

# 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: Ms Eva Wilson

Address: 506, Bunyan Court Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I object most importantly due to the environmental impact of the proposed development which will release tens of thousands of tonnes of CO2 during demolition and construction. The developer's refusal to consider retention and retrofitting is incompatible with the City's Climate Action Strategy and national policies and must thus be considered in breach of these policies. The City Corporation is proposing demolishing both buildings and building massive office blocks. The planning authority is only considering best value (ie profits) but it must also consider best use of the land. There are thousands of empty offices in the CoL and no need to build more. On the contrary, public space and residential amenities are lacking. The planned redevelopment will also have a highly destructive impact on the architectural surroundings, its history and shape. The CoL is not considering a sustainable, locally compatible development of the site but instead only the proposal that promises to be most profitable in the short-term. This is not in the interest of the residents of the CoL nor of Greater London.

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Case Officer: Gemma Delves

## Customer Details

Name: Joe Kerr

Address: Old Vicarage Hereford

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is utterly wrong to demolish buildings in the face of climate emergency. It is also wrong to demolish architecture of such quality, recognised as important examples of our postwar heritage

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Case Officer: Gemma Delves

## Customer Details

Name: Miss Rebecca Bubb

Address: 1 Longdown Lane Barby

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this proposal as it destroys the context of the Barbican Centre as well as losing a magnificent building in its own right.

Not to mention the carbon impacts this demolition would have

Sincerely

Rebecca Bubb

## Carroll, Ray

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**From:** FH [REDACTED]  
**Sent:** 31 January 2024 13:45  
**To:** PLN - Comments  
**Subject:** Objection to: Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC (together comprising the scheme known as "London Wall West") | Please lodge all of the grounds for objection laid out in the email against each application individually.

THIS IS AN EXTERNAL EMAIL

Willoughby House Group  
Barbican, London, EC2Y

Attention: Planning Department  
Email: PlnComments@cityoflondon.gov.uk

31 January 2024

Dear Sir/Madam,

**Objection to: Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC (together comprising the scheme known as "London Wall West")**

I am writing on behalf of Willoughby House Group, the registered tenant association representing the interests of c150 flats and residents of Willoughby House, Barbican Estate, London, to object to the three planning applications, 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC, together comprising the scheme known as "London Wall West"

In 2022, Willoughby House Group wrote to the Lord Mayor of London requesting a review of the strategic options for London Wall West at the highest level. The Group also wrote to the developer as part of the pre-application consultation for the scheme. So far the concerns raised in these submissions have not been met. Willoughby House Group hereby objects to all three applications, 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC, which make up the project known as "London Wall West".

The grounds for these objections, which are set out below, apply equally to all three applications –therefore we request that you please lodge all of the grounds against each application individually.

Our grounds for objecting are as follows:

**1. Overall vision appears muddled and is at odds with the listed buildings and landscape of the Barbican**

The approach to adapt the Centre for Music scheme rather than rethinking the space from the ground up has not worked well and led to a muddled scheme. As a result, elements, like the viewing platform and the performance space, now sit uneasily with a high-density and possibly multi-tenanted commercial office scheme.

The design is at odds with the listed brutalism of the Barbican and seems ill-suited to the proposed future use and operation.

**2. Damage to Heritage Assets**

All levels of planning policy require new development to make a positive contribution to local character and distinctiveness, particularly by using every opportunity to draw on "the contribution made by the historic environment to the character of a place".

The City's own Local Plan Core Strategic Policy CS12 on the Historic Environment requires new schemes "to conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors by:

1. Safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.
2. Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them.
3. Safeguarding the character and setting of the City's gardens of special historic interest".



This application, however, almost completely ignores its setting as an integral part of the listed Barbican Estate and its listed and Registered landscape.

It also pays no attention to the immediately adjoining Conservation Area and causes severe harm to the setting of the Grade I listed church of St Botolph and Postman's Park in which it sits.

### **3. Development viability**

When the site was earmarked for the Centre for Music, the Corporation said it was a "strategic location" opening up "a new 'cultural corridor' bringing visitors up from Tate Modern, via the Millennium Bridge and St Paul's into the emerging cultural hub developed by the City Corporation".

This application is based in large part on the architects' plans at the time of the Centre for Music, when a significant proportion of the site was to be given over to cultural use without affecting the commercial viability of the development overall. It is hard to understand why all that cultural space now has to be office use –if the previous scheme was viable then why does this latest one have to have so much office space in it?

This is a rare site, in public ownership. Now that the Centre for Music project is not going ahead, it is our belief that an open, transparent review of the strategic opportunity is needed to create a scheme which enhances what the City of London's current (2015) Local Plan (Core Strategic Policy CS5) identifies as a "strategic cultural quarter centred on the Barbican and residential areas at the Barbican and Golden Lane, each with its own distinctive character".

A viable scheme, with a range of uses more suited to the City's obligations as a public landowner, and meeting the need of the City to diversify in order to be attractive to commerce, seems entirely feasible on this site. In addition, looking to future demographics and needs assessment, the area needs specialist housing for older people, next to existing residential and part of this site would be very suitable.

### **4. Overdevelopment with damage to residential amenity**

The size and scale of the two main buildings represents an overdevelopment of the site with the massing of the scheme inappropriate in such close proximity to people's homes.

The result is damaging for residential and commercial amenity by:

- being too close to existing homes
- damaging privacy
- bringing attendant problems of light pollution at night. The scheme will generate light pollution at night –so far no office development in the City has yet to find a way to completely turn off its light at night, and there is no reason to believe this will be different with this development
- attendant issues of noise pollution
- loss of natural light during the day.

This leads to stress for all affected neighbours and with a proven adverse impact on health.

### **5. Financial and commercial analysis seems very optimistic**

The Property Investment Board is proposing a purely speculative development, with no secured end tenant and no secured development partner. This seems a very significant risk for a public body to take on as lead developer, with the likelihood of cost overruns and later stage design changes, as well as the potential for vacancy given the developments in office working and consequent impact on office space (amount and configuration).

Specifically regarding the office provision it is not clear that the office supply proposed is needed in this form. The City's current plan and development monitoring identifies an office supply pipeline of 515,207m<sup>2</sup> floorspace under construction plus 500,381m<sup>2</sup> of office floorspace permitted but not commenced (as of 31st March 2022). and that "there is projected to be a significant delivery of office floorspace in 2025/26".

This exceeds the City's goal of 750,000m<sup>2</sup> of pipeline, even before adjusting for any potential impact from hybrid and flexible working practices.

Our understanding is that the larger recently constructed offices are only 55% let and 60% let.

Further general investment sentiment for offices is weakening.

All of this points to significantly increased risks for large scale office developments and a high degree of optimism in the underpinning financial and commercial analysis.

#### **4. Cultural elements are extremely minor and badly thought-out**

Less than 1% of the development is earmarked for culture –this is too small and is not aligned with the planned growth in cultural use as a crucial part of development in the City.

In addition, there are no plans for how the cultural elements will be managed or maintained. And there is limited provision for public toilets.

Importantly there are also no plans for how conflicts with residential amenity will be managed which is critical given the close proximity to one of the City's largest residential areas.

#### **5. Carbon impact is unacceptable**

The carbon impact is not acceptable and is not in line with stated City policy

On City policy it is noted that:

- The City's Climate Action Strategy (investment report) talks about "rapidly decarbonising investment" and "focusing and motivating others and modelling good practice"; and
- Successive Lord Mayors have championed sustainable finance, even hosting a five-day event at COP26 in November 2021 "Mobilising private capital in the transition to net zero".

Any scheme in the current development environment and overall environmental context should meet both its commercial objectives and its carbon reduction goals.

This scheme adds over 56,000 tonnes of CO<sup>2</sup> to the atmosphere during the demolition and construction phases. This is more than the entire CO<sup>2</sup> annual output of the City Corporation's operational activities and is not acceptable.

#### **6. Honouring commitments**

All the evidence from similar developments on other sites around the Barbican, including those with a better risk profile, is that unfavourable changes are made after consultation and indeed even after planning approval, again without consultation.

We have had direct experience of this in relation to the 21 Moorfields building where, for example, the site has increased in size since consultation; the security demise has been moved outside the planning footprint with direct and negative consequences for residents and local amenity and environment; and the delivery entrance has moved so that instead of being tucked away it is now directly opposite Barbican bedrooms.

It is important that the City's Property Investment Board is clear on which of the commitments made during consultation will be honoured, as the design inevitably evolves, and that this is documented and subject to binding planning obligations.

As an RTA representing c150 flats we encourage you to withdraw this scheme and work with residents and local stakeholders to develop a more imaginative and forward-looking project. If not withdrawn, we urge you to reject this application.

Yours faithfully

Fionnuala Hogan

Chair

Willoughby House Group

Warm regards  
fionnuala



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Case Officer: Gemma Delves

## Customer Details

Name: Mr Ally Lee

Address: 71 Belgrave Road Liverpool

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Iconic building

**From:**  
**To:**  
**Subject:** London wall west - objection  
**Date:** 31 January 2024 14:10:11

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THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I am writing to object to the plans you have submitted for the demolition of the Museum of London and Bastion House sites. My objections are so numerous that it is difficult to list them all,, but I will try. I am a Barbican resident and have lived here now for over 20 years.

I am completely surrounded by enormous office blocks, many of which appear to be empty for a good part of the week, I can see no reason for the City of London to be building more office accommodation - other than the desire to extract as much money as possible from this site. This is no reason to ride roughshod over the objections of residents and others who are interested in preserving these buildings because of their architectural importance. Below are some of my objections:

- Sustainability and climate change:

Demolition and new build will unleash tens of thousands of tonnes of embodied carbon. Why haven't serious considerations been given to retaining and re-using the existing buildings? Your current proposal runs directly against national and local climate action policies, including your own City guidelines. It is completely hypocritical to state that the City of London has a climate action policy and then to completely ignore this policy when it comes to making more money.

- Mass and Scale:

The Barbican Estate and Barbican South (London Wall) were planned in tandem with open spaces in between. The current plan to build two huge office blocks is completely disproportionate in that the New Bastion House will measure two and a half times the volume of the current building and the current Museum of London more than twice the size. Please explain to me how you can justify these volumes of new built! The amount of disruption this will cause over many years is simply unjustifiable.

- Heritage:

Both current buildings are important and which should be retained and adapted. Demolition will not only destroy these heritage assets but cause substantial harm to their neighbours such as the Barbican Estate and gardens, St Giles Church and Terrace, Postman's Park, the City of London School for Girls and St Botolph's - to name a few. These will be dwarfed by the towers and the limited sky, currently available, will shrink significantly. Since I have lived in Gilbert House, the skyline has been filled in by office building after office building and this will be the last straw.

- Office Demand:

The City currently has no tenant for this site and there are other locations within the City suitable for major office developments - should such demand even exist.

At the moment there are huge office developments on London Wall (Aldermanbury), the corner of Moorgate and Ropemaker Street and the former BT building at opposite St Paul's station to name a few. Isn't this enough to satisfy the City's need for money? The demolition of the existing buildings is speculative and reckless and driven solely by the desire to maximise financial return. There is a great need for affordable accommodation in London for our frontline staff (NHS workers, teachers, police, etc) and maybe the City could set an example by showing some responsibility and compassion instead of the constant search for more income.

And as we live in the cultural hub, surely the Museum of London site could be re-purposed as an art gallery, music venue, theatre space, conference centre or some sort of space which would add value to this wonderful part of central London instead of two ugly office blocks.

I dread this development - as do many of my neighbours. We have seen so many office blocks built in the last twenty years and now is the time to call a halt in this delightful part of London.

Yours faithfully

John Fowle  
102 Gilbert House, Barbican EC2Y 8BD

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Maxim Tooker

Address: 113 Listria Park London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The demolition is an egregious act of waste and against the standards set by sustainability, and is the destruction of a building that is a significant heritage asset to London and the UK's post-war architectural heritage. It also goes against public sentiment and is in opposition to the character of the area and needs of local residents.

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Kevin Barnes

Address: 56 Glensk Road LONDON

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment:Reasons for objection

1. Carbon - demolition and rebuild will unleash tens of thousands of tonnes of CO2, even though industry experts have shown that these buildings are safe and suitable for reuse.

2. Heritage - demolition will destroy two internationally recognised icons of British post-war urban design, including important public realm.



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Case Officer: Gemma Delves

## Customer Details

Name: Mrs Yasuko Morley

Address: Flat 307 Mountjoy House London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:As a resident of neighbouring Mountjoy House, I am seriously concerned about the way the development of London Wall West is proposed and negative consequences it is very likely to bring to our neighbourhood, in terms of air quality, noise level and the damage to our welfare.

The proposed change in traffic is especially my utmost concern. The increase in the level of traffic will be a health hazard. It will no doubt pose dangers to the residents who use the area to move around, to collect our parcels and so on. I am really worried about the likely impact on emergency vehicles - when my husband was seriously ill, we needed an ambulance to attend us immediately, which was difficult enough then and delays in access to emergency vehicles would be fatal in many cases.

Please do consider that this proposed development is very close to the residential area and this will cause a massive impact on our daily life.

I would like to take this opportunity to thank you for listening to our voice. I do trust that nothing will go ahead without our consent.

Yasuko

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Case Officer: Gemma Delves

## Customer Details

Name: Ms Sarah Gaventa

Address: 515 Willoughby House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: In a climate emergency it isn't appropriate to knock down buildings ( especially in this case high quality ones by renowned modernist architects ) and the city has lost so much of its architectural heritage already . The buildings could be used as artist studios bringing more life and work into the city especially post covid which made it empty Fri-Mon . Creative producers next to our cultural centre could only foster more culture in the city and help create a new destination. It's wrong to destroy the set piece garden and it's links and walkways which is part of the link to the Barbican and complements the arch of the GII listed estate . As a neighbour I object to this shortsighted and backward looking plan which goes against the need to retrofit buildings and increase their longevity. It would be an act of architectural vandalism to demolish Bastion House is one of the best modernist buildings left in the City and destroying it would signal the city's disregard for its residents and the retrofit agenda . We have lost too much already and there is no need to do the same here especially now the plans for the music centre have collapsed . Wait and reuse it creatively to attract new workers and life to the city .

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Richard Price

Address: 6 Calabria Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I strongly object to this application. The plans involve demolition of landmark buildings which are significant architecturally and in the public realm. Complete demolition is about the worst option in terms of the Corporation's sustainability objectives. Environmentally and in quality of the cityscape and visual amenity, I urge the refurbishment and reuse of the existing buildings rather than wholesale demolition and new build. I urge staff and members to reject this application.

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Case Officer: Gemma Delves

## Customer Details

Name: Mr David Phillips

Address: 30 Talfourd Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposals are a disgraceful waste of money and embodied energy. The existing buildings are robust and well designed, they could easily be converted for many other uses. The environmental impact of demolition will be substantial. Why do this when it is totally unnecessary? The proposed replacement is a banal collection of dated shape making that will add nothing to the area. The proposals create arbitrary spaces between buildings of arbitrary form. It looks like the result of 10 minutes on AI but it is somehow worse because it was made by humans who should better understand the world. This requires a total rethink involving better architects.

**From:**  
**To:**  
**Subject:** London Wall West  
**Date:** 31 January 2024 14:25:40

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THIS IS AN EXTERNAL EMAIL

I am writing to object to the City of London's plans to demolish Bastion House and the Museum of London in favour of two massive office towers.

At a time when there is a surplus of office space which will only increase, I find it worrying that the City is going against its own retrofit first policy. As a resident I stare at the empty office space of Citypoint and unused apartments in the Heron Building. I feel the current estimate of 10% surplus office space is conservative and will only increase.

These distinguished post-war buildings designed by architects responsible for many post-war icons including Churchill Gardens in Pimlico, form part of the Barbican estate and its treasured heritage. People flock to the Barbican Estate and marvel at the vision of our estate, I notice that nobody flocks to take photographs of the soulless recent office developments surrounding it. Demolition will unleash tens of thousands of tonnes of embodied carbon which is bad for the environment and future generations. There will also be a reduction in the amount of daylight and sunlight for residents as well as privacy issues, again something I encounter at Willoughby House already.

Please rethink and set an example for future generations, look after what we have already and celebrate it.

Yours truly, Carolyn Larkin

Local resident and somebody who has worked in the area for 35 years.

702 Willoughby House  
Barbican EC2Y 8BN

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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 Peter Smart

Address: 715 Willoughby House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: Size of the two main buildings is too large for the site particularly given how close it is to people's homes.

This damages residential amenity by:

- proximity to existing homes
- damaging privacy
- problems such as light pollution at night.

As we in Willoughby House have experienced with 21 Moorfields there is also significant noise pollution which is difficult to avoid with such a large development.

These combine to have a significant adverse impact on residents' lives and potentially health.

The need and commercial rationale for such a development should be watertight given its significantly negative affects.

However, I understand that this is currently a speculative development. If this is the case, we don't

want the Corporation to be conjoined with boroughs such as Woking when it comes to assessing the quality of its commercial judgment.



# Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

## Customer Details

Name: Samantha Barber

Address: 45 Windsor Road Bexhill on Sea

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: These are iconic and shape the City around them. In addition the amount of carbon released is unacceptable. Renovate and reuse should be first principle.

# Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

## Customer Details

Name: Miss Sally Chorley

Address: 28 Ashford Close Woodstock

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Three objections:

(1) the scale and form of the proposed buildings. The last thing the City needs is another example of computer-aided design, each more ugly and inhuman than the last. The 'fly-through' is misleading: it makes the site look far more spacious than it is;

(2) after the hottest year on record, redevelopment is irresponsible. There are many good examples of refurbishment and reuse of such buildings; and

(3) millions were spent on the Museum of London building not so long ago.

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Case Officer: Gemma Delves

## Customer Details

Name: Yen-Yen Teh

Address: 8 Hatton Place London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to this application and strongly urge its refusal. Demolition for starters is unsustainable. This building with its provenance is invaluable to our post-war C20th architectural heritage, and I echo the comments of many other fellow objectors. There is no planning benefit in this proposal, only harm to the neighbourhood and ruthless commerciality.