

From: Steve Sinclair [REDACTED]
Sent: Wednesday, January 31, 2024 5:49 PM
To: Delves, Gemma [REDACTED]
Subject: Objection to 23/01304/FULEIA

THIS IS AN EXTERNAL EMAIL

Hi Gemma

I hope you don't mind me emailing you my objection to the proposed development at London Wall West (Ref: 23/01304/FULEIA), I was having problems with the portal.

I am a local architect, restaurateur and, I also teach at post-graduate level.

My full objection to the proposed demolition and development is as follows:

Objection to 23/01304/FULEIA

There are several valid objections in relation to policy compliance and legal responsibility that are significant enough for at least a deferred decision, and possibly a refusal.

The policy related objections are: 1) Negative impact on numerous high quality heritage assets; 2) negative impact on the character of the conservation area; 3) Carbon ; and 4) Impacts on neighbouring amenity (daylight/sunlight, and sense of enclosure. This I will expand on a little, however, an important and essential issue to raise before the lack of policy compliance is the matter of legal responsibility and financial viability.

The proposed LWW development will not gain the maximum financial return, and due to market position, location, and the construction cost will not be financial viable. There is no public (or internal) evidence that this has been sufficiently scrutinised and checked.

The City of London Corporation's, Policy Chairman, Chris Hayward formally stated in his letter dated 29.09.2023 to the BQAG:

“...the City Corporation is under duty to achieve ‘best consideration’ for the London Wall West site. This means that the Corporation, as a local authority, is **under legal obligation to gain the maximum financial return**, as with all local authorities in a comparable situation”

The maximum financial return is not immediately apparent when looking closer at the proposed LWW development. The construction cost for the proposal – should councillors be prepared to do a quick checking exercise – is a conservative estimate of £59m. This is based on low BCIS rates for a high-end new build office, demolition, mix of uses, landscaping, highways works, statutory costs and professional fees. It is not incorporating overheads and profits or any bank costs.

With construction cost at £43m (a cautiously low estimate) you would expect the values to far exceed this figure to ‘maximise the financial return’. However, the gross development values (including non-office space) for a top-end commercial sale in this area would only be in the region of £61m.

So, bearing in mind these figures, what would be the offer to City of London Corporation for site acquisition? It would likely be in the region of £10-15m for the scheme to be viable, and be of value to a developer. This amount would be viewed by councillors and financial journalists as simply irresponsible and illegal. And for this reason the LWW proposal should be at least deferred until viability is properly scrutinised.

Obviously, there are unique buyers for high end developments where value is no consideration. These may be overseas investors seeking to extend an asset portfolio. However, this too has no transparency or apparent scrutiny – why would such a stakeholder seek to pay high inflated values for a development that is: 1) at the south east side of the Barbican Estate; 2) removed from the proximity of the city’s high value cluster; and 3) located where there is a known low rate of office occupancy within the city. Do councillors or financial journalists trust the words of planning officers and policy chairman that this scheme is really truly viable? Again, even on these grounds the LWW proposal should be deferred until viability is properly scrutinised and understood because there is no evidence that the City of London Corporation is achieving maximum financial return. Would this be deemed illegal, if the proposal is approved?

In short, I object that the proposal is not (and nowhere near) going to provide maximum financial gain and is therefore unviable. For that reason I would urge councillors to defer or refuse, to avoid the City to be seen as legally and financially irresponsible.

On the other points of objection:

Heritage

The impact on several Grade I and II* listed properties is too severe. The proposed development does very little to convince on townscape, orientation, urban grain and setting of the development within the surrounding area. The design also demonstrates little architectural merit on how it weaves together with the listed Barbican Estate, it could be situated anywhere and makes no attempt to integrate with scale, dimension, built form and typology. There is little or no urban design idea or skill demonstrated, and subsequently this adds to the sense of loss of the neighbouring heritage buildings in this key (almost crucial) Central London context that links the square mile with St.Pauls, the river, Clerkenwell and the Barbican Estate.

The other heritage objection is the loss of the Powell & Moya designed Museum of London and Bastion house buildings. As demonstrated by 20th Century Society, and an array of prominent architects/architectural historians, and many people in the neighbourhood and members of the public, there is great interest and acknowledgment of the qualities and values of this building assemblage. It is part of the City of London's history and a reminder of the ambitions and celebration of the growth of the City of London as seen in promotional films of the 1970s, and 1980s.

On this point, the submitted studies show very little on how a development project could sustain adaptive reuse or reworking of the existing whilst achieving value. Out of 11 presented scoping options, this possibility seemed to have little traction despite strong urban trends (regionally, nationally and globally) for retaining, altering or adapting existing buildings rather than the environmentally and culturally challenging issue of complete tabula rasa. I suspect that there are many more viable options utilising the existing with new development, and could create more cultural and financial value. Again, this application needs to be deferred at least, to test this further rather than embarrass the City of London leaders with a development that erases cultural value and erodes financial value. Especially, in light of increasing and emerging attention of reuse within the news media and broadcasting sectors (including the Financial Times).

Height & Mass (design)

Building height is often seen as an easy target to object on. However, the combination of height and mass is more meaningful as planning policy (local, regional and national) seek compliance with contextual conditions. Arguably, the developments on the south side of London Wall address this – through building form, orientation, varied/stepped heights and massing. The proposed development fails to achieve this contextual understanding and goes against the grain of all buildings (old and new) in the vicinity. Considering the short distance from Paternoster Square and St.Pauls to the south and St.Barts/Clerkenwell to the east, and being part of the Barbican Estate, the proposal has no relationship in height, mass and form. The proposal has more in relation to the townscape of Canary Wharf or the high-rise cluster around St.Mary Axe – not the Barbican Estate/Clerkenwell/St.Pauls. I object to the proposal on the grounds of non-compliance of planning policies on height, mass, form and townscape.

Sustainability & Environment

1

It has been shown in recent studies that planted trees and foliage at regular high level storeys of high rise buildings do not sustain any long term benefits. Maintenance becomes highly expensive and repair is often not fully considered. In the UK planting trees and foliage at high-level storeys is wholly untested and there are no examples of any success of living facades consisting of the amount of trees and planting as seen in the proposal. On these grounds I object to the short-sightedness and unresearched proposition of biodiverse species in this location. It is not sustainable.

2

The complete demolition and tabula rasa of the site is not in keeping with sustainable development policies. As mentioned above the case for demolition has not been fully tested and could legally be exposed as misleading and mis-representative as not all discussion on options and offers made on the site have been made evident. I object to the irresponsible over-riding of sustainable policy directions, promoting this particular development as an 'exception to the rule'.

3

The whole life carbon study does not seem credible. The proposal to demolish demonstrates very little reality on circular economy and reuse, and the report has minimal information on retention/adaptation/reuse/extension of the existing buildings. The submission does contain studies showing the low carbon footprint of the proposed buildings, but misleadingly does not compare this adequately or realistically with alternative options combining retention of existing buildings. The objection here is clear, the evidence provided suggests misleading representation that this tabula rasa & 'maximised' development is good for the environment. It is not. It is not in keeping with policy.

4

Has the new road system been resolved as something that will not cause congestion and sitting cars in the neighbourhood? This information was not easy to find in the application and there are concerns about long-term effects of the change to the road system.

To conclude, this is a flawed and irresponsible proposal that could become embarrassing for council leaders and London generally if the unchecked viability is not properly reviewed prior to consent. To proceed with a consent at this stage could harm many including the City of London, it's members, it's workers, it's residents and of course it's reputation. Much of the submitted material seems unreliable and many of the council's planning policies are not been complied with.

Please accept this as a formal objection

Yours faithfully

Steve

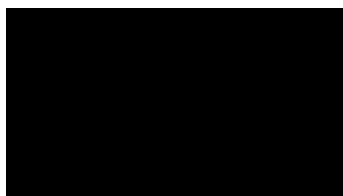
Stephen Sinclair BArch, DipArch, MSc(LSE), RIBA

Director

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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 Stephen Sinclair

Address: 10 Vyner Street London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment: This is an abbreviated version of my objection sent to Gemma Delves the case officer, which also has other policy concerns.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Alex Brogan

Address: 124 Southfield Road Oxford

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The existing building is an indispensable example of brutalism and should be renovated for public use rather than demolished.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Guy Strelitz

Address: 3 Princes Avenue London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Bastion House is an eyesore. Replacing it with something better will be very much to the public good.

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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: Dear Gemma,

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

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Oliver Lazarus

Address: 9 newbury St london

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:Lost opportunity to redevelop in a meaningful way what is already a poor bit of public domain with the city.

The proposed scheme lacks response to context and the particulars of the city and its history. The scheme is generic and the visuals of a building draped in greenery disingenuous at best and dishonest at worst.

The removal of the rotunda is welcome, and affords opportunity to create something better for the city than this design.

Object on grounds of poor design and that although on paper it may be deemed as best financial return/ value - it will fail to best serve the growth, development and rich layering of the city.

Comments for Planning Application 23/01276/LBC

Application Summary

Application Number: 23/01276/LBC

Address: Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

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

Case Officer: Gemma Delves

Customer Details

Name: Ms Jane Arthur

Address: 702 Mountjoy House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Please see Documents tab at top of page for details

Comments for Planning Application 23/01277/LBC

Application Summary

Application Number: 23/01277/LBC

Address: 140 London Wall, 150 London Wall, Shaftsbury Place, And London Wall Car Park, London EC2Y

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

Case Officer: Gemma Delves

Customer Details

Name: Ms Jane Arthur

Address: 702 Mountjoy House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Please see Documents tab at top of page for details

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Ms Jane Arthur

Address: 702 Mountjoy House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Please see Documents tab at top of page for details

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Case Officer: Gemma Delves

Customer Details

Name: Mr Aaron Todd

Address: 17 Penmaen Terrace Swansea

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This is a shameful loss of a heritage building, with a specific designed use that is still required

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Ashley Brown

Address: 24 Muriel Road Leicester

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Please respect London's Brutalist architecture heritage.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Lawrence Staden

Address: Flat 5 21 Kensington Court London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I ran a hedge fund in the City for 20 years. I completely understand that the City needs to grow and can't be trapped in the past. However, this proposal - lopping off and demolishing two integral parts of the Barbican Estate on the pretext that they are of lesser value or near the end of their natural life, just feels like salami-slicing the listing process. Let's be honest - we all understand that this proposal will make more money than preservation. It will also impair the integrity of the Barbican Estate and lead to further salami-slicing down the line until in the end... just knock the last bits down because they don't mean anything on their own.

I've watched the City of London allow numerous plans like this to go through. Yes, I like Brutalism but I also mourn the loss of the Mappin & Webb building too. It just seems that history and the environment cry out for preservation but here I am appealing to the current officials of the City of London Corporation to respect the vision of their forerunners. I reiterate - I was a hedge fund manager/investment banker and property developer. When people like me start writing in on the side of preservation...

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Case Officer: Gemma Delves

Customer Details

Name: Miss Sian Leong

Address: 147 Elderfield Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I am against the proposed replacement.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: david bonnett

Address: 152 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: We strongly object to this proposed development.

The proposed development will generate an unacceptable level and duration of disruption regarding building noise and traffic congestion for local residents. The works will obviously last for many years and meantime undermine our quality of life and right of enjoyment of our residential amenity at the Barbican.

The above objection is based on our recent, ongoing and negative experience of similar scale building construction projects in the area and that experience will be magnified more so due to this project's close proximity to where we live.

In historical and cultural terms, the potential loss of this significant building group will erode the collective legacy which currently exists. The proposal is highly damaging to the area's heritage of exemplary 20th Century architecture - most worthy of Conservation.

The proposed demolition does not reflect the original ground breaking social aspirations of the

Corporation. Where is the heart and foresight of the leaders of the Corporation of London, who originally commissioned the Barbican Estate? Where is the foresight for the area -the Conservation Masterplan, as opposed to the wholesale development and demolition approach based on commercial rather than social values?

Sustainability reports commissioned by the Barbican Action Group 2023 make the convincing case for retaining the building and refurbishing, as opposed to demolition. Retaining the existing carbon footprint aligns with current and pressing government objectives to Save the Planet. If this path could be agreed upon, it would become a mile stone and such a positive step forward in demonstrating the Corporation's overriding commitment to climate change.

By retaining this high profile and much valued group of buildings, the Corporation will demonstrate an intelligent and considered response to UK policy and worldwide climate objectives.

END

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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: Heather Griffiths

Address: 39 Willow Avenue Clifford Leeds

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This building of significant historical, architectural and visual importance must NOT be lost.

Comments for Planning Application 23/01304/FULEIA

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Name: Heather Griffiths

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Comment Reasons:

- Other

Comment: This building of significant historical, architectural and visual importance must NOT be lost.

Once again, I note with dismay the City of London's abandonment of the proposed Centre for Music, London and wish to express, in the strongest terms, my opposition to all aspects of the proposed redevelopment (euphemistically referred to as regeneration) of the Museum of London (MoL) and Bastion House site submitted under the name of London Wall West (LWW).

I find the scheme to be inappropriate in terms of scale, design, and use as well as being entirely devoid of justification. The documents published by the scheme promoter (City of London Corporation) constitute little more than a shallow, and entirely uninspiring, marketing exercise predicated on a delusional view of the needs of 21st Century cities and citizens. Simply put LWW represents **the wrong kind of development, in the wrong place, and at the wrong time.**

CULTURAL DEGRADATION

The LWW planning application reads like a high school marketing pamphlet, infused with hyperbole, flimsy claims, and specious pronouncements that smack of greenwashing. Far from the concise, factual summary to be expected from a neutral applicant. But then again the Corporation is also the land owner and Local Planning Authority (in other words judge, jury, prosecution, and defence).

On close examination, LWW represents no more than an opportunistic attempt to crest the latest wave of office bloat. It demonstrates not only a collective memory of piscine proportions (forget the 90s office disaster, forget the Culture Mile, the Centre for Music, London, the numerous nearby precedents for office fitouts, and overlook the planning gain that yielded Milton Court) but also a flagrant disregard for the site's historical and urban context, both of which it aspires to enhance.

Far from delivering world class design, the proposed glass boxes would merely replicate the anonymous corporate blandness of the majority of City buildings. By contrast, the former MoL building not only mirrors the listed architecture of the Barbican Centre in scale and finishes, but in many way trumps it in terms of visual interest and ingenuity. The Rotunda, a multi-purpose pedestrian haven from the perennially over dimensioned road network besieging it on all sides, provides a unique and highly distinctive landmark, let down only by poorly maintained public realm and pedestrian accesses.

Similarly, frequent references in the LWW application to expanding the City's retail offer appear ignorant both of the site's isolated location and the growing number of empty units both in landmark developments such as Number 1 Poultry and One New Change and, more locally, the Alban Gate highwalks. The application also neglects to mention that the old MoL building previously provided a range of popular food and beverage outlets, flexible venue spaces, and unparalleled public outreach events such as Gresham College lectures.

INAPPROPRIATE LAND USE

The proposed development site is bounded on three sides by several residential areas, notably the Barbican Estate, London House, and Monkwell Square. The Grade II Barbican Estate and Grade II* gardens, a uniquely successful mixed density urban residential complex, has a combined market value in excess of £2 billion and hosts Europe's largest arts centre together with the Guildhall School of Music and Drama. Clearly any attempt to alter the use of this site, but especially to increase building density, expand the periods of use, to introduce noise-generating activities that spill out into the public realm, and to overload existing constrained site accesses, would prove detrimental to all residents.

The misguided decision to relocate the Museum of London to a defunct part of the meat market (itself likely to suffer the Covent Garden/Spitalfields tourist theme park treatment) will no doubt

enter the annals of notable planning blunders in due course. But this is a miscalculation further compounded by MoL's proposed replacement not with the now defunct Centre of Music, London proposals (which might actually have propelled London into the global top 10) but with two bulbous office containers, space for yet more coffee shops and fast food outlets, and an appendage of around 10% of ill-defined lettable sui generis spaces.

Even adopting the Corporation's monomaniacal world view (offices, offices, and yet more offices), there is no demonstrable justification for Class A office development at this location. Goldman Sachs have recently raised concerns about potential oversupply across the City, while the most recent office rental data, from a variety of market sources, indicate a continuing downturn in demand for Central London (perhaps with the exception of high status West End locations, where supply is inevitably limited). Indeed, City vacancy rates have already started to rise, to around 10% (in itself a misleading figure that masks the fact that occupancy levels and loadings remain consistently below pre-pandemic levels).

Furthermore, the majority of recent new office acquisitions in the City appear to have been made on behalf of existing tenants relocating from older developments (typically from the City or Canary Wharf, so largely cannibalistic) as part of corporate downsizing/consolidation programmes. New developments are being chosen in the hope that net operating costs will be lower. The more popular sites are, inevitably, adjacent to mainline rail termini. Ironically, the chosen site for the new Museum of London building would have been better suited to development of the LWW genre.

Looking further ahead, given the enduring popularity of hybrid working on both sides of the Atlantic, unavoidable bottlenecks in public transport networks (despite the recent addition of the Elizabeth Line) and the widening adoption of AI (many traditional City jobs being prime targets for automation) it is likely that the drift away from traditional office-based work will continue, further reducing long-term demand for the sort of development proposed at LWW.

A far more appropriate use of the site would be a mix of cultural (closely aligned with the Barbican Arts Centre and the Guildhall School) using the former MoL buildings, and residential or low cost maker spaces using Bastion House.

ENVIRONMENTAL DEGRADATION

As the UK's already flimsy environmental pledges continue to unravel, the City appears keen to hasten the trend, since LWW's most likely legacy would be one of increased nuisance: from street noise; light pollution; air pollution (notably from unregulated catering exhausts); air turbulence; and a net increase in the urban heat island effect.

LWW's supporting sustainability analysis appears to rely heavily on a somewhat superficial carbon assessment, which conveniently ignores the obvious disbenefits that would arise from demolishing existing buildings and sub-structures with a high concrete content.

Even adopting the 60-year assessment period cited in the LWW planning application, and of course ignoring the significant sunk costs invested in the existing buildings and substructures, it is admitted that LWW would fail to achieve neutrality, let alone contribute towards a much-needed reduction in local and national carbon emissions. The somewhat dubious claims of the Citigen initiative towards 'sustainable development' goals can be ignored since there is ample space in the existing London Wall car park (even more in West Smithfield) to accommodate CHP plant without any significant remodelling.

And yet the 60-year design life assumption for LWW is entirely untenable given the current trend towards shorter and more flexible lease agreements (typically less than 10 years), historical office refurbishment cycles of a decade, and apparent ignorance of real world tenant behaviours which, to date (according to research by the University of Bath) have resulted in modern offices being little or no more energy efficient than they were 60 years ago.

There are other reasons to suspect the supplied assessment. For example buildings with a high glazing content are intrinsically thermally inefficient, not to mention high maintenance (a major component of whole life costs). A problem further exacerbated in this case by the proposed building morphology and massing (low surface area to volume ratios).

The emphasis on BREEAM and IWBI WELL certification for the LWW buildings neatly sidesteps the need for more holistic resilience frameworks such as the ILFI Living Community Challenge or even the UN Sustainable Development Goals (flawed as they are).

Claims that arisings from the extensive demolitions required to realize LWW would somehow contribute to local or national circular economy goals, or that the degrading work involved in creating them would benefit the local labour market, are risible. Almost as absurd, is the proposition that the replacement of existing, established habitat with imported, high maintenance softscaping (which, by design, would result in increased levels of disturbance) would increase biodiversity.

Frequent references to the site as a major gateway (an already redundant label given the proximity of Alban Gate and 200 Aldersgate, neither of which fully comply with the definition) are at best misguided since the site is not within convenient walking distance of any major public transport interchange (the nearest with step-free access being Farringdon some 700 m away) nor does it lie on a well-defined pedestrian axis linking any of the City's major cultural destinations. Indeed, nothing short of full pedestrianization of St Martin's le Grand/Aldersgate South and remodelling of the adjacent developments to incorporate anchor retail units could achieve this.

Even the consultee feedback (residents comprising only 22% of consultees) to the somewhat underwhelming St Paul's Gyratory scheme confirms that most people simply want better footway provision (free from the growing intrusion of feral cycle and scooter hire litter), more public seating (ideally in public garden spaces), and less road traffic (particularly noisy, polluting and single occupant private vehicles).

To conclude, if implemented London Wall West would, at a single stroke, contribute to the unchecked spread of shabby, third rate commercial and retail space, erase yet more of the city's dwindling historic fabric, and shatter any pretensions that the Corporation might once have had to promote the area as a global centre for world-class arts. In entertaining this proposal, the Corporation has demonstrated a profound lack of foresight and imagination.

From:
To:
Subject: Planning objection - London Wall West
Date: 31 January 2024 19:04:26

THIS IS AN EXTERNAL EMAIL

I object to the planning proposal for London Wall West - application references 23/01304/FULEIA, 23/01277/LBC, 2301276/LBC 'London Wall West'.

The proposed development threatens residents' well-being by diminishing daylight and sunlight, causing solar glare, disrupting familiar routes, and construction expected to last a decade. Residents' access, air quality, and peace will be compromised.

The development contradicts the City's environmental goals, disregarding a "retrofit first" approach. It will release substantial embodied carbon, and doubts linger about the accuracy of current plan emission data and structural safety claims. Viable alternatives for refurbishment were sidelined, undermining environmental commitments.

The mass and scale of the proposed redevelopment, notably Bastion House and the Museum of London, should be a last resort. The impact extends beyond the current footprint, affecting nearby heritage sites. The development sets a perilous precedent for future projects, ignoring the site's historical importance and cultural potential and placing it incredibly inconsiderately close to residents' homes.

The proposed development sacrifices the Museum of London's gateway role. There is no adequate replacement consideration, jeopardizing the City's cultural aspirations.

You must consider office development as the last resort due to volatile demand, changing work patterns, and AI automation. The City already has excess office space, with shifting demands visible in failing retail outlets. Alternative uses through refurbishment should be seriously considered.

Hitesh Chhaya
103 Andrewes House
London
EC2Y 8AY

From:

To:

Subject:

Objection to Planning Applications 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC

Date:

31 January 2024 19:05:23

THIS IS AN EXTERNAL EMAIL

I write to object to all three applications, 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC, which make up the project known as "London Wall West".

This is a highly damaging proposal, which undermines the significant value of this important historic and strategic site and the City's own aspirations for carbon reduction and policies for retrofit first. The proposed development will cause substantial harm to heritage assets, our environment and the City's cultural potential.

Against City of London Sustainability SPD

Supplementary Planning Guidance, adopted by the City on 12 December 2023 seeks to 'set exemplary standards for sustainability' stating as a key principles: 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. But this is a scheme to demolish and rebuild, despite there being 'credible' options for retention and reuse as demonstrated by the City's own 'soft market test'. This alone should be grounds for refusing this planning application.

Unacceptable and unnecessary carbon impact

The carbon impact of this scheme is also not in line with stated City policy and admirable aspirations within the Climate Action Strategy which aims to be 'modelling good practice'. Over 56,000 tonnes of CO² will be produced by this proposal during demolition and construction - that would take somewhere between 1,736,00 and 2,576,000 trees to offset. This level of carbon is not acceptable and unnecessary given there are viable alternatives to this scheme.

Damage to Heritage Assets with overdevelopment

This scheme has no regard to the surroundings and the historic and local character of the area. It is not a proportionate scheme in response to the urban context but an attempt to maximise development. It is completely out of scale with and fails to 'have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality' particularly the Grade II Barbican Estate and Grade II* public realm of which this site is considered to be an integral part.. Its height, massing and design will cause severe harm to

significant heritage assets including St Botolph's and St Gile's churches and Postman's Park. It also pays no attention to the immediately adjoining Conservation Area.

Demolition of heritage assets

Bastion House and the Museum of London buildings are considered to be part of the south Barbican estate. They are noted as buildings of architectural merit and Bastion House currently sits on the C20th Society's At Risk list of the top 10 most threatened twentieth and twenty-first century buildings across the UK. If approved, this application is an act of architectural vandalism which would lose and damage heritage assets that can never be recovered.

Flimsy Cultural Plan proposals on a cultural site

This site was given over to cultural use for the first post-war museum to be built in London and the largest urban history museum in the world. With the move of the Museum of London to Smithfield, a Centre for Music was planned to occupy the site. The scheme proposed now is for massive office development with cultural add-ons to ameliorate an overdeveloped proposition. The Cultural Plan is aspirational at best in its recommendations but none of these have been tested or shaped. This flimsy set of propositions cannot compensate for the loss of a significant public and cultural offer. It also fails to recognise how this site could valuably contribute to the creative and cultural development and investment being undertaken in this quarter of the City.

This planning application should be rejected for the environmental and heritage damage it will inflict and for the loss of cultural development opportunity on this site. If approved, none of these things can be undone. I urge those making the decision within the City to reconsider this flawed and inappropriate application and reimagine what is possible and desirable for the City as custodians of our heritage, our environment and our future. If this site is lost to yet more offices, its value will not be returned to current and future generations.

Shelagh Wright
205 Seddon House
Barbican
London EC2Y 8BX

Comments for Planning Application 23/01304/FULEIA

Application Summary

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Case Officer: Gemma Delves

Customer Details

Name: Mr Yanqi Huang

Address: 279 Holloway Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Iconic historic structure worthy of protection

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Craig Aspey

Address: FLAT 5, LONDON HOUSE 172 ALDERSGATE STREET LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:As a resident of London House, I strongly object to these proposals.

With the ongoing building constructions on Aldersgate Street, and both sides of the St Martin's Le Grand road, we are currently surrounded by constant noise pollution and pavements being closed or narrowed significantly. This proposed demolition and new build would significantly add to this noise pollution, further block and narrow pavements, and make living in the Barbican area very unpleasant throughout years of construction work.

The scale of these proposed buildings will likely negatively impact on residential amenity for those living in the Aldersgate Street area due to loss of privacy, loss of daylight and sunlight, and overshadowing from the oversized buildings.

During demolition and construction, the proposed development is likely to release significant amounts of CO₂ which is very harmful to the nearby community and environment. Surely retaining and renovating the existing buildings would offer better protection of the local community, environment and remain in-line with the City's Climate Action Strategy and national policies.

The plans for this new construction shows two unsightly buildings which do not fit-in or complement the existing historical architecture, such as the grade-II listed Barbican Estate that the Barbican area is famous for.