



Planning Applications Sub-Committee

THIRD ADDENDUM

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

3. DEMOLITION OF 140 AND 150 LONDON WALL

For Decision

a) Comments on planning applications (Pages 3 - 88)

4. LISTED BUILDING CONSENT REQUESTS

For Decision

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

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Addendum report No.2 to Committee Report: Application Nos. 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC	
Committee	Date
Planning Applications Sub Committee	17 April 2024

Late Representation

A late representation has been received from Fred Rodgers which is attached. The responses raises no new substantive planning grounds and the issues are dealt with within the report and associated documents.

From: [REDACTED]
To: [REDACTED]
Subject: FW: London Wall West - 23/01304/FULEIA etc (the Scheme)
Date: 16 April 2024 16:56:18
Attachments: [REDACTED]

Sarah Gentry
Planning Officer (Development Management)
Development Division
Environment Department
[REDACTED]



Environment Department
City of London Corporation

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

WINNER | Planning Authority of the Year



From: Fred Rodgers [REDACTED]

Sent: Tuesday, April 16, 2024 4:34 PM

To: Frederick Rodgers [REDACTED]

Cc: Richards, Gwyn [REDACTED]; Hayward, Christopher (Deputy)

[REDACTED]; Wilkinson, Paul

Subject: London Wall West - 23/01304/FULEIA etc (the Scheme)

THIS IS AN EXTERNAL EMAIL

Dear Planning Applications Sub- Committee Member,

Tomorrow, you will have the responsibility of making a decision on the Scheme, a decision forced on you by other members of the Court of Common Council and one which is completely unnecessary. The Scheme's Sponsor, your Policy Chair, is one of those other members. The same Policy Chair who, when on P&TC, was absent on the two occasions 31 Bury Street (the scheme that would have adversely affected Beavis Marks) and recommended by the Director of Planning and Development was considered. Even then, four current members of the PAS-C voted for approval when it was refused. Whatever decision you take though, it will add to the reputational damage which City Corporation (CoLC), as applicant, has already caused to itself through its blinkered pursuance of the Scheme.

Unfortunately, you will be damned if you do and damned if you don't, although many more will be adversely affected if you do than the few egos that may be hurt if you don't. The alleged purpose of the Scheme is to ensure that CoLC obtains best value on a subsequent disposal, sometime later this decade. It's understandable that, having spent over £11.5 million on the Scheme, CoLC wants to show it is money well spent. However, as the Policy Chair has stated publicly, CoLC will not be implementing the Scheme and it's highly unlikely any developer would wish to implement it either, especially as possession will not be available for some time.

Although the public consultation on the Scheme ended on 06 April, comments are still being posted to the planning portal. However, you have already received a copy of the Officer's report to Committee (Report), and you will be receiving at least one Addendum before the meeting but there are several questions of officers which have been outstanding for some time and it is doubtful that those questions will be answered in time to be considered at the meeting. This is something you should be raising with officers if you wish to reach a balanced decision on the Scheme. In the meantime, there are one or two issues regarding the Scheme which you should raise on Wednesday in any event, including – and as detailed in the Schedule:

1. The Report refers to officers.
2. The Report confirms that CoLC, as LPA, does not identify Bastion House, the Museum of London building or the Rotunda as Non-Designated Heritage Assets (NDHAs).
3. As far as carbon emissions and the submitted Whole Life-Cycle Carbon Assessment (WLCA) are concerned.
4. According to Buro Happold's *Carbon Optioneering Study, including Dashboard 1 and Dashboard 2 of 17 November 2023*.

The above are facts. There may be more incorrect “facts” in the Report. Certainly, there are many subjective views and claims, a lot of which is box-ticking, but, of course, opinions on design and public benefit will always be subjective. However, CoLC, whether as applicant or as LPA, has obligations in respect of the whole of the Square Mile and issues such as additional cultural facilities and additional of open, particularly green, spaces should be viewed in the round. Here we have Barbican Arts Centre which costs us over £30 million a year with horrific refurbishment costs but without any Culture Strategy, alongside the failure, through lack of resources, to present Destination City as a thriving green oasis. At the same time, residents and students in the east of the City are denied any cultural offers, certainly not affordable ones.

As mentioned above, the submission of the Scheme was unnecessary; “facts” you are being asked to consider aren’t; there is prima facie evidence of conflicts of interest for officers; and the Policy Chair has apparently claimed in a *Financial Times* interview in February, that he personally directs council officers to make things “work” for major office developers”. In the circumstances you have every right to refuse permission for the Scheme. After all, there would be little danger of the “costs of an appeal” threat against refusal having much weight in refusing permission.

Best regards,

Fred Rodgers

Fred Rodgers
100 Breton House
Barbican
London
EC2Y 8PQ
UK
Tel: [REDACTED]
Mob: [REDACTED]



1. The Report refers to officers. However, it doesn't distinguish between officers representing CoLC, as applicant, and those representing CoLC, as LPA. There is, of course, the required Handling Note (Note) which names most of the officers involved but the Note is undated. One consequence is that the successive claims of Buro Happold – CoLC's, as applicant, de credere planning agent, regarding disproportionate collapse have been accepted by CoLC's, as LPA, officers without question or challenge. During the period which should have been covered by the Note, CoLC's, as LPA, officers, including those identified in the Handling Note, instructed Buro Happold to prepare CoLC's, as LPA, draft Planning for Sustainability SPD which has recently gone out for public consultation. How can there not be a prime facie conflict of interest here?

2. The Report confirms that CoLC, as LPA, does not identify Bastion House, the Museum of London building or the Rotunda as Non-Designated Heritage Assets (NDHAs). This is important in that the Report would then have to give proper and due consideration to these buildings as heritage assets. These buildings – and Ironmongers' Hall – were excluded from the Barbican and Golden Lane Conservation Area (CA) in 2018 - rejected with nothing more than references to the then current Certificate of Immunity from Listing (COIL) which was due to expire on 21 July 2020, although the Hall was identified as an NDHA. Contrary to paragraph 107 of the Report, there was no appraisal of the CA in 2022 or at all. Paragraphs 551 to 553 of the Report seek to justify the non-identification by reference to guidance from Historic England (HE) for the creation of local lists of heritage assets, despite HE distinguishing local listing from identification of NDHAs. The reason for non-consideration for the CA – the COIL – whilst mentioned in paragraph 551 - isn't repeated in the Report. However, having used the HE guidance to support the non-identification, Barber-Surgeons' Hall is identified as an UDHA in paragraph 554 without it even being tested against HE's criteria. CoLC, as applicant, covertly applied to renew the COIL last November – engaging a new heritage consultant at a cost of £37,000 – but the application became public knowledge and several objections were submitted to HE. At the beginning of this month, HE hadn't submitted its advice on the application to the Secretary of State, Digital, Culture Media and Sport and it would seem reasonable to await the outcome of that application before a decision is made on the Scheme.

3. As far as carbon emissions and the submitted Whole Life-Cycle Carbon Assessment (WLCA) are concerned, according to paragraph 1106 of the Report, The methodology as set out in the COG [Carbon Optioneering Guidance] was only available in draft form from July 2022. My own response to the consultation on the draft COG is dated 06 June 2022 and the "final" issue of the document is dated 25 May 2022. CoLC, as applicant, published its first WLCA on 31 May 2022, although "document properties" shows it was created on 30 May 2022, so it seems the "excuse" offered in paragraph 1106 has no basis in fact. The failure of CoLC, as applicant to provide a detailed appraisal of "Option 2" and that of CoLC, as LPA, to require one shows a complete lack of objectivity on the part of the latter. Not only has CoLC, as applicant, through Buro Happold, moved the goalposts between May 2022 and as recently as last month as far as the construction of Bastion House is concerned, CoLC, as LPA, hasn't challenged this at all, making a mockery of CoLC bragging about its "retrofit first" policy! For the record, the cost of the original buildings was provided by the GLC and CoLC, sometime after the Ronan Point disaster; it's obvious from the architects' drawings that the structure of Bastion House was significantly changed after November 1968 – with the number of proposed external columns being reduced from six to four; the letter of 26 September 1969 from the architects referencing changes to meet the newly introduced wind speed code is missing from CoLC's file 4648 but a later confirmatory

letter remains; although the “new” design code for concrete (CP110) was introduced in November 1972, the Handbook on the Unified Code for Structural Concrete (CP110: 1972), published by the Cement and Concrete Association, is dated 01 January 1972, which is not surprising as regulations of this type are, of course, considered in draft before being approved and coming into force at a later date; and, conclusively, drawing 172-T1-15, Section A-A in both London Metropolitan Archives and CoLC file 4648 has an alteration dated 24 November 1972 with Note re 3rd floor slab added. The note reads: NB For details of construction of third floor slab see Dwgs 172-T8 -2 + 3 and Engineers’ Drawings!

4. According to Buro Happold’s Carbon Optioneering Study, including Dashboard 1 and Dashboard 2 of 17 November 2023:

3.2 Bastion House: Based on its current use as an office tower, the floor-to-floor heights in Bastion House are very low at 3.3m. The existing floor-to-ceiling heights in Bastion House are approximately 2.54m. This limits natural lighting to the depth of the floor plate and creates undesirable office accommodation. Guidance from the British Council for Offices (BCO) recommends that for refurbishments 2.45m to 2.8m floor-to-ceiling heights are acceptable in some circumstances, whilst for new-build offices with deep plan floor plates, floor-to-ceiling heights should be 2.8m to 3.2m.

The floor-to-floor height is 11 feet – 3.35 metres – the floor slab to ceiling slab height is 10 feet two inches - 3.1 metres – and the floor slab to fitted false ceiling height is 9 feet - 2.74 metres.

Comments on selected paragraphs of the officer's report to Committee

No	Para no	REPORT	Comment
1	107	The Barbican and Golden Lane Conservation Area Appraisal (2022)	There is no such document. The actual document is the Barbican and Golden Lane Conservation Area SPD.
	284	<i>.... will transform a hostile, traffic dominated environment into a lively and accessible destination, perfectly situated on the pedestrian and cultural desire line between the Barbican, St Paul's Cathedral, Millenium Bridge and the Tate.</i>	With the London Museum opening in West Smithfield and more likely to attract visitors than the Barbican Centre, especially during daytime, the more likely desire line from St Paul's will be along King Edward Street, Little Britain and West Smithfield.
2	413	<i>The southern boundary lower-ground level carpark, interface with the school playing fields and truncated severing of Mountjoy Highwalk [sic], are elements which appear unfinished, inconsistent and detract from the special interest of the garden.</i>	This requires explanation. Presumably "Highwalk" should be "Close"? Which is the "garden"? It can't be the Engineers' Garden unless it's accepted that this should also be added to the Barbican Estate RPG, as per the recent application.
3	460	<i>Taking into account the overall scale of the Barbican and Golden Lane Estate Conservation Area as a designated heritage asset the development within the conservation area and within its setting is not considered to harm its character or appearance and would preserve the significance and contribution made by setting.</i>	Can it be the case that "the overall scale" is such that no intervention within a CA can be considered to harm the character or appearance of a CA? If so, this would be giving carte blanche to completely encircle the CA with interventions of modern buildings. That would hardly preserve the significance nor the contribution made by setting.
4	461	<i>..The hall is the only surviving pre 1930s structure in the immediate locality, following the clearance of the area after the Blitz which further enhances its rarity and historic interest in the local context.</i>	Obviously "immediate locality" is relative but 1 Golden Lane, Bridgewater House, Nat West Bank, St Giles Cripplegate, St Anne and St Agnes, St Botolph's Aldersgate, St Bartholomew's Hospital, St Bartholomew's the Great, St Bartholomew's the Lesser, parts of Little Britain, Newbury Street, East Passage, Middle Street, Cloth Fair, Long Lane and West Smithfield can all be said to be nearby, at least.
5	534	<i>The immediate landscape setting would be positively transformed, made publicly accessible and be supported by heritage interpretation indicated by View 27 and the D&A Landscape Masterplan and Ground Level.</i>	"Transformed" yes, but "positively" is subjective. It could be made publicly accessible now in any event.

6	551	<i>The existing buildings on the site are the former Museum of London building and associated office development of Bastion House, of 1968-76 by Powell and Moya. These buildings have been assessed and found not to qualify for listed status by Historic England. They are now subject to a Certificate of Immunity from Listing (COIL).</i>	CoLC's, as LPA, failure to identify the three buildings as NDHAs now relies on Historic England Guidance which doesn't relate to NDHAs. However, there is an element of hindsight which the current failure to provide information regarding CoLC's response to Tavernor Consultancy's request on this subject of April 2022. That the question was asked is notable, that the answer hasn't been supplied is perhaps not so. As Historic England is in the process of advising the SoS, DCMS, on the application to renew the COIL – against several objections – CoLC, as LPA, should have delayed the consideration of the applications pending the SoS's decision.
7	551	<i>The Twentieth Century Society and other third-party objectors have argued that these buildings should be treated as a non-designated heritage asset (NDHA). Such assets are defined in the National Planning Policy Guidance (NPPG, para 039) as 'buildings, monuments, sites, places, areas or landscapes 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'. Criteria for identification of sites as NDHAs are suggested in Historic England's Advice Note 7 (Local Heritage Listing). An assessment against these criteria is made below.</i>	This is irrelevant and incorrect in any event.
8	566	<i>In conclusion, the buildings meet, to a limited extent, two of the seven criteria suggested by Historic England for identifying non-designated heritage assets. On balance it is considered that the buildings do not possess enough heritage significance to warrant this status.</i>	This is a purely subjective view having its origins in the "appraisal" of the CA in 2017/18.
	567	<i>As such, they are considered to fall short of the criteria for identification as a non-designated heritage asset, and their</i>	

		<i>demolition is not objectionable from a heritage perspective.</i>	
9	568	<i>This neo-Georgian hall to the east of the site dates from 1969, designed by Kenneth Cross following a 29-year delay after the Blitz, which irreparably damaged the second hall. Its significance principally stems from its typology and historic values with the Barber's Company having a hall in the northwest corner of the Roman Fort since the 1440s. To a lesser degree significance derives from associations with notable members and the establishment of the physic garden in Bastion 13.</i>	No evidence has been produced of the assessment of the Hall against the HE guidelines.
10	579	<i>Objections on heritage impacts have been received from Historic England, and The Twentieth Century Society, St Paul's Cathedral, BQA and many others. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.</i>	Again, this is subjective but CoLC, as LPA, doesn't have a full time Heritage Officer. The reasoning may be clear but is its conclusion reasonable?
11	600	<i>Concerns have been raised by CoLAG regarding the construction phase of the development and how access issues for Barbican residents need to be considered, particularly if residents that currently use the Thomas More House ramp are to be rerouted to using the Seddon House entrance on Aldersgate Street.</i>	Although mentioned on the Planning Portal as being included with the "Documents", CoLAG's comments aren't there. As a result, there is no opportunity for ascertaining the extent of its comments.
12	645	<i>The assessments demonstrated that the proposals would significantly improve the on-street experience of users, with Indicator scores as set out below.</i>	10% London Wall and 8% Aldersgate is hardly significant.
13	646	<i>It can be seen that the proposals would materially improve the experience of pedestrians from a Healthy Streets perspective. The improvements observed relate to design items bedded into the</i>	It is really difficult to understand how the conversion of a roundabout to a peninsula improves the street environment. The Old Street/City Road junction has hardly been

		<i>proposals, such as the provision of new resting points, street level planting, improved crossing capabilities, new on-street cycle parking, and a more ambivalent street environment.</i>	improved in this way. All the other “improvements” could be provided now by CoLC, if there was a real concern.
14	684	<i>The existing access ramp into the car park from London Wall would be repurposed to enable safe pedestrian / cycle access into the site at the western end of the car park. The existing car park access operations are indicated below in Figure 6.</i>	It's difficult to understand how mixing pedestrians and cyclists on a narrow sloping and curving ramp will enable safe access or egress for that matter.
15	1103	<p><i>A retention of the buildings is likely to require:</i></p> <ul style="list-style-type: none"> <i>• _anti-carbonation coating applied every 15-20 years</i> <i>• _for lettability and risk/insurance reasons intumescent paint or fire boarding of the structure to comply with fire safety regulations which would further reduce floor-to-ceiling heights</i> <i>• _significant alterations to the Level 3 transfer structure in the form of jacketing to beams and associated columns at Bastion House required to comply with present-day disproportionate collapse requirements.</i> 	<p>This is pure conjecture on the part of Buro Happold. The failure to include “Option 2” in the submitted WLCA is completely contrary to the retrofit first policy and, of course, it was never an intention of CoLC, as applicant, to retrofit the buildings from the outset. Presumably that decision has nothing to do with the terms of engagement of the lead architects.</p> <p>The Director of Planning and Development recommended the destruction of a 20 year old building at 120 Fleet Street so anti-carbonisation every 20 years shouldn't be a problem.</p> <p>Ceiling heights only seem to be “reduced” in Buro Happold's opinion as opposed to fact.</p> <p>Even if correct, alterations to level 3 would be neither significantly expensive or cause significant embodied carbon emissions. However:</p> <p><i>The Office Tower, the most suitable structure from the planning and service engineering points of view is a thin “flat” slab, supported by two internal lines of columns at 16' spacing straddling the centre line of the block, and lines of perimeter columns set just inside the curtain walling. This leads to an economic structure having an 8½” thick slab with 15” diameter perimeter columns at 12'</i></p>

			<p>6" centres and 24" square internal columns at up to 25' centres. The two shafts near the ends of the block incorporating lifts and stairs are to be designed to resist lateral wind forces – an important consideration in a building which is 230' above the ground at the top. The loads from the columns of the Tower are "collected" at third floor level by massive cross beams which transmit the forces to a larger grid of columns within the Podium – Museum of London second scheme - Appendix D: Report on the proposed structure, Charles Weiss and Partners, Consulting Construction Engineers: 12.68. As mentioned elsewhere, there was a significant redesign of Bastion Tower after 1968 prior to submission of the drawings and plans for approval on 05 May 1970. The approval, of course, is dated 18 September 1975 – 4648 B.</p>
16	1104	<p><i>The construction of Bastion House began in the early part of 1972 but disproportionate collapse requirements only first appeared in the structural design code for concrete (CP110) in November that year. Given that structural designs are normally completed prior to the start of construction, on the balance of probability it is considered more likely that Bastion House did not incorporate the requirements of CP110. This does not mean that the building is at risk in its present condition. The requirements of future changes to design codes are generally not retrospectively applied to an existing building, except in the case of significant alterations/modifications to that building. Investigations for Bastion House undertaken to date have indicated that, generally, compliance with modern-day requirements can be demonstrated. The applicants have allowed for a carbon contingency in the WLC assessments to cover any structural works that might be needed to</i></p>	<p>Unfortunately for Buro Happold, for the record, the cost of the original buildings was provided by the GLC and CoLC, some time after the Ronan Point disaster; it's obvious from the architects' drawings that the structure of Bastion House was significantly changed after November 1968 – with the number of proposed external columns being reduced from six to four; the letter of 26 September 1969 from the architects referencing changes to meet the newly introduced wind speed code is missing from CoLC's file 4648, although a later confirmatory letter remains; although the "new" design code for concrete (CP110) replaced the then existing CP114 in November 1972, the <i>Handbook on the Unified Code for Structural Concrete (CP110: 1972)</i>, published by the Cement and Concrete Association, is dated 01 January 1972, which is not surprising as regulations of this type are, of</p>

		<i>demonstrate compliance with current structural requirements.</i>	course, considered in draft before being approved and coming into force at a later; and, conclusively, 172-T1-15, Section A-A in both London Metropolitan Archives and CoLC file 4648 has an alteration dated 24 November 1972 with <i>Note re 3rd floor slab added</i> . The note reads: <i>NB For details of construction of third floor slab see Dwg's 172-T8 -2 + 3 and Engineers' Drawings!</i> Why hasn't CoLC, as LPA, challenged Buro Happold as most of the above information is in its possession?
17	1106	<i>2 distinctive development options for the London Wall West site have been assessed and published in spring 2022 to address this request. The methodology as set out in the COG was only available in draft form from July 2022, and the COG in its final version was adopted in March 2023</i>	As far as carbon emissions and the submitted Whole Life-Cycle Carbon Assessment (WLCA) are concerned, according to paragraph 1106 of the Report, <i>The methodology as set out in the COG [Carbon Optioneering Guidance] was only available in draft form from July 2022</i> . However, my response to the consultation on the draft COG is dated 06 June 2022 and the "final" issue of the document is dated 25 May 2022. CoLC, as applicant, published its first WLCA on 31 May 2022, although "document properties" shows it was created on 30 May 2022, so it seems the "excuse" offered in paragraph 1106 has no basis in fact.
18	1108	<i>The optioneering exercise updated in 2023 initially included 10 development options that reflected a wide range of reuse and land use scenarios which were qualitatively assessed. Of those, the following 5 options were discounted in agreement with planning officers (none of which were discounted on the basis of disproportionate collapse concerns): Scenario 2: Major refurbishment – required works for this scenario were integrated into scenario 1 (minor refurbishment) as a second phase to the minor refurbishment, to achieve a future lifetime beyond 15 years.</i>	The failure of CoLC, as applicant to provide a detailed appraisal of "Option 2" and of CoLC, as LPA, to require one shows a complete lack of objectivity on the part of the latter
19	1111	<i>.... In particular, the Museum of London building has been designed for the</i>	Again, this is entirely objective. With Option 2, Bastion House could

		<i>specific needs of a museum and has limited scope for adaptation to other uses. The options to change the use of Bastion House to hotel or residential would address some of the internal space constraints of the building, ...</i>	continue to be used as offices. Irrespective of any other factors, there is no reason why another museum cannot replace the Museum of London.
20	1113	<i>Although the redevelopment option would result in the highest quantity of demolition waste and the highest absolute carbon emissions of the assessed options due to its largest size, it would offer substantial benefits of connectivity, high quality public realm and sustainable design quality for the whole site that are required to future proof the City as a highly sustainable location. This option therefore has been further developed for the application scheme.</i>	The purpose of the Net Zero target is exactly that. In environmental terms, there can be no benefits in ignoring that target. This is all the more the case when CoLC is the applicant and ignoring the intentions of its much acclaimed Climate Action Strategy is purely hypocrisy. There can be no justification for, as CoLC, as LPA, is doing in promoting this scheme.
21	1119	<i>...The decarbonisation proposals will need to be compliant with the pending Heat Network Zoning regulations which are due to come into force in 2025 and set minimum carbon limits where new network connections are made to buildings.</i>	Is this an actual problem or more fearmongering?

17 April 2024.

Fred Rodgers
100 Breton House EC2Y 8PQ



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From: Mary Bonar
Sent: Wednesday, March 27, 2024 4:11 PM
To: Delves, Gemma **Subject:** Re: London Wall West Planning Application-Objection

THIS IS AN EXTERNAL EMAIL

Dear Ms Delves
Thank you for attaching the 7 March reply which I had not seen.
Thank you also for treating my original email as an objection

Regards
Mary Bonar

On 27 Mar 2024, at 09:22, Delves, Gemma wrote:

Dear Ms Bonar

Thank you for your email. Please can I just check that you received my email of 7th March 2024, attached for ease of reference. Notwithstanding, I can ensure that your email is treated as an objection.

Kind regards

Gemma

From: Mary Bonar
Sent: Wednesday, March 27, 2024 9:18 AM
To: Delves, Gemma
Subject: Re: London Wall West Planning Application-Objection

THIS IS AN EXTERNAL EMAIL

Dear Ms Delves
I refer to my email of 21 January below
You indicated that you were referring this to colleagues in the Transportation team but I have not received a substantive reply .

In the absence of such a reply to a matter of considerable concern will you please

treat my original email as an objection to the planning application and the Phase 2 of the St a Paul's Gyratory

Regards
Mary Bonar

On 23 Jan 2024, at 15:37, Mary Bonar wrote:

Thank you and I look forward to hearing further
Regards
Mary Bonar

On 23 Jan 2024, at 09:59, Delves, Gemma wrote:

Dear Ms Bonar

Thank you for your email which has been passed to me as case officer for the London Wall West application. I will review your questions with colleagues in the City's Transportation team and come back to you with a response.

Kind regards

Gemma

<Outlook-
Descriptio> **Gemma Delves | Principal Planning
Officer**

Environment Department | City of London |
Guildhall | London EC2V 7HH
T: 020 7332 1704

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

From: Mary Bonar
To: Richards, Gwyn
Cc: Matthew Rees
Subject: London Wall West Planning Application

THIS IS AN EXTERNAL EMAIL

23/01304/FULEIA

Dear Mr Richards

In reviewing the Transport Strategy relating to the proposed development and Volume1 of the Environmental Management Statement I have noted that the LWW development and Phase 2 of the St Paul's Gyratory Transformation Scheme (Phase 2) are in several places stated to be interdependent or Co-dependent and I understand that the design for Phase 2 has been carried out as part of the Planning Application Because I live in Wallside the vehicular access to which is via Monkwell Square I am particularly aware of access routes .

You will be aware that currently vehicles travelling West on London Wall can only access Wood Street North by navigating the Rotunda roundabout and driving East to the Wood Street junction to turn left into Wood Street North

You and colleagues will also be aware that there is a barrier across Moor Lane at night time and at weekends to protect residential amenity and that there have been proposals to create a Low Emissions Neighbourhood at Moor Lane and to restrict Beech Street to LEVs Currently access to Wood Street North can be obtained via Gresham Street and Wood Street South but that is less efficient than using the roundabout.Wood Street South has a cycle lane going South and is not particularly wide .

It will also be affected by construction works to convert

Wood Street Police Station into a hotel and by proposed works to the Southern face of 125 London Wall.
The traffic forecasts show a considerable increase in traffic in Wood Street by 2034
Wood Street north provides the access to
125 London Wall loading bay ,
Monkwell Square,
The Postern
St Giles Church Wood Street Wine Bar and CLSG at street level
Andrewes Hose Car Park which also serves Gilbert House and the Wood Street Wine Bar ,
1 London Wall Place and 2 London Wall Place Loading bays
Salters Hall
Roman House
le a mixture of commercial and residential premises and livery halls requiring 24 hour vehicular including emergency vehicle access
The removal of the Rotunda roundabout and the proposed Phase 2 Gyratory do not cater for access to Wood Street North
Would you or appropriate colleagues let me know how it is to be accessed
1 during demolition and construction
2 subsequently
if these Co-dependent developments take place ?
Regards

Mary Bonar

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Website: <http://www.cityoflondon.gov.uk>

<mime-attachment>

From:
To:
Subject: RE: 23/01304/FULEIA
Date: 05 April 2024 22:57:06

THIS IS AN EXTERNAL EMAIL

Application reference: 23/01304/FULEIA,
T23/01276/LBC, 23/01277/LBC

I am writing to object to the London Wall West plans.

I also wish to stress how much I object to the demolition plans.

Can I please have a receipt of my email.

Thank you.

Fiona Seres

Sent from my iPhone

From: Fred Rodgers

Sent: Monday, April 8, 2024 8:20 AM

To: Richards, Gwyn

Cc: Wilkinson, Paul; [Thomas, Ian](#)

Subject: Re: Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC (the scheme)

THIS IS AN EXTERNAL EMAIL

Dear Mr Richards,

Further to my last email, attached is a further objection. Please post this and the whole email chain below to the planning portal please.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
UK

On 2 Apr 2024, at 21:08, Fred Rodgers wrote:

Dear Mr Richards,

Despite having received no response to my emails below, I received the attached letter from your Division this evening. As you are aware, despite an ongoing public consultation, you are recommending approval of the scheme. Whilst your decision was to be expected, given the circumstances of the application, paying lip service to , in your own words, inconsiderate residents, makes a mockery of the whole consultation process.

Please post this email to the planning portal.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
UK

On 1 Apr 2024, at 21:54, Fred Rodgers wrote:

Dear Mr Richards,

As City Corporation's planning portal has been accessible today, I'm able to update my last email.

Firstly, I followed City Corporation's spelling and, of course, it should be Greengage and not Greengate.

On the subject of "missing" documents, I've been unable to locate an "existing" first floor plan. Also, I was under impression that there was an updated report from the Tavernor Consultancy but I may have been mistaken.

For the record, re the 282 -not 288 - page Buro Happold document -ES Further Info - the truncated version of Trium's 5.56 and the response is at the foot of this email. The comment, BH13, appears to originate from Land Use Consultants but there appears to be no record of any document from that consultant on the planning portal.

Part of the Barbican registered landscape is missing from the maps on both pages 2 and 3 Appendix C to the above document - Further Townscape Built Heritage and Visual Impact Supporting Information of February 2024. Also, of course, the Built Heritage Scope of January 2022 pre-dated the listing of Ironmongers' Hall but there can be no excuse for ignoring the registration of the Golden Lane Estate designed landscape in August 2020.

As well as being responsible for a substantial number of submitted documents, including the ES Further Info, Buro Happold is also responsible for your Division's Planning for Sustainability SPD. This

document, now the subject of public consultation, appears to have been prepared by Buro Happold contemporaneously with the submitted documents.

Despite the demands of the Circular Economy, “demolition” is constantly used instead of “deconstruction” in both submitted documents and the SPD. I appreciate the use of the former may be out of habit but, surely, the latter is the appropriate word even if its use won’t prevent the constant destruction of buildings in the City.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
UK

Truncated comment:

The Applicant is to clarify whether potential NDHAs were considered, and outline discussions with the Authority and conclusions in the ES. They should also outline the impact the loss of these buildings will have on the setting of the surrounding Heritage Assets.

Response:

In pre-application discussions the LPA confirmed that Bastion House and the former Museum of London were not considered by the CoL to be NDHAs. In 2022 the Barbican CA was reviewed and updated and the buildings remained excluded from the conservation area designation. No NDHAs were identified by the CoL for inclusion in the assessment. We note that the PPG states (with Tavernor underlining) that “Non-designated heritage assets are buildings, monuments, sites, places, areas or landscape 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. A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets”. (Paragraph: 039 Reference ID:18a-039-20190723). It goes on to state that “Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to

the public to provide greater clarity and certainty for developers and decision-makers...In some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations... “ (Paragraph: 040 Reference ID:18a-040-20190723). It is therefore clear that it is for the relevant plan-making body, i.e. CoL, to identify non-designated heritage assets (NDHAs).

A GLHER check was carried out prior to completion of the built heritage assessment.

The objects of note are described in paragraph 12.7 of the TVBHIA. They were not identified by CoL as NDHAs. Archeology is covered in ES Volume I. GLAAS were consulted as part of archaeology pre-application consultation led by MOLA.

On 31 Mar 2024, at 15:22, Fred Rodgers wrote:

Dear Mr Richards,

I note that an undated “Template for Regulation 64(2) Handling Note” was posted on the planning portal on 28 March. Perhaps you could confirm what time this was done please. I ask as there seems to be some confusion between the dates of documents and when these were posted.

Documents shown in the “Comments” portal as being posted on the “Documents” portal don’t appear there -as in the case of the recent comment from the Clerk to the Ironmongers’ Company - or have been removed after posting - as in the case of CAAC's. Also, the COLAG document that was intended to be posted by 18 March still hasn’t appeared. Ms Delves has indicated that this document is for information but, if it exists, it should surely be disclosed.

Having now had sight of the Handling Note (HN); the Pre-Application Planning Performance Agreement of 30 August 2022 (PAPPA); and the Planning Performance Agreement - Planning stage of 01 March 2024 (PPAPS), I have several comments:

PAPPA

1. This document is dated 16th August 2022 and was signed on behalf of City Corporation, as LPA, on that date and by City Corporation, as applicant, on 30 August.

However, it seems, from its Schedule 2, to only cover the period from 20 April 2021 to 25 August 2022. There then seems to be a gap until the planning application was submitted on 20 November 2023. What, if anything, relating to the PAPP, took place during that gap of 15 months? Did the meetings cease? If not, please provide details of what was discussed. I note my unanswered email to you of 15 February also requested this information.

2. According to "Current Position (2)", "[City Corporation, as LPA,] and [City Corporation, as] applicant agree that the [scheme] will give rise to a range of complex planning issues including urban design, heritage and conservation, transport and accessibility, economic development and social infrastructure and sustainability and cultural issues. However, there is no mention in Schedule 2 of meetings relating to heritage, conservation or sustainability. Why is that?

3. Whole Lifecycle Carbon has been an issue from the outset and City Corporation, as applicant, published what it described as a Whole Lifecycle Carbon Assessment on 31 May 2022. However, there appears to be little evidence of any engagement by City Corporation, as LPA, with City Corporation, as applicant, on this subject. Is that correct? If not, please supply details of such engagement.

PPAPS

1. The PPAPS is dated 01 March on page 7 but it was "made on 11 January 2024" according to page 1. What is the reason for the discrepancy?

2. The purpose of the PPAPS is shown in (1) as covering the submission of the "application as well as the expeditious processing of the planning application and Unilateral Undertaking (or a Deed of Variation of the existing Unilateral Undertaking ("Deed of Variation")). Please supply copies of the Unilateral Undertaking and any Deed of Variation.

3. In (2), included in the objectives of the PPAPS, is "to improve the quality of the [scheme]". How has that been achieved?

4. Under "The Current Position", (2), City Corporation, as LPA, and City Corporation, as applicant, "agree that the planning application will give rise to a range of complex planning issues including urban design and conservation, transport and accessibility, economic development and social infrastructure". As can be seen, there is a significant difference here with the list in 2 under PAPP.

Heritage, sustainability and cultural issues are all missing. Why is this? Also, why is residential amenity missing from both documents?

5. Please supply details of all meetings held under “The Current Position” (4)(b).

6. Under “3.13 of “Project Programme”, City Corporation, as LPA, has agreed to “share proposed conditions and all proposed planning obligations with [City Corporation, as applicant], no later than two weeks before determination by the Planning Applications Sub-Committee, unless otherwise agreed with [City Corporation, as applicant]”. This suggests a presumption of a recommendation for consent, irrespective of the harm that would cause.

7. Further under 3.13, the end of the current consultation period is within two weeks of the proposed determination date. Please confirm that no effort will be made to share any proposed conditions and/or proposed planning obligations, irrespective of actual or potential prejudice, prior to the end of the consultation period.

8. According to “Schedule 2 - Application stage”, the Section 106 is to be signed in June. This also suggests a presumption of a recommendation of consent, irrespective of the harm that would cause.

HN

1. The names of the Access Officer, Policy Officer, Strategic Transport Officer and one Public Realm Officer are all redacted in the table under 3. However, the PPAPS, which was signed on 01 March, shows the names of all of them, other than the one Public Realm Officer.

What is the reason for the change?

2. The name of the Culture Mile Officer isn't shown in 3.2 of the HN as the one “previously involved has now left the City Corporation”. However, there is no mention of the Culture Mile Officer in the PPAPS.

3. I appreciate that you cannot speak for City Corporation, as applicant, but its “team” appears to have grown disproportionately with City Corporation’s, as LPA, team between 01 March and 28 March. Even then, the involvement of Lendlease in the preparation of the scheme’s CEMP has been omitted from 3.2.1 and there’s no mention of consultants such as Greengate, Trim and ARCADIS, either providing independent advice or retained by City Corporation, as LPA on its behalf.

4. My understanding is that the City Corporation's, as applicant, Planning Agent is Gerald Eve & Co (Mr J Randall) but 3.3.2 refers to “persons identified in paragraph 3.2.1 as the agents for the planning

application". 13 firms and one individual - not Mr Randall - excessively and, no doubt, purposely, outnumber the Officers in City Corporation's, as LPA, team. That appears to challenge both the objectivity and transparency of the process, don't you agree?

5. Not only is there a myriad of "agents", City Corporation's, as applicant, team includes fourteen City Corporation Officers, one of whom has a Barbican Centre email address, although shown in 3.2.1 as the "London Wall West Project Director". Why is that number considered necessary, let alone, acceptable from any aspect?

6. Why have so many Officers employed by City Corporation, as applicant, been given permission, along with its 14 "agents" to directly engage with Officers of City Corporation's, as LPA, team? Further, why is there no apparent limitation on the number of those Officers and "agents" who are permitted to engage with individual Officers in City Corporation's, as LPA, team, at any one time?

7. The engagements referred to in 6, above, would seem to give City Corporation, as applicant, far greater weight, and consequently, influence, in the planning process than would appear to be granted to third party applicants. For comparison, even the Handling Note for the Fleet Street Estate and Salisbury Square scheme (20/00997) lists only 15 City Corporation, as applicant, Officers, including five from City of London Police and no other "agents". Who was responsible for City Corporation, as applicant, being allowed so much potential, if not actual, influence over City Corporation, as LPA, in the scheme's planning process and why?

Finally, I understand from Ms Delves that your report to Committee will assess the heritage status of both Bastion House and the Museum of London. However, as mentioned above, heritage has now been excluded from the list of complex planning issues in the PAPPAs.

Before having seen the actual Trium report, I pointed out, in an email to Ms Delves, that, whilst awaiting your response on this point, it was interesting to read Buro Happold's response to 5.56 (not 5.57) of the Trium report, in reference to NDHAs:

5.56 The ES outlines that CoLC officers and the GLHER did not identify any NDHAs (para 12.33), and that walkover surveys by the Applicant using professional judgement identified no NDHAs. Neither

Bastion House or the former Museum of London are considered in the ES as potential NDHAs by the Applicant or for their potential to be incorporated into the Conservation Area during a CA reappraisal. The COI confirmed that neither building met the very high standard required for Listing for buildings after 1945, but it did not indicate they have no historic or architectural interest. The Applicant is to clarify whether consideration (throughout the pre application process) was given to the historic or architectural interest of these two buildings and outline the discussions held with the Authority on this aspect. They should also outline the impact the loss of these buildings will have on the setting of the surrounding Heritage Assets. [BH13]

Unfortunately, I haven't downloaded the 288 page Buro Happold document, so I am unable to quote its response - which does City Corporation no favours - in full. With it being Easter and many residents, no doubt, intending to make further comments on the scheme before 06 April, access to the planning portal is denied - 502 - *Web server received an invalid response while acting as a gateway or proxy server!*

Although very supportive of Trium's comments, I don't consider these go far enough in the use of "it did not indicate they have no historic or architectural interest" instead of the positive HE indication that both buildings have some architectural interest but, unlike Bastion House, where there was historical interest as well, that in the Museum of London was even never considered in the issue of the COI. As for being "incorporated into the Conservation Area during a CA appraisal" that, as you are well aware, was, for political reasons, never allowed to be considered by the relevant Planning Officers at the time or since then.

I look forward to hearing from you on the above as a matter of urgency.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
United Kingdom

Gwyn Richards
Planning and Development Director
Environment Department
City of London Corporation
Guildhall
EC2V 7HH

08 April 2024

Dear Mr Richards,

**Re: Bastion House, the former Museum of London (MoL) and the Rotunda (LWW)
23/01304/FULEIA; 23/01276/LBC; and 23/01277/LBC (the applications)**

Below is an extract from the proposed Submission City Plan 2040 (City Plan) which seems to be self-explanatory:

12.1 Strategic Policy S11: Historic Environment

The City's historic environment will be protected, celebrated and positively managed by:

- 1. Celebrating the City's heritage for its contribution to the quality of life and promoting public enjoyment of, and access to, heritage assets;*
- 2. Conserving and enhancing heritage assets and their settings; opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness;*
- 3. Seeking wider social, cultural, economic and environmental benefits by:*
 - a) placing heritage at the heart of placemaking and delivering high quality buildings and spaces which enrich and enhance the settings of heritage assets;*
 - (b) encouraging the beneficial, continued use of heritage assets through sensitive adaptation that is consistent with their conservation and enhancement, including those on Historic England's Heritage at Risk Register;*
 - (c) encouraging heritage-led regeneration by identifying opportunities to draw on the contribution made by the historic environment to the character and identity of the place;*
 - (d) encouraging sensitive sustainable retrofit of designated as well as non-designated heritage assets and improvements that would benefit climate resilience and adaptation;*
 - (e) encouraging sites adjacent to and near heritage assets to work collaboratively with owners and operators of heritage assets to seek improvements to environmental performance, accessibility or other aspects of the functioning of heritage assets that are challenging to address;*
 - (e) Seeking enhanced public access and interpretation of the City's cultural and heritage assets, ensuring that opportunities to experience and enjoy the City's heritage and culture is available to a wide and diverse audience in a way that is socially and economically inclusive;*

Despite the commitment, in 12.1 above, to protecting, celebrating and positively managing the City's heritage, I understand that the Officer's report to Committee re the applications (the report) will set out City Corporation's reasons for failing to identify LWW as Non-Designated Heritage Assets (NDHAs) in recommending destruction. As regards NDHAs, City Corporation appears to have a reactionary approach to identification, as confirmed in 12.2.4 of the Emerging City Plan 2040:

12.2.4 Where a development proposal would affect a [NDHA] national policy requires a balanced judgement to be made having regard to the scale of harm and the significance of the asset. The City Corporation will aim to identify [NDHAs] at the earliest stage in the planning process, with reference to current national criteria. This may be supported by additional research or investigations as

appropriate and be based on a clear understanding of the building, structure, open space or archaeological remains, including group value.

This reactionary approach, though, appears to ignore the guidance from the Department of Levelling Up, Communities and Housing and the Ministry of Housing, Communities and Local Government, 10 April 2014. This is:

What are [NDHAs]?

NDHAs are buildings, monuments, sites, places, areas or landscapes 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.

A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets. Paragraph: 039 Reference ID: 18a-039-20190723 Revision date: 23.07.2019

How are [NDHAS] identified?

There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as [NDHAs] are based on sound evidence.

Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select [NDHAs] and information about the location of existing assets.

It is important that all [NDHAs] are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of [NDHAs], incorporating any such assets which are identified by neighbourhood planning bodies. (See the Historic England website for [advice on local lists](#)) They should also ensure that up to date information about [NDHAs] included in the local historic environment record.

In some cases, local planning authorities may also identify [NDHAs] as part of the decision-making process on planning applications, for example, following archaeological investigations. It is helpful if plans note areas with potential for the discovery of [NDHAs] with archaeological interest. The historic environment record will be a useful indicator of archaeological potential in the area. Paragraph: 040 Reference ID: 18a-040-20190723 Revision date: 23.07.2019.

In the heritage hierarchy, buildings etc which are neither listed nor identified as NDHAs have either little or no heritage value whatsoever. As far as listing is concerned, there was obviously a fear of this in the case of LWW. According to DP9 Ltd - retained by MoL - in a letter to Historic England (HE) of 27 March 2019 submitting the application for a second Certificate of Immunity from Listing (COI):

In 2014, the [MOL] wished to secure a [COI] in order to allow it to comprehensively assess all its options with regard to its long term future. Subsequently, it has been widely publicised that the [MOL] is moving to a new site secured at Smithfield Market and that the current site of the [MOL] and Bastion House will become the new site for the Centre for Music. We attach a copy for a letter from DCMS to the City of London dated 18 June 2018 and also a letter from the Mayor of London to the City of London dated 25 October 2018, both expressing support for the new site for the Centre for Music. In order to maintain the certainty provided by the current [COI] understanding that works on the new Centre for Music proposal will not start until 2024, the [MOL] seeks ongoing assurance that the buildings are immune from listing for a further five year period.

The advice from HE to the Secretary of State, Digital, Culture, Media and Sport (SoS) in 2015 was that LWW didn't reach the high bar imposed for the listing of post war buildings. HE's advice to the SoS, in response to the second application, indicated no change from its previous advice. No reason appears to have been given by City Corporation for it having made the third application but the current COI expires on 20 August 2024.

However, there is nothing in HE's advice, in either 2015 or 2019, to suggest that LWW had little or no heritage interest at all. On both occasions, HE's advice was based on subjective advice from MoL's heritage consultant, Ken Powell, but even City Corporation's heritage consultant for the third application, Donald Insall Associates (DIA), doesn't dismiss LWW as having little or no heritage interest. Indeed, as far as NDHAs are concerned, this is its conclusion:

In summary, the [MoL] and Bastion House are buildings of local interest, which have some limited architectural interest and group value with one another and sections of the London Wall. However, this local interest is not sufficient to amount to 'special interest', and the [MoL] in particular is no longer able to fulfil its original purpose as a museum building. Therefore, the buildings' [COI] which expires in August 2024 should be renewed.

Ignoring the gratuitous but false assertion that *the [MoL] in particular is no longer able to fulfil its original purpose as a museum building*, it should not be necessary to point out that, by asserting that *local interest is not sufficient to amount to 'special interest'*, DIA indicates that LWW should be identified as NDHAs. As a result, pursuing an argument to the contrary, whilst the prerogative of the author, whoever that might be, of the relevant section of the report, will reveal either a failure to accept reality or a closed mind – whether closed by choice or requirement.

City Corporation's continuing failure, which the report will confirm, to properly consider the heritage value of LWW as NDHAs, is simply perverse. Certainly, City Corporation's refusal has little support in both the above comments of DIA and the comments of Land Use Consultants Ltd. The latter are included in the *London Wall West EIA Review* of City Corporation's, as LPA, consultants, Trium Environmental Consulting LLP:

Non-Designated heritage assets [NDHAs]

5.56 The ES outlines that CoLC officers and the GLHER did not identify any NDHAs (para 12.33), and that walkover surveys by the Applicant using professional judgement identified no NDHAs. Neither Bastion House or the former [MoL] are considered in the ES as potential NDHAs by the Applicant or for their potential to be incorporated into the Conservation Area during a CA reappraisal. The COI confirmed that neither building met the very high standard required for Listing for buildings after 1945, but it did not indicate they have no historic or architectural interest. The Applicant is to clarify whether consideration (throughout the pre application process) was given to the historic or architectural interest of these two buildings and outline the discussions held with the Authority on this aspect. They should also outline the impact the loss of these buildings will have on the setting of the surrounding Heritage Assets. [BH13]

BH13: The Applicant is to clarify whether potential NDHAs were considered, and outline discussions with the [Local Planning] Authority. They should also outline the impact the loss of these buildings will have on the setting of the surrounding Heritage Assets.

Buro Happold, seems to be representing City Corporation, as LPA, in the producing its draft *Planning for Sustainability SPD*, as well as representing City Corporation, as applicant, as its all-enveloping consultant. Buro Happold responded to BH13 in its 282-page *London Wall West – Environmental Statement – Further Information*. This response relies almost entirely on City Corporation's perverseness.

BH13 In pre-application discussions the LPA confirmed that Bastion House and the former [MOL] were not considered by the CoL to be NDHAs. In 2022 the Barbican CA was reviewed and updated and the buildings remained excluded from the conservation area designation. No NDHAs were identified by the CoL for inclusion in the assessment. We note that the PPG states (with Tavernor [Consultancy Ltd] underlining) that “[NDHAs] are buildings, monuments, sites, places, areas or landscape 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”.

A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as [NDHAs]”. (Paragraph: 039 Reference ID:18a-039-20190723).

It goes on to state that “Plan-making bodies should make clear and up to date information on [NDHAs] accessible to the public to provide greater clarity and certainty for developers and decision-makers..In some cases, local planning authorities may also identify[NDHAs] as part of the decision-making process on planning applications, for example, following archaeological investigations...” (Paragraph: 040 Reference ID:18a-040-20190723).

It is therefore clear that it is for the relevant plan-making body, i.e. CoL, to identify[NDHAs].

A GLHER check was carried out prior to completion of the built heritage assessment. The objects of note are described in paragraph 12.7 of the TVBHIA. They were not identified by CoL as NDHAs.

Archeology is covered in ES Volume I. GLAAS were consulted as part of archaeology preapplication consultation led by MOLA.

It is clear that it is for City Corporation to identify NDHAs but it is also clear that, in respect of LWW, it has perversely failed to do this. It is also clear that Buro Happold has omitted parts of Paragraph: 040 Reference ID:18a-040-20190723 in its response to BH13. The missing section from the paragraph is underlined below:

Plan-making bodies should make clear and up to date information on [NDHAs] accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select [NDHAs] and information about the location of existing assets.

No doubt the report will draw attention to what, presumably, is an oversight on the part of Buro Happold. It will, though, be an interesting piece of creative writing that seeks to justify the unjustifiable regarding City Corporation's refusal to identify LWW as NDHAs, let alone the non-disclosure of the criteria contrary to paragraph 40 as above.

In City Corporation's, as LPA, officer's report to Committee for a previous planning application by City Corporation, as applicant, seven buildings, all subject to COIs, granted in July 2020, were shown to be identified as NDHAs, all of which were to be demolished. These were 72-78 Fleet Street (1920s), Chronicle House, 80-81 Fleet Street (1921), 8 Salisbury Court (1874/1920), 1 Salisbury Square (1961), 35 Whitefriars Street (19C) and 36-38 Whitefriars Street (19C with extensive refurbishment in 1986). There were also three historic pedestrian routes which would be altered or lost. To quote from paragraph 234, page 82 of the report for 20/00997/FULEIA:

These are all identified as [NDHAs] because the buildings and spaces have a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated assets.

It would be interesting to have sight of the seven COI applications and decisions. Obviously, most of those buildings and the pedestrian routes are substantially older than LWW, although 1 Salisbury Square was only 15 years its senior but that's not the real point. The real point is that

City Corporation, as both applicant and LPA, wasn't reticent, unlike with LWW, in identifying those seven buildings and three pedestrian routes as NDHAs. That all ten, which were also in a the Fleet Street CA have been destroyed, is further evidence of City Corporation's, as LPA, single intention of benefitting land owners, such as City Corporation, in its failure to properly and objectively appraise LWW and Ironmongers' Hall for inclusion in the Barbican and Golden Lane CA.

Regarding the applications and 12.2.4 of the City Plan, the first pre-planning application (PPA) meeting was on 20 April 2021. However, it wasn't until 01 April 2022 that City Corporation's, as applicant, Heritage Consultant, Towner Consultancy Ltd, asked City Corporation, as LPA:

I hope you find this [HE's 2014 COI recommendation] helpful in undertaking your own assessment on whether CoL consider LWW to form [NDHAs]. Please do let me know when CoL will be able to give us their conclusion on this. Let me know if you would like to have another discussion.

That appears somewhat at odds with the City Plan's - *The City Corporation will aim to identify non-designated heritage assets at the earliest stage in the planning process* - as, according to the PPA, the last meeting was on 20 August 2022. As there appears to have been no reply to the request, please indicate when City Corporation, as LPA, formed its opinion not to identify LWW as NDHAs. From Buro Happold's response to BH13 it appears that this was between 01 April 2022 and 20 August 2022. If so,, it fails to explain why City Corporation, as LPA, didn't identify LWW as NDHAs when the Barbican and Golden Lane CA was created in October 2018, let alone excluding it, as well as Ironmongers' Hall and Ferroners' House from the CA. Or was that another agenda?

The current COI renewal application may or may not succeed but Members should have sight of HE's up-to-date assessment of LWW when determining the applications. HE's advice to the SoS is due any time now and, although not definitive, Members will even be denied sight of that if a decision is made on the planning applications before the SoS receives HE's advice.

In the meantime, could you please indicate when, in 2022, the review of the Barbican and Golden Lane CA took place. Also, please also supply a copy of that review. Finally, please post this letter as a further objection to the applications.

Best regards,



Fred Rodgers - 100 Breton House, Barbican EC2Y 8PQ - fredrodgers@me.com

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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.

Case Officer: Gemma Delves

Customer Details

Name: Mr Unmesh Desai

Address: City Hall Kamal Chunchie Way London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am writing to you to object to the London Wall West planning application which is currently being considered by the City of London Corporation.

My reasons for this are shared by the Barbican Quarter Action group and relate to the harm that the scheme will have on the heritage assets in the area, most notably the Barbican Estate, Postman's Park, Watt's Memorial, St. Giles Cripplegate.

I also share concerns about the carbon impact that the demolition of the existing site will bring and falls foul of the City's new Sustainability SPD which was only adopted back in December 2023. I do not believe the case for demolition satisfies the corporation's policies in this area.

Furthermore, an office-led development is not the best use of the site, especially when the City has an oversupply of office space at present.

Plus, the mass and scale of the proposed development is also a concern. In particular, the new

Bastion House is more than two and a half times the volume of the current one. The new tower blocks will be disproportionate to the existing townscape. These massive buildings will dominate the sky and there will be a dramatic sense of encroachment. The form of the new buildings has no regard for the surrounding townscape. Their impact will be felt from all over the Barbican Estate.

For these reasons, I must object to the application in its current form and I hope that the City of London Corporation will consider these concerns when making its decision on the application.

Yours sincerely,

Unmesh Desai AM
London Assembly Member for City and East

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Mina Lad

Address: 78 London House 172 Aldersgate Street LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I have already strongly objected to these proposals and there is no change to this.

My further objection is that a very large number of additional documents (hundreds of pages) have been submitted by the applicant with no clear guidance/explanation of the revisions.

The City Corporation has no regard for its residents with the lack of transparency and undermines the principles of fair public consultation.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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.

Case Officer: Gemma Delves

Customer Details

Name: Dr Nicolas Bacon

Address: 106 Bunhill Row LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposal to demolish rather than repurpose is in direct opposition to the CoL's new Planning for Sustainability Supplementary Planning Document (SPD), which requires developments to consider a retrofit first approach. As stated by yourselves, retrofit is required

- to reduce embodied carbon emissions
 - to transition to a net zero carbon City by 2040
 - to maintain a vibrant mix of building types and uses
- [https://www.linkedin.com/posts/city-of- ... member_ios](https://www.linkedin.com/posts/city-of-... member_ios)

Hence, follow your own stated policy and retrofit rather than demolish these buildings, or contribute towards environmental harm.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Martin Kinsey

Address: 31 Granville Court Balmes Road Hackney

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am flabbergasted and outraged that any demolition of this architectural icon is even being considered. Even if Brutalism is not to everyone's taste the Grade II listed status of the estate confirms the international renown that this estate has any attempt to chip away at its edges removes the coherence of the whole estate.

Please do not let this proposal progress.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Alan Petty

Address: 37 Startforth Park Barnard Castle

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposed demolition should not be allowed to progress as both buildings are part of the Barbican estate, a development both culturally and historically important in the story of post-war redevelopment. This site is an important example of the approach taken to redeveloping war damaged sites by public bodies after the war which strove to improve the standards of living for every day people. It is also a fine example of Modernist and Brutalist architecture. In acknowledgement of these points the whole Barbican estate is grade II* listed and no part of it should even be considered for demolition.

Environmentally speaking, a rebuild- as opposed to a refit- will also increase CO2 emissions which violates the council's own net zero carbon policy.

Furthermore, the planning application and the body making the planning decision are one and the same; City of London Council. This is a flagrant conflict of interest and the whole process should be stopped until such point as an independent body can be appointed to oversee the application process instead.

There is demonstrable evidence that a conflict of interest has already occurred when the chief planning officer has publicly stated that the application will be approved before the consultation period has even ended!

To this end, corruption and bias has already occurred within the process and the council is operating in defiance of the seven principles laid down by the Nolan Committee's Report on Standards in Public Life (1995) to ensure transparency, honesty and probity.

As such, the planning application process should be stopped immediately and a review undertaken into the council's own practices.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Dr Sam Christie

Address: 9 Athelstan Road Bitterne Southampton

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: It is unacceptable to demolish this landmark structure. This is a building of historical importance for a number of reasons. The replacement is ugly and appears to be entirely unsuitable.

Are you hell bent on turning London, and by extension Britain, into a culture less waste ground of mediocrity?

Whether a building is deemed attractive, or atypical of a favoured historical period, should make no difference to the desire to preserve historical structures.

This is a well loved building in a cherished place. Please do not destroy yet another Great British landmark.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Miss c gough

Address: 33 Harcourt Street hartlepool

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I disagree with the demolition of a building which can be repurposed

From: Fred Rodgers
Sent: Tuesday, April 9, 2024 10:58 PM
To: Nancollas, Tom
Subject: 23/01304/FULEIA - LWW

THIS IS AN EXTERNAL EMAIL

Dear Tom,

I have now read paragraphs 551-567 of the officer's report to committee (the report), which I assume you were responsible for. As such, could you please explain what, in the attached HE Local Heritage Listing - HE Guidance Note 7 states that the "criteria" listed under "7 Defining the Scope of the Local List" supports City Corporation's failure to identify LWW's three buildings in LWW as NDHAs? I appreciate you use "suggested" in paragraph 552 in respect of the HE guidance but, as you can see below, Local Lists and NDHAs are distinguished by HE.

For example, below is the "note" on page 2 of the HE guidance

Definition

In some areas, local planning authorities have created a 'local list' of 'non-designated heritage assets' as suggested in the Government's Planning Practice Guidance (paragraph 39). Non-designated heritage assets are 'buildings, monuments, sites, places, areas or landscapes identified by local planning authorities as having a degree of significance meriting consideration in planning decisions but which are not formally designated'.

Also,, the note on page 10 of the HE guidance:

27 Table 1 sets out some examples of selection criteria commonly used by local planning authorities to support local heritage listing.

Table 1 (page 9)

Commonly applied selection criteria for assessing suitability of assets for local heritage listing (such criteria are often adapted from those used for national designations which refer specifically to historic or architectural interest).

I await your reply, which, in the circumstances, should be during tomorrow. When replying, please also address the points raised in my letter to Gwyn Richards of 08 April. At the same time, please let me have a copy of the 2022 Barbican and Golden Lane CA Appraisal referred to in the report and which I've previously requested but not received.

Best regards,

Fred

Fred Rodgers
100 Breton House
Barbican
London
EC2Y 8PQ
UK
<Local-Heritage-Listing-Historic-England-Advice-Note-7_(2).pdf>

Comments for Planning Application 23/01304/FULEIA

Application Summary

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Case Officer: Gemma Delves

Customer Details

Name: Miss Fern Abbott

Address: 17 Harrogate Way Wigston

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This historic building is absolutely beautiful and a fine figure in a beautiful spot that shouldn't be destroyed it should be celebrated.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Sandra Fryer

Address: 705 Bryer Court Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The City of London should stop , reassess the advice you have on re-use of the existing buildings, how they can be remodelled and move towards net zero to deliver a new culturally led, maker, creative quarter which would animate this corner of the Barbican Estate and ensure proper connectivity cross the area. this is a great place, why ruin it with a monster of a commercial office space which is not required in the City of London.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Thomas Ingram

Address: 23 Lakefield Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: There is no reason powerful enough to allow conscious-free erosion of this inimitable landmark.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Michael Keen

Address: 15 Shelford rise London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to the demolition of these two buildings and the surround highwalks. The buildings in question are of important architectural significance to both London and Britain, and as such development plans should be to preserve not destroy

Comments on Report to the Planning Applications Sub Committee

I have now read the report to the Planning Applications Sub Committee, 17 April 2024. The information included there enables me to adjust comments sent to Jeremy Randall (Gerald Eve) on 11 April 2024.

720 - 721 Interaction with Thomas More Car Park

722 – 747 Proposed Servicing Trip Generation

“...the servicing strategy outlined here will need to be more ambitious than presented within the Delivery_and Services Plan to ensure that impacts to residents are minimised. As such, a daily vehicle cap would be imposed on the site, restricting the number of vehicles permitted to visit the site per day. This daily vehicle cap would account for a consolidation rate higher than the 50% assessed and would instead require a consolidation rate of 70%. This is considered to be ambitious yet realistic, based on recent studies and example sites where such consolidation strategies have been implemented.” (724)

“A daily rate of 80 (vehicles) is considered reasonable by CoL officers and should be secured by condition .” (726)

Comment

I have read the details of the above proposals and agree that, although ambitious, the proposed servicing strategy is possible. The proposed ‘soft’ (737) and ‘hard’ (738) measures can ensure that a shared use (by Barbican Estate residents and LWW) of the Aldersgate St. ramp and Thomas More Service Yard is potentially workable.

817 – 821 Construction Logistics

827 – 828 Transport Conclusion

“The applicant will be required to engage with Barbican residents to establish a suitable access (and egress) strategy throughout construction. This will be a critical element to enable discharging of the detailed Construction Logistics Plan condition (subject to any planning approval) and the maintaining of access to the shared access ramp for Barbican residents should be priority, providing that it can be safely achieved.” (821)

“The proposals are considered to be acceptable in transport terms subject to..... a planning condition to secure a detailed Construction Logistics Plan.” (827)

Comment

The eventual contractor will be charged with the task of creating a Construction Logistics Plan. The report to the Planning Application Subcommittee doesn't make clear the extent of options that must be made available to the contractor in carrying out this task. For reasons stated earlier (see London Wall West: Additional CoLAG Feedback by Terry Trickett), the use of the Aldersgate St ramp by construction traffic during the period of construction will prevent its safe use by Barbican residents. If their priority is to be preserved, **the routes for construction traffic must lie outside the boundaries of the Barbican Estate** - these routes to

remain in use until final landscape procedures preclude their use (say 3 months before the end of the construction).

1048 – 1061 Noise and Vibration

1227 Human Rights Act 1998

“Noise from construction. Flats would be uninhabitable during the day, particularly Mountjoy with single glazing and windows would not be able to open (sic). There is significant risk that levels of noise could exceed the Unacceptable Adverse Effect Level which national policy in the Noise Policy Statement for England (NPSE) and the Noise PPG state should be avoided to prevent significant medically definable harm.” (1048)

“Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight other impact on adjoining properties and loss of access to the Thomas More car park, it is the view of officers that such interference is in the public interest and proportionate”. (1227)

Comment

For residents in Mountjoy House, the interference is not proportionate; they will have much to endure throughout the construction period. This is an added reason to ensure that the Construction Logistics Plan reduces disproportionate interference by finding and adopting construction traffic routes which lie outside the boundaries of the Barbican Estate.

Terry Trickett RIBA

THE WORSHIPFUL COMPANY OF BARBERS

COLONEL M J DORAN
CLERK / CHIEF EXECUTIVE



BARBER-SURGEONS' HALL
MONKWELL SQUARE
WOOD STREET
LONDON
EC2Y 5BL

FAO Gemma Delves
Planning Case Officer
The City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

9 April 2024

BY EMAIL: plans@cityoflondon.gov.uk
lpalondonwallwest@cityoflondon.gov.uk

Dear Ms Delves

Letter in respect of planning application with reference no. 23/01304/FULEIA (the Application)

1. Introduction

1.1 This letter is written on behalf of The Worshipful Company of Barbers (the **Company**), the legal owner of Barber-Surgeons' Hall, Monkwell Square, Wood Street, Barbican, London EC2Y 5BL (the **Hall**).

1.2 The Application, as set out in the description of development, proposes the:

*“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 **Proposals**).*

- 1.3 You will be aware that the Hall lies immediately to the east of the Application's redline boundary. At points, the Application's redline boundary runs alongside the western edge of the Hall's title boundary (title number NGL111500 at HM Land Registry). Indeed, the Application redline includes the area known as the Barber-Surgeons' Gardens, although we note that the Barber-Surgeons' Gardens are not in the ownership of the Company. The Barber-Surgeons' Gardens are distinct from the Barbers' Physic Garden, the latter being within the Company's ownership and outside of the Application redline.
- 1.4 The Hall and its environs currently provide a historic placemaking contribution to the locality and will continue to do so after completion of any development of the Proposals.
- 1.5 The Application and the Proposals are therefore a matter of the greatest interest and concern to the Company. The Application, if granted planning permission and constructed, has the potential to substantially impact the owners, occupiers and business of the Hall and consequently the Company.
- 1.6 The Company places considerable value in its long-standing relationship with the Corporation of London (the **Corporation**) and the City of London. This letter **is not** an objection to the Application. The purpose of this letter is to highlight potential negative impacts of the Proposal on the Company and the Hall and suggesting planning conditions and / or obligations that the Company requires to address such impacts.

2. Background

- 2.1 The Company has had a Hall on the present site since the 1440s. The original hall was burned down in the Great Fire of London in 1666, then rebuilt but destroyed by enemy action in 1940. The current Hall was opened in May 1969 by Her Majesty Queen Elizabeth, the late Queen Mother. The Company is unique as it is the sole City Livery Company incorporated by Act of Parliament (dated 1745). The Company is also one of the oldest livery companies in London having celebrated its 710th anniversary in 2018.
- 2.2 The Hall itself is an elegant red-brick townhouse which sits alongside the remains of the Roman-built London Wall. The Company uses part of the Hall as offices for the management and administration of the Company and the three charities for which the Company is sole corporate trustee (Barbers' Company General Charities, Barbers' Amalgamated Charities and The Haymarket Charitable Trust). The Company also uses the Hall to host a variety of Livery events throughout the year. In addition to the Company's use of the Hall, the Company relies on the Hall as a valuable source of income.

- 2.3 One revenue stream is from hiring out or utilising the Hall's multifunctional rooms. The Hall boasts four reception rooms and a garden terrace which are hireable for events including, conferences, receptions, weddings and dinners. The Great Hall is advertised as being able to accommodate a 200 person reception, the Reception Room a 100 person reception, the Court Room a 30 person reception, the Charter Room an 18 person dinner and the Terrace and Garden (the Barbers' Physic Garden) a 60 person reception.
- 2.4 Separate to the income generated from the external hire of the Hall, the upper floors are leased to a firm of architects (the **Leases**) which account for the majority of the Company's necessary operational income. The Leases, if not renewed by the current tenants, are due to expire in 3 years' time.
- 2.5 The Company is particularly concerned about the impact of construction on the Hall's operational uses and the Company's business. Our concerns are exacerbated by the estimated length of the construction period. We note that the Application envisages the construction period running from June 2027 to November 2033 – more than 6 years. The Company expects the Corporation to ensure that agreed upon mitigation measures are in place for the entirety of the construction period and that the effectiveness of such measures are considered and assessed on an ongoing basis.
- 2.6 Additionally, the Hall markets its hireable rooms and garden advertising the Hall's location and setting as a "hidden oasis" and a "tranquil escape in the heart of the Square Mile". The lengthy and extensive construction and ancillary work including in adjacent open space required in relation to the Proposals could result in a loss of business and income for the Company.
- 2.7 If the Company suffers a sustained loss of business and income throughout the Proposals' 6+ year construction period, this would be an existential threat to the Company.
- 2.8 The Company requests that the Corporation protect the Hall and the Company's business by ensuring that the Application and Proposals are brought forward with the appropriate conditions, restrictions and obligations to minimise and mitigate the Proposals' impact. This letter sets out the **minimum** planning protections sought by the Company.

3. Level of detail within the Application

- 3.1 We have reviewed the Application documents (and revisions) with a particular focus on the impact of the Proposals on the Hall and consequently the Company's business. We have found this exercise particularly difficult because of the lack of detail within the key Application documents and plans. There have been many iterations of the plans throughout the

application process which has also made it difficult to accurately assess the Proposals and phasing scheme.

- 3.2 The Company anticipates that where detail is lacking within the Application or where the approach is unclear on the face of the documents, any such situation will be addressed by a condition or section 106 obligation. We note that at the time of writing, no draft conditions or section 106 obligations are available to review.
- 3.3 Given the proximity of the Hall to the Proposals and its classification as a sensitive receptor, the Company requests that the draft conditions and section 106 obligations be circulated to it for review and comment at any early stage of drafting.

4. Construction impacts

- 4.1 The Application's Construction and Environmental Management Plan dated November 2023 and prepared by Multiplex Construction Europe Limited (the **CEMP**) envisages that works would start in 2027, with a projected completion date of November 2033. Even without setbacks or delay, the construction period is anticipated to span over 6 years.
- 4.2 The CEMP broadly details a construction programme that encompasses 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 the greater part of which would potentially cause huge disruption to the ongoing beneficial use and occupation of the Hall.

Construction compound

- 4.3 Of particular concern to the Company is the construction compound. The CEMP at paragraph 3.3 envisages that a large multi-level "Site Welfare" building is required "for the main construction period and fitting out phases". This building would be "a large set up... to accommodate up to an estimated 900 operatives and staff". The Site Welfare building is also said to "include changing room, drying facilities, canteen and toilets" to encourage operative staff to remain onsite during break times.
- 4.4 The Site Welfare building is to be solely "accessed via protected [sic] corridor along the eastern boundary of the site" as shown visually in the CEMP at page 11. The protected corridor to the multi-level Site Welfare building runs alongside the southern and western boundary of the Hall and is said to be "elevated". Paragraph 3.2.2 of the CEMP states that "the walkway access will be raised suspended access taht [sic] will serve as a protected green route access for operatives whilst providing protection to the gardens beneath" No

detail is given as to what is meant by elevated nor the design or height of this walkway. The Company is concerned that the elevated walkway and the Site Welfare building would dominate the view from the rear of the Hall for over half a decade.

- 4.5 The CEMP does not provide detail as to how long the Site Welfare building will remain in situ and appears to be deliberately vague. The CEMP also does not consider the impact of the Site Welfare building on the Hall nor the impact of 900 operatives (and presumably additional staff e.g. cleaners and cooks) coming and going throughout the day along the protected elevated walkway.
- 4.6 The Company requests that the Corporation relocate the Site Welfare building (and associated walkway) to a location that would have much less of an impact on the Hall and the Barber-Surgeons' Gardens. The Company considers that a condition should be imposed to require that plans showing an alternative location for the Site Welfare building are submitted for approval prior to commencement of development.
- 4.7 The Application is not clear as to where, when or if the elevated walkway and Site Welfare building will be removed. The Company requests that there be a condition requiring removal of the walkway and the temporary Site Welfare building at the appropriate stage of development and in any event prior to occupation.

Noise

- 4.8 An Environmental Statement dated November 2023 and prepared by Buro Happold is included with the Application (the **ES**). Chapter 7 (Noise and Vibration) sets out the significant environmental effects of the Proposals in respect to noise and vibration.
- 4.9 Table 7-8 of ES Chapter 7 identifies the Hall as a noise sensitive reception with high sensitivity (R13). Table 7-14 goes on to identify that the predicted construction noise levels for Demo3 and piling and piling exceed the relevant significant observed adverse effect level on health and quality of life (**SOAL**) for R13.
- 4.10 The CEMP at paragraph 4.1 states that the contractor will manage works within Monday - Friday 08:00 – 18:00 and Saturday 09:00 – 14:00. The intention is for the material noise generating construction works to be undertaken during working hours. It is considered that any occupants of the Hall (especially tenants working during normal business hours) would be significantly impacted by the construction works.
- 4.11 The CEMP does not explain how the Hall will be protected from noise disturbance and vibrations during the construction period.

- 4.12 The Company requests that the Corporation works closely with them to ensure appropriate protection for the Hall and the Company's business throughout the course of demolition and construction. The Company expects the noise impact of the Proposals on the Hall to be controlled by condition.
- 4.13 The Company also requests that disruptive works (specifically piling works) are restricted to "quiet hours" outside of normal or busy working hours to minimise disruption to the Hall's tenants and income generating uses.

5. Public realm

- 5.1 The Company is broadly supportive of the Application's ambition to, as the Town Planning Statement prepared by GeraldEve and dated November 2023 (the **Planning Statement**) at paragraph 12.10 puts it "deliver the creation of a high quality urban public realm".
- 5.2 The Application's public realm proposals are particularly important to the Company because of the relationship of the Hall in context to the proposed public realm area incorporating the Barber-Surgeons' Gardens. These gardens (in addition to the Physic Gardens) are also an important part of what makes the Hall an attractive events venue as already detailed in this letter - see references to "oasis".
- 5.3 Paragraphs 12.17 and 12.18 of the Planning Statement detail the Application's ambition to connect the, so called, "northern garden" with the Barber-Surgeons' Gardens:

"Northern Garden – The Northern Garden extends across the North of the Proposed Development, providing an accessible connection from Aldersgate Plaza to the Podium landscape and the Glade and down into the Barber Surgeons' Hall garden. The Northern Garden is intended to be a lush, dynamic, and seasonal, biodiverse landscape with layers of herbaceous plants and shrubs. Paths direct pedestrians through the gardens and onto other parts of the site. The tall stems of trees and their spreading overhead canopies create a cool and calm framework beneath which flows an amazing tapestry of woodland wildflowers, ferns and sedges.

Barber Surgeon's Hall Garden - The Barber Surgeons' Hall Garden will build upon the current wildflower meadow garden, proposing a dynamic planting arrangement that continuously changes throughout the seasons to create a constantly changing visitor experience. Stairs lead down from the street level into the garden and Cycle Hub below, while a ramp transverses across the façade of the new commercial building providing an accessible route down to the garden whilst also creating a belvedere of the scheduled London Wall."

- 5.4 Paragraph 13.13 of the ES Volume II: Townscape, Visual and Built Heritage Impact Assessment it is stated:

“A meandering pathway will lead from the Northern Gardens, along the water terrace and into the Barber Surgeons’ Garden, at the eastern side of the site. This area includes remnants of the historic City wall (a Scheduled Ancient Monument) and existing trees, grassland and rough pathways which lead into the Barbican Estate. The existing trees and grassed areas will remain and the pathways improved. Existing wildflower meadow beside the wall will be maintained and enhanced in the proposed ‘wilderness planting’. Where there is presently a vehicular access ramp leading off of the London Wall roadway, at the south edge of these gardens, there will be cycle stands at ground (pavement) level, with steps and lift access leading down into the gardens, and new access beneath London Wall to see further City wall remains (the ‘Roman Gate Room’). Pedestrian walkways will lead around the east edge of New Bastion House, at this lower ground level, but also from the pavement at ground and from the highwalk above, providing multi-level points from which to view the City wall remains and the landscape around them.”

- 5.5 Whilst we are supportive of the Corporation’s ambition, we are conscious that the public realm proposals will need to be informed by the ongoing consultation in respect of the Barber-Surgeons’ Gardens. The City’s Garden and Cleansing Team within the Environment Department have been running consultations to develop detailed proposals for the Barber-Surgeons’ Gardens. Indeed, the Company have been involved in several formal and informal consultations with the Corporation.
- 5.6 The Company requests that the Application be subject to the outcomes of such formal consultation so that the Application is bound to deliver the detailed proposals for the Barber-Surgeons’ Gardens (and wider public realm area) as agreed with the key stakeholders. The Company would also expect that the timings for delivering the public realm would also be secured. The Company proposes that the public realm provisions are secured by planning condition or by section 106 agreement obligations.
- 5.7 As noted above, the Site Welfare building serving circa. 900 persons is to be accessed by an “elevated” walkway running through the Barber-Surgeons’ Gardens. The Application does not specifically explain how this corridor will be “elevated”. In any case, the Company seeks assurances from the Corporation that the Barber-Surgeons’ Gardens will not be used as a logistics hub or as a site compound in any way. It is important that the existing meadow and landscaping are preserved and protected throughout the Proposals’ demolition and construction phases. A restriction preventing the Baber-Surgeons’ Gardens from being used as a compound could be attached by way of condition.

5.8 Additionally, the Company seeks a clear and unqualified assurance from the Corporation that the Company will be given full involvement in the framing of such conditions or obligations regarding the public realm's detailed design, implementation and management.

6. Conditions and the section 106 agreement

6.1 The Company expects to be actively consulted on and afforded the opportunity to participate in discussions to agree both the heads of terms for and the detailed obligations to be included in the section 106 agreement and the planning conditions in respect of those aspects of the development which impact upon the Company's interests. The Company considers this entirely reasonable given the proximity of the Hall to the Proposals and the potential ramifications of the Proposals on the Company's business. The Company seeks confirmation from the Corporation that this approach is agreed.

6.2 The Company faces the loss of its main sources of income if the impact of the Proposals on the Hall is significant. If these impacts are prolonged, the Company may not be able to survive financially until the end of the minimum 6 year construction period. We expect to be able to assist the Corporation in minimising the impacts so that every effort can be made to ensure the future of the Company.

7. Daylight, sunlight and overshadowing impacts

7.1 Chapter 13 of the ES sets out the daylight, sunlight and overshadowing impacts of the Proposals. The Hall's Psychic Garden is identified as receptor 6 at Table 13-12 and identified as of high sensitivity for overshadowing impacts. We note that the construction impacts on daylight, sunlight and overshadowing are not considered in the ES as they are "temporary".

7.2 The subject of rights of light is for separate consideration. The Company has retained GIA Surveyors Ltd to represent the Company in this matter. The Company accordingly requests that all professional fees properly incurred in connection with any potential loss of light will be met by the Corporation.

8. Asset protection and neighbourly matters agreement

8.1 Given the proximity of the Proposals and the extensive nature of the works, the Company considers that in-depth constructive discussions are essential to agree an approach to asset protection and neighbourly matters. The Company believes that this is a responsible step for the Corporation to take in the context of ensuring appropriate stewardship of the Hall.

8.2 The Company has retained Farrer & Co LLP to represent the Company in this matter. The Company request an undertaking from the Corporation (in their capacity as applicant) that all professional fees properly incurred will be met by the Corporation.

8.3 The Company requests that the completion of a neighbourly matters agreement be a pre-commencement obligation included in the section 106 agreement for the Application (if granted permission).

9. Conclusion and summary of recommendations

9.1 The purpose of this letter is to request various assurances, involvement and controls required by the Company in respect of the Application and its Proposals. We hope that the Corporation is willing to provide the further comfort and security requested, so as to continue our valued long-standing relationship.

9.2 This letter is **not** a letter of objection.

9.3 This letter has set out the Company's various concerns and where appropriate, has suggested various solutions and preferred outcomes. These suggestions are summarised below:

9.3.1 The Company to be fully engaged in discussions to agree the heads of terms for the section 106 agreement.

9.3.2 The Company to be provided an opportunity to review and comment on the draft planning conditions at an early stage.

9.3.3 The Company to be offered the opportunity to review and comment on the adequacy of the provisions which are necessary to protect the Company's interests within the section 106 agreement, such engagement to be provided at any early stage and continuing until the agreement is finalised. We will be very happy to provide you with a list of topics which we consider need to be addressed within the section 106 agreement in order to address the relevant issues.

9.3.4 In particular, the Company to be given full involvement in the framing and finalisation of:

- (a) conditions and section 106 agreement obligations regarding the public realm's detailed design, implementation and management;

- (b) a section 106 agreement obligation requiring the Corporation and the developer respectively to provide and maintain a direct contact that the Company may contact in connection with any concerns or complaints they may have throughout the demolition and construction period of development;
- (c) conditions and section 106 agreement obligations regarding the detailed phasing of the development; and
- (d) a section 106 agreement obligation requiring the completion of a neighbourly matters agreement between the Company and the Corporation prior to commencement of development.

- 9.3.5 The Company should have input into the development of the site masterplan and any consequential amendments to the Proposal.
- 9.3.6 A planning condition should be included that requires the public realm areas to be delivered in accordance with the outcomes of the formal consultations undertaken by the City of London's Environment Team.
- 9.3.7 A requirement that the Company must provide their approval on the proposed protection measures (for example to mitigate the impact of dust, debris, noise, vibration, odour generated by the Proposals) to the Hall in place throughout demolition and construction.
- 9.3.8 A pre-commencement planning condition should be included that requires the submission and approval of plans proposing an alternative location for the Site Welfare building.
- 9.3.9 A planning condition should be included that restricts disruptive works to "quiet hours" outside of normal or busy working hours.
- 9.3.10 Corporation to consult with the Company prior to approving any application for consent under section 61 of the Control of the Pollution Act 1974.
- 9.3.11 A clear and unqualified assurance that the Corporation will cover the legal and professional fees of the Company in respect of any neighbourly matters agreement, rights to light issue, or any other agreement or issue arising from the Proposals (properly incurred).

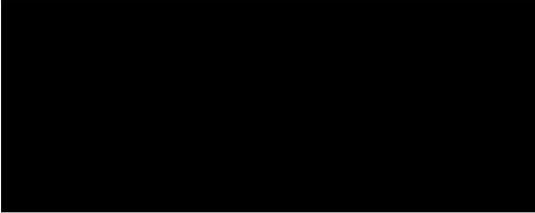
9.4 We should be grateful if you would acknowledge receipt of this letter.

Ms G Delves

9 April 2024

9.5 We would also appreciate being kept up to date on how the Application progresses, particularly in respect of the proposed date for the planning committee meeting, the draft conditions and planning obligations / section 106 agreement.

Yours faithfully



SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0014

Date of issue of this decision: 12/04/2024



www.southwark.gov.uk

LBS Reg. No.: 24/OB/0014

Date of Issue of Decision: 12/04/2024

Your Ref No.:

Applicant Ms Gemma Delves
City of London Corporation

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

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

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, Shaftsbury Place, and London Wall Car Park, London, EC2Y)

DECISION NOTICE

LBS Registered Number: 24/OB/0014

Date of issue of this decision: 12/04/2024



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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 London Wall)

In accordance with your letter received on 15 March 2024 and supporting documents.

Signed: *Stephen Platts*

Director of Planning and Growth



70 Cowcross Street, London EC1M 6EJ
Phone: (+44/0) 207 608 2409
Email: enquiries@thegardenstrust.org
www.thegardenstrust.org

margiehoffnung@thegardenstrust.org

Research - Conserve - Campaign

12th April 2024

The City of London Corporation
Guildhall
PO Box 270
London EC2P 2EK
plans@cityoflondon.gov.uk

Dear Sir or Madam,

Ref : 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 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.

Thank you for re-consulting the Gardens Trust (GT), a Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens. We responded to this on 22nd December 2023 and have no additional comments to make.

Yours sincerely,

Margie Hoffnung
Conservation Officer

PLANNING DECISION NOTICE

Gemma Delves
City of London



ISLINGTON

Development Management Service
Planning and Development Division
Community Wealth Building
PO Box 3333
222 Upper Street
LONDON N1 1YA

Case Officer: James White

T:

E: planning@islington.gov.uk

Issue Date: 26 February 2024

Application No: P2023/3586/OBS

(Please quote in all correspondence)

Dear Sir or Madam

TOWN AND COUNTRY PLANNING ACTS

BOROUGH COUNCIL'S DECISION: Observations to adjoining borough - comments

Notice is hereby given, in respect to the request for observation(s), of the above stated response of Islington Borough Council, the Local Planning Authority, in pursuance of its powers under the above mentioned Acts and Rules, Orders and Regulations made thereunder. The response relates to the application / development referred to below, at the location indicated.

The observations (if any) of the Borough Council are noted below.

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).
------------------	---

Application Type:	Observations to Adjoining Borough		
Date of Application:	13 December 2023	Application Received:	13 December 2023
Application Valid:	13 December 2023	Application Target:	03 January 2024

DEVELOPMENT:

Planning permission for the following (ref. 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 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.

P-DEC-OBS

OBSERVATIONS:

The London Borough of Islington make the following observations;

View 19 - confirmation if “cumulative” massing (rising above the roofline of Finsbury Town Hall (Grade II*)) is the proposed scheme, if so the impact would need to be considered.

View B20 - confirmation of whether or not the orange model visible above the roofline of the listed terrace on 35-45 Skinner Street (Grade II) is the proposal is required, if so the impact would need to be considered.

View B21 - a confirmatory view from Gloucester Way that identifies 27 Myddelton Street would assist the assessment to this Grade II asset and this section of the Conservation Area.

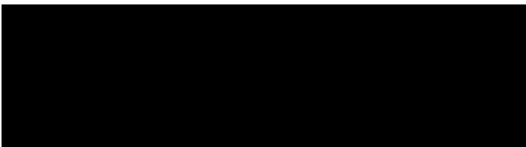
View B22 – important to consider how the materiality changes the scale and setting in this view, particularly in relation to the existing stepped canyon effect. The setting of the Hats and Feathers Conservation Area may be impacted and should be considered.

The Zone of Theoretical Visibility (ZTV) picks up some areas where the scheme may be visible but not tested with views. These are as follows;

- Charterhouse Complex and Queen Mary University of London Charterhouse Square Campus
- Clerkenwell Green Conservation Area and nearby listed building as 201 St. John Street (Grade II).
- Protected Vista from Alexandra Palace viewing terrace to St. Paul’s Cathedral
- Local View 3 - Angel to St. Paul’s Cathedral
- Local View 4 Archway Road to St. Paul’s Cathedral
- Local View 5 Archway Bridge to St. Paul’s Cathedral
- Local View 7 Dartmouth Park to St. Paul’s Cathedral

The impact on these heritage assets and views should be considered.

Yours faithfully



**KAREN SULLIVAN
SERVICE DIRECTOR - PLANNING AND DEVELOPMENT
AND PROPER OFFICER**

From: Spencer Garvagh - Asset Plus One Ltd
Sent: Monday, April 15, 2024 11:18 AM
To: Delves, Gemma
Cc: Clerk; [Guy Napier \(Gmail\)](#); Andrew Tyler
Subject: LONDON WALL WEST - IRONMONGERS POSITION

THIS IS AN EXTERNAL EMAIL

For the attention of Gemma Delves

Principal Planning Officer

City of London

Guildhall

London EC2V 7HH

Dear Gemma Delves,

The Ironmongers Company and the City of London have engaged in discussions for some seven years, and a common interest has emerged due in part to the long term interests of both organizations to foster a continually improving environment in the City that all those in the area can benefit from, whether residents or workers. We have continued our discussions with the City Surveyors on the application scheme over recent weeks, and we are now pleased to confirm we are able to support the scheme and withdraw our earlier objection letter. Discussion on the details of the scheme have been helpful to our understanding of the various aspects of the scheme and alleviated our previous concerns. We consider the scheme will be a welcome addition to this part of the Square Mile and we hope that Members will support the proposals, which will enhance the setting of our building. We have only one remaining area of concern which is the inclusion of the Highwalk that is proposed to run across the frontage of the Hall at high level. That said, we are confident that the positive and constructive discussions we have experienced with the City will continue to yield mutually beneficial solutions aesthetically and environmentally. We reiterate our points regarding the need for robust conditions and obligations to control the construction and future operation of the development. The Ironmongers Company looks forward to continued co-operation with the City as this development is built out.

Yours,

Lord Garvagh,

Chairman of the London Wall West Committee

On behalf of the Ironmongers Company.

Lord Garvagh,
Saxon House,
Upper Lambourn
West Berks RG17 8QH



Citigen (London) Ltd
Westwood Way
Westwood Business Park
Coventry
West Midlands
CV4 8LG

16th March 2024

Planning Team,
North Wing,
Guildhall,
Aldermanbury
London,
EC2V 7HH

FAO Gemma Delves

Sent via email to [REDACTED]

Dear Gemma,

In reference to Citigen Decarbonisation and London Wall West

Background

E.ON operate over 70 heat networks across the UK with many of them located in London. E.ON fully support UK Government policy that decarbonisation of heat in the urban environment is best achieved through the growth of heat networks enabled by Heat Network Zoning regulation which will not only deliver decarbonised heat to commercial and residential customers but will support an £80Bn investment into the UK economy by 2050 and the creation of 40,000 green jobs. Regulated heat network will have a requirement to meet carbon emissions thresholds and E.ON fully support this requirement as detailed in our recent response to the consultation issued by DESNZ.

Decarbonisation journey

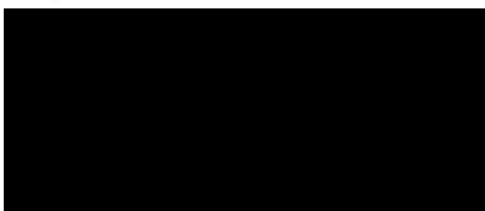
The Citigen energy network is currently on a decarbonisation journey. We have recently installed heat pumps, boreholes and waste heat recovery so that we can reduce the carbon content of heat to our existing customers. However, we have a greater level of ambition for the Citigen energy network as we are looking to further expand the number of buildings connected utilising the new Heat Network Zoning regulation. To this end, we have appointed technical advisors to create a design for this expand network, which will include circa 20km of new heat network, the addition of 100's of more buildings and the potential creation of two new energy centres which will provide low carbon heat using heat pumps and thermal stores. Our aim is to deliver heat with a carbon content of less than 100 grams of CO₂e / kWh by 2027.

London Wall West

Whilst E.ON have a clear vision on how we can expand and decarbonise our Citigen energy network it unfortunately cannot be carried out overnight as it takes time to create the design, obtain the necessary approvals and to then construct the new infrastructure. This is why the Citigen design team have worked to create an innovative heating and cooling solution for the new development at London Wall West that allows the new building to contribute to the decarbonisation of the Citigen energy network. The new energy centre, located at LWW, will provide both heat and cooling for the new development and will also feed into the Citigen energy network supporting the decarbonisation journey of Citigen and therefore helping decarbonise the Square Mile. We see this as a progressive and practical solution that can not only work for LWW but other new developments in the Square Mile where heat networks are not yet in place but where there are plans for one to be built over the next 20 years.

As always if you have any questions please do get in touch.

Your sincerely,



Antony Meanwell
Head of Heat Zone Development

From: Claire Giraud
Sent: Friday, March 8, 2024 4:27 PM
To: Gentry, Sarah
Subject: Re: Planning application for London Wall West

THIS IS AN EXTERNAL EMAIL

Hello Sarah

Lovely to meet you today, sorry if I batted your ear off about suicide prevention, i am very passionate about it.

the rotunda building accessible roof terrace : 50cm planter, 1.8 glass above it, glass is great, it's harder to climb but the planter could be used as a step so either raise the glass/remove the planter/make sure it's a thorny plant in there and add soft measures eg: cctv that is monitored/smart cctv and motion activated light.

new bastion roof terrace : 50cm planter 2.2m glass on top, this is great in terms of height, i would still advise to put thorny plants in the planter and have some soft measures as above though realistically it would take someone very tall and fit to scale that

north building roof terrace: 50 cm planter 1.2 meters on top, this is a bit low especially with the planter beneath that can be used as a step, either raise the height of the glass or take the planter away, if you keep the planter, make sure it's a thorny plant in there and add soft measures eg: cctv that is monitored/smart cctv and motion activated light.

pedestrian bridge: end 1.1 meter, middle 1.8 material tbc, I strongly advise glass to avoid a prison like feeling for the service users and to be more inclusive for wheelchair users + fencing is easier to scale/climb than glass. in response to concerns about maintenance, this will be sold so maintenance costs aren't our concerns + i would argue that saving lives is more important especially when the societal cost of a suicide is estimated to be 2 million + reputational impact and impact on staff and passersby

high walk is 6.8 meters high with 1.1 meter planter, make it thorny but I am not concerned about people jumping to their deaths from there

private balconies 1.1 meters, can we make it 1.2 and have a rolling bar at the top of the balustrade or angle the top of the balustrade to make it harder to climb?

finally one thing i forgot to say is that the building operators' staff should be trained in suicide awareness (we can potentially offer it to them for free - completion is a long way away and i do not know what my training budget will look like then) or they can commission it from the numerous suicide training providers out there (mind, samaritans, grassroot, thamesreach, etc...)

thanks and please do not hesitate should you need further help

Kind Regards

Claire Giraud

Senior Public Health Practitioner



www.nhs.uk/coronavirus

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

On Thu, 7 Mar 2024 at 08:35, Claire Giraud wrote:

Morning

let's do 3-4 tomorrow please

thanks

Kind Regards

Claire Giraud

Senior Public Health Practitioner



www.nhs.uk/coronavirus

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

On Wed, 6 Mar 2024 at 17:30, Gentry, Sarah wrote:

Hi Claire,

I could do 2pm tomorrow or anytime Friday pm if that would work?

Thanks,
Sarah

Sarah Gentry

Planning Officer (Development Management)
Development Division
Environment Department



Environment Department
City of London Corporation

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

WINNER | Planning Authority of the Year



From: Claire Giraud
Sent: Monday, March 4, 2024 10:52 AM
To: Gentry, Sarah
Subject: Re: Planning application for London Wall West

THIS IS AN EXTERNAL EMAIL

Hello Sarah

apologies but I am on leave tomorrow, can you do any other days this week or next week?

thanks

Kind Regards

Claire Giraud

Senior Public Health Practitioner



www.nhs.uk/coronavirus

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

On Fri, 1 Mar 2024 at 10:13, Gentry, Sarah wrote:

Hi Claire,

The City of London has a planning application for the following development-

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. (ref 23/01304/FULEIA)

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 London Wall) London EC2Y 5DN

Would it possible to arrange a call to talk through this application? I would be available next Tuesday if that would work for you?

Thanks,
Sarah

Sarah Gentry

Planning Officer (Development Management)

Development Division

Environment Department



Environment Department
City of London Corporation

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270 | London EC2P 2EJ |
www.cityoflondon.gov.uk

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CoLAG Meeting

Summary of feedback from CoLAG Members

Meeting on Friday 23 February 2024

On Microsoft Teams

Present:

Caroline Keane (CK)
Leila Gray (LG)
Alex Matthams (AM)
Amanda Jacobs
Jodie Greer
Mariya Stoeva
Nicholeen Hall
Rebecca Oliver
Terry Trickett
Jess Robinson
Sarah Gentry

Gerald Eve
Sheppard Robson
Buro Happold
CoLAG Chair & Member
CoLAG Member
CoLAG Member
CoLAG Member
CoLAG Member
CoLAG Member
CoLAG Member
CoLAG Member
CoL Planning Officer

1	<p>Presentations by LG and AM and Member Questions:</p> <p>During the meeting, both LG and AM presented to Members on the details of the proposed development.</p> <p>Following these presentations there were a number of specific questions from Members relating to the proposals including:</p> <ul style="list-style-type: none">• LG confirmed the levels over the proposed development, and the proposed entrances and access routes across each level.• LG explained what a scrambled crossing is, i.e. where traffic is stopped in all directions and pedestrians can choose to cross in a diagonal direction. LG used the example of the one at Oxford Circus to explain this.• LG and AM confirmed the proposal does not include any floating bus stops or cycle bypasses.• LG points out all the lift and ramped access routes, including the lift associated with the grand staircase, and the lift and ramp access to the Barber Surgeons Garden, and cultural space.• AM confirmed the details of the disabled parking, and the route from the disabled parking to the site.• There was a concern from Members in respect of the proposed bollards within the London Wall car park. AM confirmed the space between bollards is 1.2 m, in line with British standards and is sufficient for wheelchair and mobility users.• A Member raised a question in respect of gender-neutral toilets. AM and LG confirmed that all proposed buildings have the available space to provide self-contained gender-neutral toilets.
2	<p>Accessible spaces:</p> <ul style="list-style-type: none">• Members raised concerned in respect of how accessible toilets and changing places had been considered in reference to the cultural space.

U0015158: London Wall West: 4 March 2024

	<ul style="list-style-type: none"> • Similar concerns were raised in respect of accessible spaces across the new buildings. • LG confirmed that the development would be built out to shell and core and the specific fit out of the cultural space and new buildings would be undertaken by the operators of these spaces. • LG showed members the spaces for the accessible toilet areas and changing places on the plans and that there was enough space designed in for these areas to accommodate accessible design. • CK explained that the requirement for accessible spaces would be a condition of planning permission and the development would be required to submit these details for approval to the CoL before works on these areas commenced.
3	<p>Accessible bays and Taxi drop off points:</p> <ul style="list-style-type: none"> • Members raised concerns with the five accessible parking bays and noted that this was not enough. Concerns were also raised that the nearest accessible parking bays are 100m away to nearest access points. • Members noted that one accessible staff parking bay per building is not enough and may prevent disabled workers. • Members raised concerns with regards to a taxi drop off point and that this needed to be looked at. • CK confirmed that ongoing discussions were taking place between the applicant’s transport consultants and the highway officers at CoL. • Members asked about access to the site by emergency vehicles. AM confirmed that emergency vehicles would be able to access the site.
4	<p>Cultural Events Space:</p> <ul style="list-style-type: none"> • Members raised concerns with the tiered seating shown in the images of the internal cultural events space. Members noted that this style of seating did not appear to be accessible and would not allow wheelchair users to enjoy this space. • LG confirmed that the indicative design is for retractable tiered seating that could be moved to create an open exhibition or events space. The seating design proposed would allow for wheelchair accessible spaces to the top of the tiered seating at ground level where there is level entry with the outside, and by the use of the internal lift access to the lower ground level where there would be wheelchair accessible spaces to the front of the tiered seating arrangement. Members noted that other conditions such as those affecting sight could limit use of the top tier of seating, and conditions such as those affecting movement could limit use of the bottom tier of seating. • Members also raised concerns with the use of the internal cultural space by disabled performers.
5	<p>Thomas More car park and service yard:</p> <ul style="list-style-type: none"> • Members raised concerns with potential issues of the convergence of existing traffic within the Thomas More car park, in addition to the proposed traffic to service the proposed buildings, and the potential issues with this traffic entering and exiting the car park via the ramp. • It was noted that the existing Thomas More car park is accessed by residents both in vehicles, but also on foot, or in wheelchairs and mobility scooters to pick up deliver parcels. The existing car park is overseen by parking attendants. • Members raised concerns with the potential safety issues associated with the convergence of the proposed volume of traffic entering the Thomas More car park, and associated noise and pollution issues with the convergence of traffic in this area. • LG confirmed that the ramp off Aldersgate Street would be used for goods in and waste out to service the three proposed buildings and Ironmongers’ Hall. Each new building proposed has dedicated waste rooms and associated service bays; New Bastion House has its own service bay, and the Rotunda and North Building share a service bay. Servicing vehicles for Ironmongers’ Hall and New Bastion House will route through the Thomas More service yard to access their loading

	<p>bay areas. The service vehicles for the new Rotunda building and North Building will use the ramp but will not go through the Thomas More service yard.</p> <ul style="list-style-type: none"> • Members raised safety concerns over the use of an alternative ramp at Seddon House for access to the car park during construction. • Members requested additional information in respect of the details of these matters.
6	<p>Cycle Parking:</p> <ul style="list-style-type: none"> • Members raised questions in respect of cycle parking spaces, and spaces for non-standardised bikes. • AM confirmed the accessible cycle parking spaces in the short stay parking areas within the London Wall car park which has step free access. • LG confirmed the ground floor street level Sheffield cycle parking stands. • Members requested that all cycle parking design think about space for larger bikes and mobility aided bikes. • Members noted that a good signage strategy is required at street level to signal the location of the cycle parking hub at lower ground level within the London Wall car park. • Members queried whether priority lights would be used for cyclists. The members of the design team present were unable to answer this specific query. The highways design team to provide a separate response.
7	<p>Roman Fort Exhibition:</p> <ul style="list-style-type: none"> • Members asked about the potential for a ramped access to the Roman Fort Exhibition and raised concerns with lifts breaking down. • LG confirmed that a ramped access would always be the preferred option, but due to the constrained space here a ramped route is not possible.
8	<p>Lifts:</p> <ul style="list-style-type: none"> • It was noted that the lift to the eastern side of One London Wall was to be kept as existing as it was outside of the site development boundary but did connect to the replacement highwalk bridge proposed across London Wall. Members asked the team to check the existing lift specification at One London Wall.
9	<p>Construction phase:</p> <ul style="list-style-type: none"> • Members asked about the impacts of the construction phase. • CK confirmed that any grant of planning permission would be subject to a Construction management Plan to be agreed by CoL which would be required to set out construction hours of operation and provide suitable measures for dust and noise mitigation.
10	<p>Detailed design:</p> <ul style="list-style-type: none"> • Members raised concerns with the safety of the pillar holding up the highwalk within Aldersgate Plaza shown adjacent to the North Building, and the potential for people bumping into this. It was noted that the material finishes and contrast for this pillar need to be considered. • Members requested consideration of the detailed design and materials and to be compliant with British Standards. Members specifically referred to the treatment of the highwalks; handrails that can be easily distinguishable for partially sighted people with a line down the middle; the use of glazing with etching; and suitable finishes of all surfaces, ramps and stairs. • Members asked if the water garden feature was accessible. LG confirmed the adjacent lift access. • Members noted the transition from light into dark shadow on the proposed highwalk bridge link to Mountjoy Close could be difficult for neurodivergent or partially sighted people. LG confirmed that we are working with a lighting specialist Spiers & Major across the development at planning stage, but that lighting would be subject to further detailed design in the future. It was also noted

	<p>that this point would need to be discussed in the future between landowners/developers as the bridge connection is at the boundary line between the Barbican Estate and the proposed project development.</p> <ul style="list-style-type: none">• Members raised concerns with some of the distances between seating. LG confirmed that there may be potential to add further external seating subject to further detailed review.• AM confirmed all seating could adopted British Standards, however detail of seating is to be addressed post planning as part of detailed design stages.
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Addendum report No.2 to Committee Report: Application Nos. 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC	
Committee	Date
Planning Applications Sub Committee	17 April 2024

Late Representation

A late representation has been received from Fred Rodgers which is attached. The responses raises no new substantive planning grounds and the issues are dealt with within the report and associated documents.

From: [REDACTED]
To: [REDACTED]
Subject: FW: London Wall West - 23/01304/FULEIA etc (the Scheme)
Date: 16 April 2024 16:56:18
Attachments: [REDACTED]

Sarah Gentry
Planning Officer (Development Management)
Development Division
Environment Department
[REDACTED]



Environment Department
City of London Corporation

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WINNER | Planning Authority of the Year



From: Fred Rodgers [REDACTED]

Sent: Tuesday, April 16, 2024 4:34 PM

To: Frederick Rodgers [REDACTED]

Cc: Richards, Gwyn [REDACTED]; Hayward, Christopher (Deputy)

[REDACTED]; Wilkinson, Paul

Subject: London Wall West - 23/01304/FULEIA etc (the Scheme)

THIS IS AN EXTERNAL EMAIL

Dear Planning Applications Sub- Committee Member,

Tomorrow, you will have the responsibility of making a decision on the Scheme, a decision forced on you by other members of the Court of Common Council and one which is completely unnecessary. The Scheme's Sponsor, your Policy Chair, is one of those other members. The same Policy Chair who, when on P&TC, was absent on the two occasions 31 Bury Street (the scheme that would have adversely affected Beavis Marks) and recommended by the Director of Planning and Development was considered. Even then, four current members of the PAS-C voted for approval when it was refused. Whatever decision you take though, it will add to the reputational damage which City Corporation (CoLC), as applicant, has already caused to itself through its blinkered pursuance of the Scheme.

Unfortunately, you will be damned if you do and damned if you don't, although many more will be adversely affected if you do than the few egos that may be hurt if you don't. The alleged purpose of the Scheme is to ensure that CoLC obtains best value on a subsequent disposal, sometime later this decade. It's understandable that, having spent over £11.5 million on the Scheme, CoLC wants to show it is money well spent. However, as the Policy Chair has stated publicly, CoLC will not be implementing the Scheme and it's highly unlikely any developer would wish to implement it either, especially as possession will not be available for some time.

Although the public consultation on the Scheme ended on 06 April, comments are still being posted to the planning portal. However, you have already received a copy of the Officer's report to Committee (Report), and you will be receiving at least one Addendum before the meeting but there are several questions of officers which have been outstanding for some time and it is doubtful that those questions will be answered in time to be considered at the meeting. This is something you should be raising with officers if you wish to reach a balanced decision on the Scheme. In the meantime, there are one or two issues regarding the Scheme which you should raise on Wednesday in any event, including – and as detailed in the Schedule:

1. The Report refers to officers.
2. The Report confirms that CoLC, as LPA, does not identify Bastion House, the Museum of London building or the Rotunda as Non-Designated Heritage Assets (NDHAs).
3. As far as carbon emissions and the submitted Whole Life-Cycle Carbon Assessment (WLCA) are concerned.
4. According to Buro Happold's *Carbon Optioneering Study, including Dashboard 1 and Dashboard 2 of 17 November 2023*.

The above are facts. There may be more incorrect “facts” in the Report. Certainly, there are many subjective views and claims, a lot of which is box-ticking, but, of course, opinions on design and public benefit will always be subjective. However, CoLC, whether as applicant or as LPA, has obligations in respect of the whole of the Square Mile and issues such as additional cultural facilities and additional of open, particularly green, spaces should be viewed in the round. Here we have Barbican Arts Centre which costs us over £30 million a year with horrific refurbishment costs but without any Culture Strategy, alongside the failure, through lack of resources, to present Destination City as a thriving green oasis. At the same time, residents and students in the east of the City are denied any cultural offers, certainly not affordable ones.

As mentioned above, the submission of the Scheme was unnecessary; “facts” you are being asked to consider aren’t; there is prima facie evidence of conflicts of interest for officers; and the Policy Chair has apparently claimed in a *Financial Times* interview in February, that he personally directs council officers to make things “work” for major office developers”. In the circumstances you have every right to refuse permission for the Scheme. After all, there would be little danger of the “costs of an appeal” threat against refusal having much weight in refusing permission.

Best regards,

Fred Rodgers

Fred Rodgers
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Tel: [REDACTED]
Mob: [REDACTED]



1. The Report refers to officers. However, it doesn't distinguish between officers representing CoLC, as applicant, and those representing CoLC, as LPA. There is, of course, the required Handling Note (Note) which names most of the officers involved but the Note is undated. One consequence is that the successive claims of Buro Happold – CoLC's, as applicant, de credere planning agent, regarding disproportionate collapse have been accepted by CoLC's, as LPA, officers without question or challenge. During the period which should have been covered by the Note, CoLC's, as LPA, officers, including those identified in the Handling Note, instructed Buro Happold to prepare CoLC's, as LPA, draft Planning for Sustainability SPD which has recently gone out for public consultation. How can there not be a prime facie conflict of interest here?

2. The Report confirms that CoLC, as LPA, does not identify Bastion House, the Museum of London building or the Rotunda as Non-Designated Heritage Assets (NDHAs). This is important in that the Report would then have to give proper and due consideration to these buildings as heritage assets. These buildings – and Ironmongers' Hall – were excluded from the Barbican and Golden Lane Conservation Area (CA) in 2018 - rejected with nothing more than references to the then current Certificate of Immunity from Listing (COIL) which was due to expire on 21 July 2020, although the Hall was identified as an NDHA. Contrary to paragraph 107 of the Report, there was no appraisal of the CA in 2022 or at all. Paragraphs 551 to 553 of the Report seek to justify the non-identification by reference to guidance from Historic England (HE) for the creation of local lists of heritage assets, despite HE distinguishing local listing from identification of NDHAs. The reason for non-consideration for the CA – the COIL – whilst mentioned in paragraph 551 - isn't repeated in the Report. However, having used the HE guidance to support the non-identification, Barber-Surgeons' Hall is identified as an UDHA in paragraph 554 without it even being tested against HE's criteria. CoLC, as applicant, covertly applied to renew the COIL last November – engaging a new heritage consultant at a cost of £37,000 – but the application became public knowledge and several objections were submitted to HE. At the beginning of this month, HE hadn't submitted its advice on the application to the Secretary of State, Digital, Culture Media and Sport and it would seem reasonable to await the outcome of that application before a decision is made on the Scheme.

3. As far as carbon emissions and the submitted Whole Life-Cycle Carbon Assessment (WLCA) are concerned, according to paragraph 1106 of the Report, The methodology as set out in the COG [Carbon Optioneering Guidance] was only available in draft form from July 2022. My own response to the consultation on the draft COG is dated 06 June 2022 and the "final" issue of the document is dated 25 May 2022. CoLC, as applicant, published its first WLCA on 31 May 2022, although "document properties" shows it was created on 30 May 2022, so it seems the "excuse" offered in paragraph 1106 has no basis in fact. The failure of CoLC, as applicant to provide a detailed appraisal of "Option 2" and that of CoLC, as LPA, to require one shows a complete lack of objectivity on the part of the latter. Not only has CoLC, as applicant, through Buro Happold, moved the goalposts between May 2022 and as recently as last month as far as the construction of Bastion House is concerned, CoLC, as LPA, hasn't challenged this at all, making a mockery of CoLC bragging about its "retrofit first" policy! For the record, the cost of the original buildings was provided by the GLC and CoLC, sometime after the Ronan Point disaster; it's obvious from the architects' drawings that the structure of Bastion House was significantly changed after November 1968 – with the number of proposed external columns being reduced from six to four; the letter of 26 September 1969 from the architects referencing changes to meet the newly introduced wind speed code is missing from CoLC's file 4648 but a later confirmatory

letter remains; although the “new” design code for concrete (CP110) was introduced in November 1972, the Handbook on the Unified Code for Structural Concrete (CP110: 1972), published by the Cement and Concrete Association, is dated 01 January 1972, which is not surprising as regulations of this type are, of course, considered in draft before being approved and coming into force at a later date; and, conclusively, drawing 172-T1-15, Section A-A in both London Metropolitan Archives and CoLC file 4648 has an alteration dated 24 November 1972 with Note re 3rd floor slab added. The note reads: NB For details of construction of third floor slab see Dwgs 172-T8 -2 + 3 and Engineers’ Drawings!

4. According to Buro Happold’s Carbon Optioneering Study, including Dashboard 1 and Dashboard 2 of 17 November 2023:

3.2 Bastion House: Based on its current use as an office tower, the floor-to-floor heights in Bastion House are very low at 3.3m. The existing floor-to-ceiling heights in Bastion House are approximately 2.54m. This limits natural lighting to the depth of the floor plate and creates undesirable office accommodation. Guidance from the British Council for Offices (BCO) recommends that for refurbishments 2.45m to 2.8m floor-to-ceiling heights are acceptable in some circumstances, whilst for new-build offices with deep plan floor plates, floor-to-ceiling heights should be 2.8m to 3.2m.

The floor-to-floor height is 11 feet – 3.35 metres – the floor slab to ceiling slab height is 10 feet two inches - 3.1 metres – and the floor slab to fitted false ceiling height is 9 feet - 2.74 metres.