically identified (3B) in the Conservation Area Management Guidelines.

55. Views 14A, 14B and A4 provided in the applicant's TVHBIA show some of the impact of the Rotunda Building. However, no view is provided from the pathway along the south side of Postman's Park which provides a continuum of views to the north.

56. The Rotunda Building will also appear above 75 Little Britain in views from King Edward Street. View B17 in the TVHBIA is not taken from the best position. Examination of the model shows that the impact on the skyline looking east from the west side of King Edward Street will be considerable, including views down Little Britain itself.

57. It should be noted that the Draft City Local Plan 2040 does not identify London Wall West as an area that is appropriate for tall buildings. While it will no doubt be argued by the applicant that the northern section of 200 Aldersgate

Street already sets a precedent for tall buildings, there is no doubt that its height detracts from the character and appearance of Postman's Park. An additional tall building, closer and with a bigger footprint than the tall section of 200 Aldersgate Street, will exacerbate this harm. Two 'wrongs' will not make a 'right' in this situation. It is frankly extraordinary that the applicant's assessment of the impact of the Rotunda Building is 'moderately beneficial'.

58. There will also be a harmful impact on the southern section of Aldersgate Street. The existing Museum Rotunda provides a low-rise termination to the view north along St Martin Le Grand and the southern section of Aldersgate Street. The 1990s development immediately north of Little Britain was carefully restricted to six storeys in height in order to protect the setting of the east end elevation and nave of St Botolph's Church, and the backdrop of views of the western spire and south elevation from Postman's Park. The proposed 14 storey tower of the new Rotunda Building will radically alter this view and the harm setting of the church and the eastern edge of the Postman's Park Conservation Area.

### **Setting of St Anne and St Agnes Church Grade I listed Ref. 1286384 Setting of Foster Lane Conservation Area**

59. The Church of St Anne and St Agnes on the north side of Gresham Street is a building of the highest heritage significance. There are important views of the church from the south and east. In these views the charming and diminutive belfry is visible against sky, and it is notable that the scale of modern development to the north has been restrained in order not to overpower the setting of the church. The new Rotunda Building will be clearly visible rising above these buildings, particularly from the north-eastern end of Foster Lane, which is arguably the best view of the church. The view of the tower and belfry will be harmed by this intrusive backdrop. View B18 in the applicant's TVHBIA fails to encompass this view, and is oriented to look down Noble Street, conveniently excluding the church.

60. The western boundary of the Foster Lane Conservation Area directly abuts the Postman's Park Conservation Area at St Martin Le Grand. Immediately to the north of the Conservation Area, Castle House, 4-6 Aldersgate Street (built in 1999) and the corner of Aldersgate Street and London Wall, part of Foster's One London Wall (completed in 2005), respect the prevailing townscape context with five/six storey scale, and the setting of St Botolph's Church opposite, and St Anne and St Agnes to its south. The low scale of the existing Museum

Rotunda provides a very modest and unassuming background. This view and the wider townscape context will be significantly altered by the scale of the new Rotunda Building. Its scale will become a very prominent and obtrusive feature which will harm the setting of the Foster Lane Conservation Area.

61. The Foster Lane Conservation Area Character Summary and Management Strategy SPD 2015 identifies important views of the 19<sup>th</sup> century townscape at the corner of Gresham Street and Aldersgate Street. The applicant's TVHBIA fails to include this view of the corner of Gresham Street. View 13 is too close, taken from the south side of the existing roundabout, albeit the scale of the new Rotunda Building will be overwhelming. View 12 taken towards the southern end of St Martin Le Grand is too far south.

### **Wider Impacts on other Heritage Assets**

62. The applicant's TVHBIA includes dozens of 'before' and 'after' images from distant viewpoints. It will be for others to comment on these impacts, such as the incursion into the existing backdrop views of the tiered spire of St Bride's Church, Fleet Street, evident in Views 1 and 2 of the TVHBIA, or potential views from parts of Charterhouse Square or The Charterhouse itself, not considered in View B23.

### **OVERALL ASSESSMENT OF HARM**

63. The proposal involves the complete loss of two non-designated heritage assets, namely the former Museum of London building and Bastion House. There is substantial harm to these heritage assets.

64. The proposal involves less than substantial harm to the setting of several listed buildings, a Registered Park and Garden, a Scheduled Ancient Monument, and the setting of three conservation areas.

65. The most damaging impacts on designated heritage assets are the background views of the church of St Giles Cripplegate from within the Barbican, and the views of the spires of St Botolph Aldersgate from Postman's Park and St Anne and St Agnes from Gresham Street, both currently silhouetted against sky. While this is less-than-substantial harm, as defined in National Planning Policy Framework and Guidance, it lies potentially at the middle-to-upper range of less-than-substantial harm, given that the heritage assets are Grade I buildings of the highest significance of which their setting is a major contributor.

66. There is also less-than-substantial harm to the setting of Ironmongers' Hall and the Barbican, to the setting of the London Wall Scheduled Ancient Monument and to the character and appearance of the Postman's Park and Foster Lane Conservation Areas. These come at the lower-to mid-range of the scale.

67. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm. Paragraph 202 of NPPF is thus relevant, requiring the balance of harm against public benefits.

### **HERITAGE BENEFITS**

68. The applicant's claim that the proposals contain considerable heritage benefits is strongly challenged and disputed. The opening up of the setting of Ironmongers' Hall to wider public view and exposure, as explained above, is not considered to be a benefit. The claim made by the applicant throughout the TVBHIA that the new development will have only beneficial impacts on the historic environment is strongly refuted.

### **BALANCING HARM AGAINST PUBLIC BENEFITS**

69. Paragraph 202 of NPPF states that "where a development proposal will lead to less than substantial harm to the significance of the heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

70. Paragraph 203 of NPPF requires that "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

71. Paragraph 199 of NPPF requires that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Given the considerable degree of less-than-substantial harm that is caused to designated assets of very high heritage significance, this must be given great weight.

72. Paragraph 200 of NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”. It is not at all clear from the current proposals that such justification exists.

73. During the developer’s application for a Certificate of Immunity from Listing in 2014 and 2019 considerable emphasis was placed on proposals at the time to develop the site for a new concert hall and music centre, as a key component in the aim to create a Cultural Mile along the northern edge of the City. It was suggested that it would be impossible to adapt the existing structures of the Museum to create the large concert hall then envisaged, and that the large public benefit from the new concert hall would therefore justify comprehensive demolition. The COIL would ensure that the balance of heritage harm against public benefit would not be altered by the increased heritage significance that statutory listing would confer. However, the concert hall and music centre have now been abandoned and replaced by a commercial scheme with less definite cultural public benefit. Indeed, one of the benefits now muted by the applicant is that profits from the development will help to pay for the relocation of the Museum to Smithfield, which is happening in any event.

74. The proposals, promoted by the owner of the land, are speculative, with no pre-let or funding provision, likely intended to maximise the value of the site with a view to disposal to a developer. It seems probable that there are alternative options which could retain at least some of the existing fabric of both the Museum and Bastion House. Such alternatives would likely cause less heritage harm and might also provide a variety of uses, some of which could construe public benefit, whilst also achieving a positive value for the owner. The optimum viable use for the site might not be that which achieves the highest value in purely monetary terms.

## **CONCLUSION**

75. The proposals cause widespread harm to a large number of heritage assets, including the complete loss of two undesignated heritage assets. Harm to designated heritage assets is less than substantial, but nevertheless of such degree that will considerably erode and harm their significance. This harm is not outweighed by heritage benefits elsewhere, nor do there appear to be other outstanding public benefits which would offset the great weight that must be



given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

Barbican Quarter Action

December 2023

### **Author of this report**

Alec Forshaw worked for 35 years as a conservation and urban design officer in local government. As a specialist heritage and planning consultant he has presented evidence at major Public Inquiries including Smithfield (2014), Liverpool Welsh Streets (2014), New River Head (2017), Norwich Anglia Square (2020), Custom House (2021), and M&S Oxford Street (2022). He contributed to the designation of the Barbican and Golden Lane Conservation Area, and has been heavily involved in the very recent designation of the Creechurch/Bevis Marks Conservation Area. He is the co-author of *The Barbican: Architecture and Light* (2015) and *New City: Contemporary Architecture in the City of London* (2013).

### **APPENDIX**

*From God's house to Bauhaus and back again* Bryan Appleyard, published in *The Times* 26 November 1982

### **LIST OF FIGURES**

Figure 1 Map of South Barbican Development Masterplan 1959

Figure 2 Alleys off Aldersgate c.1840

Figure 3 Ordnance Survey Map 1945

Bryan Appleyard, complete with Pevsner's writings and architect Will Alsop, appraises a selection of modern buildings

From God's house to Bauhaus and back again

Should the appreciation of post-war architecture be left to the experts or can the public at large raise their eyes skyward in admiration rather than conventional condemnation? A leisurely weekend walk through the City of London can confound the sceptics and provide a real insight into the best of modern buildings

Modern architecture requires some explanation. Its post-war reputation in this country has been appalling and the buildings of the seventies, designed in reaction to the public's disgust, have done little to remedy the popular standing of the art.

It is not enough to complain, as architects persistently do, about cowardly clients, unrealistic planners and mindlessly difficult local protest groups. That is merely to compound the incomprehension. It would be far better for architects to own up to the immensity of the mistakes and to the relentless mediocrity of most modern developments; then to spend the rest of the time drawing attention to the best that has been achieved.

Post-war British architecture has thrown up a number of fine buildings, some with the confident air of near-masterpieces. But the strength of the reaction against the failures has meant that most people no longer bother to look.

They are there, however, and the City of London is as good a place as any to walk around and look for them. But first it is necessary to understand a few of the reasons for the peculiar nature of modern architecture. Of all the arts, architecture is the one in which the artist aspires most literally to the rendering of the deity. Sir John Soane's Bank of England presupposes a God as surely as Lewis Cubitt's King's Cross presupposes a train.

A building is centred on the human function when they are not destroying our cities. But Mies' buildings are beautiful and LeCorbusier did possess an astonishingly fertile and varied visual imagination. Wolfe's verbal sermons at the expense of an aesthetic he perceives as anti-life are less impressive if reduced to their essence - a banal, noisy exercise in phillistinism.

British building in the fifties and sixties was conceived under the modernist spell. The steel and glass towers that began to emerge at that time were "expressed structure" or "form-following function" whether we liked it or not. Gradually it began to emerge that we did not want the anti-prophet developer fury of the sixties spilled over into anti-architect fury.

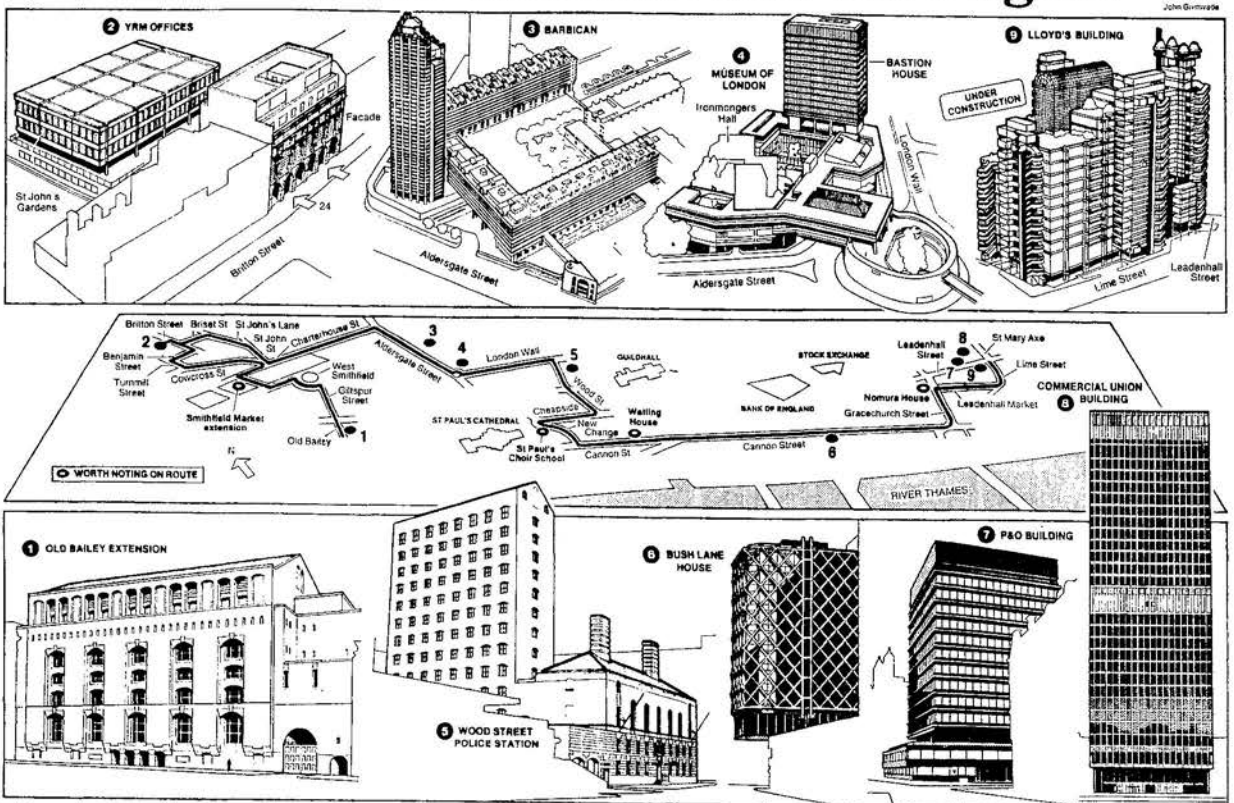
The Victorians' profound belief in that view led to such extravagant masterpieces as St Francis Station. "Form follows function" and applied decoration were part of the transcendent and moral significance attached to commerce. Even the most Victorian house would be endowed with decorative mouldings.

At the height of this decorative extravaganza, though, a few people decided that God had died. The carnival continued into this century in the form of decorative gasp being art nouveau - but then the crisis came. Vulgarly, this is assumed to have been caused by the First World War, in reality that was only a symptom, and the trend was discernible long before.

In the godless post-war world a generation of prodigiously-gifted architects went back to basics. In the manner of Walter Gropius at the Bauhaus or of Le Corbusier or Mies van der Rohe, a profound disgust with the idea of decoration was conceived. A new conceptual centre had to be found for their art to replace the decayed metaphysics. For Mies this new centre was an ethereal perfection of abstract form, for Le Corbusier it was a visionary determination to transform the world - "architecture or revolution".

For Mies this was a new proletarian functionalism. The notion of "expressed structure" was conceived, it meant that the final appearance of a building should be dependent on its construction. Decoration or disguise was an offence against the clear light of the new Utopia.

It is easy now to mock the idealism which characterized these visionaries. With hindsight we can blame them for the horror executed by lesser talents. Tom Wolfe in his book From Bauhaus to our House (Cape) does just that but, in doing so, he fails to grasp the creative power they possessed. Without that, modern architects can be portrayed all too simply as slavish acolytes of a gang of



rather at its modern extension southwards down Old Bailey. This is the first of two buildings by the firm of McMoran & Whitby on our route and both can fairly claim to be among the best. Built in 1967-69, the Old Bailey extension was well ahead of its time in the abandonment of modernist conventions, not for the new vernacular, but for a far more coherent and radical style. The frontage on Old Bailey itself is brilliant with its massive sheets of Portland stone interrupted by recessed windows with flat arches and by vertical projections which sweep smoothly back into the wall just above street level. At the top there is a haunting row of arches, some blanked off, while the entrance is an understated and surprisingly small doorway after the drama of the rest of the frontage.

The architects wisely decided to attempt to blend with the neo-baroque extravagance of Mountford's original building. Indeed the clear line of their shallow-pitched roof looks suspiciously like an ironic comment on its somewhat empty rhetoric. But the overall effect is breathtaking in the way that a grand entrance permits it to be human as well.

Heading northwards through Smithfield and a maze of streets we arrive at 24 Briton Street - the first truly classic piece of modern architecture on the walk. These are the offices of the architect's York, Rosenberg, Mardall. They are behind the Victorian street frontage which the firm has restored and converted into shops and flats. The arch in the centre leads into a brick courtyard in which rests with perfect simplicity a three-story steel and glass structure, exuding an almost oriental, meditative calm.

The effect of such stunning simplicity is not easily achieved. Note specifically the carefully-conceived relationship of the block as a whole to its surrounding space. But note especially the rigour of the detailing: the revolving door entrance, for example, is prevented from creating a nasty bulge by being set back slightly more than usual. The doors thus provide a satisfying vertical shape into the facade. Note also the tone of the red steel facings against a beige-toned version of the usual colour of the treated steel in the building.

It is a building which challenges our anger at the relentless simplifying tendency of modernism. It reveals that simplification can attain harmony rather than monotony. Mies' tired mad that it is bad but here at least his purism and

rigour found sufficiently careful disciplines. Returning to Charterhouse Street we head east towards the unavoidable Barbican. Like the West End's Centre Point this is a development which is likely to drive people to nail their colours to the mast on the subject of modern architecture. For a start it is intended to be lived rather than worked in, and for people living reluctantly in tower blocks it is the popular image of everything that is vile about architecture.

However, people do choose to live in the Barbican and ironically they do higher rents the higher up the towers they go. Alsop's main criticism is the lack of colour though he defends vigorously the care which has gone into the shaping of the towers. But he admits that the acceptance as a whole suffers from being too large for the firm of architects - Chamberlin, Powell & Bon had their scheme accepted in 1959 but their arms were only finished last year.

The date of the scheme's acceptance is important because it means that the Barbican concept began to age damagingly in the midst of the building programme. The realization that a raised podium and apparently endless dripping concrete corridors may be intimidating rather than welcoming slowly began to dawn on people as crime and vandalism bred in and disfigured one council block after another. Ironic comparisons with Le Corbusier's "Ville Radieuse" - never actually built - are inevitable when confronted with such strict anti-individual idealism.

Pevsner rightly described the design of the Barbican's immediate neighbour in Aldersgate Street as "brilliant". It is lower than the Barbican, London, begun in 1972 whose beautiful variations and careful detailing are demonstrations of late modernism at its cool and satisfying best.

Its problem lay in crossing the road to the brick mound at the centre of the roundabout at the junction with London Wall. Powell & Moya achieved this by projecting the ribbon windows pillars which rise through the facade of the building, cutting through tiles and even through windows. The effect is complex and yet clean and the rhythm of the movement across the road

endows an unexpected ethereal quality to the composition seen from the west. Powell & Moya also designed the office block, known as Bastion House, which grows out of the museum development. This was the last in the series of blocks that ran dramatically the length of the dual carriageway section of London Wall. The others are somewhat anonymous sixties products, very much representative of post-war British modernism: Bastion House, however, is given a more massive look by its brown colouring, yet the effect is neatly raised by the way the whole is offset from the building below on concrete pillars and blocks. The building itself is perhaps a routine expression of slightly-elaborated modernism but it is

building completely lack the oppressive quality of the borrowings of the "new vernacular". In contrast, 80 Cannon Street - Bush Lane House - whose place in the mainstream of architectural thinking is evident from the moment you catch a glimpse of the black block enclosed in its massive steel lattice. Rarely can the doctrine of "expressed structure" have been taken so literally. The steel tubes carry water as a fire precaution and, structurally, were intended as a means of preventing vibrations from tube trains. In reality, as Alsop points out, there are many ways of doing that and the real reason was probably that the architects just wanted to build their huge lattice.

The effect from a distance is of a somewhat crude outcrop but at street level the empty space left by the raised first floor creates a surprisingly attractive effect. The block is raised with sufficient care and to a sufficient height to prevent any oppressive effect for the pedestrians. Its clumsiness prevents this being any more than an interesting building but it is worth noting as yet another variation on the simple modernist theme.

Through to Gracechurch Street where number 3 - Nomura House - has an elegant Italian feel with its angled windows, and then through the superb Victorian Leadenhall Market opposite. With its magnificent ironwork, so beloved of young architects today - this is an appropriate way to reach the climax of the walk: the junction of Leadenhall Street, St Mary's Axe and Lime Street.

most uncompromising application of Mies' idealism in London. The delicacy of its construction is stunning and the way the piazza in front dips down from street level has the effect of presenting the entire 381-foot frontage to us in one breathtaking sweep. The P&O building next door is a reasonably worthy companion but lacks the uncompromising grace of the Utopia.

The climax of the walk is thus a suitably commercial one, for Mies. Modernism was the style of architecture which defined the modern, corporate look. It was a look based upon a clean, abstract ideal form which reached its apotheosis in his own magnificent but chilling Seagram Building in New York. In the last analysis, however, it

was only one idea among many. But it was an idea that insisted on its own superiority and spiritual purity. The stock of the City arises from its contrast with the general jumble and stylistic cacophony which surrounds it. It is a worthwhile shock but it would be insanity to attempt to suppress that plurality in favour of a modernist singularity. This is what Le Corbusier wanted to do in Paris and it is what the Brazilians have done - disastrously - in Brasilia. Happily Alsop and his contemporaries have emerged from such Utopian dreams. They may not have reinstated God in the process but at least they have restored messy, unpredictable, unplanable man.

'The proportions and the raised level achieve what many a development has attempted - the effect of floating'

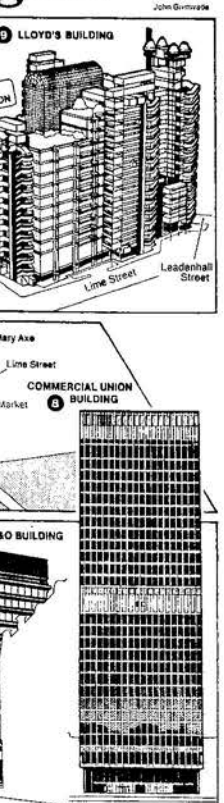
saved by the proportions and the raised level which achieves what many a development has attempted - the effect of floating. Turning right off London Wall into Wood Street we come to the police station which is McMoran & Whitby's second building on this walk. Completed in 1965, it shows once again how the firm appears to have stepped effortlessly beyond modernism without the struggles and indecision which have characterized the same step among others.

Again using Portland stone, they have this time produced an initially conventional-looking frontage which is rusticated (blocks separated by joint lines) at ground level and then smooth above. You first begin to realise there is something unusual in this building when you notice the rustication returning in the extraordinarily massive chimney stacks. Then looking up again, the smooth stone returns for a brilliant, slightly tapered, tower with a decorative archway which hark back to the Old Bailey.

This is a relatively unknown building - indeed, Alsop was dismissive of its existence - but it is an important one. The initial sense of oddness gives way to admiration at the coherence of the development. Only at the back does this break down slightly where the tower meets the lower storey slightly differently. The references to older styles of

Opposite is the Commercial Union building, built in 1964. 69 by George Melvin, Ward & Partners. This is perhaps the

'The overall effect is breathtaking while the avoidance of any grand entrance permits it to be human as well'



Opposite is the Commercial Union building, built in 1964. 69 by George Melvin, Ward & Partners. This is perhaps the

Advertisement for Teacher's Scotch Whisky. It features a bottle of Teacher's Scotch Whisky and a glass. The text reads: 'EST. 1850 TEACHER'S A WELCOME AWAITING. Through to Gracechurch Street where number 3 - Nomura House - has an elegant Italian feel with its angled windows, and then through the superb Victorian Leadenhall Market opposite. With its magnificent ironwork, so beloved of young architects today - this is an appropriate way to reach the climax of the walk: the junction of Leadenhall Street, St Mary's Axe and Lime Street. This promises to be an intersection which will stand as a monument to the achievements of modernism. On one side - Richard Rogers' new Lloyd's building is slowly rising to its climax in a 290 foot glass-roofed atrium. In spite of the current vogue for Rogers' work largely based on the popular success of his Centre Pompidou in Paris, it is important to remember that he is in effect no more than a late modernist. He is still in the business of "expressed structure" even if he has added a somewhat baroque twist to the ideology. In the wake of Rogers' failure to make the shortlist for the National Gallery extension, it is some consolation and Lloyd's had already given him this opportunity for another major London building. Opposite is the Commercial Union building, built in 1964. 69 by George Melvin, Ward & Partners. This is perhaps the



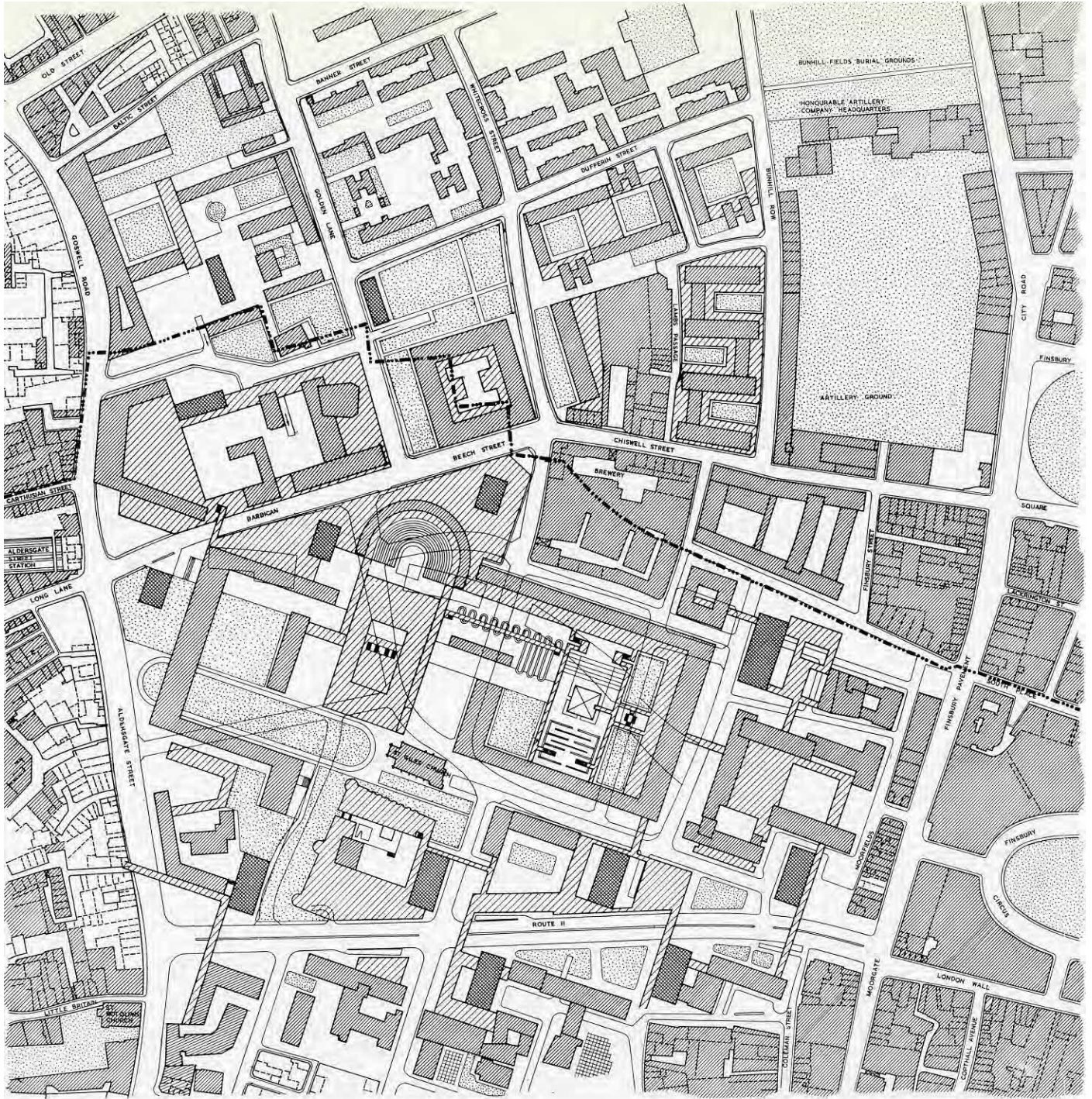


FIGURE 1 MASTERPLAN 1959







FIGURE 3 1945 OS MAP

APPENDIX F



29 January 2024

By Email only: [REDACTED]

Dear Brenda,

**RE: (ROL01285) Redevelopment of 140 & 150 London Wall and its effect upon the Barbican Estate residents Monkwell Square and London House – Daylight and sunlight**

Anstey Horne has been instructed by the Barbican Quarter Action group to review the ES chapter report on Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage that accompanies the planning application for 140 & 150 London Wall (planning application 23/01304/FULEIA).

As part of the review, we have been asked to comment upon the methodology adopted for the various assessments and upon the overall impact that the proposed scheme will have upon the residents of the Barbican, Monkwell Square and London House. This letter sets out our observations.

**Review of methodology**

**3D Contextual Model**

The 3D computer model of the existing site and surrounding context upon which the assessments are based, has been constructed using “*photogrammetric survey, site photography and OS information*” and has subsequently “*been updated using measured survey of the adjacent properties to the site*” (paragraph 13.2.7).

Photogrammetric survey does not establish the location of windows on a façade and has a built-in tolerance of up to 300mm. Measured survey provides greater accuracy of modelling and results.

The City of London as the Local Planning Authority should request confirmation as to which properties are modelled from measured survey and which are modelled from photogrammetric survey. In addition, confirmation as to how the windows and their locations have been modelled where photogrammetric survey has been used.

Until it is confirmed which properties are modelled from measured survey and which are modelled from photogrammetric survey, the overall accuracy of the modelling and analysis results cannot be commented upon.



## Daylight and Sunlight Assessment (Impact upon neighbours)

The BRE guidance sets out the tests that should be adopted when assessing the impact upon existing neighbours under section 2.2 of the document. The guidance states that the vertical sky component (VSC), no sky line (NSL) and annual probable sunlight hours (APSH) tests should be used.

Comparative daylight illuminance analysis ('illuminance method') has been undertaken for the surrounding properties (paragraph 3.2.17). Daylight illuminance is an absolute assessment of the daylight performance within a proposed scheme as set out within section 2.1 of the BRE guidance.

The appendices do not include any NSL contour plots. Therefore, it is not possible to see what layouts Waldrams' have used for each of the neighbouring properties. It would be helpful to review these to establish how the internal configurations of neighbours have been modelled, particularly where assumed layouts have been applied, as this can heavily influence the findings of the NSL test.

## Solar Glare Assessment

The solar glare analysis has been undertaken using climate based data (paragraph 13.2.44). We request that a supplementary assessment of solar glare on a 'clear sky' basis be provided to fully understand the potential for solar reflection at key road junctions.

The report states that "incidence of proposed glare arising from the proposed development.....is likely to be major adverse and significant" for the residents of Monkwell Square (paragraph 13.6.180). It would therefore be helpful for the number of tested viewpoints to be expanded to also include windows to the north and south ends of the elevation (either side of the currently tested viewpoints).

It would also be helpful to see the angles on the field of vision illustrations on the appendix 13-F solar glare results drawings. It is assumed that the angles are 3°, 10°, 20°, 30°, 40° etc.

## Light Spillage Assessment

The report states that "there are only small areas of low additional light spill, the impact at Mountjoy House is therefore negligible and the effect not significant, particularly as any of these small areas do not appear to coincide with windows serving habitable space" (paragraph 13.6.125)

No clear indication of where the additional light spill occurs to the facade of Mountjoy House has been provided. A drawing should be provided which overlays the light spill analysis and the facade of Mountjoy House to confirm the areas of additional light spill do not coincide with windows serving habitable rooms.

In addition, the City of London as the Local Planning Authority should request that the analysis for the site be rerun without the light spill from the existing neighbouring buildings being considered in the baseline scenario.

This will determine the effect of the proposed scheme in isolation and whether the proposed scheme meets the pre and post curfew targets of 25 and 5 Lux as set out within the ILP (2011) Guidance Notes.

#### Review of results for Impact Upon Neighbours

The VSC daylight results have been run on a room-by-room basis as well as a window-by-window basis (Table 13-22 and paragraph 13.6.40). The room-by-room results do not appear to be appended to the report. It is therefore not possible to comment upon this assessment.

Reference is made to a without balconies assessment as justification for the impact upon Mountjoy House (paragraph 13.6.40). These results do not appear to be appended to the report. It is therefore not possible to comment upon this assessment.

The results for Mountjoy House, show that there will be significant (moderate or major) VSC daylight impacts to 12 bedrooms on the 1<sup>st</sup> to 6<sup>th</sup> floors. Nine of these bedrooms will also experience a significant reduction in annual sunlight. The remaining three bedrooms will experience a minor reduction in annual sunlight outside of the BRE guidance target.

The results for London House (172 Aldersgate Street), show that seven windows will experience significant (moderate) VSC daylight impacts. Five of these windows serve living/dining rooms or living/kitchen/dining rooms. A further eight rooms will experience significant (moderate or major) NSL daylight impacts. Two of these rooms are living/dining rooms.

With regard sunlight for London House, paragraph 13.6.64 states that “in sunlight terms, 46 of 47 living rooms with windows that face within 90° of due south meet the target value for APSH with the proposal in place. The impact to these windows is therefore considered negligible”. The results in the appendices appear to list seven living rooms with windows that face within 90° of due south (pages 44 to 47). Three of the windows serving these living rooms experience significant (major) impacts in both annual and winter sunlight, two of which are located with no winter sunlight (R1 on the eighth and ninth floors). A further three windows experience significant (major) impacts in winter sunlight.

We have reviewed the sun-on-ground overshadowing analysis and while there is a reduction in sunlight, these are within the BRE guidelines. We therefore have no further comment.

With regard solar glare, paragraph 13.6.180 states that there will be major adverse and significant incidence of solar glare to Monkwell Square, and that “mitigation measures including the use of non-reflective glass coatings or fritting will be required”. Such measures need to be specified by the architect at the design stage to avoid “major adverse and significant” and therefore unacceptable levels of solar glare.

## Review of results for Internal Daylight Assessment

The report concludes that the scheme will not achieve the BREEAM daylighting credits. The report goes further to state that achieving BREEAM daylight credits is difficult in urban locations and lists the competing requirements of the design scheme. We therefore have no further comment.

## Conclusion and Recommendations

There will be significant impacts in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight.

There will be significant VSC daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant NSL daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight.

There will be major adverse and significant incidences of solar glare to residents within Monkwell Square.

The City of London as the Local Planning Authority should request that the following points be clarified:

- To verify the accuracy of the 3D modelling and analysis, confirmation of which properties are modelled from measured survey, and which are modelled from photogrammetric survey should be requested;
- Confirm how the windows and their locations have been modelled where photogrammetric survey has been used; and,
- To confirm the solar glare results within appendix 13-F, include the angles on the field of vision on the solar glare results drawings.

In addition, the following information and assessments should be provided:

- VSC daylight results on a room-by-room basis;
- VSC daylight results on a room-by-room basis without balconies;
- NSL contour plots to establish the layout used within the analysis;
- A 'clear sky' solar glare analysis to fully understand the potential for solar reflection at the points assessed;
- Expanded the number of tested viewpoints for solar glare for Monkwell Square;
- An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP (2011) Guidance Note; and

- Confirm the location of the areas of additional light spill on the façade of Mountjoy House to show that they do not coincide with the location of windows serving habitable rooms.

Kind regards



Anstey Horne

APPENDIX G



London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

The London Plan 2021	
POLICY	Referenced in Planning Statement?
Policy GG1 Building Strong and Inclusive Communities	Y
Policy GG2 Making the Best Use of Land	Y
Policy GG5 Making the Best Use of Land	Y
Policy GG6 Increasing Efficiency and Resilience	Y
Policy SD4 The Central Activities Zone	Y
Policy SD5 Offices, other Strategic Functions and Residential Development in the CAZ	Y
Policy D2 Infrastructure requirements for sustainable densities	Y
Policy D3 Optimising site Capacity through the Design-led Approach	Y
Policy D4 Delivering Good Design	Y
Policy D5 Inclusive Design	Y
Policy D6 Housing quality and standards	Y
Policy D8 Public Realm	Y
Policy D9 Tall Buildings	Y
Policy D11 Safety, Security and Resilience to Emergency	N
Policy D12 Fire Safety	Y
Policy E1 Offices	Y
Policy E2 Providing Suitable Business Space	N
Policy E3 Affordable Workspace	N
Policy E10 Visitor infrastructure	N
Policy HC1 Heritage conservation and growth	Y
Policy HC3 Strategic and Local Views	Y
HC4 London View Management Framework	Y
Policy H5 Supporting London’s culture and creative industries	N
Policy G1 Green Infrastructure	Y
Policy G4 Open Space	Y
Policy G5 Urban greening	Y
Policy G6 Biodiversity and Access to Nature	Y
Policy G7 Trees and Woodlands	Y
Policy SI 1 Improving Air Quality	Y
Policy SI 2 Minimising Greenhouse Gas Emissions	Y
Policy SI 7 Reducing Waste and Supporting the Circular Economy	N
Policy SI 12 Flood Risk Management	Y
Policy SI 13 Sustainable Drainage	Y
Policy T1 Strategic Approach to Transport	Y
Policy T2 Healthy Streets	Y
Policy T4 Assessing and Mitigating Transport Impacts	Y
Policy T5 Cycling	Y
Policy T6 Car parking	Y
Policy T7 Protecting and enhancing London’s Waterways	Y

London Wall West (ref: 23/01304/FULEIA)  
 Planning Policy Review – 31/01/2024

The City of London Local Plan 2015	
POLICY	Referenced in Planning Statement?
Policy CS1 Offices	Y
Policy DM 1.1 Protection of office accommodation	
Policy DM 1.2 Assembly and protection of large office development sites	Y
Policy DM 1.3 Small and medium sized business units	Y
Policy DM 1.5 Mixed uses in commercial areas	Y
Policy CS3 Security and Safety	
Policy DM 3.1 Self-containment in mixed use developments	
Policy DM 3.2 Security measures in new developments around existing buildings	
Policy DM 3.3 Crowded places	
Policy DM 3.4 Traffic management	
Policy CS5 The North of the City	
Policy CS10 Design	Y
Policy DM 10.1 New development	Y
Policy DM 10.4 Environmental Enhancement	Y
Policy DM 10.7 Daylight and sunlight	Y
Policy DM 10.8 Access and inclusive design	Y
Policy CS11 Visitors, Arts and Culture	
Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities	
Policy DM 11.3 Hotels	
Policy CS12 Historic Environment	Y
Policy DM 12.1 Managing change affecting all heritage assets and spaces	
Policy DM 12.3 Listed buildings	
Policy DM 12.4 Ancient monuments and archaeology	Y
Policy DM 12.5 Historic parks and gardens	
Policy CS13 Protected views	Y
Policy CS14 Tall Buildings	
Policy CS15 Sustainable Development and Climate Change	Y
Policy DM15.1 Sustainability requirements	
Policy DM 15.2 Energy and CO2 emissions assessments	Y
Policy DM 15.3 Low and zero carbon technologies	
Policy DM 15.4 Offsetting of carbon emissions	Y
Policy DM 15.5 Climate change resilience and adaptation	
Policy DM 15.6 Air quality	Y
Policy DM15.7 Noise and light pollution	Y
Policy DM15.8 Contaminated land and water quality	
Policy CS16 Public Transport Streets and Walkways	Y
Policy DM 16.1 Transport impacts of development	
Policy DM 16.2 Pedestrian movement	
Policies DM 16.3 Cycle parking	
DM 16.4 Facilities to encourage active travel	
DM 16.5 Parking and servicing standards	Y
Policy CS17 Waste	
Policy DM 17.2 Designing out construction waste	Y



London Wall West (ref: 23/01304/FULEIA)  
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Policy CS19 Open Spaces and Recreation	N
Policy DM 19.1 Additional open space	N
Policy DM 19.2 Biodiversity and urban greening	Y
Policy DM 21.3 Residential environment	N
Policy CS22 Social Infrastructure and Opportunities	N

Emerging Local Plan City Plan 2040	
POLICY	Referenced in Planning Statement?
Draft Strategic Policy S1: Health and Inclusive City	Y
Draft Policy HL1: Inclusive buildings and spaces	N
Draft Policy HL2: Air quality	N
Draft Policy HL3: Noise	N
Draft Policy HL5: Contaminated land and water quality	N
Draft Policy HL6: Location and protection of social and community facilities	N
Draft Policy HL9: Play areas and facilities	N
Draft Policy HL10: Health Impact Assessments (HIA)	N
Draft Strategic Policy S2: Safe and Secure City	N
Draft Policy SA1: Crowded Places Publicly accessible locations	N
Draft Policy SA3: Designing in Security	N
Draft Strategic Policy S4: Offices	Y
Draft Policy OF1: Office Development	Y
Draft Policy OF2: Protection of Existing Office Floorspace	N
Draft Strategic Policy S6: Culture and Visitors	Y
Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities	N
Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities	Y
Draft Policy CV3: Provision of Visitor Facilities	N
Draft Strategic Policy S7: Infrastructure and Utilities	N
Draft Policy IN2: Infrastructure Capacity	N
Draft Strategic Policy S8: Design	Y
Draft Policy DE1: Sustainable Design	Y
Draft Policy DE2: Design Quality	Y
Draft Policy DE3: Public Realm	Y
Draft Policy DE5: Terraces and Elevated Public Spaces	Y
Draft Policy DE8: Daylight and Sunlight	N
Draft Policy DE9: Lighting	N
Draft Strategic Policy S9: Transport and Servicing	N
Draft Policy VT1: The impacts of development on transport	N
Draft Policy VT3: Vehicle Parking	N
Draft Strategic Policy S10: Active Travel and Healthy Streets	N
Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding	N
Draft Policy AT2: Active Travel including Cycling	N
Draft Policy AT3: Cycle Parking	N
Draft Strategic Policy S11: Historic Environment	Y
Draft Policy HE1: Managing Change to Historic Environment Development	Y

London Wall West (ref: 23/01304/FULEIA)  
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Draft Policy HE2: Ancient Monuments and Archaeology	N
Draft Strategic Policy S12: Tall Buildings	N
Draft Strategic Policy S13: Protected Views	N
Draft Strategic Policy S14: Open Spaces and Green Infrastructure	Y
Draft Policy OS2: City Urban Greening	N
Draft Policy OS4: Biodiversity Net Gain	N
Draft Strategic Policy S15: Climate Resilience and Flood Risk	N
Draft Policy CR1: Overheating and Urban Heat Island Effect	N
Draft Strategic Policy S16: Circular Economy and Waste	N
Draft Strategic Policy S23: Smithfield and Barbican Key Area of Change	Y

City of London SPD/PAN	
POLICY	Referenced in Planning Statement?
Air Quality SPD, July 2017	Y
Archaeology and Development Guidance SPD, July 2017	Y
Barbican and Golden Lane Conservation Area SPD, February 2022	Y
Lighting SPD, October 2023	Y
Office Use SPD, January 2022	Y
Open Space Strategy SPD, January 2015	Y
Planning Obligations SPD, July 2014	Y
Protected Views SPD, January 2012	Y
Barbican Listed Building Management Guidelines, Volumes I, II and IV (2012-2015)	N
Archaeology in the City PAN,	N
Carbon Options Guidance PAN, March 2023	N
Developer Engagement Guidance PAN, May 2023	N
Preventing suicides in high rise buildings and structures PAN, November 2022	N
Solar Convergence PAN, July 2017	Y
Solar Glare PAN, July 2017	N
Sunlight PAN, July 2017	N
Wind Microclimate PAN, August 2019	Y

London Plan Guidance	
POLICY	Referenced in Planning Statement?
Planning for Equality and Diversity in London SPG, October 2007	N
All London Green Grid SPG, March 2012	N
London View Management Framework SPG, March 2012	Y
Play and Informal Recreation SPG, September 2012	N
The Control of Dust and Emissions during Construction and Demolition SPG, July 2014	N
Accessible London: Achieving an Inclusive Environment SPG, October 2014	Y
Social Infrastructure SPG, May 2015	N
Public London Charter LPG, October 2021	N
Circular Economy Statements LPG, March 2022	Y

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Whole Life-Cycle Carbon Assessments LPG, March 2022	Y
Fire Safety LPG, draft June 2022	N
Sustainable transport, Walking and Cycling LPG, December 2022	N
Air Quality Positive LPG, February 2023	N
Air Quality Neutral LPG, February 2023	N
Urban Greening Factor LPG, February 2023	Y
Optimising Site Capacity: A Design-Led Approach LPG, June 2023	N



Historic England

Gemma Delves  
Environment Department  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

Your Ref: 23/01277/LBC  
Our Ref: 218206

Contact:  
Helen Hawkins



31<sup>st</sup> January 2024

Dear Ms Delves,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2021**

140 London Wall, 150 London Wall, Shaftsbury Place, And London Wall Car Park, London EC2Y

*External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftsbury Place, and London Wall Car Park, London, EC2Y)*

### Recommend Archaeology Conditions

Thank you for your consultation received on 12<sup>th</sup> December 2023.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

### Assessment of Significance and Impact



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

London Wall West is located just to the north-west of the Roman and medieval city walls and Roman fort. Parts of the Scheduled walls are included within the site boundary. A Jewish cemetery of possibly 11th century date extends partially onto the north-east area of the site, within the Barber Surgeon's garden and beneath Bastion House. This formed the only Jewish cemetery in England until 1290 when the Jews were expelled. No evidence for the cemetery is visible above ground. Jewish law strictly forbids the disturbance or excavation of Jewish graves. A full response to the development proposals for London Wall West from the Committee for the Preservation of Jewish Cemeteries in Europe (CPJCE) has been received by CoL and their concerns have been reflected in the advice provided below.

This response relates solely to non-designated archaeological issues. Impacts on designated assets, including the Scheduled Monuments and their settings, will be covered by our Development Advice Team who will respond separately.

Impacts from the proposed development on potential archaeology for this application are limited to the new landscaping design for the Northern Garden and Barber Surgeon's Garden. There does not appear to be any below ground impact from construction of the new Mountjoy Close highwalk.

The submitted ES includes a chapter for archaeology and also a baseline report has been provided as an appendix (Appendix 15). The results of the pre-determination archaeological evaluation have been provided to GLAAS separately rather than submitted with the planning application, but MOLA have confirmed that the results of the evaluation have been used to assess the archaeological potential of the site and are included in the ES where relevant. The evaluation report should be submitted as part of any necessary ES revisions or updates.

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



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In our response to the scoping document, GLAAS requested that the ES contain an explanation of how the new development will avoid any impact on the potential remains of the medieval Jewish cemetery in the north-east of the site and demonstrate how and where these remains have already been removed by the current basement. Unfortunately, this has not been as clearly demonstrated by either the ES or the Appendix as we had hoped. Some discussion of medieval burials has been provided, but the ES does not make fully clear that these relate to the burial ground at St Giles, which partially extended onto the site, not the Jewish cemetery. Any revisions or amendments to the ES should include a clearer assessment of impact for the Jewish cemetery within the Northern garden and Barber Surgeon's Garden.

The hard and soft landscaping around the new Mountjoy Close highwalk, in the Northern Garden and the Barber Surgeon's Garden, incorporates a small part of the projected extent of the Jewish cemetery. Burials from the former St Giles burial ground and Roman archaeology may also be present in this area. No construction work is proposed in this area and the archaeology baseline states that the landscaping work here will be carried out through ground that has been raised by 1m in height. No plans showing new services were available at this stage and so it is unclear if any below ground excavation is proposed in this area.

It is therefore recommended that a plan be produced which shows the area of the Jewish cemetery within the Northern Garden and Barber Surgeon's Garden and also indicates a 'no dig' zone around this area. The 'no dig' area should be incorporated into the landscaping method statement, the SUDS, the method statement for new services and the Construction Management Plan. This should be secured by condition and the 'no dig' zone demarcated on site by solid fixed barriers for the duration of the construction work. Any landscaping proposed in this area should be carried out through raised made ground which has been imported into the area and is of sufficient depth to prevent any excavation into the current ground level for construction of the new landscaping proposals. Any removal of hardstanding currently in the area should not affect the softer ground below and an archaeological watching brief should be carried out during the removal of hardstanding etc in order to confirm that previous ground levels are not disturbed.

The anticipated Roman, medieval and post-medieval archaeology which may survive elsewhere on the site is likely to be of low-moderate significance and, in places, very truncated. This archaeological potential can therefore be mitigated through the use of planning conditions. A full programme of public benefit, which includes opening up access to the Roman west fort gate, currently located in the underground car park, is proposed. The proposals also include new interpretation for the City walls, an exhibition space and digital and artistic interpretation of the heritage of the site. It is unfortunate that the information from the cultural strategy, which was submitted with the ES, was not included within the archaeology mitigation proposals within the ES as this would have usefully demonstrated the



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benefits of public access to this formerly hidden monument. An assessment of the public benefit should be included in any ES revision or amendment.

### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

### Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

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

**Mitigation for archaeology in the area affected by the landscaping works has been built into the scheme by ensuring that the ground is raised by 1m in the two northern garden areas, as described in the archaeological desk-based assessment.** If this is carried out then only the two archaeological planning conditions outlined below will be necessary, in order to ensure full protection for the Jewish cemetery during the construction works.

I therefore recommend attaching two archaeological conditions as follows:

Condition 1 No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or



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- development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and
- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
  - B. Where appropriate, details of a programme for delivering related positive public benefits
  - C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

**Informative** The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

## Condition 2: Preservation - protection

No development shall commence until details of fencing, signage and other control measures to protect the part of the Jewish Cemetery that may extend onto the site have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of operational works.

**Informative:** A plan of the relevant area should be produced and approved by GLAAS. This plan should then be incorporated into all relevant method statements, including but not limited to landscaping, new services, SUDs and the Construction Management plan. The area shown on the plan should also be approved by the CPJCE.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological work would comprise the following:



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## Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

An archaeological watching brief should be carried out during the removal of any hardstanding etc in the Northern Garden and Barber Surgeon's Garden in order to ensure that potential remains of the Jewish cemetery are not disturbed.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



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31 January 2024

Dear Gemma Delves

**London Wall West, Bastion House and Museum of London, 140-150 London Wall, EC2Y**

REF: 23/01304/FULEIA, 23/01277/LBC & 23/01276/LBC

The Twentieth Century Society has been notified of the above applications for the comprehensive redevelopment of the Museum of London and Bastion House site to provide three new buildings ('North Building', 'Bastion House' and 'Rotunda Building') providing office floorspace with a cultural and retail offering with a public plaza at street-level and 'the Glade', an elevated garden at highwalk level. The Society strongly objects to the scheme due to the loss of the two existing buildings, which should be identified as Non-Designated Heritage Assets (NDHAs), and on account of the substantial harm that would be caused by the development to the setting of the Grade II listed Ironmongers' Hall and to the Barbican Estate, which is Grade II listed, with a Grade II\* registered landscape and is set within the Barbican and Golden Lane Conservation Area.

**ASSESSMENT**

The Society strongly objects to the proposed redevelopment on account of the substantial harm that would be caused to the site's heritage assets. This includes:

Non-Designated Heritage Assets

The Museum of London and Bastion House

The Museum of London was built in 1971-76 to designs by Powell and Moya, one of the most significant practices in post-war Britain. It was the first post-war museum to be built in London, and is a robust and interesting response to the constrained and historic site. To the east is the 'Miesian' Bastion house also by Powell and Moya which was built as part of the new museum scheme and is a rare surviving example of the firm's commercial output. It is also an important survivor of the original post-war 'Route XI' LCC masterplan. Bastion House was the last of six office towers which were built along London Wall in the 1960s and 70s - only two survive and Bastion House is the best preserved of the two.

The Museum of London (MoL) and Bastion House should be identified as Non-Designated Heritage Assets. Planning Policy Guidance (PPG, 2019) identifies NDHAs as "buildings [...] identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets". This accurately describes the MoL and Bastion House which were turned down for inclusion on the national list but clearly have heritage significance in a local context for the reasons set out above. The PPG explains

that local planning authorities may identify NDHAs as part of the decision-making process and we urge you to do so here.

The proposed development would involve the full demolition of the MoL and Bastion House which should be treated as NDHAs. The National Planning Policy Framework (NPPF, 2023) includes a paragraph on NDHAs which states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset” (paragraph 209). The scale of harm or loss would be at the highest level as the buildings would be completely demolished.

The NPPF describes heritage assets as “an irreplaceable resource” (paragraph 195) and states that “In determining applications, local planning authorities should take account of [...] the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation” (paragraph 203). We have yet to see compelling evidence proving that refurbishing and repurposing the buildings would not be deliverable. In fact, we understand that the City received credible bids from a number of developers proposing schemes that involved the retention and reuse of the existing buildings. As such, it remains our understanding that the buildings are structurally sound and capable of being upgraded and adapted for reuse. There should be a strong presumption in favour of repurposing and reusing buildings, as outlined in paragraph 157 of the NPPF: “The planning system should support the transition to a low carbon future in a changing climate [...] [and] encourage the reuse of existing resources, including the conversion of existing buildings”.

#### Designated Heritage Assets:

##### The Barbican Estate

Developed on a site devastated by WWII bombing, the Barbican Estate was designed from 1955 and built between 1962 and 1982. The architects were Chamberlin, Powell and Bon, a leading post-war practice. The Barbican is an internationally celebrated work of British post-war Brutalist architecture and urban planning.

The Barbican Estate lies to the north of the proposed redevelopment site. The significance of the estate is recognised in its Grade II listing, in the registration of its landscape at Grade II\* and in its designation as the Barbican and Golden Lane Conservation Area.

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

Harm would be caused through the demolition of the MoL and Bastion House. Built contemporaneously with the estate, the MoL and Bastion House form part of the Barbican’s history and its architecture and highwalks relate and integrate it to the estate. It is our view that the MoL and Bastion House make an important and positive contribution to the setting of the designated estate. The proposed redevelopment would result in the loss of the existing buildings (which constitute high-quality, complementary contemporary development) in views towards and from the estate, but would also result in the loss of a site which contributes to the estate’s historic significance. As outlined in Historic England’s guidance, ‘The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (2017)’, ‘setting’ is experienced through views but also through “our understanding of the historic relationship between

places [...] For example, buildings that are in close proximity [...] may have a historic or aesthetic connection that amplifies the experience of the significance of each.” (p.2). The loss of this contemporary development built in the ‘70s in connection with the Barbican would serve to further disconnect the estate from its original post-war urban landscape - this landscape has already been eroded by recent development and would be further harmed by the proposed scheme.

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

- From St Paul’s Cathedral Golden Gallery (view 11 within the TVBHIA, part 14, pp.85-86). This view is from the highest viewing gallery of St Paul’s, a strategic heritage asset, which is regularly enjoyed by visitors and tourists. The Barbican is currently clearly legible in this view, but the proposed development (specifically the Rotunda) would substantially obscure the Barbican, particularly the estate’s Thomas More House. The Barbican is an important heritage asset which should remain fully on show in this key view.
- Looking north along St Martin’s Le Grand (view 12 in the TVBHIA, part 15, pp.88-89). The Barbican Estate’s Lauderdale Tower is currently appreciated as a landmark building that terminates this view down this major thoroughfare in the City of London. The proposed development (again, specifically the Rotunda) would completely block views of the tower. The applicant’s suggestion that the development, on account of its ‘high design quality’, would be an appropriate replacement in this view to an iconic designated heritage asset is erroneous.
- From views from Aldersgate (view 17 within the TVBHIA, part 22, pp.106-107). The proposed development would impact on the estate’s setting here, which is another key thoroughfare within the City. In current views, which take in both the MoL and Bastion House, the MoL is seen to be low-lying and its white tile-clad elevations distinguish the building from the Barbican while ensuring that it is a complementary neighbour. Built to five storeys and designed with highly-modelled brick elevations, the proposed ‘North Building’ would compete with the Barbican’s John Wesley Turret in this view.

The development would also impact on views from within the designated Barbican Estate. This is shown in the applicant’s TVBHIA in views:

- From the Lakeside Terrace (view 21 within the TVBHIA, part 26, pp.121-122) and from St Giles’ Terrace, outside St Giles Cripplegate (view 24 within the TVBHIA, part 29, pp.130-131). In both of these views, the proposed Rotunda would appear beside/behind the Barbican and would remove some of the clarity of the architectural expression of the roofline and elevations of the listed Mountjoy House.
- From views from the Thomas More Highwalk terrace (view 26 within the TVBHIA, part 31 & part 32, pp.136-137 and supplementary verified view A8 in the TVBHIA, PART 43, pp.207-208). Bastion House and the MoL are clearly seen within this view. With its low-lying, horizontal form and in the treatment of its tile-clad elevations which distinguish it from the concrete of the estate, the MoL complements the Barbican’s listed highwalk in this view. The proposed North Building would have a much more visually intrusive impact on this part of the estate on account of its bold modelling and tonally similar finishes.
- The new development would be highly visible in numerous other views from within the estate - for example, from the Highwalk from Wallside (which is a noted local view from the

Barbican and Golden Lane CAA, view 26) (view 27 within the applicant's TVBHIA, part 33, pp.142-143); from the western end of St Giles' terrace (another noted local view within the CAA, view 16) (supplementary verified view A7 within the TVBHIA, part 42, pp.204-205); from Monkwell Square (view 28 in the TVBHIA, part 34, pp.145-146); from Beech Gardens (supplementary non-verified view, B26, pp.264-265); and from the Defoe Highwalk (supplementary non-verified view, B27, pp.266-267). In all these views, Bastion House and the MoL provide an appropriate backdrop to the estate, on account of their simple, rectilinear profiles and restrained elevation treatments. The facade design of the proposed developments are complicated in their massing and expression and would serve to draw the eye away from the estate's designated architecture and landscape.

The applicant claims that the proposed development would be in keeping with the character and scale of the existing urban context to the south of the estate. While we accept that there has been tall development nearby, this does not justify further harmful encroaching development. As outlined in Historic England's guidance on setting, "Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting [...] consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the heritage asset" (p.4). The proposed development, particularly the Rotunda which would replace the low-rise MoL, would have a seriously detrimental impact on the setting of the designated estate.

#### The Ironmongers' Hall

The hall was built in 1922-25 by Sydney Tatchell for the Worshipful Company of Ironmongers. It is a rare example of an interwar livery hall, built in a Neo-Tudor/ Jacobean revival style with richly-decorated interiors that are remarkably well preserved. The building was threatened with demolition in the post-war period to facilitate the construction of the Museum of London, but the Minister of Housing and Local Government intervened, following a public inquiry, to ensure that the Ironmongers was saved and it was subsequently intelligently incorporated within the new development by Powell and Moya. The Ironmongers' Hall was recently Grade II listed, with the Society's support.

The Ironmongers' Hall is accessed off Aldersgate St, via the historic Shaftesbury Place. The applicant notes the hall's 'enclosed' setting, being enveloped by the MoL and approached by way of an opening off Aldersgate. It observes how the hall was hemmed in by buildings and accessed underneath an archway like this when it was built in the 1930s, prior to WWII bombing which cleared the site. The hall did not originally have a full street frontage, but was rather intended to be glimpsed from the street (as seen in the applicant's figure 4:12 within part 2 of the TVBHIA, p.21). When the architects incorporated the hall into the new MoL development, Powell and Moya retained this historic entrance sequence and spatial character. As demonstrated in view 18 from Aldersgate (TVBHIA, part 23, pp.109-110), the proposed development would open the hall up to the street. The applicant claims that 'the creation of new views of the Hall' from Aldersgate would contribute to 'an overall enhancement to the setting of the Hall, and [...] increased appreciation of the heritage significance of the listed building' (14.28 within the TVBHIA, part 36, 176) – the implication is that this opening up of the site would be a heritage benefit. It is our view that the enclosed character of the hall's setting and the way it is revealed through glimpses from the street contributes to its significance and the loss of this in the development would be detrimental, rather than positive or beneficial. It can hardly be claimed, as the applicant does, that the proposed highwalk would partly retain this enclosed character.

Not only would the sense of enclosure be lost, but the loss of the MoL and Bastion House buildings themselves would have a harmful impact on the hall's setting and significance. While not its original setting, the MoL development has become part of the hall's post-war history. As outlined in Historic England's guidance on setting, "Settings of heritage assets change over time [...] settings which have changed may [...] themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term." (p.4). It is our view that the existing buildings contribute positively to the setting of the Grade II hall and their loss would have a detrimental impact.

The proposed development would itself negatively impact on views of the Grade II listed Ironmongers' Hall, particularly from the Thomas More Highwalk. This is seen in the applicant's TVBHIA view 26 (parts 31 & 32 of the TVBHIA, pp.136-137) and supplementary verified view A9 (part 44 of the TVBHIA, pp.210-211). The clean rectilinear forms and simple, muted finishes of the existing buildings provide a harmonious contrast with the warmth and characterful roofline of the Ironmongers' Hall, with its gables and hipped roof with a gablet. The proposed buildings appear far more intrusive and overbearing, and their complicated massing and expression would visually compete with and distract from the hall. Their impact on views of the listed building would be detrimental.

#### Policy relating to Designated Heritage Assets

Sections 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 state that 'In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and 'In the exercise, with respect to any buildings or other land in a conservation area [...] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'

The NPPF (2023) states that

- 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).' (paragraph 205)
- 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.' (paragraph 206)
- 'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use.' (paragraph 207)

The London Plan (2021) Policy HC1: Heritage conservation and growth (C) states that 'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative



impacts of incremental change from development on heritage assets and their settings should also be actively managed’.

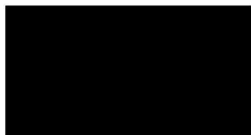
The adopted City of London Local Plan (2015) includes Policy DM 10.1: New development which states that ‘the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways’. Policy DM 12.1: Managing change affecting all heritage assets and spaces states that ‘4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.’

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

This substantial harm would not be outweighed by heritage benefits nor by the public benefits that would be delivered by the scheme. This is ultimately an office development, with some (albeit not substantial) public cultural offerings. Economic, social and environmental benefits could be achieved through a scheme which retained and revitalised the existing buildings on the site. Their demolition and the site’s redevelopment is not ‘necessary’ to provide these benefits.

It is our view that the scheme contravenes national and local policy regarding the conservation of heritage assets. We urge the local authority to refuse permission for the development.

We hope that these comments are of use to you. We would be grateful if you could please inform us of your decision on these applications.



Yours sincerely,

Coco Whittaker

**Senior Caseworker**

The Twentieth Century Society  
70 Cowcross Street  
London, EC1M 6EJ



**Remit:** The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



Ms Gemma Delves  
Corporation of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: L01570342

8 February 2024

Dear Ms Delves

**Arrangements for Handling Heritage Applications Direction 2021**

**140 LONDON WALL, 150 LONDON WALL, SHAFTSBURY PLACE, AND LONDON WALL CAR PARK, LONDON EC2Y**  
**Application No 23/01277/LBC**

Thank you for your letter of 19 December 2023 regarding the above application for listed building consent. On the basis of the information available to date, in our view you do not need to notify us of this application under the relevant statutory provisions, details of which are enclosed.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**  
Inspector of Historic Buildings and Areas



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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## **Planning and Listed Building Consent applications requiring consultation with and notification to Historic England (the Historic Buildings and Monuments Commission for England) April 2021**

### **Introduction**

This enclosure sets out the circumstances in which Historic England must be consulted or notified of applications for planning permission or listed building consent.

It has been amended to reflect the changes introduced by MHCLG on 21 April 2021

- (a) extending planning controls to statues and other monuments and,
- (b) extending the range of applications for listed building consent notified to Historic England.

### **Applications for planning permission**

Historic England must be consulted or notified (see note 1) of the following planning applications by virtue of the following provisions:

#### **Consultation:**

Development which in the opinion of the local planning authority falls within these categories:

- P1 Development of land involving the demolition, in whole or in part, or the material alteration of a listed building which is classified as Grade I or II\*
- P2 Development likely to affect the site of a scheduled monument
- P3 Development likely to affect any battlefield or a Grade I or II\* park or garden of special historic interest which is registered in accordance with section 8C of the Historic Buildings and Ancient Monuments Act 1953

#### **Basis for this - Town and Country Planning (Development Management Procedure) (England) Order 2015 - article 18 and Schedule 4.**

- P4 Development likely to affect certain strategically important views in London

#### **Basis for this - Secretary of State for Communities and Local Government Directions relating to Protected Vistas 2012**

#### **Notification:**

Development which the local authority (or Secretary of State) think would affect:

- P5 The setting of a Grade I or II\* listed building; or
- P6 The character or appearance of a conservation area where
  - i) the development involves the erection of a new building or the extension of an existing building; and
  - ii) the area of land in respect of which the application is made is more than 1,000 square metres

#### **Basis for this - Planning (Listed Buildings and Conservation Areas) Regulations 1990 - regulation 5A (as amended by The Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2015**



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*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

- P7 Local authority/ies own applications for planning permission for relevant demolition in conservation areas. (see note 2)

**Basis for this - Town and Country Planning General Regulations 1992 (as amended by the Town and Country Planning General (Amendment) (England) Regulations 2015**

Note 1: There is a difference between Consultation and Notification. When LPAs consult on applications, there is a duty to provide a substantive response to the LPA within 21 days. A notification from the LPA is to enable representations to be made if we so wish, and to respond within 21 days. Historic England does not make a distinction in its handling of advice work.

**Applications for listed building consent**

Historic England must be notified of the following applications for listed building consent by virtue of the following provisions:

**Notification:**

- L1 For works in respect of any Grade I or II\* listed building; and  
L2 For relevant works in respect of any grade II (unstarred) listed building

(relevant works means:

- i) works for the demolition of any principal building (see note 3);
- ii) works for the alteration of any principal building which comprise or include the demolition of a principal external wall of the principal building; or
- iii) works for the alteration of any principal building which comprises or includes the demolition of all or a substantial part of the interior of the principal building.
- iv) commemorative object works

For the purposes of sub paragraphs ii) and iii) above:

- a) a proposal to retain less than 50% of the surface area of that part of a principal building represented on any elevation (ascertained by external measurement on a vertical plan, including the vertical plane of any roof) is treated as a proposal for the demolition of a principal external wall;
- b) a proposal to demolish any principal internal element of the structure including any staircase, load bearing wall, floor structure or roof structure is treated as a proposal for the demolition of a substantial part of the interior.)

For the purposes of sub paragraph iv) above:

“commemorative object works” means works for the full or part demolition of a statue, monument, memorial or plaque that are, or are part of, a listed building

- L3 Decisions taken by the local planning authorities on these applications

**Basis for this - Arrangements for handling heritage applications - Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021 - made under section 12, 15 (1) and (5) of the Planning (Listed Buildings and Conservation Areas) Act 1990**

**Historic England**  
**27 April 2021**



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Note 2: Relevant demolition is defined in section 196D of the Town and Country Planning Act 1990 as “demolition of a building that is situated in a conservation area in England and is not a building to which section 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 does not apply by virtue of s75 of that Act (listed buildings, certain ecclesiastical buildings, scheduled monuments and buildings described in a direction of the Secretary of State under that section.)

Note 3: “principal building” means a building shown on the list compiled under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and includes (unless the list entry indicates otherwise) any object or structure fixed to that building, but does not include any curtilage building.



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**THE IRONMONGERS' COMPANY**

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**IRONMONGERS' HALL,**  
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ENTRANCE IN ALDERSGATE STREET

Planning and Development Director  
City of London Corporation  
Department of Planning & Transportation  
PO Box 270  
Guildhall  
London EC2P 3EJ

FAO of Gemma Delves, Case Officer

30 January 2024

Dear Sirs

**Application Ref No: 23/01304/FULEIA**

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

**Application Ref No: 23/01276/LBC**

**Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y). | Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA**

- 1. Introduction** – This letter is written on behalf of the Worshipful Company of Ironmongers London, the Ironmongers' Charity and Ferroners plc (together "Ironmongers" or "the Company") which, taken together, are the legal owners of and related entities interested in Ironmongers' Hall and Ferroners House in Shaftesbury Place, London EC2Y 8AA, who write on behalf of themselves and associated Ironmongers charitable and other entities.

As you will be well aware, the Hall and Ferroners' House are almost entirely enclosed and surrounded by the existing – now closed – Museum of London, both lying to the west of and close to the existing Bastion House.

The recently registered planning and listed building applications referenced above are therefore of course a matter of the greatest interest and concern to Ironmongers, given that were it to be consented and built, very substantial impacts would be experienced by the owners and occupiers of both the Hall and Ferroners House, during and following what is identified in the application as a construction period of sixty-eight months, from January 2028 to August 2033, encompassing overlapping demolition, piling (including enabling works), basement box construction, super-structure and finishes, and external works and landscaping. On any view, this is a very significant development proposal which would clearly cause huge disruption to the ongoing beneficial use and occupation and servicing of the Hall.

2. **The Ironmongers' Company** – The Worshipful Company of Ironmongers, having existed since the 1300s, received its Royal Charter from Edward IV in 1463, is tenth in order of precedence according to the ranking established in 1515 for the 48 City of London Livery Companies then in existence. Following the occurrence of an air raid in 1917, in which the Hall, then located in Fenchurch Street, was badly damaged, the Company relocated to its current site almost 100 years ago, the Hall having been dedicated by the Bishop of London on 17 June 1925.

The Company places great value in its very long-standing relationship with the City of London, and with the City Corporation – which we hope can be maintained long into the future.

3. **High-level summary of the Company's position with respect to the application** – The Company takes its responsibilities as a City occupier and neighbour with the utmost seriousness. We entirely recognise – and are fully supportive of the fact that – the fabric of a dense urban environment such as at the west end of London Wall will (and must) evolve, change, and adapt over time, both to anticipate and respond to changing circumstances.

The Company does, though, bring objectivity to its task. We would not wish to obstruct a proposal which clearly met, indeed surpassed, with ease, our requirements and expectations of a carefully designed new neighbouring group of buildings.

To this end, we have both commissioned detailed advice from experienced consultants, and made our own careful assessment of the likely impacts which this proposal, if consented and built, would have on the continued operation of our Hall.

The Company at the highest level of abstraction, subject to what is said below, fully supports the redevelopment of the application site, entirely recognising that the now functionally obsolescent Museum of London is in need of wholesale replacement. We are, though, frankly unpersuaded as to the position on Bastion House at the present time.

Both the City Surveyor and we fully appreciate, of course, that any scheme such as proposed here could not proceed unless the Corporation acquires the freehold of Ferroners' House.



The Company does have some fundamental questions over the City Surveyor's approach to the in-depth consideration of genuine alternatives to the scheme as currently proposed, that would have, in the longer term – post completion – less adverse impact on Ironmongers' Hall. We have reservations over whether the current proposal should be considered to be the last word on the build-out of this highly complex site.

Last, but by no means least, the Company will not take a step back from its determined insistence upon a high level of contractual protection with respect to legally enforceable Asset Protection and Neighbourly Matters Agreements that would need to be secured before any works were to commence.

4. **Ironmongers' Hall** – The Hall was listed at Grade II by the Secretary of State on the advice of Historic England on 20 April 2023 under [Ref No 1485812](#). As will be seen, the listing excludes Ferroners' House. The Hall as a City Livery Hall is of course a paradigm example of a highly sensitive receptor in planning terms.

The history of the redevelopment of the land at the western end of London Wall on the east side of Aldersgate Street is of relevance and interest in the context of the emerging development of what became the site of the Museum of London and Bastion House. The City Corporation in the post-war years designated large areas of land which had sustained extensive wartime damage from aerial bombardment into Redevelopment Units; and one such Unit was designated as involving essentially the entirety of the land on which the Museum of London was built, and on which Ironmongers' Hall then stood and continues to stand. The City Corporation's objective of securing a Compulsory Purchase Order for the whole of the Redevelopment Unit was thwarted by the unequivocal recommendation of the CPO Inspector, endorsed by the Secretary of State, to exclude the site of Ironmongers' Hall and its immediate environment in Shaftesbury Place from the CPO.

This could be said to have guaranteed that it would be and would remain inevitable that Ironmongers' Hall should necessarily co-exist for the semi-indefinite future alongside the contiguous land owned by the Corporation of London in a good-neighbourly fashion and configuration, not only for the 1960s recovery from extensive war damage, but for subsequent generations of redevelopment, as is now apparent.

Whatever may be the view as to whether the City Corporation achieved this objective in the design and construction of its surrounding Museum of London in the years following confirmation of the CPO, the intended demolition of the Museum (and Bastion House) and their replacement with next-generation development to create a new townscape environment that would continue to co-exist as a good neighbour of Ironmongers' Hall presents a vital opportunity to remedy past wrongs, and to reset such important matters for the next generation of buildings and the badly-needed improvements to the public realm around the buildings.

5. **Ferroners' House** – The office extension known as Ferroners' House was developed on the Company's estate in 1975 – 1977 physically attached to the Hall; it is not considered to be a building of any notable architectural merit (and does not form part of the listing). It is, however, an important asset for the Company, generating significant revenue from

sub-lettings, both arms' length commercial tenants, and other established City entities, the Shipwrights Livery Company, included.

6. **General observations on the application** – Attention is drawn to a stark contradiction in the approach to the application. It is described in the Planning Statement as a “unique” opportunity to reform this part of London Wall. Yet as all involved are well aware, the most careful consideration was being given until 2021 to the proposal to build the Centre for Music on the very site which forms the current application. It is self-evident from this that the site is capable of accommodating entirely different forms of development, as well as completely different uses.

The key issue is whether the current application, if consented in its submitted form, would bring about an exemplary new urban environment, featuring design of the highest quality, which would command strong support, a commendable and sympathetic neighbour to adjoining buildings and uses, in line with national and city planning policy requirements. Quoting from para 131 of the recently published NPPF (December 2023):

*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.*

It would be reasonable for the Company and indeed other close neighbours of the site to look for firm commitments from the City Corporation that any scheme considered by the Planning & Transportation Committee represented the final form of any development that might come about. Regrettably, however, history teaches that a resolution to grant planning permission for a complex development is seldom the last word – and a developer introduced into the equation treats the committed envelope as no more than a starting-point for a scheme which then undergoes unremitting value-engineering and compromises (including enlargement) in its detailed design. It would be of assistance to the Company to be informed of whether that is a state of affairs for which we should be prepared in this case.

The enormous scale, bulk and massing of the development envelope proposed would sit very uneasily alongside Ironmongers' Hall and would clearly have very significant adverse impacts due to its height and proximity – including on the degradation of the light received by the Hall. The proposed Rotunda Building, of considerable bulk and size on its own, is seen from the application materials to cast significant shadow across the Hall, which would undoubtedly be highly detrimental. The design overall pays scant regard to the Hall as a sensitive receptor listed neighbour, and would for generations be seen as a poor piece of townscape. An objective assessment may question whether the City Corporation has a degree of conflict of interest in setting on this scale of development as appropriate for this site.

7. **Some specific areas of note** – Having reviewed the detail of the submitted material, attention is drawn to the following issues:

- a) **The Client Brief from the outset** – It is unfortunately (and highly regrettably) necessary to read between the lines of the prolix application material in order to try to ascertain the originating brief from the City Surveyor when, after the Centre for Music project had been initially and then finally abandoned. It would be of benefit to the Company's greater understanding of the overall approach to this proposal for us to understand when, how, and why, the fundamentally different CfM design morphed into the current scheme, now applied for, under the control of the same lead architect. Two uniquely high-quality designs for exactly the same site, less than three years apart, to an onlooker – and certainly to a neighbour surrounded by the application site - perhaps invite a justifiable insistence on challenging the thinking underlying the approach to the design. Exactly how much attention was paid, by critical-friend challenge, to the rather rapid evolution to move on from the CfM proposal, to where the Corporation now stands? Please could we see the social and economic drivers that were influential in the emergence of the brief.

**The viability of the proposal** – **The application material** is notably silent on the viability of the proposal and from our review of the materials no viability statement has been provided. The Company makes the assumption that the justification for the scale of the proposal is founded at least in part – perhaps rather significantly – on the asserted need for new buildings of very considerable scale and assumed value in a 2033 commercial market at (indicative) completion, and far beyond. The Company is being asked to pay a huge price for this development to proceed. As a very longstanding City institution, the Company has always eschewed speculation as a basis on which to maintain a sure footing for the future. It is fervently hoped that the City Surveyor has adopted the same approach here.

- b) **The committed level of detail in the application** – There is a disturbingly approximate, seemingly calculated, shortcoming in the level of detail embedded in the submitted application drawings which form part of the committed application materials. The Site plans, elevations, sections and use plans submitted as part of the Design and Access Statement, as well as the drawings and plans found at Appendix 2 of the Environmental Statement do not provide sufficient detail as to the relevant impacts of the development, particularly on the Ironmongers' Hall. In addition to this, the various plans and the different locations these are found make it very difficult for a thorough assessment to be made. This makes it very difficult for immediate neighbours to form a clear, well-informed view about, still less obtain very clear advice on, likely potential direct impacts of this scheme if it were to go ahead. It also invites questions about the extent to which the environmental impact assessment does – or could – accurately assess the likely significant impacts of the scheme. From the drawing blocks on the application drawings, it is evident that the drawings were the subject of amendment during the application process. There are material internal inconsistencies among and between the submitted drawings. The

expected phasing of the proposed development, and thus its impacts on Ironmongers, is virtually impossible to ascertain.

It is no answer to this point that the likely extensive conditions that would be on any planning permission would provide a framework for the plugging in of gaps. No draft conditions are available to review – and are probably months away from being exposed to public analysis. The City as planning authority would need to be completely satisfied that the release of a planning permission for this scheme were safe to do. Not least because the setting of a threshold would be highly relevant to the subsequent determination of proposals for the later amendment of the development proposal. This will be of concern to neighbours, including Barbican residents and other sensitive receptor owners and occupiers.

- c) **Serious harm to heritage assets** – The Non-Technical Summary of the environmental statement contains, at paragraph 3.13.12, in the section headed ‘Townscape, Visual and Built Heritage Impact Assessment (TVBHIA)’ the somewhat insouciant comment as follows:

*“The proposed development includes the demolition of Ferroners’ House which forms an extension to the Grade II listed Ironmongers’ Hall but is not included within the statutory listing. The proposals further include minor works to the listed buildings in association with the wider proposed development. A minor beneficial effect on Ironmongers’ Hall (Grade II) would result from the improved appreciation of its heritage significance facilitated by the removal of its existing 1970s extension, the opening up of the Aldersgate Street frontage, enhancements to the character of the landscape surrounding the listed building, and improved pedestrian access and movement within its immediate setting.”*

The ES Volume II: Townscape, Visual and Built Heritage Impact Assessment at paragraph 14.30 provides the following:

*“On balance, due to the removal of detracting elements (primarily Ferroners’ House), and the creation of new views of the Hall – mainly from Aldersgate Street, but also from the proposed new landscape and improved pedestrian routes around the Hall – the proposed development would result in an overall enhancement to the setting of the Hall, and there would be an increased appreciation of the heritage significance of the listed building. This impact is considered to be below in magnitude. The scale of effect would be minor and the nature of the effect would be beneficial.”*

We invite you to explain the background to this assessment. Does it accord and correspond with your Department’s general approach to heritage harm appraisal? How will the Corporation provide an independent critique of the assessment?

- d) **The depth of genuine consideration of less harmful alternatives** – The Alternatives and the Design Evolution chapter in the submitted Environmental Statement shows a lack of detail as to the degree to which there have been genuine considerations of less harmful alternatives, particularly when one has regard to the Ironmongers' Hall. Massing Sketch 2 and 3 as detailed in the chapter provided that the Ironmongers' Hall would be completely cut off from the street, and provides a brief outline of other issues with these designs. However, none of these are discussed in sufficient detail.
- e) **Specifically, the north-south Pedestrian Walkway parallel to Aldersgate Street, and a high circulatory walk to the rear of the Cultural Centre** - The siting of the City Walkway on the west side of the listed Hall, entirely contrary to the scheme design shown to the Company in earlier pre-application consultations, repeats the gross mistake in the previous design of the Museum of London, serving only to enclose and obstruct the front (west-facing) elevation of the Hall, and is avoidable, harmful and will be regarded as an unardonable example of fundamentally poor quality design.

The introduction of a high circulatory walk to the rear of the Cultural Centre in close proximity to the Hall would introduce the likelihood of noise disturbance and add both to the sense of enclosure and the reduction in the light received by the Hall - another example of poor design which needs further analysis.

- f) **The paucity of the assessment of construction-phase impacts on Ironmongers' Hall and other sensitive receptors nearby** – There are significant areas of concern identified by the applicant in its own assessments, that raise justifiable issues for Ironmongers, not least because there are very significant works of separation which would be required to demolish Ferroners' House, which is structurally integrated with the Hall. To take a few examples:
- The **construction vibration** is anticipated to exceed the SOAEL (significant observed adverse effect level) for both potential disturbance and structural damage to the Hall [ES, para 7.5.11];
  - This concern is further commented on in para 7.8.1 of the ES, which states [in part] that '...some significant noise and vibration effects may remain after mitigation during the demolition and construction phase of the proposed development. As part of the CEMP/ section 61 application the regime for monitoring construction noise and vibration and associated limits at various receptors will be agreed with the CoLC. This would be expected to comprise an appraisal and condition survey of Ironmongers' Hall building and its susceptibility to damage as well as on-site trials to establish in situ levels of vibration and how the levels of vibration can be minimised and managed in order to avoid building damage. Appropriate vibration limits will be set between the contractor and the Council to protect surrounding receptors, this will include a protocol to produce warnings if the works are approaching the agreed trigger levels and associated actions e.g. to investigate the cause and review works methodologies prior to any limit being reached'.



- The Construction and Environment Management Plan prepared by Multiplex and submitted with the application, which the Applicant has accepted will be a condition on any permission granted in the ES chapter on Demolition and Construction, provides comment on the owners and occupiers requiring specific legal agreements to be established to enable the construction of the elevated slab to progress in this sensitive location. However, no further detail is provided.

This is highly confusing. The reference to ‘significant *noise*’, as well as significant *vibration*, is omitted in para 7.8.1, and appears to have fallen away. The setting of appropriate limits (vibration only, it would appear) are to be set between the contractor and the Council, with no reference to the Ironmongers Company – we assume that the Company would not be a bystander in this exercise, when first set up, and on a very active continuing basis. The levels to be set appear to be confined to the avoidance of building damage – not, it would seem, to any element of regard for the sensitive receptor nature of the use of the Hall by the Company during the almost six-year programme of works to carry out the development.

The Company had been given, and had in good faith relied upon, repeated assurances given by the Corporation’s various lead officers in the very protracted (largely one-way) communications preceding the submission of the application in late December 2023, that full protection would be offered in contractually enforceable Asset Protection and Neighbourly Matters Agreement form. It is disquieting for the Company to be required to sift through a very large amount of detail - not shown to us in draft in advance – and to discover details of this kind which are of obvious concern to the Company. All the more so, because there has been no constructive engagement from the Corporation in several disciplines (Planning, Surveyor, and more) at various levels on the subject of asset protection.

- g) **Embodied Carbon; and the case for the retention of Bastion House** – There will inevitably be very close attention paid to this subject, and rightly so. The Company is considering the position in close detail, recognising that the law, practice, and politics of this are all in a very volatile state at present. Sufficient to state for now that the Company reserves its position entirely on this subject. It is regrettable that the City Surveyor was so reluctant to place his cards face-up on the table from an early stage, and made necessary the need for reliance on Freedom of Information legislation for access to be gained to key factual data; yet now makes a virtue and strength out of why there is a compelling case for the wholesale demolition of Bastion House. This does not add up. It requires much closer scrutiny from independent evaluation.
- h) **Daylight, Sunlight and Overshadowing impacts** – Daylight and Sunlight impact is a further aspect over which the Company has strong reservations. Paragraph 7.13 of the Planning Statement states that:

*“The majority of nearby properties experience reductions smaller than the threshold at which changes may become noticeable i.e. a less than 20% change. Where this is not the case, and reductions are beyond the retained level of daylight is considered to be good for an urban location and the effect is minor overall. It is considered that on balance the proposed development accords with Policy DM10.7 and Draft Policy DE2”.*

This will clearly need further examination, since it manifestly falls short of good, let alone best, practice on this important subject. The Company is advised that recent decision-making on the subject at and above Inspectorate level established at appeals would be highly likely to adopt a very different approach to the subject than is revealed by the extract quoted above.

As indicated above, the Rotunda element would loom up over the Hall and introduce significant and most unwelcome overshadowing.

The subject of rights of light is for separate consideration.

- i) **Wind assessment** – Given recent experience of the highly unsatisfactory conditions brought about by wind impact of new tall buildings in the City, the Company is highly sceptical of the conclusion that the proposals would result in no significant wind microclimate effects, and the rather casual assertion that in this respect the proposals accord with applicable London Plan and Local Plan policies. The methodology used in assessments on this element by the development industry would appear to be crude and inexact to a high degree. We consider that a more hesitant approach would be in order; combined with a clear recognition that, given the close proximity of long-term sensitive receptor immediate neighbours, were unsatisfactory conditions to be experienced, remedial steps would immediately be taken. It is disappointing to read that no supplementary mitigation appears to have been considered.
8. **Draft Planning Conditions and s106 Planning Obligations** – We trust that your authority, in acknowledgement of the very significant impacts which this project would have on Ironmongers’ Hall in both the construction and post-completion stages will recognise and accept that if the scheme proceeds to a resolution to grant and beyond, Ironmongers would be invited to participate to the fullest extent in the framing of relevant draft planning conditions and planning obligations addressing both the entire construction period and post-construction estate management matters.

Your unqualified assurance to this effect is requested. It would plainly not be acceptable for these to be developed to an advanced stage and presented to Ironmongers as a *fait accompli*.

9. **Asset Protection and Neighbourly Matters Agreement** – We make the same point regarding active participation in relation to this topic. In this regard, entirely without prejudice to the Ironmongers position in relation to the application, early in-depth constructive discussion on asset protection and neighbourly matters appears to the



Company to be a responsible step to be taken in the context of the appropriate stewardship of the recently-listed Hall.

Previous discussions on this topic have not borne fruit, which we consider to be rather regrettable.

10. **In conclusion** – The Company is realistic that the wholesale replacement of the Museum of London is a sensible course of action to pursue, provided that the replacement form of development is guaranteed to produce a very high-quality sensitively designed urban environment, including public realm of the highest quality worthy of this important location, respectful of the rich heritage and sensitive receptor uses in the neighbourhood. The Company is unpersuaded of the robustness of the case for the replacement of Bastion House, on currently available information. As indicated, we also question the justification for the sheer scale and bulk of the development proposed.

The level of commitment incorporated in the application falls short and allows scope for value-engineering and depletion of design quality. The application reveals a lack of flexibility of thinking about genuine alternatives considered, which would give rise to a more suitable scheme. The siting of the City Walkway on the west side of the listed Hall, entirely contrary to the scheme design shown to the Company in earlier pre-application consultations, repeats the gross mistake in the previous design of the Museum of London, serving only to enclose and obstruct the front (west-facing) elevation of the Hall, and is avoidable, harmful and will be regarded as an unpardonable example of fundamentally poor quality design. It is one of the aspects of the approach taken to the design of the walkways which needs to be fundamentally rethought, another being the proposed high circulatory walk to the rear of the Cultural Centre. The microclimate effects, notably daylight and sunlight impacts, overshadowing and wind conditions, all need further analysis and independent evaluation. The construction impacts demonstrate that close co-operation with the Company would be essential. The phasing of the scheme in construction is wholly unsatisfactory. The assurance of uninterrupted servicing capability for the Hall, a material consideration of high importance, is ignored, and appears to be rather precarious, which is plainly unsatisfactory.

The need for the highest level of asset protection for the Hall, and acknowledging both the impact of the loss of income during the construction phase and the critical importance of the separation works that would be required, clearly a sine qua non of any project being acceptable even at the highest level of abstraction, seemingly continues to be overlooked by the City Surveyor as the landowner. This is as surprising as it is regrettable, given that the scheme will be unable to proceed if the City Surveyor is unable to agree terms with the Company over a potential acquisition of the freehold of Ferroners' House, currently attached to the listed Hall.

Yours faithfully



Colonel CPH Knaggs OBE  
Clerk



## Representing the interests of Barbican Residents

Barbican Association Planning Sub-Committee  
c/o 343 Lauderdale Tower  
Barbican  
London EC2Y 8NA

Department of the Built Environment  
City of London  
PO Box 270,  
Guildhall  
London EC2P 2EJ

11 February 2024

**For the attention of Ms Gemma Delves, Planning Officer**

Dear Ms Delves,

**Objection to applications 23/01304/FULEIA; 23/01276/LBC; 23/01277/LBC – London Wall West**

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to **object** to the above applications relating to the site at London Wall West. We endorse the objections submitted by the Barbican Quarter Action group, of which the BA is a member, but we make these additional points on behalf of our members. The grounds for objection include: significant loss of residential amenity, significant harm to heritage assets, paucity of perceived cultural benefits, and significantly harmful environmental impact. In addition, we point out that the access arrangements for the construction phase and servicing during the life of the building are unworkable, and that consultation on these aspects has been non-existent.

We are disappointed that the applicant has decided to overlook all the concerns and issues highlighted by the many residents and interested parties that live and work in the vicinity of the proposed development site during the consultation process. It is also disappointing to note that the City of London Corporation rejected several proposals to re-fit and re-purpose Bastion House and the Museum of London – offers it itself described as credible – in favour of the demolition of these two important examples of post war architecture and their replacement with oversized offices for which there is questionable demand, and in an area of the City prioritised for housing, not offices. This is also in contravention of the City's (and national) policy of "Retrofit and re-use".

In our view, the proposals are both unsympathetic and inappropriate in size for this sensitive and densely populated residential and mixed urban location and the massing would consequently bring both a serious loss of amenity to residents and loss of architectural coherence with little wider benefit to the City of London. The proposals will cause significant harm to the setting of Grade 1, Grade 2 and Grade 2\* heritage assets abutting as they do so closely to a number of key listed buildings and City Conservation

areas. These include the Grade 1 St Botolphs and St Giles churches, the Grade 2 and Grade 2\* listed Barbican Estate and landscape and the Barbican and Golden Lane Foster Lane and Postman's Park Conservation Areas.

### **Significant loss of residential amenity**

The proposed massing of the buildings will cause substantial loss of light to many residents in the neighbouring Barbican Estate, particularly those blocks nearest to the site, namely Seddon, Thomas More and Mountjoy Houses. The Daylight and Sunlight documents submitted with these applications suggest that *"the overall impact on daylight to Mountjoy House is considered to be negligible to minor adverse and thus the effect is not significant.....Overall, therefore, the impact on daylight and sunlight to Thomas Moore House is considered to be minor adverse and thus the effect is not significant.* The documentation comes up with a similar analysis with regard to light spill and solar glare.

The emerging Local Plan 2040 takes into account the cumulative effects of developments. The successive building of taller buildings in Aldersgate and on London Wall has already affected lighting levels in residents' flats. The massing of the proposed new Bastion House is 2.5x that of the existing building. The proposed new Rotunda building is planned to be 14 storeys high (vs the existing low-level Museum of London structure) and the new North building 5 storeys high. The loss of daylight and sunlight to all nearby premises will be significant to the residents concerned.

Residential amenity will be impacted not only by loss of daylight and sunlight but also by the attendant impacts of overshadowing, light spill, solar glare, and noise. The risk of night time light pollution is an additional concern.

Loss of privacy and overlooking are also issues of concern. The buildings not only overlook many residential properties but also that of the City of London School for Girls. In this latter regard, for example, we note that in addition to the many office windows overlooking the area, the proposed welfare block during the many years of construction is planned to be adjacent to and overlooking the school's sports pitches in addition to the many residents in Thomas More House, giving rise to additional concerns regarding the safeguarding of pupils.

The loss of light and privacy and the inevitable impact of noise and pollution from the demolition and construction of the site over many years will have seriously adverse effects on the health and well-being of residents, workers and visitors to the area from commencement of the works through to 2033.

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

In the emerging Draft City Plan 2040 in Policy HS3: Residential environment it states: *"The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements....* It goes on: **2. All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to**

***adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE9.***

Although not yet adopted, the emerging plan should take considerable weight, partly because it has been so long in production and the policies on residential protection have been there (unchallenged) since the first iteration. Moreover, Policy DM 21.3 Residential environment in the Local Plan 2015 is not even referenced in the planning statement, which is surprising given the extent to which the development impinges on the residential environment, including taking over some of its space.

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

The Barbican was deliberately designed to provide a tranquil residential place in the City. This development puts that tranquillity at risk – and the Agent of Change principle mentioned in the emerging Local Plan 2040 requires new developments to provide adequate mitigation or to be resisted.

It is also clear from the servicing and construction plans that the impact on residential amenity has not been taken seriously in these proposals.

Policy CS5 The North of the City in the Local Plan 2015 includes:

*4. Ensuring the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as Smithfield Market, Barbican, Golden Lane and Broadgate, **whilst preserving privacy, security and noise abatement for residents and businesses.***

*5. Identifying and meeting residents' needs in the north of the City, **including protection of residential amenity, community facilities and open space.***

Again we are not reassured that these proposals acknowledge the need to protect privacy, security, and noise abatement.

Moreover, it is clear from both the 2015 and 2040 plans that new housing in the City is intended to be built adjacent to the existing residential clusters. The use of the London Wall West site for offices removes the site as a prime candidate for housing, next to the City's largest residential cluster.

### **Significant harm to heritage assets**

These proposals will cause substantial harm to the heritage of the area and they ignore the cultural history of the site. The design and massing of the buildings sit totally out of character with both the listed Barbican Estate which it borders and the neighbouring buildings in Aldersgate Street, London Wall and St Martins le Grand.

These proposals would have a major negative impact on the surrounding area. The site marks an ancient gateway to the City on a thoroughfare that has been in constant use since Roman times and its planned re-routing would destroy the historic Roman street line. The

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

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

A view of one of the Barbican's iconic towers from St Martin Le Grand to the south would be completely obscured by the bulk of the Rotunda Building. Given the stated aim of the developers to provide a gateway to the cultural offerings of the area, it is ironic that one of the existing cultural offerings (namely the Barbican estate) should be obscured from view by what is just another office building, bearing no design relationship to the brutalist estate.

With specific regard to the Barbican and Golden Lane estates, the Barbican and Golden Lane Supplementary Planning Document (SPD) published in February 2022 states that the *"Barbican Estate is a unique example of coherent inner city planning of the post war era.....and goes on "the overall plan form of the Barbican, and the integrated relationship between buildings, spaces, lakes, podium walkways all contribute to the special value of the composition as a totality"*. The SPD also sets out the City of London Corporation's policies relating to this important conservation area. The document states that ***"Development should preserve and enhance the distinctive character and appearance of the Barbican and Golden Lane conservation area – as set out in this SPD – and the significance of individual heritage assets within the boundary. Where appropriate, development should seek to better reveal the significance of the conservation area and other individual heritage assets."***

The SPD goes on to state that *"Conservation area status, following designation in 2018, requires that in the exercise of planning functions, special attention must be paid to the desirability of **preserving or enhancing the character and appearance of the area**"*.

### **Where are the cultural benefits?**

The City is in the process of ramping up the concept of Destination City, replacing the previous Culture Mile initiative. The London Wall West site should surely act as a gateway to this significant cultural area and not act as a monolithic obstruction. The London Plan 2021 recognised this area as one of London's strategic cultural areas which went some way to supporting the City of London's previous plans to put a Centre for Music on the site. Once these plans were shelved it was not unreasonable that part of the site at least would be used for a meaningful cultural addition to the City (though that is arguable since the Museum is being replaced and enlarged on a site nearby). Or, more radically, the City could

have taken a strategic look at the site and considered what the City is most deficient in – the obvious alternatives being housing and green space.

We note that the cultural plans for the site are vaguely specified and uncertain. Only c12% of the total site is to be apportioned to culture (and of which c2% is to be apportioned to food and beverage spaces). The remaining space is to be apportioned (speculatively) to office use, thereby providing no significant addition to the cultural offerings of the area. Indeed, we argue that overall the proposals have an adverse effect on the existing cultural elements of the area: the new buildings block the visibility of the cultural events and exhibitions already on offer across the iconic Barbican estate and its Arts Centre. We would remind the committee that the Barbican was described by the government's Independent Panel on UNESCO World Heritage status *"As a masterpiece of brutalist architecture and town planning reflecting the standards of its time and arguably, one of the best examples of municipal urbanism, ....that has maintained its authenticity and integrity despite periods of adaptation and change"*.

At present someone coming north up St Martin Le Grand sees a large area of sky above the roundabout with a view of one of the Barbican towers (itself a cultural attraction). The proposals would completely block that view of the Barbican and of the sky, also obscuring wayfinding and the route to the north.

### **Servicing and construction plans unworkable**

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

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

Total predicted traffic flows will more than double and restrict access for residents, their deliveries and for emergency vehicles. Even Buro Happold, the consultant engineers, state that this plan is far from ideal given that *"the constraints of the existing site and Ironmongers Hall result in a layout where two way circulation is not possible for large good vehicles and refuse trucks, such that there are only limited passing opportunities. Furthermore, visibility is somewhat restricted especially around the retained Ironmongers Hall building such that vehicles travelling in opposite directions cannot easily see oncoming vehicles."*

#### *Construction phase*

The proposal that during the construction phase the ramp from Aldersgate Street to the Thomas More carpark should be restricted to construction traffic only is completely unrealistic. The only other vehicle access to that car park is down a narrow one way ramp with a 180 degree turn at the bottom. This is not navigable by anything larger than a medium sized car (and a skilled driver). The route is not wide enough for more than one

vehicle: backing up to let vehicles through would involve backing onto Aldersgate Street at one end and round an 180 degree turn at the other. The entrance will not accommodate the City's waste lorries that remove rubbish or vans larger than a car.

The Construction and Environmental Service Plan says at p 32 "*Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however this should only be utilised when absolutely necessary.*" Data from 2017 from an audit of the Thomas More car park showed over 100 vehicle movements a day. The number of deliveries is likely to have increased since then. About 33 of those a day were accounted for by residents with parking places. The others were contractors' vehicles for the estate and for residents and delivery vehicles. Access for these vehicles will be "absolutely necessary" many times in the day. Such mingling of construction vehicles and residential and other non-construction traffic is, as the Construction report implies, unsafe.

#### *During operation of the completed buildings*

The proposal is that all three new buildings - New Bastion House, the Rotunda, and the North building (plus Ironmongers) will be serviced via the ramp into Thomas More carpark. The service road from London Wall that exits onto the top part of the ramp currently will disappear.

The North building will not have enough space in its service area for vehicles to turn round so they will enter the area frontwards and have to backout onto the ramp (as shown in 23/01277/LBC). Thus obstructing all other incoming and outgoing traffic and contravening the City's servicing standards. Local Plan 2015 Policy **DM16.5** item 4 says "*On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear.*"

It is not clear whether and how the residents' use of the carpark will be reconfigured and there has been no consultation with residents or other stakeholders about this aspect of the plan.

The information in 23/01277/LBC shows that the areas of the carpark that currently

- allow deliveries for residents to be unloaded
- house the electric vehicle charging points,
- provide parking for Mountjoy House,
- provide an emergency exit from the Girls School
- provide facilities for long term estate contractors

will no longer be available: the space will be a traffic route to the new buildings' service areas.

There is no information on the implications of this traffic on access for emergency vehicles to the flats.

The application envisages between 104 and 174 vehicle movements (depending on how many are consolidated) a day to service the three buildings. That is on top of the current level of vehicle movements from residents' vehicles and the Thomas More Carpark is the busiest in the Barbican (2017 figures showed about 100 vehicle movements a day).

The proposed new buildings on the London Wall West site are considerably larger than the existing buildings on the site - and will therefore have greater servicing needs - yet the access for servicing is much less than that available for the older buildings.



These proposals for access are not fit for purpose and if this application is to go ahead need to be radically reworked to:

- provide an alternative access for construction vehicles
- provide additional access during the operation of the building. It cannot be acceptable for significantly increased levels of noisy and air polluting traffic to be placed near to a residential site.

Moreover, the proposal to remove the roundabout – which has not been subject to a full consultation – will force traffic exiting from the ramp from the Thomas More carpark that wants to go north and west to go some considerable way south and east before finding its correct route. This will only lead to further congestion on London Wall (which is likely to be busier because of any future restrictions to Beech Street).

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

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

The ARUP report supporting this application indicates that the growth area for office demand is in emerging businesses, which need cheaper, smaller, flexible spaces. There also remains significant uncertainty about the long-term demand for offices given that post-Covid patterns of work still do not appear to have been established.

Indeed, the ARUP report itself points to very diverse scenarios for the future. City Officers have advised that the expectation is that demand will lie between the in-person return and the hybrid ARUP scenarios, but without explaining the rationale for the choice. Given the amount of office space that the City already has in the pipeline, it remains questionable as to whether the proposed developments at London Wall West are critical to the City's overall office space targets.

### **Environmental impact**

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

In a press release issued by the City of London Corporation on 12<sup>th</sup> December 2023 it was announced that the City's Planning and Transport Committee had approved a new Sustainability Supplementary Planning Document (SPD). It went on to say that *"The move aligns with the organisation's Climate Action Strategy, which supports the achievement of net zero for the whole Square Mile by 2040. The SPD ... sets out what the City Corporation expects to see addressed through the developer's approach to their sites and the design and construction of buildings. The SPD aligns with the emerging City Plan 2040, expected to be approved and adopted in 2024. Five key considerations are identified in the guidance for*

*developers, in order to set exemplary standards for sustainability, without undermining the economic viability of planning applications. These include:*

***Retrofit and reuse*** - *Outlining the ‘retrofit first’ approach, promoting the reuse of existing buildings where this is the most sustainable and suitable approach for a site, in line with the City Corporation’s adopted Carbon Options Guidance.”*

Having publicly and repeatedly announced that “retrofit first” is to form the cornerstone of the City’s planning policy, we question why this policy was ignored in relation to the London Wall West site. This runs counter to all accepted sustainability considerations including at national level, notably NPPF 2023, section 14 as well as the City’s own.

The justification for demolishing Bastion House was that the building was structurally unstable. This has, however, been proven to be incorrect and supports the view that Bastion House – together with the Museum of London building - could and should be repurposed.

In this regard, the City Corporation’s soft market test for interested parties to express their interest in retaining and repurposing the site was flawed from the outset, being too short a period of time for any interested party to adequately assess the site. The three credible responses seem not to have been properly followed up.

### **Summary and conclusion**

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

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

It removes a major candidate site for housing – in an area of the City where more housing is part of the Local Plan.

It offers little extra green space.

This part of the City is not a key area for large offices, and it is not clear that another three office buildings will offer much benefit to the City

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-committee

Sue Cox – Deputy Chair, Barbican Association Planning Sub-committee

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**From:** Jane Smith  
**Sent:** Sunday, February 11, 2024 6:42 PM  
**To:** Hughes, Ian  
**Cc:** SMCX34; [chairbarbassociaation](#); [theszlesingers](#); Chair, Mountjoy House  
**Subject:** [Unsafe servicing proposals for London Wall West](#)

THIS IS AN EXTERNAL EMAIL

Dear Ian

I am writing to you as City Operations Director on behalf of the Barbican Association about our serious concerns about the access and servicing arrangements for the proposed development at London Wall West (planning applications 23/01304/FULEIA; 23/01276/LBC; 23/01277/LBC).

Irrespective of the merits or otherwise of the applications, we think the proposals for access during construction and for servicing during operation of the building are unsafe and unworkable.

We have not had a chance to make representations on them because we were not consulted on these aspects pre-application.

We are interested to know the observations of the transportation and roads team on these aspects.

Our concerns are set out below.

The proposed access to all the buildings of the London Wall West site for vehicles is via the ramp from Aldersgate Street to the Thomas More carpark that serves Seddon,

Mountjoy, and Thomas More Houses and Lauderdale Tower.

### **Construction phase**

The Construction and Environmental Management plan says on p 31

" It is assumed that the rear service yard will be restricted to construction traffic only from the commencement of the main demolition post museum closure and will remain restricted until the project's completion"

This is unrealistic.

The developer's proposed alternative for residential use of the car park is to use the entrance to Lauderdale Car park. But this is only accessible by small vehicles - and skilled drivers - and is only wide enough for a single vehicle on a steep ramp. Backing up to let vehicles through would involve backing onto Aldersgate Street at one end and round an 180 degree turn at the other. The entrance will not accommodate the City's waste lorries that remove rubbish or vans larger than a car.

p32 goes on to say

" Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however should only be utilised when absolutely necessary."

Data from 2017 from an audit of the Thomas More car park showed over 100 vehicle movements a day. The number of deliveries is likely to have increased since then.

About 33 of those a day were accounted for by residents with parking places. The others were contractors' vehicles for the estate and for residents and delivery vehicles. Access for these vehicles will be "absolutely necessary" many times in the day.

Such mingling of construction vehicles and residential and other non-construction traffic is, as the Construction report implies, unsafe.

## **During operation of the completed buildings**

The proposal is that all three new buildings - New Bastion House, the Rotunda, and the North building (plus Ironmongers) will be serviced via the ramp into Thomas More carpark. The service road from London Wall that exits onto the top part of the ramp currently will disappear.

The North building will not have enough space in its service area for vehicles to turn round so they will enter the area frontwards and have to backout onto the ramp (as shown in 23/01277/LBC) – which is against City policy

It is not clear whether and how the residents' use of the carpark will be reconfigured and there has been no consultation with residents or other stakeholders about this aspect of the plan.

The information in 23/01277/LBC shows that the areas of the carpark that

- Allow deliveries for residents to be unloaded
- house the electric vehicle charging points,
- provide parking for Mountjoy House,
- provide an emergency exit from the Girls School
- provide facilities for long term estate contractors

will no longer be available: the space will be a traffic route to the new buildings' service areas.

There is no information on the implications of this traffic on access for emergency vehicles to the flats.

The application envisages between 104 and 174 vehicle movements (depending on how many are consolidated) a day to service the three buildings. That is on top of the current level of vehicle movements from residents' vehicles and the Thomas More Carpark is the busiest in the Barbican (2017 figures showed about 100 vehicle movements a day).

The proposed new buildings on the London Wall West site are considerably larger than the existing buildings on the site - and will therefore have greater servicing needs - yet the access for servicing is much less than that available for the older buildings, and will have to share limited space with the existing residential traffic.

We would be interested in your observations.

Best wishes

Yours sincerely

Jane

Jane Smith

Chaire, Barbican Association planning subcommittee



Your ref:  
My ref: 23/08719/OBS

**Please reply to:** Allison Borden

Tel No:

Email:

Gemma Delves  
City of London  
PO Box 270, Guildhall, London EC2P 2EJ

**Town Planning & Building Control**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

22 February 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

#### SCHEDULE

**Application No.:** 23/08719/OBS

**Application Date:**

**Date Received:** 12.12.2023

**Date Amended:** 12.12.2023

**Plan Nos:** City of London Letter Dated 12 December 2023

**Address:** Development Site At London Wall West, Bastion House And Museum Of London, London Wall, City Of London, London

**Proposal:** Planning permission for the following (23/01304/FULEIA): Demolition of 140 and 150 London Wall to provide a phased development comprising: the construction 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 reconfiguration of the ironmongers' Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterer's 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 and hard and soft landscaping; and associated and ancilliary works, structures and highways works.

Listed Building Consent for the following: (23/01277/LBC): External alterations to existing highwalks at the Barbican Estate including the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, Shaftsbury Place, and London Walk Car Park, London EC2Y)



Listed Building Consent for the following: (23/01276/LBC): Demolition of Ferroners' House alongside alterations and facade and roof level of Ironmonger' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, Shaftsbury Place, and London Walk Car Park, London EC2Y)

Yours faithfully



**Deirdra Armsby**  
**Director of Town Planning & Building Control**

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



**Note:**

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- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



**From:**

**To:**

**Subject:**

LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response

**Date:**

29 February 2024 15:19:28

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THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter [@activetraveleng](#)

Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ ref:a0zTw0000000gvJIAQ;dff45c89e0cecb1c3f2a26704c4ed5d1:ref ]

**From:**  
**To:**  
**Subject:** RE: Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 06 March 2024 16:50:00  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y).

Thank you for your re-consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*

Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** lpalondonwallwest  
**Sent:** 27 February 2024 14:15  
**To:** lpalondonwallwest  
**Subject:** Planning Application Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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**From:**  
**To:**  
**Cc:**  
**Subject:** RE: Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 15 March 2024 16:02:59  
**Attachments:** [image001.png](#)

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THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Thank you for your e-mail.

After reviewing the documents I can't see any relevant documents that changes our previous comments dated 19 December 2023. Therefore our water capacity condition still stands and we have no further comments to make.

Kind Regards,

**Saira Irshad**

Development Database Administrator

Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ



**It's everyone's water**

---

**From:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>  
**Sent:** Thursday, March 14, 2024 3:55 PM  
**To:** lpalondonwallwest <lpalondonwallwest@cityoflondon.gov.uk>  
**Cc:** Delves, Gemma  
**Subject:** Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

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Dear Consultee/Contributor,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall,

Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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Good Growth

Gemma Delves  
City of London Corporation  
By Email

**Our ref:** 2024/0150/S1  
**Your ref:** 23/01304/FULEIA  
**Date:** 15 March 2024

Dear Gemma Delves

**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 14 March 2024 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 reconsulted on the application under following category of the Mayor of London Order, as the site boundary encroaches into a small section of the Postman's Park Conservation Area:

**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 meters of floorspace for class B1 (business)”*

I have assessed the details of the application and, given the scale and nature of the proposals, conclude that the amendments do not give rise to any new strategic planning issues.

City Hall, Kamal Chunchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

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

Therefore, 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

**From:**

**To:**

**Subject:** LPA Reference: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC Standing Advice Response

**Date:** 19 March 2024 08:40:33

THIS IS AN EXTERNAL EMAIL

**LPA Reference:** 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

**ATE Reference:** ATE/23/01053/FULL

**Site Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5D, London

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

## Standing Advice

Dear Sir/Madam,

Thank you for your email.

In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here:

<https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes>

Regards,

 **Development Management Team**

Active Travel England

West Offices Station Rise, York, YO1 6GA

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Instagram [@activetravelengland](#) and on [LinkedIn](#)

]]>

[ ref:a0zTw0000000gvJIAQ;b3c56f02f4a11e1e428c463b924b69e0:ref ]

**From:**  
**To:**  
**Cc:**  
**Subject:** RE: Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC  
**Date:** 03 April 2024 09:11:17  
**Attachments:** [image001.png](#)  
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good morning,

**Application No:** 23/01304/FULEIA

**Site address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including Void, Lifts And Stairs At 200 Aldersgate Street And One London Wall) London EC2Y 5DN

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

**Application No:** 23/01277/LBC

**Site address:** 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London EC2Y

**Proposal:** External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

**Application No:** 23/01276/LBC

**Site address:** Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

**Proposal:** Demolition of Ferroners' House alongside external alterations to the façade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Thank you for your re-consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

*This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.*



Kind regards,

**Tom Li**

Safeguarding Engineer (LU+DLR) | Infrastructure Protection  
5 Endeavour Square | 7<sup>th</sup> Floor Zone B | Westfield Avenue | E20 1JN



---

**From:** lpalondonwallwest

**Sent:** 14 March 2024 15:55

**To:** lpalondonwallwest

**Cc:** Delves, Gemma

**Subject:** Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

Dear Consultee/Contributor,

Please see attached consultation for London Wall West - 140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y (including void, lifts and stairs at 200 Aldersgate Street and One London Wall).

Reply with your comments to [lpalondonwallwest@cityoflondon.gov.uk](mailto:lpalondonwallwest@cityoflondon.gov.uk).

Kind Regards,

Planning Administration

On behalf of

Gemma Delves  
Environment Department  
City of London

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Your ref:  
My ref: 24/01717/OBS

**Please reply to:** Nikki Mitchell  
Tel No: [REDACTED]  
Email: [REDACTED]

Gemma Delves  
City of London  
PO Box 270, Guildhall, London EC2P 2EJ

**Town Planning & Building Control**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

3 April 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

#### SCHEDULE

<b>Application No.:</b> 24/01717/OBS	<b>Application Date:</b>
<b>Date Received:</b> 14.03.2024	<b>Date Amended:</b> 14.03.2024

**Plan Nos:** Letter from City of London dated 14 March 2024.

**Address:** London Wall West, 140 London Wall, 150 London Wall, Ironmongers Hall, Shaftesbury Place, London Wall Car Park, City Of London, London,

**Proposal:** Planning permission for the following (ref 23/01304/FULEIA) Demolition of 140 and 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 and hard and soft landscaping; and associated and ancillary works, structures and highways works.

Listed Building Consent for the following (23/01277/LBC): External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y) Listed Building Consent for the following (23/01276/LBC):

Demolition of Ferroners House alongside external alterations to the facade and roof level of Ironmongers Hall, internal reconfiguring to cores and back of house areas and

associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y)

Yours faithfully



**Deirdra Armsby**  
**Director of Town Planning & Building Control**

**Note:**

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



**Note:**

- 3f The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.





## Representing the interests of Barbican Residents

Barbican Association Planning Sub-Committee  
c/o 343 Lauderdale Tower  
Barbican  
London EC2Y 8NA

Department of the Built Environment  
City of London  
PO Box 270,  
Guildhall  
London EC2P 2EJ

6 April 2024

**For the attention of Ms Gemma Delves, Planning Officer**

Dear Ms Delves,

**Further objections to applications 23/01304/FULEIA; 23/01276/LBC; 23/01277/LBC – London Wall West**

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to reiterate our **objections** to the above applications relating to the site at London Wall West.

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

**Questionable speed and process in dealing with these applications**

We would point out that the sheer haste with which this application is being processed is both questionable and concerning in the extreme. The planning applications for these huge and complex proposals were received on 21<sup>st</sup> November 2023 and validated just two days later. Notice of the application and the first consultation period was sent out by the City on 12<sup>th</sup> December 2023, just ahead of the Christmas and New Year holiday period, making it difficult for many people to digest and comment on the many hundreds of pages of documents that had been uploaded onto the planning portal. In addition, these documents

– many of which were in multiple parts, hard to download and lacking any helpful indexing - were extremely difficult to get to grips with and therefore very challenging to ensure effective public comment in a timely manner.

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

### **Applications have already been approved by the Chief Planning Officer**

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

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

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

### **Unseemly haste to get these applications through to Committee**

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

### **What is happening to the Ferroner's House application?**



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

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

### **City Plan 2040 launch deferred until after the 17<sup>th</sup> April meeting**

Formal consultation on the new draft City Plan 2040 was originally scheduled for launch on 15<sup>th</sup> April 2024. We now learn that this launch has been put back to 18<sup>th</sup> April 2024 ie. a day later than the Planning Applications Sub-committee meeting date which is due to debate the London Wall West proposals. This is a deeply worrying, indeed even manipulative, move by the City and reflects very badly indeed on the whole Planning process relating to these applications.

The City of London has stated that *“A key objective of the draft City Plan is to ensure that the Square Mile transitions to a zero carbon city by 2040. Since the Plan was drafted, the way whole lifecycle carbon (WLC) of development is measured and assessed through the planning system has evolved significantly (including through strategic planning policy and guidance, and the production of the City Corporation’s Carbon Options Guidance) and **increased importance has been given to encouraging the retrofit of existing buildings...**”*

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

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

### **Strong emphasis on Retrofit first**

The draft City Plan 2040 focuses on the need to retrofit first.

By way of example, we include a selection of the policies within the Plan which include:

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

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

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

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

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

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

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

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

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

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

planning policy regime and avoid the further weight that will be attached to the emerging one.

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

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

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

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

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

### **Our previous objections remain undiminished**

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

- **Significant loss of residential amenity** – the disproportionate scale of the increase in height and mass of the proposed buildings will cause loss of daylight and sunlight, overshadowing, light spill, solar glare, noise and night time light pollution to all neighbouring properties, the majority of which are residential
- **Loss of privacy and overlooking** – not just for many residential properties but also the City of London School for Girls.
- **Significant harm to heritage assets** – the proposals and loss of architectural coherence will cause significant harm to the setting of Grade 1, Grade 2 and Grade 2\* heritage assets with little wider benefit to the City of London.
-

- **Paucity of perceived cultural benefits** - cultural plans for the site are vaguely specified and uncertain, with only c10% of the total site to be apportioned to culture
- **Harmful environmental impact** - having publicly and repeatedly announced that “retrofit first” is to form the cornerstone of the City’s planning policy, we question why this policy was ignored in relation to the London Wall West site. This runs counter to all accepted sustainability considerations including at national level, notably NPPF 2023, section 14. The justification for demolishing Bastion House was that the building was structurally unstable. This has, however, been proven to be untrue and supports the view that Bastion House – together with the Museum of London building - could and should be repurposed.
- **Soft market test flawed and not followed up** - the City Corporation’s soft market test for interested parties to express their interest in retaining and repurposing the site was flawed from the outset, being too short a period of time for any interested party to adequately assess the site. The three credible responses seem not to have been properly followed up whilst news that the City of London Police may make temporary use of Bastion House and the City of London School for Girls of the Museum of London serve to confirm that these buildings remain fit for use
- **Totally unworkable access arrangements** – both for the construction phase and servicing during the life of the building
- **Proposed removal of roundabout** - the impact of the loss of the roundabout that the new development proposes will be substantial on traffic flow and give rise to major congestion, delays and inconvenience throughout the area, not least given the proposals for the new St Paul’s gyratory system. How can a scheme that proposes such a major change to the existing road layout be assessed by Officers and the Planning Applications Sub-committee without the input of TFL? We also make the observation that this proposal has not been subject to a full consultation.

For all of the reasons detailed in this letter, we reiterate our objections to this scheme and request that these applications be rejected.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-committee

Sue Cox – Deputy Chair, Barbican Association Planning Sub-committee



Historic England

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Environment Department  
City of London  
PO Box 270  
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London EC2P 2EJ

Your Ref: 23/01277/LBC  
Our Ref: 218206

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31<sup>st</sup> January 2024

Dear Ms Delves,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
NATIONAL PLANNING POLICY FRAMEWORK 2021**

140 London Wall, 150 London Wall, Shaftsbury Place, And London Wall Car Park, London EC2Y

*External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftsbury Place, and London Wall Car Park, London, EC2Y)*

**Recommend Archaeology Conditions**

Thank you for your consultation received on 12<sup>th</sup> December 2023.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

**Assessment of Significance and Impact**



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The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

London Wall West is located just to the north-west of the Roman and medieval city walls and Roman fort. Parts of the Scheduled walls are included within the site boundary. A Jewish cemetery of possibly 11th century date extends partially onto the north-east area of the site, within the Barber Surgeon's garden and beneath Bastion House. This formed the only Jewish cemetery in England until 1290 when the Jews were expelled. No evidence for the cemetery is visible above ground. Jewish law strictly forbids the disturbance or excavation of Jewish graves. A full response to the development proposals for London Wall West from the Committee for the Preservation of Jewish Cemeteries in Europe (CPJCE) has been received by CoL and their concerns have been reflected in the advice provided below.

This response relates solely to non-designated archaeological issues. Impacts on designated assets, including the Scheduled Monuments and their settings, will be covered by our Development Advice Team who will respond separately.

Impacts from the proposed development on potential archaeology for this application are limited to the new landscaping design for the Northern Garden and Barber Surgeon's Garden. There does not appear to be any below ground impact from construction of the new Mountjoy Close highwalk.

The submitted ES includes a chapter for archaeology and also a baseline report has been provided as an appendix (Appendix 15). The results of the pre-determination archaeological evaluation have been provided to GLAAS separately rather than submitted with the planning application, but MOLA have confirmed that the results of the evaluation have been used to assess the archaeological potential of the site and are included in the ES where relevant. The evaluation report should be submitted as part of any necessary ES revisions or updates.

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



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In our response to the scoping document, GLAAS requested that the ES contain an explanation of how the new development will avoid any impact on the potential remains of the medieval Jewish cemetery in the north-east of the site and demonstrate how and where these remains have already been removed by the current basement. Unfortunately, this has not been as clearly demonstrated by either the ES or the Appendix as we had hoped. Some discussion of medieval burials has been provided, but the ES does not make fully clear that these relate to the burial ground at St Giles, which partially extended onto the site, not the Jewish cemetery. Any revisions or amendments to the ES should include a clearer assessment of impact for the Jewish cemetery within the Northern garden and Barber Surgeon's Garden.

The hard and soft landscaping around the new Mountjoy Close highwalk, in the Northern Garden and the Barber Surgeon's Garden, incorporates a small part of the projected extent of the Jewish cemetery. Burials from the former St Giles burial ground and Roman archaeology may also be present in this area. No construction work is proposed in this area and the archaeology baseline states that the landscaping work here will be carried out through ground that has been raised by 1m in height. No plans showing new services were available at this stage and so it is unclear if any below ground excavation is proposed in this area.

It is therefore recommended that a plan be produced which shows the area of the Jewish cemetery within the Northern Garden and Barber Surgeon's Garden and also indicates a 'no dig' zone around this area. The 'no dig' area should be incorporated into the landscaping method statement, the SUDS, the method statement for new services and the Construction Management Plan. This should be secured by condition and the 'no dig' zone demarcated on site by solid fixed barriers for the duration of the construction work. Any landscaping proposed in this area should be carried out through raised made ground which has been imported into the area and is of sufficient depth to prevent any excavation into the current ground level for construction of the new landscaping proposals. Any removal of hardstanding currently in the area should not affect the softer ground below and an archaeological watching brief should be carried out during the removal of hardstanding etc in order to confirm that previous ground levels are not disturbed.

The anticipated Roman, medieval and post-medieval archaeology which may survive elsewhere on the site is likely to be of low-moderate significance and, in places, very truncated. This archaeological potential can therefore be mitigated through the use of planning conditions. A full programme of public benefit, which includes opening up access to the Roman west fort gate, currently located in the underground car park, is proposed. The proposals also include new interpretation for the City walls, an exhibition space and digital and artistic interpretation of the heritage of the site. It is unfortunate that the information from the cultural strategy, which was submitted with the ES, was not included within the archaeology mitigation proposals within the ES as this would have usefully demonstrated the



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benefits of public access to this formerly hidden monument. An assessment of the public benefit should be included in any ES revision or amendment.

### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

### Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

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

**Mitigation for archaeology in the area affected by the landscaping works has been built into the scheme by ensuring that the ground is raised by 1m in the two northern garden areas, as described in the archaeological desk-based assessment.** If this is carried out then only the two archaeological planning conditions outlined below will be necessary, in order to ensure full protection for the Jewish cemetery during the construction works.

I therefore recommend attaching two archaeological conditions as follows:

Condition 1 No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or



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- development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and
- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
  - B. Where appropriate, details of a programme for delivering related positive public benefits
  - C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

## Condition 2: Preservation - protection

No development shall commence until details of fencing, signage and other control measures to protect the part of the Jewish Cemetery that may extend onto the site have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of operational works.

Informative: A plan of the relevant area should be produced and approved by GLAAS. This plan should then be incorporated into all relevant method statements, including but not limited to landscaping, new services, SUDs and the Construction Management plan. The area shown on the plan should also be approved by the CPJCE.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological work would comprise the following:



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## Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

An archaeological watching brief should be carried out during the removal of any hardstanding etc in the Northern Garden and Barber Surgeon's Garden in order to ensure that potential remains of the Jewish cemetery are not disturbed.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



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Historic England

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Environment Department  
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PO Box 270  
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London EC2P 2EJ

Your Ref: **23/01277/LBC**  
Our Ref: 218206

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2<sup>nd</sup> April 2024

Dear Ms Delves,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)**  
**NATIONAL PLANNING POLICY FRAMEWORK 2021**

*Reconsultation received - 27/02/24*

*External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of new highwalks, hard and soft landscaping, and works associated with the construction of new buildings with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftsbury Place, and London Wall Car Park, London, EC2Y)*

### Recommend Four Archaeological Conditions

Thank you for your consultation received on 12<sup>th</sup> December 2023.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

### Assessment of Significance and Impact



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The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

London Wall West is located just to the north-west of the Roman and medieval city walls and Roman fort. Parts of the Scheduled walls are included within the site boundary. A Jewish cemetery of possibly 11th century date extends partially onto the north-east area of the site, within the Barber Surgeon's garden and beneath Bastion House. This formed the only Jewish cemetery in England until 1290 when the Jews were expelled. No evidence for the cemetery is visible above ground. Jewish law strictly forbids the disturbance or excavation of Jewish graves.

This response relates solely to non-designated archaeological issues. Impacts on designated assets, including the Scheduled Monuments and their settings, will be covered by our Development Advice Team who will respond separately.

The submitted ES includes a chapter for archaeology and also a baseline report has been provided as an appendix (Appendix 15). The results of the pre-determination archaeological evaluation have been provided to GLAAS separately rather than submitted with the planning application, but MOLA have confirmed that the results of the evaluation have been used to assess the archaeological potential of the site and are included in the ES where relevant. The evaluation report should be submitted as part of any necessary ES revisions or updates.

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

In our response to the scoping document, GLAAS requested that the ES contain an explanation of how the new development will avoid any impact on the potential remains of the medieval Jewish cemetery in the north-east of the site and demonstrate how and where these remains have already been removed by the current basement. Unfortunately, this has not been as clearly demonstrated by either the ES or the Appendix as we had hoped. Some



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discussion of medieval burials has been provided, but the ES does not make fully clear that these relate to the burial ground at St Giles, which partially extended onto the site, not the Jewish cemetery. The two cemeteries are not believed to overlap. Figure 38 of the appendix suggests that parts of the Bastion House basement have only removed archaeological remains to a depth of c. 12.1m OD (basement floor at 13.1m OD and c 1m of concrete slab) which could suggest there is still some potential for burials to survive within the basement.

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

A small area to the north of Bastion House, in the north-east part of the proposed development and including the Barber Surgeon's Garden, incorporates a small part of the projected extent of the Jewish cemetery. No construction work is proposed in this area and the archaeology baseline states that the landscaping work here will be carried out through ground that has been raised by 1m in height.

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

It is therefore recommended that a plan be produced which shows the area of the Jewish cemetery within the site and also indicates a 'no dig' zone around this area, outside the current basement of Bastion House. The 'no dig' area should be incorporated into the landscaping method statement, the SUDS, the method statement for new services and the



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Construction Management Plan. This should be secured by condition and the 'no dig' zone demarcated on site by solid fixed barriers for the duration of the construction work.

The anticipated Roman, medieval and post-medieval archaeology which may survive elsewhere on the site is likely to be of low-moderate significance and, in places, very truncated. This archaeological potential can therefore be mitigated through the use of planning conditions. A full programme of public benefit, which includes opening up access to the Roman west fort gate, currently located in the underground car park, is proposed. The proposals also include new interpretation for the City walls, an exhibition space and digital and artistic interpretation of the heritage of the site. It is unfortunate that the information from the cultural strategy, which was submitted with the ES, was not included within the archaeology mitigation proposals within the ES as this would have usefully demonstrated the benefits of public access to this formerly hidden monument. An assessment of the public benefit should be included in any ES

### Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

### Recommendations

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

I advise that the development could cause harm to archaeological remains and further field evaluation is needed to determine appropriate mitigation areas and establish the full extent of truncation on the site. Some evaluation was carried out pre-determination but not all



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areas were accessible for trenching. The evaluation is likely to need to take place post-demolition in order to access the relevant areas. Evaluation should be followed by an appropriate scheme of mitigation.

I therefore recommend attaching four archaeological conditions as follows:

**Condition 1** No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

**Informative** Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

### **Condition 2: Preservation - protection**

No development shall commence until details of fencing, signage and other control measures to protect the part of the Jewish Cemetery that may extend onto the site have been submitted and approved in writing by the local planning authority. The



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development shall be carried out in accordance with the approved details and maintained for the duration of operational works.

Informative: A plan of the relevant area should be produced and approved by GLAAS. This plan should then be incorporated into all relevant method statements, including but not limited to landscaping, new services, SUDs and the Construction Management plan. The area shown on the plan should also be approved by the CPJCE.

### Condition 3: Foundation Design ...

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. This submission will be informed by the Stage 1 evaluation. The development shall be carried out in accordance with the approved details.

### Condition 4: Public Engagement

No development shall commence until details of an appropriate programme of public engagement including a timetable have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.

Informative: Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

### Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-



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determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Further evaluation should be carried out on the site once more access to the different areas is available. The results of the evaluation will feed into the mitigation design, which is likely to comprise excavation and watching briefs.

## Public engagement

Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained will be communicated, in addition to formal publication and deposition of the archive, through display of the fort remains, new interpretation for the walls and a permanent exhibition. The archaeology could also inform site design and public art.

## Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

An archaeological watching brief should be carried out during foundation removal in Bastion House. This is likely to also require attendance by a member of the CPJCE in order to confirm that no Jewish burials survive in this area.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser  
Greater London Archaeological Advisory Service  
London and South East Region



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Ms Gemma Delves  
Corporation of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: L01570342

8 February 2024

Dear Ms Delves

**Arrangements for Handling Heritage Applications Direction 2021**

**140 LONDON WALL, 150 LONDON WALL, SHAFTSBURY PLACE, AND LONDON WALL CAR PARK, LONDON EC2Y**  
**Application No 23/01277/LBC**

Thank you for your letter of 19 December 2023 regarding the above application for listed building consent. On the basis of the information available to date, in our view you do not need to notify us of this application under the relevant statutory provisions, details of which are enclosed.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Breda Daly**

Inspector of Historic Buildings and Areas  
E-mail: [breda.daly@HistoricEngland.org.uk](mailto:breda.daly@HistoricEngland.org.uk)



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## **Planning and Listed Building Consent applications requiring consultation with and notification to Historic England (the Historic Buildings and Monuments Commission for England) April 2021**

### **Introduction**

This enclosure sets out the circumstances in which Historic England must be consulted or notified of applications for planning permission or listed building consent.

It has been amended to reflect the changes introduced by MHCLG on 21 April 2021

- (a) extending planning controls to statues and other monuments and,
- (b) extending the range of applications for listed building consent notified to Historic England.

### **Applications for planning permission**

Historic England must be consulted or notified (see note 1) of the following planning applications by virtue of the following provisions:

#### **Consultation:**

Development which in the opinion of the local planning authority falls within these categories:

- P1 Development of land involving the demolition, in whole or in part, or the material alteration of a listed building which is classified as Grade I or II\*
- P2 Development likely to affect the site of a scheduled monument
- P3 Development likely to affect any battlefield or a Grade I or II\* park or garden of special historic interest which is registered in accordance with section 8C of the Historic Buildings and Ancient Monuments Act 1953

#### **Basis for this - Town and Country Planning (Development Management Procedure) (England) Order 2015 - article 18 and Schedule 4.**

- P4 Development likely to affect certain strategically important views in London

#### **Basis for this - Secretary of State for Communities and Local Government Directions relating to Protected Vistas 2012**

#### **Notification:**

Development which the local authority (or Secretary of State) think would affect:

- P5 The setting of a Grade I or II\* listed building; or
- P6 The character or appearance of a conservation area where
  - i) the development involves the erection of a new building or the extension of an existing building; and
  - ii) the area of land in respect of which the application is made is more than 1,000 square metres

#### **Basis for this - Planning (Listed Buildings and Conservation Areas) Regulations 1990 - regulation 5A (as amended by The Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2015**



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P7 Local authority/ies own applications for planning permission for relevant demolition in conservation areas. (see note 2)

**Basis for this - Town and Country Planning General Regulations 1992 (as amended by the Town and Country Planning General (Amendment) (England) Regulations 2015**

Note 1: There is a difference between Consultation and Notification. When LPAs consult on applications, there is a duty to provide a substantive response to the LPA within 21 days. A notification from the LPA is to enable representations to be made if we so wish, and to respond within 21 days. Historic England does not make a distinction in its handling of advice work.

**Applications for listed building consent**

Historic England must be notified of the following applications for listed building consent by virtue of the following provisions:

**Notification:**

- L1 For works in respect of any Grade I or II\* listed building; and
- L2 For relevant works in respect of any grade II (unstarred) listed building

(relevant works means:

- i) works for the demolition of any principal building (see note 3);
- ii) works for the alteration of any principal building which comprise or include the demolition of a principal external wall of the principal building; or
- iii) works for the alteration of any principal building which comprises or includes the demolition of all or a substantial part of the interior of the principal building.
- iv) commemorative object works

For the purposes of sub paragraphs ii) and iii) above:

- a) a proposal to retain less than 50% of the surface area of that part of a principal building represented on any elevation (ascertained by external measurement on a vertical plan, including the vertical plane of any roof) is treated as a proposal for the demolition of a principal external wall;
- b) a proposal to demolish any principal internal element of the structure including any staircase, load bearing wall, floor structure or roof structure is treated as a proposal for the demolition of a substantial part of the interior.)

For the purposes of sub paragraph iv) above:

“commemorative object works” means works for the full or part demolition of a statue, monument, memorial or plaque that are, or are part of, a listed building

- L3 Decisions taken by the local planning authorities on these applications

**Basis for this - Arrangements for handling heritage applications - Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021 - made under section 12, 15 (1) and (5) of the Planning (Listed Buildings and Conservation Areas) Act 1990**

**Historic England**  
**27 April 2021**



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Note 2: Relevant demolition is defined in section 196D of the Town and Country Planning Act 1990 as “demolition of a building that is situated in a conservation area in England and is not a building to which section 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 does not apply by virtue of s75 of that Act (listed buildings, certain ecclesiastical buildings, scheduled monuments and buildings described in a direction of the Secretary of State under that section.)

Note 3: “principal building” means a building shown on the list compiled under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and includes (unless the list entry indicates otherwise) any object or structure fixed to that building, but does not include any curtilage building.



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