

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 Michael Priaulx

Address: 56 Myddleton Avenue London

Comment Details

Commenter Type: Other

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Other

Comment: If this development goes ahead please include integral swift bricks, a universal nest brick for small bird species, in accordance with the draft City of London Plan. Please specify them following best-practice guidance such as BS 42021 or CIEEM. Comment on behalf of Islington Swifts Group, an urban wildlife conservation organisation.

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Case Officer: Gemma Delves

Customer Details

Name: John Vercoutre

Address: 201 mounjoy house Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I object to the demolition of bastion house and surrounding Barbican building because they are extrasmly well build and the dust and noise pollution would affect me severely as my bedroom is approx 100 feet from bastion house and being asthmatic my health would take a sharp decline and force me to have to move which I would exspect compensation for as this building is more than capable of restoring ?

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: Kunal Kishore

Address: 603 Mountjoy House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: It is unclear how this proposal enhances the lives of the current and future residents of Barbican and its vicinity. We will be personally affected by the proximity of the construction with prolonged exposure pollution, dust, noise that is unlikely to be consistent with the city's standards and environmental aspirations. The proposed traffic flow for LWW directly interferes with the pedestrian access to the complex and impacts safety.

Furthermore, disregarding the enormous carbon impact of destruction and reconstruction and not considering the possibility of renovating and repurposing existing buildings is an embarrassingly unenlightened posture.

The proposed development sits in visual proximity to at least two architectural landmarks, St Paul's and the Barbican. The proposal to implant office buildings of mediocre design is most unbecoming in this historically significant neighbourhood. Have we considered if this is really what is needed in the city given the current office occupancy rates and the state of commercial real estate? Have we stopped thinking of building things that endear and endure?

Please reconsider this uninspired plan and take into consideration the needs and concerns of the

residents. A more detailed report from my fellow resident at the Barbican can be found here:
<https://acrobat.adobe.com/id/urn:aaid:sc:EU:a44cfdc9-9e2d-4ea1-80a0-51cbc5f92a5a>.

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Caroline Winter

Address: First floor flat 36 great Eastern Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: To protect beautiful buildings that highlight our architectural heritage.

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Case Officer: Gemma Delves

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Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

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is needed in the city given the current office occupancy rates and the state of commercial real estate? Have we stopped thinking of building things that endear and endure?

Please reconsider this uninspired plan and take into consideration the needs of concerns of the residents. A more detailed report from my fellow resident at the Barbican can be found here: <https://acrobat.adobe.com/id/urn:aaid:sc:EU:a44cfdc9-9e2d-4ea1-80a0-51cbc5f92a5a>.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Dermot O'Brien

Address: 35 Peabody Court, Roscoe St. London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The scheme proposed would completely be out of character with the area. It does not seem to be sympathetic or appropriate to the existing architecture in or around the Barbican.

I strongly feel that the former MOL site and other buildings proposed for demolition could be repurposed and used for many other possible functions while retaining the architectural character of the Barbican. It seems very shortsighted of the city of London to not utilize and find other uses for these buildings.

From:
To:
Subject: Objection to planning
Date: 31 January 2024 23:54:53

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

With regard to the proposed plans for London Wall West I would like to make the following objections.

1. I have not seen any substantial details about sustainability and the health of City workers and residents.
2. With regard to Heritage, I would like you to clarify how the site and buildings were acquired and what constraints there are removing the buildings from being used for culture and entertainment, especially at the moment when the City of London is pushing Destination City.
3. I believe the mass and scale are prohibitive and will have a detrimental effect on the Girls' School as well as the workers and residents, who are essential in importance to the existence of the City of London.
4. You suggested at this week's City of London meeting that there is at least 7% of A and B office space unoccupied at present. Research has shown that people will continue to work from home for the foreseeable future and that this has not affected their output.
5. I believe the Highwalk is integral to the Barbican and its surroundings and absolutely must be preserved, to keep the original plans in place.
6. I also object to the demolition of the roundabout as this is an important transport route.

I therefore object to the proposed plans.

Yours faithfully,
Alison Parry
144 Defoe House
Barbican Resident

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Case Officer: Gemma Delves

Customer Details

Name: Mr Norman Rea

Address: 107 Defoe House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:

The reasons for objection are

1 The size and scale of the development is out of proportion to the existing and represents over development

2 The size and scale is not in keeping with the adjoining buildings in terms of the listed nature of the buildings of the barbican center

3 The proposed use of the buildings as offices reduces the amenity value of the site which should be for amenity of those living in the location - It should be for culture and learning and recreational in line with the existing use

4 The demolition of the existing buildings has an adverse impact on the environment and releases carbon which runs contrary to current public policy

5 The loss of the existing heritage buildings

6 The scale will result in overlooking and adverse reflection of light onto surrounding neighbouring properties

Yours faithfully

N Rea

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Case Officer: Gemma Delves

Customer Details

Name: Ms Lisa Hughes

Address: 8 Lambie Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I don't believe 140 and 150 London Wall should be demolished. They have architectural interest and from an environmental point of view it would be far better to retain and repurpose them. We can't keep knocking down buildings just because we feel like it. Future generations will not thank us for this on more than one count. Please reject this planning application. Thank you very much.

THE IRONMONGERS' COMPANY

T: 020 7776 2304
E: clerk@ironmongers.org
www.ironmongers.org

IRONMONGERS' HALL,
1 SHAFTESBURY PLACE,
LONDON, EC2Y 8AA
ENTRANCE IN ALDERSGATE STREET

Planning and Development Director
City of London Corporation
Department of Planning & Transportation
PO Box 270
Guildhall
London EC2P 3EJ

FAO of Gemma Delves, Case Officer

30 January 2024

Dear Sirs

Application Ref No: 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.

Application Ref No: 23/01276/LBC

Demolition of Ferroners' House alongside external alterations to the facade and roof level of Ironmongers' Hall, internal reconfiguring to cores and back of house areas and associated works in association with the development proposed at London Wall West (140 London Wall, 150 London Wall, Shaftesbury Place, and London Wall Car Park, London, EC2Y). | Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA

- 1. Introduction** – This letter is written on behalf of the Worshipful Company of Ironmongers London, the Ironmongers' Charity and Ferroners plc (together "Ironmongers" or "the Company") which, taken together, are the legal owners of and related entities interested in Ironmongers' Hall and Ferroners House in Shaftesbury Place, London EC2Y 8AA, who write on behalf of themselves and associated Ironmongers charitable and other entities.

As you will be well aware, the Hall and Ferroners' House are almost entirely enclosed and surrounded by the existing – now closed – Museum of London, both lying to the west of and close to the existing Bastion House.

The recently registered planning and listed building applications referenced above are therefore of course a matter of the greatest interest and concern to Ironmongers, given that were it to be consented and built, very substantial impacts would be experienced by the owners and occupiers of both the Hall and Ferroners House, during and following what is identified in the application as a construction period of sixty-eight months, from January 2028 to August 2033, encompassing overlapping demolition, piling (including enabling works), basement box construction, super-structure and finishes, and external works and landscaping. On any view, this is a very significant development proposal which would clearly cause huge disruption to the ongoing beneficial use and occupation and servicing of the Hall.

2. **The Ironmongers' Company** – The Worshipful Company of Ironmongers, having existed since the 1300s, received its Royal Charter from Edward IV in 1463, is tenth in order of precedence according to the ranking established in 1515 for the 48 City of London Livery Companies then in existence. Following the occurrence of an air raid in 1917, in which the Hall, then located in Fenchurch Street, was badly damaged, the Company relocated to its current site almost 100 years ago, the Hall having been dedicated by the Bishop of London on 17 June 1925.

The Company places great value in its very long-standing relationship with the City of London, and with the City Corporation – which we hope can be maintained long into the future.

3. **High-level summary of the Company's position with respect to the application** – The Company takes its responsibilities as a City occupier and neighbour with the utmost seriousness. We entirely recognise – and are fully supportive of the fact that – the fabric of a dense urban environment such as at the west end of London Wall will (and must) evolve, change, and adapt over time, both to anticipate and respond to changing circumstances.

The Company does, though, bring objectivity to its task. We would not wish to obstruct a proposal which clearly met, indeed surpassed, with ease, our requirements and expectations of a carefully designed new neighbouring group of buildings.

To this end, we have both commissioned detailed advice from experienced consultants, and made our own careful assessment of the likely impacts which this proposal, if consented and built, would have on the continued operation of our Hall.

The Company at the highest level of abstraction, subject to what is said below, fully supports the redevelopment of the application site, entirely recognising that the now functionally obsolescent Museum of London is in need of wholesale replacement. We are, though, frankly unpersuaded as to the position on Bastion House at the present time.

Both the City Surveyor and we fully appreciate, of course, that any scheme such as proposed here could not proceed unless the Corporation acquires the freehold of Ferroners' House.

The Company does have some fundamental questions over the City Surveyor's approach to the in-depth consideration of genuine alternatives to the scheme as currently proposed, that would have, in the longer term – post completion – less adverse impact on Ironmongers' Hall. We have reservations over whether the current proposal should be considered to be the last word on the build-out of this highly complex site.

Last, but by no means least, the Company will not take a step back from its determined insistence upon a high level of contractual protection with respect to legally enforceable Asset Protection and Neighbourly Matters Agreements that would need to be secured before any works were to commence.

4. **Ironmongers' Hall** – The Hall was listed at Grade II by the Secretary of State on the advice of Historic England on 20 April 2023 under [Ref No 1485812](#). As will be seen, the listing excludes Ferroners' House. The Hall as a City Livery Hall is of course a paradigm example of a highly sensitive receptor in planning terms.

The history of the redevelopment of the land at the western end of London Wall on the east side of Aldersgate Street is of relevance and interest in the context of the emerging development of what became the site of the Museum of London and Bastion House. The City Corporation in the post-war years designated large areas of land which had sustained extensive wartime damage from aerial bombardment into Redevelopment Units; and one such Unit was designated as involving essentially the entirety of the land on which the Museum of London was built, and on which Ironmongers' Hall then stood and continues to stand. The City Corporation's objective of securing a Compulsory Purchase Order for the whole of the Redevelopment Unit was thwarted by the unequivocal recommendation of the CPO Inspector, endorsed by the Secretary of State, to exclude the site of Ironmongers' Hall and its immediate environment in Shaftesbury Place from the CPO.

This could be said to have guaranteed that it would be and would remain inevitable that Ironmongers' Hall should necessarily co-exist for the semi-indefinite future alongside the contiguous land owned by the Corporation of London in a good-neighbourly fashion and configuration, not only for the 1960s recovery from extensive war damage, but for subsequent generations of redevelopment, as is now apparent.

Whatever may be the view as to whether the City Corporation achieved this objective in the design and construction of its surrounding Museum of London in the years following confirmation of the CPO, the intended demolition of the Museum (and Bastion House) and their replacement with next-generation development to create a new townscape environment that would continue to co-exist as a good neighbour of Ironmongers' Hall presents a vital opportunity to remedy past wrongs, and to reset such important matters for the next generation of buildings and the badly-needed improvements to the public realm around the buildings.

5. **Ferroners' House** – The office extension known as Ferroners' House was developed on the Company's estate in 1975 – 1977 physically attached to the Hall; it is not considered to be a building of any notable architectural merit (and does not form part of the listing). It is, however, an important asset for the Company, generating significant revenue from

sub-lettings, both arms' length commercial tenants, and other established City entities, the Shipwrights Livery Company, included.

6. **General observations on the application** – Attention is drawn to a stark contradiction in the approach to the application. It is described in the Planning Statement as a “unique” opportunity to reform this part of London Wall. Yet as all involved are well aware, the most careful consideration was being given until 2021 to the proposal to build the Centre for Music on the very site which forms the current application. It is self-evident from this that the site is capable of accommodating entirely different forms of development, as well as completely different uses.

The key issue is whether the current application, if consented in its submitted form, would bring about an exemplary new urban environment, featuring design of the highest quality, which would command strong support, a commendable and sympathetic neighbour to adjoining buildings and uses, in line with national and city planning policy requirements. Quoting from para 131 of the recently published NPPF (December 2023):

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

It would be reasonable for the Company and indeed other close neighbours of the site to look for firm commitments from the City Corporation that any scheme considered by the Planning & Transportation Committee represented the final form of any development that might come about. Regrettably, however, history teaches that a resolution to grant planning permission for a complex development is seldom the last word – and a developer introduced into the equation treats the committed envelope as no more than a starting-point for a scheme which then undergoes unremitting value-engineering and compromises (including enlargement) in its detailed design. It would be of assistance to the Company to be informed of whether that is a state of affairs for which we should be prepared in this case.

The enormous scale, bulk and massing of the development envelope proposed would sit very uneasily alongside Ironmongers' Hall and would clearly have very significant adverse impacts due to its height and proximity – including on the degradation of the light received by the Hall. The proposed Rotunda Building, of considerable bulk and size on its own, is seen from the application materials to cast significant shadow across the Hall, which would undoubtedly be highly detrimental. The design overall pays scant regard to the Hall as a sensitive receptor listed neighbour, and would for generations be seen as a poor piece of townscape. An objective assessment may question whether the City Corporation has a degree of conflict of interest in setting on this scale of development as appropriate for this site.

7. **Some specific areas of note** – Having reviewed the detail of the submitted material, attention is drawn to the following issues:

- a) **The Client Brief from the outset** – It is unfortunately (and highly regrettably) necessary to read between the lines of the prolix application material in order to try to ascertain the originating brief from the City Surveyor when, after the Centre for Music project had been initially and then finally abandoned. It would be of benefit to the Company's greater understanding of the overall approach to this proposal for us to understand when, how, and why, the fundamentally different CfM design morphed into the current scheme, now applied for, under the control of the same lead architect. Two uniquely high-quality designs for exactly the same site, less than three years apart, to an onlooker – and certainly to a neighbour surrounded by the application site - perhaps invite a justifiable insistence on challenging the thinking underlying the approach to the design. Exactly how much attention was paid, by critical-friend challenge, to the rather rapid evolution to move on from the CfM proposal, to where the Corporation now stands? Please could we see the social and economic drivers that were influential in the emergence of the brief.

The viability of the proposal – The application material is notably silent on the viability of the proposal and from our review of the materials no viability statement has been provided. The Company makes the assumption that the justification for the scale of the proposal is founded at least in part – perhaps rather significantly – on the asserted need for new buildings of very considerable scale and assumed value in a 2033 commercial market at (indicative) completion, and far beyond. The Company is being asked to pay a huge price for this development to proceed. As a very longstanding City institution, the Company has always eschewed speculation as a basis on which to maintain a sure footing for the future. It is fervently hoped that the City Surveyor has adopted the same approach here.

- b) **The committed level of detail in the application** – There is a disturbingly approximate, seemingly calculated, shortcoming in the level of detail embedded in the submitted application drawings which form part of the committed application materials. The Site plans, elevations, sections and use plans submitted as part of the Design and Access Statement, as well as the drawings and plans found at Appendix 2 of the Environmental Statement do not provide sufficient detail as to the relevant impacts of the development, particularly on the Ironmongers' Hall. In addition to this, the various plans and the different locations these are found make it very difficult for a thorough assessment to be made. This makes it very difficult for immediate neighbours to form a clear, well-informed view about, still less obtain very clear advice on, likely potential direct impacts of this scheme if it were to go ahead. It also invites questions about the extent to which the environmental impact assessment does – or could – accurately assess the likely significant impacts of the scheme. From the drawing blocks on the application drawings, it is evident that the drawings were the subject of amendment during the application process. There are material internal inconsistencies among and between the submitted drawings. The