

expected phasing of the proposed development, and thus its impacts on Ironmongers, is virtually impossible to ascertain.

It is no answer to this point that the likely extensive conditions that would be on any planning permission would provide a framework for the plugging in of gaps. No draft conditions are available to review – and are probably months away from being exposed to public analysis. The City as planning authority would need to be completely satisfied that the release of a planning permission for this scheme were safe to do. Not least because the setting of a threshold would be highly relevant to the subsequent determination of proposals for the later amendment of the development proposal. This will be of concern to neighbours, including Barbican residents and other sensitive receptor owners and occupiers.

- c) **Serious harm to heritage assets** – The Non-Technical Summary of the environmental statement contains, at paragraph 3.13.12, in the section headed ‘Townscape, Visual and Built Heritage Impact Assessment (TVBHIA)’ the somewhat insouciant comment as follows:

“The proposed development includes the demolition of Ferroners’ House which forms an extension to the Grade II listed Ironmongers’ Hall but is not included within the statutory listing. The proposals further include minor works to the listed buildings in association with the wider proposed development. A minor beneficial effect on Ironmongers’ Hall (Grade II) would result from the improved appreciation of its heritage significance facilitated by the removal of its existing 1970s extension, the opening up of the Aldersgate Street frontage, enhancements to the character of the landscape surrounding the listed building, and improved pedestrian access and movement within its immediate setting.”

The ES Volume II: Townscape, Visual and Built Heritage Impact Assessment at paragraph 14.30 provides the following:

“On balance, due to the removal of detracting elements (primarily Ferroners’ House), and the creation of new views of the Hall – mainly from Aldersgate Street, but also from the proposed new landscape and improved pedestrian routes around the Hall – the proposed development would result in an overall enhancement to the setting of the Hall, and there would be an increased appreciation of the heritage significance of the listed building. This impact is considered to be below in magnitude. The scale of effect would be minor and the nature of the effect would be beneficial.”

We invite you to explain the background to this assessment. Does it accord and correspond with your Department’s general approach to heritage harm appraisal? How will the Corporation provide an independent critique of the assessment?

- d) **The depth of genuine consideration of less harmful alternatives** – The Alternatives and the Design Evolution chapter in the submitted Environmental Statement shows a lack of detail as to the degree to which there have been genuine considerations of less harmful alternatives, particularly when one has regard to the Ironmongers' Hall. Massing Sketch 2 and 3 as detailed in the chapter provided that the Ironmongers' Hall would be completely cut off from the street, and provides a brief outline of other issues with these designs. However, none of these are discussed in sufficient detail.
- e) **Specifically, the north-south Pedestrian Walkway parallel to Aldersgate Street, and a high circulatory walk to the rear of the Cultural Centre** - The siting of the City Walkway on the west side of the listed Hall, entirely contrary to the scheme design shown to the Company in earlier pre-application consultations, repeats the gross mistake in the previous design of the Museum of London, serving only to enclose and obstruct the front (west-facing) elevation of the Hall, and is avoidable, harmful and will be regarded as an unardonable example of fundamentally poor quality design.

The introduction of a high circulatory walk to the rear of the Cultural Centre in close proximity to the Hall would introduce the likelihood of noise disturbance and add both to the sense of enclosure and the reduction in the light received by the Hall - another example of poor design which needs further analysis.

- f) **The paucity of the assessment of construction-phase impacts on Ironmongers' Hall and other sensitive receptors nearby** – There are significant areas of concern identified by the applicant in its own assessments, that raise justifiable issues for Ironmongers, not least because there are very significant works of separation which would be required to demolish Ferroners' House, which is structurally integrated with the Hall. To take a few examples:
- The **construction vibration** is anticipated to exceed the SOAEL (significant observed adverse effect level) for both potential disturbance and structural damage to the Hall [ES, para 7.5.11];
 - This concern is further commented on in para 7.8.1 of the ES, which states [in part] that '...some significant noise and vibration effects may remain after mitigation during the demolition and construction phase of the proposed development. As part of the CEMP/ section 61 application the regime for monitoring construction noise and vibration and associated limits at various receptors will be agreed with the CoLC. This would be expected to comprise an appraisal and condition survey of Ironmongers' Hall building and its susceptibility to damage as well as on-site trials to establish in situ levels of vibration and how the levels of vibration can be minimised and managed in order to avoid building damage. Appropriate vibration limits will be set between the contractor and the Council to protect surrounding receptors, this will include a protocol to produce warnings if the works are approaching the agreed trigger levels and associated actions e.g. to investigate the cause and review works methodologies prior to any limit being reached'.

- The Construction and Environment Management Plan prepared by Multiplex and submitted with the application, which the Applicant has accepted will be a condition on any permission granted in the ES chapter on Demolition and Construction, provides comment on the owners and occupiers requiring specific legal agreements to be established to enable the construction of the elevated slab to progress in this sensitive location. However, no further detail is provided.

This is highly confusing. The reference to ‘significant *noise*’, as well as significant *vibration*, is omitted in para 7.8.1, and appears to have fallen away. The setting of appropriate limits (vibration only, it would appear) are to be set between the contractor and the Council, with no reference to the Ironmongers Company – we assume that the Company would not be a bystander in this exercise, when first set up, and on a very active continuing basis. The levels to be set appear to be confined to the avoidance of building damage – not, it would seem, to any element of regard for the sensitive receptor nature of the use of the Hall by the Company during the almost six-year programme of works to carry out the development.

The Company had been given, and had in good faith relied upon, repeated assurances given by the Corporation’s various lead officers in the very protracted (largely one-way) communications preceding the submission of the application in late December 2023, that full protection would be offered in contractually enforceable Asset Protection and Neighbourly Matters Agreement form. It is disquieting for the Company to be required to sift through a very large amount of detail - not shown to us in draft in advance – and to discover details of this kind which are of obvious concern to the Company. All the more so, because there has been no constructive engagement from the Corporation in several disciplines (Planning, Surveyor, and more) at various levels on the subject of asset protection.

- g) **Embodied Carbon; and the case for the retention of Bastion House** – There will inevitably be very close attention paid to this subject, and rightly so. The Company is considering the position in close detail, recognising that the law, practice, and politics of this are all in a very volatile state at present. Sufficient to state for now that the Company reserves its position entirely on this subject. It is regrettable that the City Surveyor was so reluctant to place his cards face-up on the table from an early stage, and made necessary the need for reliance on Freedom of Information legislation for access to be gained to key factual data; yet now makes a virtue and strength out of why there is a compelling case for the wholesale demolition of Bastion House. This does not add up. It requires much closer scrutiny from independent evaluation.
- h) **Daylight, Sunlight and Overshadowing impacts** – Daylight and Sunlight impact is a further aspect over which the Company has strong reservations. Paragraph 7.13 of the Planning Statement states that:

“The majority of nearby properties experience reductions smaller than the threshold at which changes may become noticeable i.e. a less than 20% change. Where this is not the case, and reductions are beyond the retained level of daylight is considered to be good for an urban location and the effect is minor overall. It is considered that on balance the proposed development accords with Policy DM10.7 and Draft Policy DE2”.

This will clearly need further examination, since it manifestly falls short of good, let alone best, practice on this important subject. The Company is advised that recent decision-making on the subject at and above Inspectorate level established at appeals would be highly likely to adopt a very different approach to the subject than is revealed by the extract quoted above.

As indicated above, the Rotunda element would loom up over the Hall and introduce significant and most unwelcome overshadowing.

The subject of rights of light is for separate consideration.

- i) **Wind assessment** – Given recent experience of the highly unsatisfactory conditions brought about by wind impact of new tall buildings in the City, the Company is highly sceptical of the conclusion that the proposals would result in no significant wind microclimate effects, and the rather casual assertion that in this respect the proposals accord with applicable London Plan and Local Plan policies. The methodology used in assessments on this element by the development industry would appear to be crude and inexact to a high degree. We consider that a more hesitant approach would be in order; combined with a clear recognition that, given the close proximity of long-term sensitive receptor immediate neighbours, were unsatisfactory conditions to be experienced, remedial steps would immediately be taken. It is disappointing to read that no supplementary mitigation appears to have been considered.
8. **Draft Planning Conditions and s106 Planning Obligations** – We trust that your authority, in acknowledgement of the very significant impacts which this project would have on Ironmongers’ Hall in both the construction and post-completion stages will recognise and accept that if the scheme proceeds to a resolution to grant and beyond, Ironmongers would be invited to participate to the fullest extent in the framing of relevant draft planning conditions and planning obligations addressing both the entire construction period and post-construction estate management matters.

Your unqualified assurance to this effect is requested. It would plainly not be acceptable for these to be developed to an advanced stage and presented to Ironmongers as a *fait accompli*.
 9. **Asset Protection and Neighbourly Matters Agreement** – We make the same point regarding active participation in relation to this topic. In this regard, entirely without prejudice to the Ironmongers position in relation to the application, early in-depth constructive discussion on asset protection and neighbourly matters appears to the

Company to be a responsible step to be taken in the context of the appropriate stewardship of the recently-listed Hall.

Previous discussions on this topic have not borne fruit, which we consider to be rather regrettable.

10. **In conclusion** – The Company is realistic that the wholesale replacement of the Museum of London is a sensible course of action to pursue, provided that the replacement form of development is guaranteed to produce a very high-quality sensitively designed urban environment, including public realm of the highest quality worthy of this important location, respectful of the rich heritage and sensitive receptor uses in the neighbourhood. The Company is unpersuaded of the robustness of the case for the replacement of Bastion House, on currently available information. As indicated, we also question the justification for the sheer scale and bulk of the development proposed.

The level of commitment incorporated in the application falls short and allows scope for value-engineering and depletion of design quality. The application reveals a lack of flexibility of thinking about genuine alternatives considered, which would give rise to a more suitable scheme. The siting of the City Walkway on the west side of the listed Hall, entirely contrary to the scheme design shown to the Company in earlier pre-application consultations, repeats the gross mistake in the previous design of the Museum of London, serving only to enclose and obstruct the front (west-facing) elevation of the Hall, and is avoidable, harmful and will be regarded as an unpardonable example of fundamentally poor quality design. It is one of the aspects of the approach taken to the design of the walkways which needs to be fundamentally rethought, another being the proposed high circulatory walk to the rear of the Cultural Centre. The microclimate effects, notably daylight and sunlight impacts, overshadowing and wind conditions, all need further analysis and independent evaluation. The construction impacts demonstrate that close co-operation with the Company would be essential. The phasing of the scheme in construction is wholly unsatisfactory. The assurance of uninterrupted servicing capability for the Hall, a material consideration of high importance, is ignored, and appears to be rather precarious, which is plainly unsatisfactory.

The need for the highest level of asset protection for the Hall, and acknowledging both the impact of the loss of income during the construction phase and the critical importance of the separation works that would be required, clearly a sine qua non of any project being acceptable even at the highest level of abstraction, seemingly continues to be overlooked by the City Surveyor as the landowner. This is as surprising as it is regrettable, given that the scheme will be unable to proceed if the City Surveyor is unable to agree terms with the Company over a potential acquisition of the freehold of Ferroners' House, currently attached to the listed Hall.

Yours faithfully


Colonel CPH Knaggs OBE
Clerk

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: Mrs Victoria Pop-Arad

Address: 9 Gleneagles Close London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Unacceptable to demolish buildings of such heritage significance (or any other perfectly good buildings for that matter), to make room for new development that will not benefit the local community. Demolishing these heritage buildings will create a dangerous precedent for future demolitions.

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Case Officer: Gemma Delves

Customer Details

Name: Ms Marion Friedmann

Address: 107 Kingsgate Road London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It is a very important architectural heritage, a beautiful example of 60ies architecture by great architects from the era. Such buildings and history have to be preserved. London would lose another iconic building, just for development business gains. A true disaster this would be and another rare building from that era gone forever. Don't destroy yourself London.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Andy Costa

Address: South Villa Windsor Road London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The Museum of Brutalist Architecture (MoBA), objects to the demolition of this iconic example of post-war architecture. The Museum of London was designed by Powell & Moya, one of the most significant design practices in post-war Britain, it was a symbol of optimism and an important part of the City of London's post-war planning history.

Secondly, the repurposing and regeneration of any existing building should be favoured rather than its demolition and replacement, so as to reduce the carbon impact of development on our cities and our planet.

We therefore call for the rejection of the application and the retention, refurbishment and repurposing of the building.

Museum of Brutalist Architecture

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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
- Other
- 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 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 Andrew Spear

Address: 25 The Rowans Chalfont st peter Gerrards cross

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is a hugely important building on the London skyline and represents a period in architecture which is ever decreasing. We can't afford to lose important buildings like this. Find a new use for it, rather than demolish this icon.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Jim Denchfield

Address: 78 sycamore rd Rickmansworth

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is an essential part of British heritage

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Case Officer: Gemma Delves

Customer Details

Name: Mr Andrew Norris

Address: 39 Barley Croft Bromsgrove

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This is a building of architectural and cultural importance!

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Catherine Ashton Copestake

Address: House in the Trees Wightwick Bank Wolverhampton

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:As a member of the C20 Society, a Mid Century Modernist, lover of the Barbican and as some who believes in re-use and re-purpose of buildings and materials, I object to this proposal. If we don't stand up for and respect the work of our contemporaries, there will be nothing left of our time here. I speak as a Brummie who has witnessed her own C20 city torn down (Smallbrook Ringway on the cards now) to be replaced by sub-standard buildings that will themselves be replaced, possibly in my lifetime. A disgrace, and a colossal waste of materials.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Emanuele Alberto Cirello

Address: 23 Perry Street Crayford

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It is time we value heritage buildings from the last century and apply proper maintenance or at the very least refurbishment and active re-use rather than turning everything into dust, especially in a time such as ours where the climate threat is substantial and collective identity is lost in favour of a building sector that appeases to the needs and wants of corporate entities. Our built environment is a place we inhabit, that mirrors (or at least should) our aspirations and is testament of who we were, are and will be.

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Case Officer: Gemma Delves

Customer Details

Name: Francesca Berry

Address: 69 Addison Road Kings Heath Birmingham

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I grew up in the Barbican, living in Shakespeare Tower and then Wallside during the 1980s and 1990s. Bastion House is architecturally very important, as important as the Barbican. Together, and with the former Museum of London building they are architecturally important and crucial to the architectural heritage of the area and the country. Please do not destroy our heritage.