

# 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: Jude Stuchfield

Address: 34 Pretoria Road Romford

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The tower is historic building that represents a slice of London gone by, which in the city of today is a rare thing to see given the amount of redevelopment and gentrification expanding out from the city centre.

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Case Officer: Gemma Delves

## Customer Details

Name: Mrs Denise Rawls

Address: 34 Ickburgh Road Clapton Hackney

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Knocking down this building will contribute to the fabric of London being destroyed. Our city needs growth and renewal and this should be done systematically, embracing the iconic and significant buildings which have shaped modern Britain and London.

We don't need more offices, or more coffee shops. We need to repurpose buildings into homes and cultural spaces to bring actual communities of and social economic groups into zone 1, not keep destroying what we have and through building further separate people. We're a historic city, that includes our post war buildings.

Be brave, embrace what the pandemic showed us, we are have a housing shortage and we need community.

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Case Officer: Gemma Delves

## Customer Details

Name: Ms silvia kolbowski

Address: 109 Seddon House, Barbican, London EC2Y 8BX

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: It is impossible to note anything that is worthy in this scheme. The site is developed as if living in a fantasy world where there is no dire climate crisis, the demand for office space is limitless, and as if no urban residential fabric is located nearby that would be severely impacted by diminished light, looming towers, and five years of health-threatening pollution during construction, and traffic congestion and circulation chaos.

The scheme is stylistically out of place, evinces a mind-boggling disregard for the design aspects of the orthogonal urban fabric around it, and specifically overwhelms the revered scale and design elements of the Barbican Estate. This Diller Scofidio + Renfro scheme is generic, designed to be plunked down anywhere. But it doesn't belong next to one of the most thoughtfully planned and successful mixed-use architectural complexes in the world.

The walk-through animation is deceiving; it dramatically overemphasizes the public spaces, and omits views that would give viewers a sense of what it would feel like to be near those massively

bulky towers on a crowded site. The public amenities themselves are gimmicky.

It is apparent that the City of London has been badly advised on how to re-purpose the site. Its residents, visitors, and all Londoners will suffer from the pollution generated by this scheme, and must be better served in terms of environment, design, and use.

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Case Officer: Gemma Delves

## Customer Details

Name: Mrs Grace Scanlan

Address: 18b Shepherdess walk London

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment:As an owner of two flats on aldersgate street I strongly oppose this planning.

The disruption to the local area in terms of noise, traffic and pollution will be unacceptable for the duration of the demolition and build.

I strongly urge you to reconsider - this building would significantly impact the lives of residents and passers by detrimentally for years.

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Peter Morton

Address: 28 South Road Oundle Peterborough

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This valuable building should not be demolished.

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Kevin Fellingham

Address: 17a Mansfield Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The Two form a fantastic pair , on a diagram of generic speculative rental space and on an intensely worked and specific cultural building,, by the same architects at the same time for the same clients- a moment in architectural culture describing the difference between on kind people f modernity and its opposite.

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Colin Griffiths

Address: 15 Riviera Gardens Leeds

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This prime example of modernist architecture is of historical and cultural value. It defines an era of modern architecture and should therefore be preserved and protected. We learn from the past to hopefully build a better future.

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Case Officer: Gemma Delves

## Customer Details

Name: Ms Elena Pascolo

Address: 35 Gresley Road LONDON

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The current proposal shows a distinctive lack of civic offer for a site of local, citywide and national significance.

In addition, the alternative proposals used to qualify that there is only one viable solution to developing the site requiring wholesale demolition, show a superficial understanding of the social and cultural value that can be achieved through an imaginative reassembly (including new infill) repair and reuse of the existing assemblage of buildings and associated spaces. There is always more than one viable alternative. It purely depends on what is defined by viability, returns on (social? as opposed to financial?) investment and the longer term legacy value to the city and nation as a whole .

The site and its existing assemblage of buildings and spaces, is a remarkable opportunity to show leadership and innovation in championing a shift in values and approaches to our built environment in an epoch of planetary crisis : a shift from showcasing London 's past cultural history to one which demonstrates how values of adaptive reuse, reassembly and repair can lead

to significant urban reinvention without complete demolition.

If the current proposals are passed, then it will signal yet another failure in civic imagination and duty , both by the landowners and local Councillors, to reimagine a future which is premised on new formulations of good growth and civic legacy.

London deserves better.

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Case Officer: Gemma Delves

## Customer Details

Name: Ms Jane Ellison

Address: 14 South Eastern Road Ramsgate

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The demolition of this building is unnecessary. Why not renovate and restore? The loss of C20 post-war design vernacular in the architecture of London is erasing an important part of our capital's history. The Barbican development nearby is also part of this vernacular, so why shouldn't 140-150 London Wall stay too as an equal example of design from the post-war period, forming an interesting 'Mid-Mod Quarter'?

I also object on the basis that demolition and re-build is not a sustainable decision.

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Case Officer: Gemma Delves

## Customer Details

Name: Dr Elizabeth Simpson

Address: 107 Seddon 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: Chris Hayward, in his summary at the City's Jan 30th 2024 'Asking questions' meeting equated the £40+M estimated cost of renovation of the Barbican Centre, (described both as 'the elephant in the room' and 'the jewel in the crown') with the need to optimise money from the sale of the LWW site with planning permission for a huge office development. This he claimed would increase footfall in the square mile and help businesses, particularly retail, to flourish.

Despite having 'tested the market' for alternative options for repurposing the modernist listed buildings, Bastion House and the Museum of London the CoL maintains that pulling them down rather than repurposing them would not be counter to the City's stated policy of minimising carbon footprint. They, together with the Barbican, are the City's 20th century heritage assets. Denial of the environment concerns is based on the false premise that only new-build schemes focused on making money can enhance the City's value.

Alternative options have been proposed, but not explored. They include attracting educational and research institutes to expand in the City, as Camden has done in their Kings Cross scheme, and taking advantage of how prestigious Institutions like Imperial College are expanding to White City and to the west beyond. Queen Mary University already has laboratories in Charterhouse and has further new developments east of the City. Each of these are associated with leading hospitals, and together have opened strong links with biotechnology and big Pharma companies.

Ill-considered aspects of the proposal also include destroying the function of the Thomas More carpark (serving residents of three Barbican terrace blocks, Seddon House, Thomas More House and Mountjoy House. The proposal involves adding lorries to the narrow already overused car parking ramp access from Aldersgate Street needed for the destruction of the Museum of London and Bastion House.

The City proposes to submit for planning permission the plans objected to by hundreds of people with long term interests in the City: a large number of Barbican residents and several small and medium sized businesses, their owners also being residents (unlike office developers). Ignoring the evidence-based comments of rate-paying residents in favour of those paying business taxes risks creating serious grievances which are likely to bring the City into disrepute.

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Case Officer: Gemma Delves

## Customer Details

Name: Dr Peter Rowe

Address: 131 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 proposed building is disproportionate for the neighbourhood. It will destroy local heritage.

I am not convinced that more office space is needed when there is more home working than prior to the pandemic.

It will not help reduce our greenhouse gas emissions.

People from the building will be able to look into my home, affecting the privacy of my family and me. Its height and closeness will block out light from my home. I fear the construction will create much noise for many years.

The proposed use of the car park ramp for Thomas More House will adversely affect access, both for me and for deliveries, for many years.

**From:** Sean Bashforth

**Sent:** Wednesday, January 31, 2024 9:39 PM

**To:** Delves, Gemma      Horkan, David

<

**Subject:** LONDON WALL WEST PLANNING AND LISTED BUILDING APPLICATIONS (LPA REFS. 23/01304/FULEIA & 23/01277/LBC: RESIDENT OBJECTION

THIS IS AN EXTERNAL EMAIL

**Dear Sir/Madam**

I refer to the above planning application, submitted on behalf of the City of London Corporation.

I am a resident of Mountjoy House which overlooks, and will be directly impacted by, the construction and operation of this project. I am also a chartered town planner with over 27 years experience of promoting major regeneration proposals in London and a Board Member of one of the largest independent planning consultancies in London.

Whilst I am not personally opposed to the principle of redevelopment, I object to several aspects of this poorly conceived scheme. I commented on the applicant's pre-application consultation and also contacted City Planning Officers (Gemma Delves and David Horkan) to express concern about what could be proposed and the lack of meaningful consultation. It is therefore very disappointing to see that the application, as now submitted, has failed to address concerns. As I explain below, that application should be withdrawn and redesigned in a way that takes into account the policy conflicts and properly reflects the views of Barbican residents and others.

### **Conflicting Interests**

The City Corporation's multiple role as the promoter of the development, the planning authority (decision maker) and freeholder/managing agent of the Barbican Estate means that it has a great responsibility to demonstrate objectivity and best practice. Sadly, this is not the case. The application appears to have followed a standard template which the Applicant's team has used elsewhere and has not taken into account the unique nature of the site, including its various listed buildings/conservation areas and the immediate proximity of residents and the City of London School for Girls.

### **Procedural Errors**

The red-line for both applications directly overlaps Mountjoy House, including the south western corner of the building itself and the ancillary areas beneath. It will directly have an impact on the areas to which leaseholders own or have rights over within the terms of their lease. As well as connecting to the podium walkway, major changes are proposed to the resident car parking area which also provides the only resident access to adjacent open space.

I note:

1. None of the residents were formally served notices on as required by the DMPO (as confirmed by the Applicant's application form). If an error has been made, the only course of action is withdraw the application and address it through full resubmission/ reconsultation.

2. Aside from high level engagement in 2021, I and other residents have not been made aware from the City (in its role as freeholder/managing agent) of specific changes including providing the servicing for two major office buildings in areas which residents and visitors use regularly for car parking and for access to neighbouring open spaces. Aside from the basic lack of courtesy, such changes are likely to directly affect the day to day enjoyment of residents and indeed may require changes to residents' leases.

### **Amenity (particularly noise)**

Table 4.1 of the Environmental Statement (ES) indicates construction commencing in January 2028 and completing in November 2033. Piling is estimated to take nearly 69 weeks (nearly a year and a half), completing in July 2029. Mountjoy House directly adjoins the Site along with Thomas More House and the City of London School for Girls (particularly the playground/sports pitches). In ES terms the site is therefore surrounded by sensitive receptors, whose day to day activities will be directly affected by the construction process during the daytime in particular, including school lessons, sports activities and the residents (including myself) working from home.

Within Chapter 7 of the ES, Mountjoy House (reference R03), like nearly all of its neighbours, is described as having a high sensitivity (Table 7-8) and existing daytime background noise of up to 52db (Table 7-12). During the construction period this is predicted to increase to up to 82db and exceed the SOEAL. In my experience, these levels of noise are extremely high when judged against the absolute noise levels and the relative change (up to 30db on a logarithmic scale) and the description in 7.5.7 of the ES which describes them as '*relatively high level, worst case set of predictions*' is plainly misleading.

In my experience, such a level of noise which will be experienced for circa 5 years, will mean that my flat that that of my neighbours will be uninhabitable during the daytime. I note that:

1. The specific characteristics of the flats in Mountjoy House make it particularly susceptible to additional noise (they are single aspect, single glazed and have with floor to ceiling high windows). Given the listed status of the Barbican complex, enhanced noise insulation is not a realistic option.
2. There would be no opportunity to open windows for ventilation during summer months due to noise and inevitably dust from construction. None of the flats have air conditioning nor mechanical ventilation.
3. Such noise levels are likely to severely disrupt the use of the sports and play areas of the School which are also used by the Barbican tennis club outside of school hours.
4. There is a significant risk that the levels of noise could exceed the Unacceptable Adverse Effect Level (UEAEL)– which national policy in the Noise Policy Statement for England (NPSE) and the Noise PPG state should be avoided to prevent significant medically definable harm. This level of noise can not be brushed to one side as being capable of being dealt with through a code of construction practice or through environmental health noise nuisance measures.
5. Such levels of noise are clearly contrary to DM15.7 of the City of London

## Local Plan and D14 of the London Plan.

Also of significant concern is the potential for noise from the completed development, with no information being provided about the use and potential restrictions on the cultural uses and amenity areas. Given the proximity and characteristics of the flats described above, there is a significant risk of unacceptable impacts on noise particularly during the evening and nighttime period where policy and guidance make it clear that noise can have a particularly detrimental effect on health and well-being.

### **Design**

Policy D4 of the London Plan makes it mandatory for proposals to undergo a thorough independent design review process. This is particularly important to these proposals, where the City are both the Applicant and Planning Authority. However, there is no evidence of such a process being undertaken in the submitted material. The Design and Access Statement simply makes limited comment on refinements to the facades of the two tallest buildings in response to feedback.

To meet policy requirements, it needs to be shown how independent expert advice has truly influenced the design. This is particularly important given the inclusion and proximity of heritage assets and the bulky nature of the new large round office buildings. Based on my experience, I would be very surprised if the layout, form and massing of the two largest buildings meet the 'exceptional design test' for buildings in planning policy.

### **Servicing**

The proposals will fundamentally change the character and function of the car parking area beneath Thomas More House and Mountjoy House. Over the last 12 months, a portakabin and various outbuildings have been located next to the rear of Bastion House without planning nor listed building consent, adding clutter and inhibiting resident access to the adjacent open space.

This will be worsened significantly with these proposals with the main servicing point for 'Bastion Yard' encroaching into the service area and removing visitor car parking spaces.

### **Hidden Agenda?**

In my experience it is common practice to 'bank permissions' with a view to sell on a site for others to bring forward future proposals. I expressed concerns about this approach at the pre-application stage given that a public authority is promoting the scheme rather than an experienced developer. In this instance, I note that the designs of two main office buildings appear to have commercially unattractive irregular floorplates and elaborate (expensive) facades.

As already noted, the ES indicates that construction is due to begin in 2028, some 4 years away. However, it is unclear why there is such a delay. Standard time limit conditions require development to commence within 3 years from the grant of consent and there is a good reason for such conditions (to prevent uncertainty).

Of particular concern would be early demolition of the existing buildings and then allowing the site to remain vacant until construction commences. This would create an unacceptable blight for residents and neighbours and also inhibit the already limited north south permeability in this part of the Barbican.

### **Lack of detail/limited analysis**

Despite the number of documents submitted there is often a lack of detail and incomplete analysis, which makes it impossible for consultees to reach a reasoned judgement on the proposals. For instance, the ES states that there is an increase in open space provision, but no analysis (comparable amounts and diagrams) to support such an assertion.

The Planning Statement also states that the emerging local plan should not be given any weight yet, then seeks to draw support from it in the justification for the proposals.

## **Conclusion**

For the reasons explained, I strongly object to the scheme. Poor design and other concerns (particularly unacceptable noise impacts during construction) are symptomatic of a flawed process which has not been informed by proper engagement and a proper understanding of the site constraints. Proper analysis and informed sensitive design could have led to a different approach which could have, for instance, re-used existing buildings (with additional climate change benefits).

Given the multiple roles that the City of London Corporation has on the project (Applicant, Decision Maker and Freeholder), there was a real opportunity for the process and scheme to be class leading. Instead, its hard not to come to the conclusion that this is not the case.

I trust that you will keep me informed of the progress of the application.

Yours sincerely

**Sean Bashforth** BA, MA, MRTPI

404 Mountjoy House, Barbican, EC2Y8BP

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Case Officer: Gemma Delves

## Customer Details

Name: Dr Gail E Evans

Address: 172 Aldersgate Street 43 London House London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: This 'out-of-scale' development will dominate the surrounding neighbourhood spoiling the area's cultural heritage by diminishing its ancient Roman remains and the Jewish cemetery. Additionally, the development will cause substantial harm to the setting of neighbouring listed and unlisted assets including the Barbican, St Giles Cripplegate, Ironmongers' Hall and Postman's Park. Grade II listed Barbican Estate and the City of London School for Girls will see their architectural integrity compromised. Finally, the development will have a negative impact on the lives of those who live and work in the area, including pollution (during demolition), noise and loss of sunlight.

# Comments for Planning Application 23/01304/FULEIA

## Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

## Customer Details

Name: Ms CATHERINE SLESSOR

Address: Flat 3 3-4 Doughty Street London

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Bastion House and the Museum of London are two distinguished works by architects Powell & Moya. Each is of its time and contributes to the urban scene and character of the City in different ways. Their proposed replacements are generic and wholly undistinguished. Moreover, demolishing both buildings will be extraordinarily wasteful in energetic terms. It seems reasonable to ask if the City really needs yet more generic office blocks and why imaginative new uses could not be found for both buildings. Therefore, I object to the proposals.

Catherine Slessor, President, 20th Century Society

# Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

## Customer Details

Name: Jonathan Mackenzie

Address: 5 Howes Place Cambridge

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is a fine building with a significant history. It should be repurposed and not demolished, both to retain that history and on environmental grounds of unnecessary increased CO2 emissions.

# Comments for Planning Application 23/01304/FULEIA

## Application Summary

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Case Officer: Gemma Delves

## Customer Details

Name: Mr Rupert Cook

Address: 10-12 Emerald Street London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: In the context of the climate emergency the demolition and new build is unnecessary resource use and loss of embodied carbon.

In design terms the building is out of place and context, with too much glass inappropriate for a 21st century building.

# Comments for Planning Application 23/01304/FULEIA

## Application Summary

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Case Officer: Gemma Delves

## Customer Details

Name: Marina Snee

Address: 42 Lindley Street York

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I'm in disbelief that this is a genuine intent to demolish such building of high importance. We should be taking pride in valuing great design not allowing anyone with a bit of power and money blind to the beauty and heritage take a greedy action. Shame.

**From:**

**To:**

**Subject:**

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

**Date:**

31 January 2024 21:08:28

THIS IS AN EXTERNAL EMAIL

I object.

Many of the objections submitted to date have rightly focussed on the critical issues of substantial environmental and heritage harm; challenges to the need at this time in history for the construction of new offices and of new offices in such an historic and strategic location as London Wall West; the major inadequacies of the City's consultation programme throughout; questions about process and governance not least with the City having spent £11.5 million pounds to date to get London Wall West to this stage only to sell the site onto a developer who would have no intention of proceeding with the current scheme that has cost this sum; and the City as the developer of this scheme then passing it to its own planning department and committee for determination: in other words the City 'marking its own homework'; and finally the multiple ways in which the proposed development wilfully contravenes so many of the City's own policies - most notably its laudable Net Zero commitments and its recent and very welcome retrofit first planning guidance - consequently bringing the City's international reputation into question. All of these are very serious objections and I'm in 100% agreement with them so I do not feel that I need to add any further but rather outline below some other issues in opposition to the deeply flawed, incoherent and damaging London Wall West proposal.

## **1 Where did the City's vision go?**

We could not live and work in a more fascinating, complex, mysterious, compelling and energetic city that has shifted and morphed for over more than a millennia. It has gone through many major crises - plagues, the Great Fire, the Second World War and most recently COVIS-19, the worst pandemic in more than a century - and each time it recovers and reinvents itself with courage, determination and optimism.

In the case of the dark years after the devastation of the Second World War the City showed the most extraordinary vision, imagination and boldness in the creation of the Barbican and Golden Lane Estates and its environs including the Museum of

London and Bastion House, the latter being acknowledged from the outset as being a core part of the overall forward-thinking development. Together they represent one of the greatest treasures of the City of London and now attract diverse and enthusiastic visitors from across London and the UK and from across the world.

With its plan to incorporate not just housing but also public space, education, arts and culture, sports facilities, retail and hospitality the City pursued what is now acknowledged as a utopian vision, unmatched at the time or since. Indeed the government's Independent Panel on UNESCO World Heritage Status has said: "*As a masterpiece of brutalist architecture and town planning reflecting the standards of its time the Barbican is one of the best examples of municipal urbanism in the brutalist style in the world that has maintained its authenticity and integrity despite periods of adaptation and change*"

Or at least it maintained its authenticity and integrity until now. Today the City's plans for London Wall West abandon its extraordinary, globally-celebrated and utopian vision of the past as it seeks permission to vandalise if not destroy the very treasure that it created. It is for this reason that this reckless planning application should be rejected, not least to protect the reputation of the City on the world stage.

The City can and should do better with all the incredible resources it has at its finger tips. It can and should show the same vision as it has in the past, if not exceed it, and swiftly reject the London Wall West plans.

## **2 The privatisation of public space at London Wall West**

At a time when cities across Europe and across the world are significantly increasing public, civic and green amenity space for all to share, the City of London regrettably appears to be moving in exactly the opposite direction with its London Wall West development proposals. Paris has audacious plans to pedestrianise most of the Champs Elysees, arguably already one of the most beautiful boulevards in the world, alongside other visionary city centre public realm investments in the run up to the Olympics and Paralympics. Many other of the City of London's global competitor cities are similarly investing in bold schemes that prioritise citizens

and humanised public facilities and infrastructure in the recognition that, in the post-pandemic world, greater amenity has to be provided for people of all kinds to boost their health and wellbeing, their productivity and their sense of belonging as well as recognising the need to respond, with unprecedented urgency, to the climate emergency including through the ingenious retrofitting of buildings and structures rather than demolition, in the case of New York including the conversion of thousand of offices into homes on Manhattan. Not so in the Square Mile where newly-constructed ever taller, carbon-hungry office towers are resulting in a miserable and degraded everyday experience down at pavement level for workers, businesses, visitors, tourists and residents alike.

The LWW site is currently free-to-use, open public space with the highwalks an important pedestrian route for people from North to South and East to West and thus represents a vital public amenity. The new proposal significantly changes this. Most people would use the street rather than pass through the meandering site should the development go ahead. And whilst the land would continue to be owned by the City it would be managed, on an every day basis, by the occupier of the property who would have the right to expel anyone that they choose to. This has been the case in many other privately-managed 'public' spaces in London, such as Paternoster Square and Granary Square and its environs at Kings Cross, where over-zealous security guards regularly chase off people that they deem to be undesirable, particular younger people. Should planning permission be granted and the site sold on to a developer, that developer is unlikely to proceed with the current scheme and in time come forward with an alternative office-based proposal but the same arrangement would be in place: the occupier's management and securitisation of the formerly public, civic realm.

In addition the planning application makes clear that at times the 'public' space at LWW would be closed to accommodate private events, though how often is not specified. As with so many aspects of the planning application there is vague detail or contradictory detail. Nevertheless the conclusion has to be that the London Wall West proposal is a clear case of the privatisation of the public realm and amenity, amenity that is needed now more than ever for post-pandemic flourishing. It is therefore a indisputable case of irreversible public harm that will be regretted for generations to come. A shameful legacy from those in the Corporation of London

now making critical decisions about the future of this amazing city.

### **3 Culture washing**

The Culture Plan is not a culture plan. Disappointingly it is rather a lazy, vague and unimaginative declaration of intent missing all the elements that are vital for an effective C21st culture plan: a crystal clear vision; the establishment of need; the comprehensive description of data and evidence gathered and the conclusions from this; detailed capital and revenue models and a persuasive business case; a thorough risk assessment; a compelling strategy for delivery and for monitoring and evaluation; convincing proposals for the management and curation of the cultural facilities and services proposed, other than the hazy suggestion that they be managed by, the currently under review, Destination City; and, vitally in this particular case, comprehensive details of the types of people, organisations and institutions who were proactively approached, during the creation of the plan, to explore potential partnerships and direct involvement in the London Wall West development. With this critical information missing the plan is nothing more than a statement of loose aspirations and timeworn cliches that could be applied almost anywhere in London and beyond. The City and its workers, businesses, visitors, tourists and residents deserve better than this.

And deserve better than this because of the thrilling creative regeneration that will take place in the London Wall West area in the decade to come with over £1 billion to be invested in major arts, cultural, creative economy and public realm developments including the Barbican Centre, the new London Museum and the market buildings at Smithfield East that will put the neighbourhood even more firmly on the international map. Yet whilst referencing these developments the plan makes little suggestion of how London Wall West would be coordinated with them to enhance the cultural offer, build a neighbourhood-wide cultural and creative campus and avoid wasteful duplication. In this plan London Wall West stands alone. As with so much else in the City nothing joins up but is rather in isolation.

But then in the end London Wall West is not a cultural development, unlike the Centre for Music that preceded it, but rather an office development with a hint of cultural provision tacked on: cultural provision being only a small part of the development.

With such a weak plan loaded with unsubstantiated aspirations it will be left to any future developer to interpret as they wish. It is very likely therefore that the generic arts, culture and creative propositions for London Wall West will be value engineered downwards or disappear completely, as has been the case with so many developments in the City in the past. This therefore has all the appearance of being yet another case of knowing culture washing as part of a planning process.

#### **4 Learning and Skills Development?**

As with the Culture Plan this report is a thin and unconvincing contribution to the case for the London Wall West development, leading to the conclusion that it is nothing more than virtue signalling. Again there is no convincing plan but rather a wishlist of desirable outcomes without proper evidence to back it up. The City has a commendable track record in supporting learning and skills development, as do the Livery Companies who are comprehensively referenced in this report. But the proposals here, as currently described, promise much but would deliver little, not least given the limited space provided and the demand suggested for a commercial return on the use of space that would inhibit the opportunities for reaching those most in need of the spaces for learning purposes. The priority as outlined is on young people which is admirable and necessary but there is little regard to post-school and university students, to other age groups, to intergenerational learning, to the substantial needs of City workers, businesses and SMEs. Nor to how learning programmes on the London Wall West privatised site would be delivered. And astonishingly , as with the Culture Plan, little regard to the world-class education and learning programmes of the major cultural institutions adjacent to the site. But then it is likely that the learning dimension of the development would likely be value engineered downwards or disappear altogether, just as the cultural dimension would be.

#### **5 Conclusion**

Given all of the above I hope that members and officers in the Corporation of London will see sense, realise that it is capable of much better than what it currently proposes, reconnect with its astonishing vision and imagination of the past, think not just of current but also of future generations in the context of the climate emergency and consequently abandon its toxic and delusional

London Wall West proposal. Failure to do so will result in the City's primary strategy of Destination City being rebranded locally and beyond as Desperation City or Demolition City. And the City of London's precious reputation severely damaged.

Peter Jenkinson  
205 Seddon House  
Barbican  
London  
EC2Y 8BX

# Comments for Planning Application 23/01304/FULEIA

## Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

## Customer Details

Name: Ms Sara Marley

Address: 266 Ben Jonson House Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment: I object to this project on climate emergency grounds. It's not in keeping with UK carbon zero aims nor stated intention to reuse and retrofit existing buildings.

Neighbouring residential flats will suffer loss of daylight and sunlight. The mass and scale is out of keeping with the Grade II\* listed Barbican. The existing, and elegant Bastian House is a cherished part of the Barbican cityscape.

Members of the public and residents will lose useful, safe and clean air highwalk links to Barts and St Paul's.

# Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

## Customer Details

Name: Miss Maja Jadachowska

Address: 105 Hallam Street London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: These buildings are a part of London's late 20th century aesthetic history, and should be treated with the due respect as such. I encourage diversity in London's landscape through both innovation and conservation, rather than demolition. These changes would significantly damage the cohesion of the Barbican area, long connected to these modernist architectural styles, and reinforce a damaging precedent for the removal of such significant sites of the last century. Please don't let this be a loss to posterity for the sake of fashions.

# 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: Mrs Silvia Crawford

Address: 73 Lauderdale Tower Barbican London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: I object to the demolition of Ferroners House and associated structures. This 'destroy and rebuild even higher' policy is completely out of touch with environmental and carbon footprint reduction policies. Social and infrastructure impacts affecting the City of London School for Girls, Raising Dragons Kindergarden as well as local residents and users of Thomas More carpark have not been given consideration. I'm also concerned about potential damage to the historic site of the Roman Wall which is extremely close as is Ironmongers' Hall.

The scale of proposed buildings is completely out of proportion to the rest of the area. I cannot understand why little consideration has been given to sustainable refurbishment, improvement and reuse of the existing structures. It appears that financial gain and prestige are given priority over local community/residents (who pay council tax). This is inappropriate and excessive use of resources, energy and funds. The amount of CO2 emissions and damage to a historical site cannot be underestimated and is in complete contrast to climate action policy.