

# 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 Megumi Yamashita

Address: 30 Tafourd Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am strongly object to this proposal. First of all, the existing building was built as a part of the Barbican Estate, significant 20th century architecture. as a whole. The Bastion House is robust and can be renovate to fit for the new purpose. Secondary, the design of the new proposal does not suit for the site. It's not sympathetic to surrounding area. It looks like a mixture of the trend around 2018 and already looks dated. It's simply not good enough to be built next to the Barbican. Also from the point of carbon emission, this redevelopment should be reconsidered and keeping the Bastion House is vital.

**From:**  
**To:**  
**Subject:** London Wall West  
**Date:** 31 January 2024 17:02:39

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THIS IS AN EXTERNAL EMAIL

I am writing with regards to the consultation on the City of London plans for London Wall West. I am a City of London resident.

I write to protest about these plans for this historically significant area. The area around the far end of London Wall forms part of the approach to St Paul's Cathedral and in close proximity to it. It is on an ancient route into London, along Aldersgate Street. It stands at the corner of the listed Barbican estate, and close to the ancient St Giles Church, Cripplegate. All this should place a burden of responsibility on the decision makers in the City of London to consider carefully anything which materially alters this area.

Yet there is no evidence of such consideration being given. The current plans provide for buildings which are cumbersome, over-large and blocky. Their mass and scale is alarming and ugly. The new development will obscure nationally important sightlines, and will adversely affect light levels and noise levels for many residents in the immediate area, and for existing business people and for schoolchildren at City of London Girls school, both during the building and for years to come. Not to mention visitors and tourists, from Britain and overseas.

On the issue of sustainability alone the plans should be dropped immediately. They run counter to all right thinking on climate policy at the current time, including to the declared position of the City of London itself. The change of use of the existing buildings - the sites of the former Museum of London and Bastion House - could have been effected in a much more environmentally friendly way through conversion of the existing buildings. That approach would not have offended so drastically against sustainability issues and the historic significance of the area. The conclusion is inevitable that the City's climate action position is window dressing, and was never meant to impact its practice.

And, unbelievably and shockingly, I understand that this is speculative building. There are no occupants lined up. It is not even needed. A casual walk through the City will reveal that, post Brexit and post pandemic, there is much unused office space available. So why is this monstrosity of a development even being contemplated? Is it fear on the part of the City authorities that they may not retain their leading position? Is it greed? Surely your responsibility for this historic area should overcome all that? Think of the serious and significant history and architecture bodies who oppose this.

In conclusion I must ask you to withdraw these plans and begin to act responsibly towards your role in safeguarding this historic and beautiful part of London and the nation. To continue with this is to demonstrate a philistine disregard for that role.

Julie Mapstone

509 Seddon House, Barbican EC2Y 8BX

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Nathan Morse

Address: 28 Thomas More House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: The planning for Thomas More car park (in which I park my car) seems to indicate that there will be a full closure.

My parents are both ageing, one with Parkinson's and heart issues. The reason we bought this flat was so that they could visit and spend time with me, and I would be able to provide care.

If they are staying, what happens in the instance of an ambulance being called, and the paramedics are unable to access? And the same for other ageing (or urgently ill) residents?

Where also am I meant to park my car without having to traverse the Barbican estate?

I strongly object on these grounds, it seems unimaginable to be both put in danger and

inconvenienced for such a long period.

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Case Officer: Gemma Delves

## Customer Details

Name: Mrs Diana Gray

Address: 38 Thomas More House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I wish to object to this planning application for the following reasons.

As the Barbican Estate and other buildings in the area are listed, these and other non-listed buildings that have heritage and historical importance will be comprised and as part of the Culture Mile scheme, supported by the Corporation of London be a loss of local amenities for residents and visitors.

It is also a breach of local, London and National policies on heritage and environment.

The plans shows an overdevelopment of the site and the large scale mass of office building is not in keeping with the area. To provide even more large office buildings when there are so many office blocks under construction or standing empty in the City is counter productive.

Unacceptable damage to the environment will be unleashed with 56K tonnes CO2. We know there are developers who wish to retain the existing and refurbish but they have been ignored in favour of a money making scheme that only benefits the Corporation of London.

As a resident of Thomas More House I am particularly concerned about the access to be used to

the site, being the slip road beside the museum and residents' car park. This is already in constant use by residents, emergency vehicles and delivery vans. This extra major increase in lorries and site equipment will cause deadly, unacceptable pollution and congestion to residents and Barbican Estate Office workers. Aldersgate Street is already congested and this increase in heavy traffic will mean long delays for motorists, delivery, buses and emergency vehicles in the area.

I ask the Corporation of London Planning Department to reconsider the application and the damage it will do to this part of the City.

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Case Officer: Gemma Delves

## Customer Details

Name: Ms Katy Hackney

Address: 87 Lenthall Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Please

Reconsider!

This is the Barbican it is MEANT to Look different and is so important

Please

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Case Officer: Gemma Delves

## Customer Details

Name: Mrs Miranda Griffin

Address: 106 Alfriston Rd London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The museum of London building is iconic and historically important. It would be a terrible shame if we were to lose it. The feel of the area would change dramatically and lose its character



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Case Officer: Gemma Delves

## Customer Details

Name: Mr Ian Martin

Address: Home Lea Cromwell Road Lancaster

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Please let's not lose another 20th Century landmark. Greener and kinder to repurpose.

**From:**  
**To:**  
**Subject:** London Wall West objection  
**Date:** 31 January 2024 17:13:24

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THIS IS AN EXTERNAL EMAIL

To Whom it may Concern

I write regarding plans for London Wall West as resident of 13 Wallside, on the North side of Monkwell Square.

My objection relates to loss of residential amenity, including the use of gardens surrounding Barber Surgeons Hall and potential overshadowing and loss of daylight to the roof terrace and lower rooms of the properties facing Monkwell Square.

During the redevelopment of this site, I am also concerned at the impact, at street level, on the flow of traffic and how it will move without major congestion. This disturbance will be unhelpful to cyclists and pedestrians too.

The scale of the development requires careful consideration to those living close by and hours of noisy work should be limited to weekdays.

Yours faithfully

Melanie Beckham

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Stuart Dixon

Address: 3 Cargil Court Edinburgh

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: Bastion House, the Museum of London, the roundabout rotunda and the associated highwalks are integral parts of an internationally recognised and admired estate. They are of top quality and represent superb architecture that the City should be proud of. They use space generously and humanely and they represent the southern entrance to the Barbican estate, which is one of the top few Brutalist projects in the world - a style that is now rightly admired, revered and protected.

London Wall has been compromised elsewhere with excessive inappropriate development. Please don't make that mistake again here.

Two other points

1. Because of the nature and climate emergencies, we must now retrofit and reuse, prioritising adaptation instead of demolition and excessive construction.
2. There is simply no need for further office or retail in the area.

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Nathan Morse

Address: 28 Thomas More House, Barbican, London EC2Y 8BT

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:1. The planning for Thomas More car park (in which I park my car) seems to indicate that there will be a full closure.

My parents are both ageing, one with Parkinson's and heart issues. The reason we bought this flat was so that they could visit and spend time with me, and I would be able to provide care.

If they are staying, what happens in the instance of an ambulance being called, and the paramedics are unable to access? And the same for other ageing (or urgently ill) residents?

Where also am I meant to park my car without having to traverse the Barbican estate?

I strongly object on these grounds, it seems unimaginable to be bth put in danger and

inconvenienced for such a long period.

## 2. Scale of development.

The offices and retail/F&B locations will all be overlooking the playing grounds of the girls school, and directly into my lounge window. The prospect of 17 and 14 story blocks directly in front of my living room window is unacceptable.

If the development were shrunk in scale somewhat, it would have more support in the local community.

## 3. Environmental grounds.

The destruction of the building emits carbon, this is a given, however on top of this, our invaluable access to sky is being taken away, even if it is argued this is only fractional per apartment, having looked at the light and sky reports in Guildhall.

Also, the vast increase in noise and nuisance to the surrounding areas will be unbearable for those of us who work from home.

## 4. Cultural/architectural heritage.

As there is an application open for Museum of London/Bastion House to be listed, would it not be more appropriate/fair/moral for this pivotal and vital decision to be made in advance of this planning decision?

It seems that this has been intentionally timed to kill off MOL/Bastion before this site is protected.

**From:**  
**To:**  
**Subject:** Objection to London Wall West projects  
**Date:** 31 January 2024 17:20:02

THIS IS AN EXTERNAL EMAIL

Dear City of London,

As a resident of the Barbican Estate , I OBJECT to applications 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC (London Wall West) on the following reasons:

1. Sustainability and carbon footprint: the lowest carbon footprint will be to refurbish and continue to use existing buildings (that are still in excellent standing). Only through such measures that we'll be on track to national net zero goals.
2. Heritage - the application will substantially disturb the designated and non-designated heritage assets in this area (St Giles, the Barbican Estate and surrounding landscape, Bastion House, the Museum of London, etc.) and the Golden Lane Conservation Area which adjoins it. The application intrudes on important views to and from St Pauls and St Botolphs in Postmans Park.
3. Construction impacts and pollution are underestimated as they do not include fit-out, which can add two years and many thousands of lorry movements to the impact (we are currently experiences long and disturbance with building 'touch-ups" on Moorfields and Moor Lane with many work done outside of normal working hours - early mornings starting at 5am and after midnight)
4. Harmony with the neighborhood - it is too massive for the site, has zero harmony with the surrounding townscape
5. Contradicts with the national planning policy of "retrofit first". The city must comply with this on its own site
6. Amenity - due to the massive scale, neighbouring properties will lose sunlight and daylight, and office vis-a-vis. Light pollution at night will also damage amenity.
7. Permanently worsent traffic, emergency access and residents' use of the car park.

Please consider these reasons and rethink the London Wall West projects.

Sincerely,

Anne Huang  
327 Willoughby House, Barbican.

Jan-Marc Petroschka  
on behalf of: **BEN JONSON HOUSE GROUP**

349 Ben Jonson House  
Barbican  
London  
EC2Y 8NQ

City of London Corporation  
**Department of Planning and Transportation**  
PO Box 270  
Guildhall  
London  
EC2P 3EJ

31 January 2024

**OBJECTION TO PLANNING APPLICATIONS 23/01304/FULEIA; 23/01277/LBC and  
23/01276/LBC**

This letter sets out the Ben Johnson House Group's formal objection to all three applications which together comprise the proposals for the site known as "London Wall West" as follows:

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

## TOWNSCAPE: DESIGN, SCALE, GRAIN, CHARACTER AND SETTING

1. The entire Barbican area, devastated by heavy bombing during WWII, was subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards. *“A powerful motivation in the preparation of the various post-war reconstruction plans was a desire to prevent uncontrolled piecemeal development with no aesthetic coherence.”* (David Heathcote, *Barbican, Penthouse over the City*, (Chichester, John Wiley & Sons, 2004) page 72.)
2. The area was divided into three zones, North Barbican – the area north of Beech Street, South Barbican – the area along London Wall and Moorgate, and in between Centre Barbican.
3. Centre and South Barbican – bounded by Moorgate in the east, Aldersgate Street in the west, Beech Street/Silk Street/Ropemaker Street in the north and London Wall in the south – were laid out on one orthogonal grid, parallel to Moorgate. The South Barbican was redeveloped for commercial use with office towers and the central area eventually as the residential Barbican Estate.
4. The Museum of London and Bastion House were part of the commercial South Barbican redevelopment along London Wall with its originally six regularly spaced, parallel and modular point blocks on top of two-storey podia. The towers were executed by developers to the planning authority’s strict design brief for uniform appearance; they were inspired by latest office blocks in New York and Stockholm. While four of the towers have since been replaced, one tower at eastern end, Beaumont City Tower, and one at western end, Bastion House, have survived.
5. As a condition for the Centre Barbican development the architects of the residential Barbican Estate, Chamberlin, Powell & Bon, had to incorporate the LCC and Planning Committee’s Commercial Barbican plan into theirs. Hence, the coordinated plan defined streets and open spaces contained in between the two developments, building volumes were aligned, in proportion to each other and linked by an extensive network of pedways.
6. Over the past 30 years, four of the six original 1960s London Wall office blocks have been replaced. It is noteworthy that all new buildings replacing the original towers and other parts of the London Wall plan, from Terry Farrell’s Alban Gate on London Wall (1992) to Richard Rogers Partnership’s 88 Wood Street (2001) and Make’s 1&2 London Wall Place (2017), strictly adhere to the orthogonal grid of the post-war plan.
7. In contrast to the proposed buildings other developments adjacent to the Postman’s Park, and Barbican Estate and Golden Lane CAs with their listed buildings, respond to its specific urban context of their immediate neighbours:
  - 200 Aldersgate steps down to adjacent London House and Little Brittain, where the building is successively broken down in scale.



- One London Wall steps down to 10 Aldersgate Street, aligning it with the roofline of its neighbours along Aldersgate Street.
  - 88 Wood Street is in height aligned with its smaller scale neighbours along Wood Street.
  - London Wall Place breaks down its mass into proportionate sections and places height in a careful composition and in response to the buildings of the Barbican Estate, allowing for sufficient breathing space.
  - Developments along Moor Lane reduce the height along the street to that of the Barbican Estate.
8. The density of the urban fabric has significantly increased, with height and volume extending into the area of the former two-storey podia. These tall and large modern office blocks, however, have a few things in common. They all:
- Strictly follow the perpendicular grid of the post-war South and Centre Barbican plan.
  - Continue to contain, define and reinforce the urban street space and public realm.
  - Break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context, their immediate neighbours, including the Barbican Estate.
  - Place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks.
  - Continue, maintain or reinstate the elevated pedways that link the Barbican estate to its surrounding neighbourhood.
9. On the east side of the Barbican area, replacement blocks of the post-war development along Moor Lane generally follow the shoulder height of the Barbican Estate. From here the height and massing increases, away from the Estate and towards Moorfields. What were once two point-blocks, Britannic Tower and Moor House, with lower blocks in between is, de facto, morphing into an approximate 20-storey continuous high wall. The result represents the piecemeal approach the original masterplan sought to avoid. The haphazard and jagged wall of buildings is not a redeeming quality. On the contrary, it is judged to be harmful to the setting of the Barbican, the CA, and the residential amenities, specifically, the Grade II listed Willoughby House.
10. Both 88 Wood Street, an 18-storey high office block (GIA 33,000m<sup>2</sup>) and 1 London Wall Place (29,000m<sup>2</sup>) feature office blocks of similar volume to the proposed London Wall West scheme. However, the massing of these substantial and tall buildings is carefully articulated, modulated and broken down into smaller segments which in proportion relate to the grain of the adjacent listed Barbican Estate and their immediate urban context.

11. None of the above prevailing qualities were applied to the three proposed blocks. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing bulk and massing, do not respect the scale and grain of the local built environment and bear little to no relation to the post-war masterplan with its perpendicular grid and synergy between Barbican South and Centre Barbican area.
12. New Bastion House will measure more than two and a half times the volume of the current Bastion House and the proposed Rotunda building more than twice. The impact of the sheer volume proposed is exasperated by the monolithic nature of the buildings and their complete lack of articulation, specifically the outfacing shells. Their impact will be felt from all corners of the Barbican Estate and on its streets, from Aldersgate Street, St Martin's Le Grand to London Wall and Monkwell Square, from Lakeside Terrace and the highwalks.
13. Instead of carefully developing a proportionate scheme in response to its precise urban context, its streets and buildings, including the listed Barbican, and its rich history, the brief here to the architects is to maximise, no matter what, pushing development to the legal limits. This is urban planning by accountants, not by town planners.
14. The site boundaries including the roundabout and street are extruded, the volume curbed only by protected long distance views of St. Paul's from Hungerford Bridge, Waterloo Bridge and Millennium Bridge, and legal limits to the reduction of day and sunlight for residential properties around and the girls school's only external amenity. The remaining volumes are then developed into the proposed scheme, with the buildings sited in the middle of the road which both cross and block the historic Roman route — the longest numbered road in the UK. The proposal bears no relation in form, scale, grain nor massing to its surrounding.
15. The TVBHIA on page 31, point 6.12 claims that: *"The scale and design character of the proposed buildings would complement the existing townscape character of the site. The high-quality of the architectural treatment and the enhancement to the quality of the public realm on site would result in an enhancement to townscape character and quality. (...) There would be no adverse effects on TCAs."*
16. The findings of the TVBHIA are highly contested. The scheme stands in stark contrast to the post-war plan and the evolution and partial redevelopment of South Barbican over the past 30 years, as outlined in detail above. The applicant's appraisal demonstrates an utter lack of appreciation and/or disregard of the quality and character of the townscape. Hence, the scale and design of the proposed development are highly damaging to the setting, quality and character of the area.
17. The TVBHIA further states on pages 167/8, under point 12.66, that: *"As such, tall and large modern commercial buildings form a well-established part of the Barbican Estate's setting. Their scale and proximity further contribute towards a sense of*

*enclosure and segregation which is characteristic of the Barbican Estate and forms part of its significance. The Barbican Estate buildings are appreciable against this background of tall buildings within its close setting, and, despite the proximity of the modern commercial buildings, there remains a clear sense of separation between the heritage asset and its urban surroundings.”*

18. This is key to this highly subjective interpretation of the TVBHIA. New building on the perimeter of the site will supposedly contribute to the setting of the Barbican by virtue of their contrasting scale and proximity leading to a high degree of enclosure and segregation. This approach and justification are highly contested. They stand in stark contrast to principles of sound town planning and planning policies.
19. The proposed development and the parameters of judgement set out in the TVBHIA's are contrary to **National Planning Policy Framework**, December 2023:
- **NPPF, Chapter 12.** Achieving well-designed and beautiful places, **Paragraph 135.** *Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit (...).*
  - **NPPF, Chapter 16.** Conserving and enhancing a historic environment, **Paragraph 196.** *c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place.*
  - **NPPF, Chapter 16.** Conserving and enhancing a historic environment, **Paragraph 206.** *Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*
  - **NPPF, Chapter 16.** Conserving and enhancing a historic environment, **Paragraph 212.** *Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.*

20. The proposed development and TVBHIA conflicts with **The London Plan**, The Spatial Development and Strategy for Greater London, March 2021. Specifically:

- **Policy D3**, Optimising site capacity through the design-led approach. **Form and layout:** 1) *enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.* **Quality and character:** 1) *respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.*
- **3.3.7** *Developments that show a clear understanding of, and relationship with, the distinctive features of a place are more likely to be successful. These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the special characteristics of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value.*

21. Further, the proposed assessment and development do not comply with the **City of London, Local Plan**, adopted 15<sup>th</sup> January 2015, specifically:

- **Core Strategic Policy CS10:** Design: *To promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment, by: 1. Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. 3. Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces.*
- **Policy DM 10.1** New development: *To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that: the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways.*
- **Core Strategic Policy CS12:** Historic Environment: *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. 4. Safeguarding the character and setting of the City's gardens of special historic interest.*

22. As the proposed development fails on most if not all the above National, London and Local Plan Policies, we request the application to be rejected.

## **HERITAGE: THE MUSEUM OF LONDON AND BASTION HOUSE**

23. The Museum of London, the first post-war museum to be built in London and the largest urban history museum in the world, was designed by one of the most prominent architects of post-war Britain, Powell and Moya. The architects made the museum work very hard: It is more than a just building, it is integral part of the post-war urban landscape.
24. The many site constraints led to a complex building: While the museum follows the perpendicular grid of the Barbican masterplan and incorporates one of the six commercial towers, it holds the Ironmongers Hall at its centre, frames and defines, at oblique angles, London Wall, the roundabout and Aldersgate Street.
25. Within these tight site constraints, the architects delivered a clear, restrained, and functional museum with grand entrance concourse, entrance hall, temporary and permanent exhibition areas, lecture hall, cafeteria and restaurant, administration, services, etc.
26. As one of the original six towers along London Wall, Bastion House is the most distinguished. Designed in a strongly Miesian form, the 14 story block hovers above its plinth, the museum. Bastion House is carefully proportioned and detailed. It is one of the last externally unaltered surviving examples of its type in the City of London.
27. It is noteworthy that the museum's Philip Powell (Powell and Moya) and the Barbican's Geoffry Powell (Chamberlain, Powell and Bon) were firm friends from university days. Hence, the choice of materials for the two cultural buildings of the post-war Barbican redevelopment, the Barbican Centre and the Museum of London, is hardly a coincidence. As on the earlier Barbican Estate, the Museum of London and Bastion House were supported by muscular pick-hammered concrete columns. While the office block's façade followed the planning authority's strict design brief for the six London Wall towers, the museum building was clad in rectangular white tiles. Some years later, the exhibition spaces (galleries) of the Barbican Centre followed suit and were clad in white rectangular tiles – just as the earlier museum.

28. The TVBHIA states on pages 23, under point 4.22: *“Bastion House is the only remaining office block associated with the post-war masterplan for London Wall, which envisaged the construction of six curtain-walled office blocks, arranged equidistantly to either side of the widened road.”*
29. This is factually wrong. While four of the original towers have since been replaced, two towers have survived: one at the eastern end, City Tower and, at the western end, Bastion House.
30. The TVBHIA states on pages 23, under point 4.22: *“Whilst there is some historic interest associated with Bastion House for these reasons, little else of the masterplan remains today beyond the broad roadway and hard edges of Route XI. The walkway has been fragmented and bypassed by further development of London Wall, diluting the aspirations of the plan.”*
31. The opposite is the case: Along the north side of London Wall, the replacement schemes Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE, and Foster’s Moor House at 120 London Wall have adhered to the principles of the original masterplan. All schemes have maintained, continued, and celebrated the highwalk connections while bringing the buildings down to street level. Buildings follow the perpendicular grid of the original plan, and continue to frame existing streets, external spaces and gardens. The highwalks continue to be highly popular and they each extend with smaller and larger circuits, serving many as a measure of daily exercise, especially for joggers, and the older generation.
32. The TVBHIA states on pages 167/8, under point 12.66: *“There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. That includes the slab block Bastion House, on the site, which was conceived as part of a separate masterplan for commercial development along London Wall, rather than in conjunction with the Barbican Estate.”*
33. This assessment is factually wrong as explained under point 5. regarding the comprehensive evolution and integration of the plans and point 23. the synergies between the Museum of London and the Barbican arts Centre.
34. The 20<sup>th</sup> Century Society added the Museum of London and Bastion House to their 2023 Risk List of top ten buildings under threat of demolition. The above statement runs contrary to C20’s evaluation: *“To the east is Bastion House, also by P&M, built as a speculative office development above the podium, as part of the new museum scheme. Standing on piers of biscuit-coloured concrete with Miesian bronzed curtain walling, it is now a rare survivor of a hugely important part of the City of London’s post-war planning history.”*
35. The demolition of the Museum of London and Bastion House will result in the loss of an important part of the post-war redevelopment of the Barbican. It will result in the loss of two undesignated heritage assets. As such, the retention, repurposing,

adaptation and retrofitting of the buildings should have been the starting point of a serious options appraisal for the site – from a historic, cultural, social and environmental perspective.

36. The sheer and disproportionate amount and bulk of the proposed replacement buildings and their position bear no relation to the original plan, and have no regard for the existing townscape, whether in form, scale or grain. The proposed development is harmful to the Grade II listed Barbican Estate, the Barbican Registered Park and Garden (Grade II\*), the Grade I listed churches St Botolph and St. Giles, the three adjoining CAs, and to the general setting of the immediate and wider neighbourhood.
37. From a historic perspective the demolition of the Museum of London and Bastion House is contrary to **National Planning Policy Framework**, December 2023:
- **NPPF, Chapter 16.** Conserving and enhancing the historic environment, **paragraph 195.** *Heritage assets range from sites and buildings of local historic value to those of the highest significance (...) These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.*
  - **NPPF, Chapter 16.** Conserving and enhancing the historic environment, **paragraph 196.** *Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place.*
38. The proposed development will cause considerable harm to the various adjoining heritage assets and the loss of two undesignated heritage assets, the Museum of London and Bastion House. The harm to the heritage assets is considered less than substantial, however, it is not sufficiently outweighed by heritage benefits or public benefits elsewhere. The application should therefore be refused.

## RETROFIT FIRST AND WHOLE LIFE CARBON

39. When the CoLC published its interim WLCA in May 2022, only two development options were evaluated: one part demolition and one full demolition option. The CoLC claimed that Bastion House could not be retained due to the potential of progressive collapse. A structural peer review later disproved that claim. However,

the report was never withdrawn, a full retention scheme never seriously considered from the outset, contrary to planning policy quoted under point 37.

40. In April/May 2023 the CoLC undertook a brief 30-working day Soft Market Test, inviting developers to put forward detailed proposals for the retention and adaptation of the Museum of London and Bastion House for a new use. The CoLC received several credible proposals for the existing buildings, as confirmed by Christopher Hayward, Chair of Policy and Resources, at City Question Time 15 June 2023.
41. While these credible proposals would have complied with National, London and CoLC net zero, retrofit, and carbon policies, they were not further pursued and as Option 2, Major Refurbishment, deliberately excluded from the Whole Life Carbon Assessment of the application (Carbon Optioneering Study, Including Dashboard 1 and Dashboard 2.)
42. From an environmental perspective, the demolition of the Museum of London and Bastion House and the exclusion of a Major Refurbishment option in the WLCA is contrary to **National Planning Policy Framework**, December 2023:
  - **NPPF, Chapter 2.** Achieving sustainable development, **paragraph 8.** Achieving sustainable development means that the planning system has three overarching objectives, a) economic – to help build a strong, responsive and competitive economy; b) social – to support strong, vibrant and healthy communities; and c) environmental – **to protect and enhance our natural, built and historic environment**; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
  - **NPPF, Chapter 14.** Meeting the challenge of climate change, flooding and coastal change, **paragraph 157.** The planning system should support the transition to a low carbon future in a changing climate (...) It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, **including the conversion of existing buildings**; and support renewable and low carbon energy and associated infrastructure.
43. The restricted options appraisal and development taken forward do not comply with the **City of London, Local Plan**, adopted 15<sup>th</sup> January 2015, specifically:
  - **Core Strategic Policy CS15:** Sustainable Development and Climate Change, 3. Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.
44. The proposal is equally contrary to CoLC's a new Sustainability Supplementary Planning Document (SPD) on 12 December 2023. One key consideration identified in the guidance for developers, in order to set exemplary standards for sustainability, without undermining the economic viability of planning applications is: **Retrofit and**



**reuse** - Outlining the 'retrofit first' approach, promoting the reuse of existing buildings where this is the most sustainable and suitable approach for a site, in line with the City Corporation's adopted Carbon Options Guidance.

45. From the outset the applicant has never considered a retention and retrofit first scheme. This is a serious omission, contrary to National, London and Local Plan Policies, and the application should therefore be refused.

46. Option 2, Major Refurbishment of the existing buildings was excluded from an assessment engineered in favour of Option 9. The assessment is therefore not credible, and the application should be refused.

## **CONCLUSION**

The choice of a world-renowned architectural practice cannot hide that fact that this is an out of scale, out of place, one-dimensional, banal development; inward looking, self-referential, and disengaged from its surroundings. It is a highly damaging proposal, not worth the (multidimensional) value of this important historic and strategic site it is now proposed to occupy. The proposed development will cause substantial harm to the City of London, its townscape, heritage assets, residential amenities, and our environment. Furthermore, the scheme is non-compliant with National, London and Local Planning Policies. The application should therefore be refused.

Copied by email:

- Fiona Lean, Chair of Ben Jonson House Group
- Wendy Spurry, Secretary of Ben Jonson House Group
- Stephen Chapman, Treasurer of Ben Jonson House Group

# 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 Joel Morris

Address: 83 Buxton Road Walthamstow

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The interaction of this building with the ancient stones of the wall is one of my favourite architectural juxtapositions in London.

# Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

## Customer Details

Name: Ms Anastasiia Manokhina

Address: 16 Andrewes House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object the demolition of Museum of London as it definitely has high architectural significance and I think it should be reimaged instead, not demolished.

**From:**  
**To:**  
**Subject:** Planning Application 23/01304/FULEIA  
**Date:** 31 January 2024 17:33:18

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THIS IS AN EXTERNAL EMAIL

I am a resident of Thomas More House, which faces the London Wall West site, the subject of planning application 23/01304/FULEIA and the related applications 23/1276/LBC and 23/01277/LBC. I object to them all for the following reasons:

In the light of the climate emergency, the thrust at national and local level is towards achieving Net Zero carbon emissions. In fact, the City Corporation has been boasting of all that it is doing to this end. However, these applications fly in the face of all that it is saying, and the result will be the release of more carbon dioxide into the atmosphere than if it went ahead with a retrofit of the existing structures. I believe there were companies interested in putting together schemes to retrofit Bastion House and the former museum buildings, but no details were ever released.

By way of contrast, the proposed £200m office overhaul at 65 Gresham Street was recently praised by the Chairman of the City of London Corporation Planning and Transport Committee, Shravan Joshi, who said: "The 65 Gresham Street proposals represent an exemplary retrofit scheme that will provide benefits for everyone." It is one of the largest building reuse projects in the Square Mile to date.

From the sheer scale of the proposed development at London Wall West, it is quite clear the City Corporation is focused on obtaining as much money out of the site as it can and has no regard for the owners and occupiers of buildings surrounding it. The two largest office towers will dominate the area and there is no attempt architecturally to blend in with all the adjoining buildings, particularly the Listed Barbican residential estate. Drawings show two buildings which would be more suited as hotels in a Spanish coastal resort. They will overlook Thomas More House and beyond and there will be no privacy for children at the City of London School for Girls when they exercise on the roof of the Thomas More carpark. The towers will not only cause loss of daylight and sunlight but will also cause wind turbulence in this very confined area at the junction of London Wall and Aldersgate Street. During the day they are likely to generate noise and disturbance in the locality by virtue of the sheer numbers employed in them and at night nearby residents are bound to suffer from light pollution, already a perennial problem for those of us living in the City.

This is an historic part of the City, close to the Roman wall and at the beginning of the A1 (Aldersgate) which heads north as far as Scotland, with several Listed buildings in the vicinity. The City Corporation promotes Culture Mile, along its West/East axis from Smithfield to Barbican Centre, whilst ignoring a South/North route to it from Tate Modern, across the Millennium Bridge and past St Pauls to Barbican. This is clearly evident because, if this scheme goes ahead, anyone approaching Barbican along St. Martin's Le Grand will be confronted by one of the huge office towers. It will appear to be in the middle of the road, blocking the view further North and, to me, suggests there is nothing more to be seen beyond that point. The City Corporation really could do better than this. Instead of focussing on short-term gain for its own selfish purposes, it should be focussing on creating an area of which it and the people of London could be proud for generations to come.

At highway level, I am very concerned at the proposal to remove the Rotunda roundabout and introducing two-way traffic at the junction of London Wall and Aldersgate Street. The roads here are already very congested and I cannot believe this has been properly thought

through. At the first presentation of the scheme for this area I remember asking one of the Corporation staff to explain the thinking and it was met with silence. It was quite clear lines had been drawn on a plan without considering the implications.

Of even more concern are the proposals for access to the site. It is beyond belief that, when development of the site is proposed to be vastly increased in size, access points are to be reduced from two to one during construction and on completion. Further, that the present one-way system will, of necessity, become two-way. The remaining access from Aldersgate Street is already heavily used each day by the residents of Lauderdale Tower, Lambert Jones Mews, Seddon House, Thomas More House and Mountjoy House. It is the busiest car park on the estate in terms of deliveries and resident movements and is the only access point for the emergency services. Access is from a busy main road and the cross over interrupts a pavement used by many who live and work in the City.

I fail to see how construction traffic would also be able to be accommodated, in terms of traffic movement but also in terms of safety, noise and pollution. My flat is at level 02 and my bedroom looks into the open side of the Thomas More car park. In recent years pollution surveys have been undertaken in conjunction with the City Corporation and the results have shown that pollution at the bedroom end of my flat is higher than on the opposite side of the building. If planning consent is given to this application, pollution levels will soar both during construction and afterwards, becoming a danger to my health and also the children using the City of London School for Girls play area on the car park roof.

Please reject these applications.

Alan Newman  
79 Thomas More House  
Barbican  
London  
EC2Y 8BU