

I would therefore like conditions to be made that the applicant is required to pay for the cost of all window cleaning, car cleaning, and a full surface clean of all residential properties in Monkwell Square, including Wallside during the lengthy period of demolition and construction.

There will be significant impact of light from the new buildings, both from glare on the glass, as well as from lights being left on at night. Another condition is needed to prevent glare from windows onto neighbouring areas. Mitigation of reflected solar glare using measures including the use of non-reflective glass coatings or fritting is commonplace and it is assumed therefore that glare materially above the baseline position will be mitigated as part of detailed design. However an assumption is not good enough, This needs to be made a stated condition of any planning permission given which it is not at the present time.

Conditions need to be required to ensure that all lights in the building automatically turn off at night by the use of movement sensors.

Another impact on light will be the removal of it as it will be blocked by the vast building, the overall size of which is completely out of kilter with anything else around it. It will be like being at the bottom of a vast cliff right in front of you, with balconies looking down on you. There must be no balconies on the Monkwell Square side of the building or any side overlooking people's homes and roof top gardens and conservatory living spaces.

I note from the video that it is proposed there is a Restaurant Café on the bottom of the building closest to Monkwell Square side. Why is it on the residential side of the building rather than the non-residential side? This makes no sense at all when the public open spaces are on the other side, away from residential areas. It is not clear where the access and exit is. It should not exit to Monkwell Square. It is too close to people's homes. There will be significant noise impact but there has been no assessment of this in these plans. It is not clear what the opening hours will be and strict Planning and Licencing restrictions will need to be a condition of the planning permission granted for the location of any restaurant/café in this location. In addition there will be the negative impact of yet more light pollution.

Once this proposed development is built antisocial behaviour and noise at night – especially in outside areas – where there has been none before will follow. There will need to be water tight restrictions in any planning permission given to prevent this. There should not be an outdoor public performance space anywhere in this development. Conditions should explicitly state than this is not permitted.

I am also concerned about the proposals for cycle routes through the development, in particular how they will cycle towards the East of the development. I consider it likely that cyclists will choose to cycle through Monkwell Square and the Barber Surgeon Hall Gardens. The possibility of this needs to be prevented by Planning restrictions and conditions.

The video you have made to show us what the development will look like is of no use to anyone living in Monkwell Square because it does not show the development from our perspective at all. I wonder if that is deliberate. From what I can see it will not be an improvement but will severely adversely affect the area in which I have lived for 24 years.

The City Corporation stated that it would improve the Smithfield and Barbican area in the City's Strategic Policy S23: Smithfield and Barbican by enhancing the special character of the area through sensitive change. This plan does not achieve that. In fact the opposite. It destroys it. There is

nothing sensitive about it. It takes a sledge hammer to the existing area and ruins it. Why cannot the buildings be refurbished like Citypoint was in 2000, 24 years ago? If that building could be refurbished then why can these buildings not be refurbished now?

As Breda Daly says in the Historic England response to these plans:

“Given the physical and developmental connection between the Barbican Estate and this application site, it is important that **careful consideration** be given to their relationship and the very high significance of the Grade II\* registered Landscape including the Highwalk.”

And

“The proposed hard and soft landscaping will inevitably have a relationship with the Grade II\* garden and be legible as an extension to it. The proposals should be informed by the registered landscape.”

This careful consideration to be in keeping with the Barbican Estate and its gardens is not demonstrated by the plans I have seen. The negative impact on the Barbican Estate does not seem to have taken into account at all. The area in which I live, Monkwell Square, has not even been included in the sections I mentioned at the beginning of this letter.

It must be noted that, despite Breda’s reference to weighting of the harm she notes will take place to:

“the existing greenspace of Barber Surgeons’ Garden and alongside the preserved sections of the London Wall would result in direct physical impacts to the grade II\* registered park and garden.”

being mitigated by

“**any public benefits** which might accrue, and the proposed development’s improving access and connectivity to underutilised and less-visited parts of the Barbican Gardens could be considered beneficial.”

the Barbican Gardens are private and are not open to the public and therefore improved access is irrelevant as it is not possible for the public to access the Barbican Gardens. No public benefit can therefore be gained in mitigation of the harm this development will do.

In addition, Breda identifies that:

“the proposals to build hard up to the monument, losing the line of the ditch and overshadowing the monument slightly are considered as some harm to the significance of the monument through development within the setting. Bastion House and the Museum of London do currently compromise the setting, however, **the increased mass and the loss of some of the clear space between the monument and the new building must be considered harmful.**”

As a member of the Barbican Listed Building Management Guidelines Working Party I cannot see how this development shows any sympathy with its surroundings as it is required to demonstrate in adherence to those Guidelines.

To add insult to injury these plans change the road system which runs alongside a quiet residential area so that it seems it will be impossible for us to access our homes by car from London Wall. This is completely unacceptable and needs to be reworked.

The Construction and Management Logistics Plan along with the Environmental Management Statement (Vol1) makes it evident that use of the Western end of London Wall will be severely constrained as a result of the proposed demolition and construction with utilities diversions from 2027, the demolition of part of the Rotunda and subsequent construction of the Rotunda building, works in 2028 and 2029 in connection with the co-dependent Phase 2, the use of pavement and road space on the Western carriageway for construction purposes, the removal of three footbridges and

Bastion Highwalk and at some stage the replacement of the latter and of the footbridge to One London Wall.

As a result, the London Wall bus stops will be relocated with consequent loss of amenity, in the absence of the foot bridges a temporary crossing will be installed and the Santander cycle hub will be moved. London Wall is likely to be closed to two directional traffic. Individually these matters would cause disruption, associated noise and inconvenience but these disruptive activities are indicated to last for over 5 years. After that access to the east bound carriageway of London Wall will be permanently constrained.

Having examined the planning documents referred to it appears that little consideration has been given to the question of how vehicular access is to be maintained to Wood Street North both during and after the construction period. This is not an insignificant matter given that Wood Street North provides the main vehicular access to the Southern and South Eastern side of the Barbican Residential Estate including:

1. Wallside;
2. The Postern;
3. Gilbert House;
4. Andrewes House;
5. 125 London Wall loading bay;
6. two London Wall Place loading bays;
7. Monkwell Square;
8. Barber-Surgeons' Hall;
9. residential Monkwell House;
10. Roman House (also residential);
11. St Giles' Cripplegate Church;
12. Newpark Childcare Centre;
13. The City of London School for Girls;
14. Salters Hall.

Wood Street South is difficult to access, relatively narrow and contains an important cycle route. The timing of this proposed development is that at the same time as the construction works are taking place works are also proposed to be undertaken at Wood Street Police Station. An increase in HGVs and other vehicles using Moor Lane (when the barrier is actually open) would further reduce residential amenity. It cannot be right that the combination of demolition and construction including Phase 2 would cause such significant loss of access from London Wall and the situation continues after the construction phase because there is no provision for traffic which currently needs to use the roundabout to access the east-bound carriageway of London Wall to travel to the South side of the Barbican Estate et al as listed above to continue to do so.

A condition needs to be made to ensure vehicular access is retained throughout the works and once any development has been completed to ensure we can continue to access our homes and garages in Monkwell Square with our vehicles directly from the London Wall West bound carriageway as we can currently. My son has a Blue Badge and due to various medical conditions is periodically unable to walk. This is therefore of critical concern to us.

At the end of the lengthy construction period I, amongst the many residents in the largest residential area of the City, would be living next to two ultra modern and massive glass office buildings; new Bastion House is 2 ½ times the size of the existing Bastion House and the Rotunda building twice the size and of a completely different scale to the existing Bastion House and Museum of London. In contrast to the current buildings the proposed new office buildings bear no affinity in their design

and scale to the immediately adjoining and iconic Barbican Residential Estate. Nor do the proposed new buildings and the plazas in any way reflect the historical significance of this site including its interesting history as an area outside the old City walls significant for its provision for non-conformists and the Jewish Community, and standing at the beginning of the Great North Road. The new buildings will obscure the views of the Barbican including its three Towers from the South by interposing more glass offices thus changing the impression of the City as a place where people both work and live. The proposed development contrasts with the sensitive approach taken to the development of London Wall Place which has enhanced heritage assets and public amenity.

In the course of these works the quiet rotunda gardens and Engineers Gardens (the public garden near Ironmonger's Hall) and many trees will disappear not to be replaced for many years until the end of the works by new planting and plazas. In no way will the cultural offering of the Museum or the Centre for Music (which was due to replace the Museum) and the loss of the visual connection to St Paul's Cathedral be compensated for by an outdoor public performance space (which is not wanted or required) and landscaped gardens, with London Wall in the Barbers' Gardens completely swamped by the monolithic edifice going right up to it. Not only is the proposal entirely different in the type of cultural offering but the open space including the existing Barber Surgeon's Gardens, Monkswell Square and parts of the Barbican Gardens will be overwhelmed and overshadowed by massive office blocks. I doubt that anything will grow in the shadow. There needs to be greater consistency of design between the listed Barbican Estate as envisaged by the listing which requires areas adjoining and alongside the Barbican Estate to be sympathetic to that listing. I cannot see how the design of this development achieves that in any way at all.

I have visited the exhibition of the model and reviewed a number of the planning documents, including some which state that Wallside is owned by the Corporation of London which is incorrect. That is the subject of separate correspondence, including confirmation that the documents are incorrect in this respect from the City Solicitor's Department, but the fact of that error raises concern about what else may be incorrect in the assumptions made by this application.

If this development goes ahead the health of my son and myself will be adversely affected, and so too will the value of my home. This proposed development needs to be replaced with something much smaller and in keeping with its surroundings.

Yours faithfully

*Nicola Baker*

Miss N P Baker  
nicolapbaker@gmail.com

# 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: Rob Small

Address: 22 Bergholt Mews London

## Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: So many London landmarks are disappearing in a rush by developers to build offices and make a tidy profit.

The carbon that is generated by demolition far exceeds the amount created when buildings are instead repurposed.

It is also an intricate part, albeit on the edge, of the world renowned Barbican and Golden Lane estates.

# 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 Kevin Carter

Address: 81 Chesterton Ave Harpenden

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is a part of our cultural heritage, please leave it alone. What's more, demolishing buildings like this only adds to the climate emergency.

**From:**  
**To:**  
**Subject:** Objection  
**Date:** 02 February 2024 10:12:00

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

As the Lib Dem parliamentary candidate for the Cities of London and Westminster, and on behalf of dozens of members, activists and supporters in the City of London, I would like to object to the proposed development.

From our extensive doorknocking in the Barbican and nearby, it is clear to us that many residents are strongly opposed to this scheme. Many of them do not have the oracy, literacy to IT skills to engage formally with the planning process, so I hope this submission will represent them too.

I will start with democracy. The proposed project has not been properly consulted. It is clear that many residents are only dimly aware of its impact. The formulaic, bureaucratic and restrictive consultation process comes across as a box-ticking exercise, not a genuine attempt to engage with the community.

The overwhelming impression given by the City authorities is that they are interested in maximising the narrowly defined economic return from this site, without considering the community, cultural, and environmental aspects of the issue. We have not seen a proper assessment of the carbon-cost of the new project, vis-a-vis the potential for retrofitting. Demolition should be a last resort, not the first resort.

This is in sharp contrast to the image that the Corporation and its senior officials seek to present when they are talking to the outside world.

**We will not hesitate to highlight this apparent hypocrisy in our campaigning, and to encourage media scrutiny. The reputational damage to the City alone should be enough to make decision-makers think again.**

Even on narrow commercial grounds, the case for redevelopment is questionable. Does the City really need more office space in a world where patterns of work are changing? To keep the City competitive it needs to be people-friendlier. Museums, cultural venues, green spaces and opportunities for social contact will be a vital part of that. Yet vital features of the City's liveability — Barbican Estate and gardens, St. Giles', Postman's Park and St. Botolph's — will be overshadowed and infringed by the proposed project. We see no sign that the City authorities have seriously considered this aspect of the project.

These and many other points have been made in other parties' submissions and I strongly endorse them, without necessarily repeating them here.

Yours faithfully

Edward Lucas  
Lib Dem parliamentary candidate  
Cities of London and Westminster

37 Tetcott Rd SW10 0SB





# Comments for Planning Application 23/01304/FULEIA

## Application Summary

Application Number: 23/01304/FULEIA

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

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

Case Officer: Gemma Delves

## Customer Details

Name: Ms Julie Mapstone

Address: Flat 509 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: I am commenting specifically concerning the proposed use of Thomas More car park during the construction of London Wall West and forever afterwards.

Thomas More car park and its attendants play a significant role in the lives of the residents of Thomas More House, Mountjoy House, Seddon House, and Lambert Jones Mews. This includes parking for cars, bicycles, and motor bikes; parcel delivery and collection (parcel delivery is not allowed into the blocks so there is no other means of receiving parcels); providing key access to flats and certain common resources; rubbish sorting storage and collection; and a resource for anti-social incidents or other trouble arising in the area at any time of day or night. The car park is very well used.

The proposals will mean a massive increase in heavy vehicle traffic, not time-limited but forever, in

an area not currently fit for such additional use. The changes necessary to accommodate this have not been fully specified. The increase in pollution and noise will affect residents in that corner of the estate, and schoolchildren using their sports pitches above Thomas More carpark., and it will add to the danger for them. The proposed new route for residents' cars is not workable. It is clear the design team did not give proper consideration to this issue at the outset and are now attempting to tack on an unconsidered and appalling approach.

This intrudes into the grade II listed Barbican estate for a major commercial development, with no regard to the effect on residents or children exercising nearby, nor to the other listed properties in the area. And it adds to the insult on a historical corner of the City by the LWW proposals.

# Comments for Planning Application 23/01304/FULEIA

## Application Summary

Application Number: 23/01304/FULEIA

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

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

Case Officer: Gemma Delves

## Customer Details

Name: Ms A Gillespie

Address: 176 Andrewes House London

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The buildings are oversized for the neighbourhood, which will create:

- significant light pollution at night
- a darker neighbourhood with shadowing during the day
- compromised privacy

Further to the above, the plans misrepresent the impact. At ground level, the wide angle views give a false impression of the size of open spaces. At building level, the plans presented in community consultations have shown angles that don't fairly reflect the true size of the buildings. There are geospatial tools readily available to developers that give fair 3D representations. Why weren't they used? The fact that the developers have chosen not to present key angles and vertical flythroughs + their selective approach to the visualisations has built distrust with neighbours. The planning application should not be approved unless and until the developers consult the community based on a fair and accurate presentation of the development.

# 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: Peter Wrench

Address: 2 Bonnersfield Close Harrow

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Object on grounds that:

Buildings are of lasting architectural merit

Demolition and rebuild should be prevented on environmental grounds- release of carbon co2.

More office accommodation is not required in city

# 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: Margarita Murillo Benítez

Address: Flat 10 9 Albert Embankment London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I would like to object this application due to the demolition of a building that is structurally sound and is of cultural and historic significance. As a structural engineer, I advocate to repurpose existing structures, considering refurbishing as the primary option and only demolishing if a building is beyond the possibility of being repaired and strengthened. This is the only solution in a climatic emergency and retention should be considered as a top priority.

# 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 Dominik Arni

Address: 49 Carol Street London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The size and design of the proposed scheme will cause harm to the Barbican estate. The design is generic and of bad quality. Given that the site lies in direct proximity to St Pauls and the heart of the City of London, something more thoughtful, crafted and aligned with the traditions of British architecture would be appropriate. The demolition of Bastion house is unnecessary and should be incorporate into a new design to secure its embodied carbon.

**From:**  
**To:**  
**Subject:** London Wall West  
**Date:** 03 February 2024 12:21:35

---

THIS IS AN EXTERNAL EMAIL

I object to the proposed development of the Bastion/ Museum of London site. I live in The Barbican and it saddens me that the chance to create something splendid is being squandered by this insipid and ill-conceived proposal. Having dismissed the wishes of the local community to redesign and repurpose, the CoL could have commissioned an innovative and thrilling architectural solution. Instead we have a two slab proposal with what would seem to be insolvable traffic complications. The once-in-a-lifetime opportunity to build on the vision and boldness of Chamberlain, Powell and Bon will be missed if these plans go ahead.

Stephen Rigg  
17 Andrewes House

# 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 Rupert Martin

Address: 17 Oldfield Road Bristol

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This fine example of post war architecture by a distinguished architectural practice should be preserved and repurposed not destroyed.



Gwyn Richards  
Planning and Development Director  
City of London Corporation

03 February 2024

Dear Mr Richards,

**RE: 140 London Wall (140) and 150 London Wall (150) – together 140/150  
23/01304/FULEIA; 23/01276/LBC; and 23/01277/LBC (the Applications)**

This is Part 2 of my objection to the Applications which relates to the failure of City Corporation (CoLC) to identify 140/150 as non-designated heritage assets (NDHAs). The Appendix, below, includes parts of the submitted Townscape, Visual and Built Heritage Impact Assessment (TVBHIA) with my comments and amendments. However, it also includes my evidence and argument in challenging the lack of objectivity of CoLC's consultant, Ken Powell, in his submissions which advised Historic England's decision to recommend to the Secretary of State (SoS), Digital, Culture Media and Sport (DCM&S) not to list 140/150.

The SoS's decision led to Certificates of Immunity from Listing (COIs) being issued in 2015 and renewed in 2019. Whilst identification as NDHAs might not prevent the destruction of 140/150, it would, at least, require you to properly consider them as heritage assets in your report to committee.

According to the Department of Levelling Up, Housing and Communities' *Historic Environment Guidance* (updated 23 July 2019):

***What are non-designated heritage assets?***

*39. Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.*

*A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.*

***How are non-designated heritage assets identified?***

*40. There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.*

*Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers.*

*This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets.*

*It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies. (See the Historic England website for [advice on local lists](#)) They should also ensure that up to date information about non-designated heritage assets is included in the local historic environment record.*

*In some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations. It is helpful if plans note areas with potential for the discovery of non-designated heritage assets with archaeological interest. The historic environment record will be a useful indicator of archaeological potential in the area.*

So why doesn't CoLC identify 140/150 as NDHAs? If CoLC's applications for COIs had been unsuccessful, 140/150 would now be listed as designated heritage assets but what is it that prevents 140/150 being identified as NDHAs? 140/150 have a *degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets*, so why hasn't CoLC identified 140/150 as such?

Being subject to COIs supports the case for identifying 140/150 as NDHAs since, according to Historic England in 2015:

*The Museum of London and Bastion House, London Wall, City of London, constructed 1971-76, are not recommended for listing for the following principal reasons:*

*\* Architectural interest: both buildings have some interest as pieces by Powell and Moya, a post-war architectural practice of national repute, but neither building compares favourably to other listed buildings of their type and date, nor to listed examples of Powell and Moya's work;*

*\* Historic interest: Bastion House in particular has some historic interest for its part in London's post-war masterplan, but this is not sufficient to compensate for the level of architectural interest;*

*\* Alteration: the Museum of London has been significantly altered internally, resulting in the accumulative loss of Powell and Moya's interior spatial planning, fixtures and fittings;*

*\* Group value: with the listed Barbican to the north and the scheduled monument to the east is noted but does not outweigh other key considerations.*

Until such time as 140/150 have been identified as NDHAs and properly considered as such in your report to committee, leading to a recommendation to refuse, I object to the Applications.

Finally, on 8 October 2018, CoLC failed to include 140/150 in the Barbican and Golden Lane Conservation Area. Its in house appraisal of, inter alia, 140/150 for inclusion simply reads:

<i>Museum of London</i>	<i>A Certificate of Immunity was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, as the Secretary of State does not intend to list this building. The certificate was issued on 22nd July 2015 and will expire on 21st July 2020.</i>
<i>Bastion House</i>	<i>A Certificate of Immunity was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, as the Secretary of State does not intend to list this building. The certificate was issued on 22nd July 2015 and will expire on 21st July 2020.</i>

I trust your own consideration of 140/150 will be more professional and detailed than that appraisal.

Best regards,

Fred Rodgers

100 Breton House EC2Y 8PQ

# APPENDIX

Document	Pages
My evidence and argument re lack of objectivity in support of COIs	4 – 9
Ken Powell's reports supporting the issue of COIs with my comments	10 – 24
My email to SoS, DCM&S and letter in reply.	25 – 28
Various correspondence etc.	29 – 39
Extract from submitted ES Volume II TVHIA with my comments.	40 - 48

## NOTE:

Except where specifically stated, the following rely on documents contained in City Corporation's planning file 4648 (in 13 parts plus plans) and publicly accessible documents in London Metropolitan Archives. Reference to "Pevsner" is to *The Buildings of England – London 1: The City of London – Simon Bradley and Nikolaus Pevsner*.

Fred Rodgers 03 February 2024

03 February 2024

**Fred Rodgers: Evidence and argument in challenging the lack of objectivity re the COIs relating to 140/150 (Case Number 1464340) of 22 August 2019 and expiring on 22 August 2024 renewing COI (Case Number 1424713) of 25 July 2015**

Copies of my email to the Secretary of State (SoS) for Digital, Culture, Media & Sport (DCM&S) of 01 March 2021 and the reply from Jack Roberts, DCM&S Ministerial Support Team, of 31 March 2021 in respect of the COI are included below. Since that exchange, Ironmongers' Hall (excluding Ferroners' House which was built around 2005 and designed by Fitzroy, Robinson and Partners) has been listed Grade II (Case Number 1485812); the City of London Corporation (CoLC) has introduced its Carbon Options Guidance Planning Advice Note; the draft Local Plan (City Plan 2040), which is due to be formally approved this month prior to Regulation 19 consultation, advocates a "Retrofit First" policy; and CoLC has applied for planning permission for the total redevelopment of LWW, including the demolition of both 140 and 150 - 23/01304/FULEIA; 23/01277/LBC; and 23/01276/LBC – (the Scheme).

CoLC as 140/150's freeholder, has made the applications for planning permission. However, it must be said that CoLC lacks bona fides, as it failed to meet its own pre-application consultation requirements as set out in 4.8 of its May 2023 Statement of Community Involvement:

*[CoLC] is committed to early and ongoing consultation engagement on planning applications. This means working with developers, local residents and other stakeholders from the earliest possible stage in the development process until the submission of an application to shape and guide development proposals that are most suitable to their context. The pre-application process requires respect and understanding for stakeholders' interests, open, accessible and reasoned communication, and informative and meaningful engagement.*

Not only has CoLC failed to comply with its own pre-application consultation requirements though. In October 2022 Chris Hayward, its Policy Chair, publicly committed it to both further public consultation and the production of a 3D model of the proposed scheme before submitting a planning application. Neither occurred but, no doubt, CoLC will rely on the fact that the Scheme, itself, is irrelevant, as it has no intention, should permission be granted, of developing it. Further, any third party acquiring an interest in 140/150 is likely to propose an alternative scheme, with the Scheme being a starting point.

Since the planning applications were validated, there have been over 400 formal objections to the Scheme. These provide various valid reasons why CoLC, as the local planning authority, shouldn't grant CoLC, as applicant, planning permission to develop 140/150, which is owned by CoLC. However, below, are my observations on the process whereby the COI was not only granted in 2015 but renewed in 2019.

1. The lack of objectivity - and accuracy - on the part of Ken Powell (KP) whose reports – the original of 2014 (KP1); his Foreword of February 2019 (KP2); and his Appendix, also of February 2019 (KP3) – all of which are included below with my comments in red. KP references his book, *20<sup>th</sup> Century Architects: Powell & Moya*, which contains a list of works, including, on page 127, under 1962-1976 – *Museum of London, London Wall, City of London: Client: Corporation of the City of London Museum*. There are three further references – *Royal Society of Arts Journal, May 1973, pp404-6; Architectural Review, July 1977, pp 16-28; and RIBA commendation 1979*. I haven't traced the RSA Journal item but the Architectural Review item is freely available online, having been republished in 2012. However, it's the third entry which KP seems to have completely ignored. Perhaps, in view of the lack of objectivity, this isn't surprising:

*Commendation – London Region*

*Museum of London London Wall, London EC2*

*Powell, Moya and Partners in conjunction with E. C. Chandler – City Architect and Planning Officer*

*The new museum houses the combined collections of the former London and Guildhall museums and has become a centre for the study of the capital's history and development. The building turns away from the noisy traffic on the south and east of the site, facing inwards on to the peace of an enclosed garden court. From the outside it appears as a solid enclosing wall perforated only by the occasional window; inside the public exhibition is arranged on two floors around the court and to the east of the existing Ironmonger's Hall. To the west, is the educational wing with conservation labs, administration and libraries above.*

*The structure is of reinforced concrete with free standing internal columns which will allow for flexibility in the future. Externally, the exposed concrete is bush-hammered.*

*At the south-west corner of the site, the traffic roundabout has been used to build a rotunda containing a restaurant and terraces and connected by walkways to the museum on the one hand, and the Corporation of London's partially-built high level walkway on the other.*

*Jury's report: An extremely difficult city site has resulted in complex planning problems on several levels, which have been solved both in the public and working parts in an interesting, varied and exciting way. The museum turns its back to the noisy boundary traffic and the main views are to a large garden court. That the mass of children and adults (about 70,000 visitors a year) obviously enjoy the exhibition area speaks well for the building which in most places nicely accommodates a variety of displays at the same time achieving an easily understandable circulation once the museum has been entered. The difficult problem of a proper balance between the visual contribution of the building and of the exhibits has been successfully resolved.*

*Job architects: Sir Philip Powell. John Cantwell, Bernard Throp, Colin Garratt, Robert Stebbings.*

*Client: The Corporation of London.*

*Builder: G. E. Wallis and Sons Ltd.*

*Consultants: Structural engineer: Charles Weiss and Partners; Mechanical engineer: David Kut and Partners; Electrical engineers: Peter Jay and Partners; Quantity surveyors: E C Harris and Partners; Exhibition designers: Higgins Ney and Partners.*

The Commendation includes four unidentified images. The main, half page one, being of the glazed-roof entrance and the other, smaller, three being a site plan of the buildings; a view of 140 from the west; and a gallery landing.

KP not only failed to provide the detail of an article that appeared in The Times, "Saturday" for 20-26 November 1982, he failed even to reference it. The article, *From God's house to Bauhaus and back again*, is by Bryan Appleyard who, *with Pevsner's writings and architect Will Alsop appraise[d] a selection of modern buildings:*

*Pevsner rightly described the design of the Barbican's immediate neighbour in Aldersgate Street as "brilliant". It is Powell & Moya's Museum of London, begun in 1972 whose beautiful variations and careful detailing are demonstrations of late modernism at its cool and satisfying best.*

*Its problem lay in crossing the road to the brick mound at the centre of the roundabout at the junction with London Wall. Powell & Moya achieved this by projecting the ribbon windows against their white tiles in a finely composed arm which exposes the usual melodramatics associated with such attempts.*

*"Expressed structure" is even handled with unusual sensitivity in the rough concrete pillars which rise through the façade of the building, cutting through tiles and even through windows. The effect is complex and yet clean and the rhythm of the movement across the road endows an unexpected ethereal quality to the composition seen from the west.*

*Powell & Moya also designed the office block, known as Bastion House, which grows out of the museum development. This was the last in the series of blocks that run dramatically the length of the dual carriageway section of London Wall. The others are somewhat anonymous sixties products, very much representative of post-war British modernism. Bastion House, however, is given a more massive look by its brown colouring, yet the effect is neatly offset by the way the whole is raised from the building below on concrete pillars and blocks. The building itself is perhaps a routine expression of slightly elaborated modernism but it is saved by the proportions and the raised level which achieves what many a development has attempted – the effect of floating.*

Ironically, the caption text under TVIA Part 29 - 24 Barbican Estate: St Giles' Terrace. Outside St Giles', Cripplegate, includes:

*The existing Bastion House is prominent in the centre of the view, with its rectilinear, dark mass appearing to float above the podium containing the former Museum of London, which is mainly obscured in this view by the Wallside Highwalk.*

In addition, KP wrote the following on 30 January 1997 in the Architects Journal:

*Pringle Richards Sharratt - A sense of independence - Kenneth Powell, Architects Journal  
A sense of independence*

*With Commissions in Sheffield and the City of London, Pringle Richards Sharratt is establishing an enviable reputation.*

*The latest job to come into the PRS office is an in-depth appraisal of Bastion House on London Wall for the City. The building, squatting above the Museum of London which looks set to remain on the site, was designed by Powell & Moya and is the best of the London Wall office slabs. But it must have been a relief for the practice to learn of Sir Philip Powell's lack of enthusiasm for it, since complete demolition and redevelopment is perhaps the most obvious option.*

Although an image of PRS's proposal and a brief text was on its website until recently, my request for a copy of the actual report has resulted in the removal of both image and text.

KP references both the Architects' Journal of 04 July 1996, which contains his article: *Powell & Moya: the first thirty years* and his book, *Powell & Moya* published by the Twentieth Century Society in 2009. In view of the comment in his article re Pringle, Richards, Sharratt above, there is a lack of objectivity on his part. That said, in the Architects' Journal article, KP claims Powell, considered it to be a "terrible" site he was working on, which was "tacked on to the Barbican" but 150 "is a calm oasis internally" with the glazed, barrel-vaulted gallery which links the main floors is especially memorable". Additionally, "externally, however, it makes little impact and the associated office tower, though better than the others along what was known as *Route 11*, is really just another office block". Note that KP doesn't even refer to the "office tower" as Bastion House (140) but includes it as one of "a procession of sub-Miesian packing- case office blocks".

## 2. The reason for which the 2019 COI was requested no longer exists:

As can be seen below, there are letters to CoLC's then Chair of its Policy and Resources Committee from both the Mayor of London (25 October 2018) and the then Minister for Arts, Heritage and Tourism, DMC&S (18 June 2018). These letters were written in support of the then proposed Centre for Music (CfM) and, whilst neither of them specifically reference LWW, both were submitted by DP9 Ltd with the application to renew the COI as can be seen from its letter of 27 March 2019 below.

3. The history of 140/150:

CoLC approved the original scheme for 140/150 on 16<sup>th</sup> February 1967. This was subject to the Department of Education and Science and the Greater London Council agreeing to share with CoLC the cost of fees in respect of any work which may become abortive if the Compulsory Purchase Order in respect of Redevelopment Unit No. 46, which included Ironmongers' Hall, was not confirmed.

According to the Royal Fine Art Commission in a letter to the City Architect & Planning Officer dated 13<sup>th</sup> February 1967:

*The design for this building was considered by the Commission on 8<sup>th</sup> February, following the Examination Committee's discussion with you and the architects. While the Commission is inclined to think that the design for the Museum proper would be more satisfactory from an architectural point of view if the office block were to be omitted, it recognises that the inclusion of this block is regarded as necessary both to complete the comprehensive scheme for London Wall and to make the building of the new Museum of London financially possible.*

*Given the necessity for this office block, the Commission considers that the scheme has been handled with great ingenuity by the architects and should be approved.*

On the objection of the Worshipful Company of Ironmongers, the relevant Minister subsequently excluded Ironmongers' Hall from the CPO as CoLC had failed to provide clear evidence that that site was need for the development. The decision, of course, had a negative effect on the the approved scheme. This not only resulted in a redesign but also a fall out with Chamberlin Powell & Bon as the subsequent amended scheme moved the building 50 feet to the east and 15 feet to the north, so restricting the view of St Paul's from the Barbican Estate. The southern part of Mountjoy Close was terminated abruptly by this easterly movement.

The Royal Fine Arts Commission wasn't impressed with the retention of Ironmongers' Hall when considering the revised scheme. Its letter to CoLC of 11 January 1968, questioned whether the Minister's decision was the right one and continued:

*If the life of Ironmongers' Hall in its now incongruous position is considered to be relatively short, the Commission hopes that the present scheme for the Museum of London will include in its design space for extension at a later stage which will take full advantage of the demolition – or perhaps even the re-building – of Ironmongers' Hall.*

*On the other hand, if it is intended by the Minister's decision that Ironmongers' Hall should be preserved more or less in perpetuity, then the relationship between these two fairly permanent buildings seems, in the Commission's view, to need still further consideration.*

*In saying this, the Commission recognises the many excellencies of the revised plan, particularly in regard to the pedestrian walkways and the traffic island. It would be glad to discuss with the Architects any further modifications which they suggest.*

As per my comments below, by the time the revised scheme was completed – work didn't commence until early 1971 after prolonged funding disputes between CoLC and GLC which had to be resolved by central government – KP's criticism that architecture had changed direction is meaningless. Had 140/150 been a 1976 design, there might have been some justification for KP's criticism but it wasn't and there can't be.

Further, as opined by KP, whether or not 140/150 was Powell & Moya's best work is subjective, so irrelevant to the existence of a building that was "ingenious" (*Pevsner*) in its planning. That

the entrances aren't at street level is directly related to the highwalks of both London Wall and the Barbican Estate. The latter, of course, being listed Grade II.

Although developers and CoLC have worked to destroy some of the highwalks on London Wall, it is still possible to walk above street level from 140/150 to the south of Fore Street Avenue, as well as to cross London Wall at both 1 London Wall Place and Alban Gate. Also, when the current redevelopments are completed, it will be possible to cross London Wall to 55 Basinghall Street (2 Aldermanbury Square), as well as Moor Lane to Moorgate Station via 21 Moorfields.

4. The failure to consider 150's Historic interest:

*To be of special historic interest a building must illustrate important aspects of the nation's social, economic, cultural or military history and/or must have close associations with nationally important people.*

*There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing.*

150 was never considered for its historic interest, either in 2015 or 2019, despite its contribution to the nation's social and cultural history. At the same time, the Museum of London introduced many nationally important people to millions of its visitors. What it is and what it did has to be considered as well its fabric but that, in itself, is of "sufficient quality of interest".

The following is an extract from the website SE1 Direct re the former City Hall, The Queen's Walk:

*The building - which dates from 2002 - was turned down for listed status in 2022 with Historic England concluding that "although a striking geometric design of clear technical sophistication for a landmark London building, City Hall does not rank amongst the very best examples of the work of Foster & Partners in this period".*

*The heritage watchdog's assessment added that "the building's significance as a symbol of London municipal democracy and governance into the 21st century is limited by the indirect nature of the commission through a private developer and the departure of the mayor and assembly after only 20 years of tenancy occupation".*

If the rejection of City Hall's historic interest was as stated above, then Historic England's failure to consider 150's historic interest is all the more disconcerting. CoLC, the instigator of the COI, instead of being proud of the continuing additions to its heritage seems blind to this aspect of it. Again, the obvious lack of objectivity of KP is clear in the absence of any consideration of historic interest.

*A further consideration which the Secretary of State may take into account is group value – where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historic functional relationship between a group of buildings.*

The relevant question here is how many buildings form a group. Certainly, taken and appraised together, 140 and 150 *comprise an important architectural or historic unity.*

It can also be argued that the ingenious planning (*Pevsner*) in the architects' solution to a very difficult problem is *a fine example of planning.* It can also be argued that: *there is a historic functional relationship between a group of buildings* as regards 140/150 and, because of the "wrap around", Ironmongers' Hall as well.