

(Harmondsworth, 1966, reprinted 2014).

K.Powell, *Powell & Moya: Twentieth Century Architects* (London, 2009). F.Sheppard, *The Treasury of London's Past* (London, 1991).

*Architectural Review*, July, 1977

*Architects' Journal*, 28 April, 1971; 4 July, 1996

*Building*, 1 July, 1977

*Building Design*, 2 November, 2001; 21 May, 2010

*L'Industria Italiana del Cemento*, (11), 1980

*London Journal*, November, 1977

*RIBA Journal*, June, 2010

*Wallis News*, December, 1976

This application has been prepared by Kenneth Powell, MA, HonFRIBA. Kenneth Powell is an architectural historian, critic and consultant who has written extensively on 20<sup>th</sup> century and contemporary British architecture and on London buildings. He is the author of a monograph on the work of Powell & Moya (2009). As a consultant, he has advised extensively on listing and related issues.

Comments in red by Fred Rodgers 01 February 2024

## KP2 - FOREWORD: FEBRUARY, 2019.

An application for a Certificate of Immunity from Listing (COI) in respect of the Museum of London and Bastion House, both located on London Wall in the City of London was made on 15 December, 2014. In considering their advice on the application, Historic England stated (report dated 21 May, 2015) that “we do not consider either the Museum of London or Bastion House to possess special interest. Therefore neither building should be listed and a COI should be issued”.

After considering Historic England’s advice, the Secretary of State for Culture, Media and Sport authorized the issue of a COI and Historic England formally notified the applicant of this decision in a letter dated 22 July, 2015. The effect of this decision was to preclude the listing (or serving of a Building Preservation Notice) in respect of the Museum of London and Bastion House for a period of five years from the date of this letter. The COI therefore expires on 22 July, 2020.

The context to the application for a COI is the decision, announced in 2015, to relocate the Museum of London from London Wall to West Smithfield, where it will occupy the historic General Market complex, currently redundant. A design competition for the Smithfield site was launched in 2016 and architects Stanton Williams and Asif Khan were subsequently appointed as part of a team to develop designs, which will form the basis of a forthcoming planning application.

The reason the General Market complex was “currently redundant” was the failure of Henderson Global Investors to obtain planning permission for redevelopment (13/00150/FULEIA) after the application was called in by the then Secretary of State for Communities and Local Government. Paragraphs 11 and 12, under “The heritage assets” in the SoS’s letter of 14 July 2014 to DP 9 make interesting and relevant reading. This letter reveals the haste in which the decision relocate to Smithfield was taken but it should be remembered that this was a decision taken by City Corporation in order to find an occupier for these unoccupied and dilapidated buildings.

### The heritage assets

11. *The Secretary of State has had regard to the Inspector’s comments about the Smithfield area, its heritage assets and the adjoining Conservation Areas at IR18-21 and at IR400-416. He sees no reason to disagree with the Inspector’s remark that the General Market, the Annex Market, the Red House and the Engine House are not listed but are clearly an integral part of the Smithfield market complex and are recognised as non-designated heritage assets which contribute strongly to the distinctive character of the Smithfield Conservation Area (IR408). In relation to the market group and its setting, the Secretary of State agrees, for the reasons given by the Inspector (IR416), that the market and the Holborn Viaduct effectively lie within a large shared setting which strongly enhances their significance and reflects their origins as grand Victorian engineering schemes that have shaped the area as it is seen today.*
12. *For the reasons given by the Inspector at IR417 – 418, the Secretary no reason to disagree with his view that the deteriorated state of the buildings is, at least in part, the result of the history of deliberate neglect and that, in assessing the planning balance, less weight should therefore be given to the current condition of the buildings and the consequent benefit of their repair (IR418).*

Following the Museum of London’s decision to relocate from London Wall the existing site of

the Museum was selected as the preferred site for a new world-class concert hall. Following an OJEU procurement process, the practice of Diller Scofidio + Renfro was selected in October, 2017, to develop designs for what is envisaged as “a world-class venue for performance and education across all musical genres”. To be developed in association with the London Symphony Orchestra, the Barbican Centre and the Guildhall School of Music and Drama, the Centre for Music will house a 2000 seat concert hall and also performance, rehearsal and education spaces in a world class landmark building. The City of London has agreed in principle to make the Museum of London site available for the Centre for Music and a funding package is being put in place. The Centre and the relocated Museum are key components in the City’s Culture Mile, a strategy that underpins the City’s emergence as a world leader in the field of the arts and culture.

Working in conjunction with many other arts, educational and other institutions in an area extending from Moorgate to Smithfield, the Centre for Music and new Museum of London will be major additions to London’s attractions as a global centre of business, education and culture. The inauguration of the Crossrail Elizabeth Line will dramatically enhance the accessibility of this quarter of the capital.

The redevelopment of the London Wall site of the Museum of London and Bastion House is therefore a vital element in the Culture Mile strategy and the Museum of London is actively planning its relocation.

The Centre for Music proposal was formally abandoned at the beginning of 2021. As a result, any justification, and it’s difficult to see any, in the proposal for the Centre in the preceding two and a half paragraphs is irrelevant.

Both the Museum of London and Bastion House were designed by architects Powell & Moya. Their practice, established in 1946, was one of the most respected British practices of the post-war era and a number of its buildings are listed. A paper written by Kenneth Powell, author of the only monograph on the work of Powell & Moya, contained a critical assessment of the Museum and Bastion House. Powell’s judgement on the Museum - that it reflected a falling-off in the quality of the firm’s work - was echoed by the C20th Society, the only external body to comment on the COI application. The Society added that the extensive alterations to the building carried out since 1990 were an additional bar to listing.

Presumably this “paper” is the 2014 appraisal. Powell’s judgement has to be qualified, particularly as regards the objectivity of his expressed opinion.

The C20th Society argued, however, that notwithstanding comprehensive re-modelling of its interior, Bastion House “retains some architectural and historic interest.” Historic England commented that Bastion House possessed “some historic interest for its part in London’s post-war masterplan” but that this was not enough to compensate for its lack of architectural quality. In the light of these comments, a further note on Bastion House and its significance has been produced and is appended to the application for the renewal of the COI. The Museum of London and Bastion House were conceived as part of an integrated project, Bastion House forming part of the funding package for the Museum. Their demolition will facilitate an outstanding development on the site. Current leases to tenants of Bastion House expire in September, 2019. The Museum of London expects to open in West Smithfield in 2023, following the complex operation of removing its collections. The demolition of the Powell & Moya buildings will follow in 2024.

Applications for a COIL can only be assessed on the basis of the architectural and historic interest of the buildings in question. No new evidence has emerged to challenge Historic England's 2015 judgment that neither the Museum of London nor Bastion House meet the criteria for listing.

While no "new" evidence may have emerged, consideration of the application should have been informed by an objective opinion something Ken Powell notably failed to provide.

The relocation of the Museum of London to West Smithfield and the development of the Centre for Music represent a huge potential investment in the cultural and educational life of London and have national significance. The renewal of the current COIL is vital to permit the continuing development of these projects, for which the redevelopment of the London Wall site is fundamental.

Having been granted a COI in 2015, why was a renewal "vital" if there was no new evidence to justify listing? A listing would not prevent redevelopment.

This note has been prepared by Kenneth Powell, MA, HonFRIBA. Kenneth Powell is an architectural historian, critic and consultant who has written extensively on 20<sup>th</sup> century and contemporary British architecture and on London buildings. He is the author of a monograph on the work of Powell & Moya (2009). As a consultant, he has advised extensively on listing and related issues.

Comments in red by Fred Rodgers 01 February 2024

**KP3 - APPENDIX: A FURTHER NOTE REGARDING BASTION HOUSE (140 LONDON WALL).  
FEBRUARY, 2019.**

INTRODUCTION: Historic England's Notification Report, dated 13<sup>th</sup> May, 2015, recommended that a Certificate of Immunity from listing be issued in respect of the Museum of London and Bastion House (140 London Wall). In respect of Bastion House, Historic England commented that the building had "some historic interest for its part in London's post-war master-plan, but this is not sufficient to compensate for the level of architectural interest".

In a letter dated 27<sup>th</sup> March, 2015, the C20th Society, while not objecting to the issue of a Certificate in respect of the Museum of London, argued that Bastion House "retains architectural and historical significance". It noted that Bastion House was "a rare surviving example of the firm's (i.e. Powell & Moya's) office work".

(A Certificate of Immunity was issued on 22<sup>nd</sup> July, 2015.)

1. ARCHITECTURAL SIGNIFICANCE: The practice of Powell & Moya was established in 1946 on the basis of Philip Powell and Hidalgo Moya's competition-winning scheme for the large housing development in Pimlico subsequently known as Churchill Gardens. Powell & Moya is rightly regarded as one of the outstanding British architectural practices of the post-war era and a number of its works have been listed.

In common with other critically acclaimed practices of the period, Powell & Moya was motivated by a strong social commitment that was in tune with the ethos of post-war reconstruction. Public projects, initially housing, schools and hospitals, and later university buildings, formed the bulk of its workload. It was only in the mid-1970s that Powell & Moya undertook a commission for an office project – a new headquarters, set in landscaped grounds, for London & Manchester Assurance at Winslade Park, near Exeter. But this was a bespoke commission, with a generous budget, for an enlightened client. The practice eschewed work for developers and speculative office development, a sector booming from the late 1950s on, was left to "commercial" practices.

The commission for Bastion House – from the City of London Corporation – was linked to that for the new Museum of London, for which it formed part of the funding package. Undertaking the job with some reluctance, Philip Powell thought that Bastion House was one of the practice's weakest works. It is certainly entirely untypical of Powell & Moya's oeuvre, sometimes characterized as "humane modernism". The practice was particularly known for its additions to Oxford and Cambridge colleges, which were inspired responses to historic context. The City was not Powell & Moya's natural habitat.

Does KP's opinion here match his 2014 report. Certainly, KP has claimed his namesake "disliked" the result rather than "being one of the practice's weakest works". What is the reference to the City here?

The form of Bastion House, as a tall (14 storey) slab set on a podium level walkway, was dictated by the master-plan for the redevelopment of London Wall dating from the mid-1950s and implemented from 1960 onwards. The widened London Wall, virtually an urban motorway and described as "Route XI", was lined with six office towers, their form taking its cue from the model of Skidmore, Owings & Merrill's Lever House in New York, completed in 1952. Of the six, only City Tower (completed in 1964 but entirely re-clad in the 1980s) and Bastion House survive. Neither SOM nor Lever House – which has just been refurbished - were referred to in 2014. London Wall didn't exist from Aldersgate to Fore Street until Route 11 was constructed as a dual carriageway.

The London Wall reconstruction was hailed by some critics as a rare example of comprehensive planning, in contrast to the piecemeal redevelopment taking place elsewhere in the City. Nikolaus Pevsner (writing in 1973) declared that "to walk around London Wall is a pleasure" but within two decades the planning prescriptions on which it was based were generally rejected. The post-1990 redevelopment of the area has seen the re-emergence of London Wall as a pedestrian route with buildings entered at street

level. **Not strictly true between Aldersgate Street and Wood Street.**

The architectural treatment of Bastion House reflects the influence of Lever House and of the work of Mies van der Rohe – its bronzed curtain-walling is a distinctively Miesian feature. As an exemplar of its style, Bastion House is less significant than the Commercial Union tower (now St Helen's), completed in 1969 to designs by architects GMW. An application for the listing of this building was rejected and redevelopment is planned. **The consented loss of St Helen's Tower should make the retention of 140 vital. Interestingly, GMW's Arts Tower at Sheffield University (1965) is listed Grade II\* as, according to HE it was 'the most elegant university tower in Britain of its period'.**

An earlier (1958-60) work by GMW, Castrol House on Marylebone Road, was closely modelled on Lever House. Converted to residential use and now known as Marathon House, it is not listed. Both Bastion House and the Museum of London represent something of a falling off in the quality of Powell & Moya's work in the 1970s. The *Buildings of England's* comment (1997) on the Museum – that it "falls short of the architects' best work" – is apposite. Perhaps the best of the practice's later projects is the Queen Elizabeth II Conference Centre at Westminster (completed in 1986) but an application for its listing was recently refused. **The full sentence from page 137 of *The Buildings of London* is "The building's ingenious planning does its best to overcome the awkward site, although the result falls short of the architects' best work".**

Though in some respects superior to the other office slabs on London Wall, Bastion House is, in essence, a rerun of a quintessentially 1960s building type, unaffected by the newly emerging architectural strategies of the 1970s. (Richard Rogers' revolutionary Lloyd's Building went on site in 1978.) It possesses nothing of the special interest required for statutory listing and was not, it appears, a candidate for inclusion on (then) English Heritage's survey of office buildings dating from 1964 to 1984 that resulted in fourteen listings in 2015. **Not surprisingly "[140] is in essence a rerun of a quintessentially 1960s building type, unaffected by the emerging architectural strategies of the 1970s" as it was designed in 1968/71, with building commencing in early 1971 – seven years before 1 Lime Street. However, KP produces no evidence of the building not being "cutting edge" when building commenced.**

2. HISTORIC SIGNIFICANCE: In terms of the criteria set out in 2010 for the selection of buildings for listing, Bastion House can be considered as possessing historic interest in only one respect: as a surviving remnant of the 1960s reconstruction of London Wall it might be seen as a reflection of the economic development of the post-war City. Hence Historic England's comment cited above. However, the demolition of virtually all of the other built fabric of that period on London Wall renders it a meaningless and isolated survivor. There are no grounds for listing in terms of historic significance. **Surely, its very survival is a ground for listing.**
- 3 CONCLUSIONS: In terms of the criteria set out for statutory listing, it remains clear, in the absence of any new evidence, that Bastion House, lacking special architectural and historic interest, entirely fails to meet these criteria.

This note has been prepared by Kenneth Powell, MA, HonFRIBA. Kenneth Powell is an architectural historian, critic and consultant who has written extensively on 20<sup>th</sup> century and contemporary British architecture and on London buildings. He is the author of a monograph on the work of Powell & Moya (2009). As a consultant, he has advised extensively on listing and related issues.

**Comments in red by Fred Rodgers 01 February 2024**

01 March 2021

Dear Secretary of State,

City of London Corporation's decision to abandon the proposed construction of its Centre for Music (CfM) project at the Museum of London (MoL) site - once it's vacated around 2025 - was long overdue. This was the case when your Department extended the Certificate of Immunity from Listing (Col) - reference number 1465513 - for both the MoL and adjoining Bastion House (BH) for five years in August 2019.

The grounds for the decision to issue the original MoL Col in July 2015 were, from memory, that Historic England (HE) considered that, as MoL had undergone "extensive" alteration since completion in 1976, there were no grounds to justify listing. From memory, because details of the original MoL Col are no longer available online and no grounds are shown for the extension of the MoL Col. No doubt the original grounds are available from HE's archives but probably not during the current lockdown. However, there is this reference from Building Design on 06 September 2019:

C20 Society caseworker Grace Etheridge said [MoL] and [BH] had been granted Cols in 2015 and it was seen as "extremely unlikely" that the previous recommendation would be overturned if substantial new evidence was not discovered.

*"In 2015 we didn't object to the issuing of a Col for [MoL] as we thought it had suffered too much alteration to meet the criteria for listing," she said.*

*"We stated that [BH] held architectural and historic significance. However our comments were neutral so we neither objected to the Col nor explicitly stated that we thought it met the criteria for listing."*

*In July, the project team for the new Museum of London said it was targeting a 2024 completion for the West Smithfield project, meaning Powell and Moya's building – which opened in 1976 – would never reach its 50th birthday.*

The original MoL Col was issued in July 2015 after the decision of the then SoS, Eric Pickles, to accept the advice of the Planning Inspectorate and reject the planning application for the proposed redevelopment of Smithfield General Market (13/00150) in July 2014, This was after the application was called in by the SoS - <https://www.theguardian.com/politics/2014/jul/08/eric-pickles-smithfield-market-redevelopment-plans-support-campaign>. Basically the decision was because of City Corporation's wilful neglect of its historic buildings for around 30 years, a neglect that was even used to try to justify the Inspector recommending the grant of permission!

City Corporation had then to find a use for its deteriorating Smithfield site. As MoL was literally bursting at the seams, with a substantial part of its 7 million item collection in storage at any one time and needing £50 million capital investment over 10 years because of its deteriorating fabric, the decision was made to relocate to Smithfield. At that time, the cost of the work was estimated at £250 million, with 2021 as the expected completion date

- <https://www.london.gov.uk/decisions/md2070-museum-london-move-west-smithfield>.

Without any details from HE, it is difficult to tell when City Corporation requested the original MoL Col but the decision to locate the CfM at the MoL site wasn't confirmed until December 2015 - <https://www.theguardian.com/uk-news/2015/dec/16/278m-concert-hall-museum-of-london-site>. Whilst, as mentioned above, the grounds for the original MoL Col aren't now available from HE online, that wasn't the case on 15 January 2021. Presumably, the removal by HE within five weeks is totally unconnected with City Corporation having abandoned the CfM.

Having obtained the original MoL Col, which would ease its obtaining of planning permission for the site, City Corporation turned its attention to building the CfM there. In November 2017, City Corporation determined to exclude both MoL and BH from the proposed Barbican and Golden Lane Conservation Area (CA). This was confirmed in October 2018 and was stated to be because of both the original MoL Col and the original BH Col.

Such was City Corporation's desperation to move MoL to Smithfield that there was no full site survey before the decision was made. As a result, over the last few years, extensive site surveys have revealed there was much more space than City Corporation was aware of. Inevitably, the estimated cost of the work has increased substantially - now around £330 million.

Smithfield is, no doubt, a suitable alternative MoL site and the proposals revealed in the current planning application - 20/00789 - are to be admired. The treatment of the existing buildings - General Market, Fish Market, Chicken Market and the Triangular Building - is both sensitive and sympathetic.

Not only was the MoL site to be redeveloped for the CfM, City Corporation is considering redevelopment proposals for BH as it will have vacant possession as the existing occupiers' leases expire later this year. The original BH Col was also issued in July 2015 but, again, there are no details of the grounds for the issue on HE's website. In fact, unlike for the original MoL Col, there's no sign of it all.

MoL was designed by Powell & Moya, as was BH. Both were completed around 1976, with the latter being the last component of the 1950s Route XI scheme for London Wall. City Tower and Roman House being the only other surviving buildings along this section of dual carriage way, with the latter having been converted from offices to flats a few years ago. Both MoL and BH are mentioned in Simon Bradley's and Nikolaus Pevsner's *The Buildings of England, London 1: The City of London*, pp 322-324, the former to a significant extent and the latter much less so but, at least, complementarily.

It's quite likely that BH has seen internal changes over the last 45 years, although there seems to be no record of any planning permissions since 2000. Internal changes wouldn't be surprising but the comments of Simon Thurley are quite pertinent in respect of both BH and MoL:

<https://www.theguardian.com/artanddesign/2016/nov/13/save-brutalist-buildings-warns-simon-thurley>.

As mentioned, there was a significant refurbishment and alteration of MoL, designed by Eyre Wilkinson and completed in 2010, following the grant of planning permission (06/00174). Interestingly, although the Barbican Estate had been listed Grade II and its registered landscape listed Grade II\* by then, there seems to have been no consideration of the affect of the significant refurbishment and alteration on either the adjoining heritage assets or the setting of the same.

The public documents for 06/00174 include neither a heritage statement nor a design and access statement, either one which would have detailed all the changes. EH wasn't consulted on the proposal nor was the Barbican Association (BA), another formal consultee. However, the significant refurbishment and alteration persuaded C20 Society not to object to the original MoL Col being issued.

The comments of Grace Etheridge regarding BH are puzzling, particularly as neither the architectural nor historical significances seem to be specified in any accessible online document. However, the existence of the two Col's is no reason for rejecting the inclusion of both MoL and BH in the CA, along with the other areas requested by both the BA and the Golden Lane Estate Residents Association (GLERA) in 2017.



Whilst perhaps neither MoL nor BH warrants listing on architectural grounds - although a case could be made to the contrary - there are ample grounds for consideration of listing on historical grounds. In any event, the purpose of a Col is to prevent a spot listing. A spot listing, it seems, is only normally granted for a Grade II\* listing - in essence, to prevent the expeditious demolition of a building without due consideration of its architectural and/or historic interest.

A spot listing would be unlikely in the circumstances and, even if it were made, as with the CA, the existence of such restrictions doesn't prevent planning permission being granted for development. In essence, it only prevents demolition without permission, something that must be an essential block if we are ever to achieve zero carbon, if nothing else.

In the circumstances, please give due consideration to revoking both ColS and requesting City Corporation to reconsider the extent of the area included in the CA, as requested by both the BA and GLERA.

Best regards,

Fred Rodgers



# Department for Digital, Culture, Media & Sport

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31 March 2021

Mr Frederick Rodgers  
[REDACTED]

Our Ref: TO2021/06391

Dear Frederick,

Thank you for your email of 1st March to the Secretary of State requesting that consideration be given to revoking the Certificate of Immunity issued under the terms of the Planning (Listed Buildings and Conservation Areas) Act 1990 in 2019 in relation to the Museum of London and Basing House, and to reconsidering the extent of the Barbican and Golden Lane Conservation Area. I am replying as a member of the Ministerial Support Team.

Given that it precludes the Secretary of State from listing a building, and a local planning authority from serving a building preservation notice in relation to it, for a period of five years, before he decides to grant an application for a Certificate of Immunity (COI) from listing under the terms of section 6 of the 1990 Act the Secretary of State considers the building's claims to special architectural or historic interest. If he concludes that the building in question possesses special architectural or historic interest – having regard to the advice of Historic England and to any representations that have been received – he must list it. If he concludes that it does not he may choose to issue a COI.

The purpose of a COI is to provide certainty to the owner and/or developer of the building in question, hence there is no scope for the revoking of extant COIs. However, before issuing a COI the Secretary of State allows 28 days for interested parties to request a non-statutory review of his decision.

The Secretary of State's policy is not to accept applications for a subsequent COI for a building if the current one remains valid for two years or longer, and then, only if there is clear justification for doing so. Whilst renewal is common, it cannot be assumed that a second COI will be issued as a fresh assessment will be completed and circumstances may have changed since the issue of the original, particularly if new evidence or understanding regarding the building's claims to special architectural or historic interest comes to light in the intervening period.

Regarding your request that consideration be given to revising the extent of the Barbican and Golden Lane Conservation Area, this should be addressed to the relevant local planning authority.

I hope you find this information helpful.

Yours sincerely,

Jake Roberts  
**Ministerial Support Team**





Historic England

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22 July 2015

Dear [REDACTED]

**PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990  
(the 1990 Act) BUILDINGS OF SPECIAL ARCHITECTURAL OR HISTORIC  
INTEREST**

**Museum Of London and Bastion House, London Wall, City of London**

As you will know from our earlier letters, we have been assessing whether the above buildings hold special architectural or historic interest, as a result of an application to issue a Certificate of Immunity (COI) for them.

We have now taken into account all the representations made, and completed our assessment of the buildings. Having considered our recommendation, the Secretary of State for Culture, Media and Sport has decided not to add the Museum of London and Bastion House to the List of Buildings of Special Architectural or Historic Interest.

Accordingly we can confirm that the Minister hereby certifies that he does not intend to list the buildings.

I attach a copy of our advice report, prepared for the Department for Culture, Media and Sport (DCMS), which gives the principal reasons for this decision.

Under section 6(2) of the 1990 Act, the effect of this certificate is to preclude the Secretary of State from listing the Museum of London and Bastion House for a period of five years from the date of issue (being the date of this letter), and to preclude the local planning authority from serving a Building Preservation Notice (BPN) on the buildings during that period.



Historic England

Please do not hesitate to contact me if I can be of any further assistance. More information can also be found on our website at [www.historicengland.org.uk](http://www.historicengland.org.uk).

Yours sincerely



Senior Designation and Business Coordinator - South

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#### **Data Protection Act 1998**

Your personal details, along with the other information you have provided and information obtained from other sources, will be retained by Historic England for administrative purposes and, where applicable, for future consideration. Historic England will not release personal details to a third party if the disclosure would contravene the Data Protection principles.

#### **Freedom of Information**

Historic England is subject to the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 which provide a general right of access to information we hold. We may provide the information you have supplied in response to a request made under this legislation, subject to any exemptions which apply. Historic England will consult with external parties as necessary prior to releasing information.



Historic England

# Listing and the Enterprise and Regulatory Reform Act

## Applications for Certificates of Immunity from Listing

December 2015

The Enterprise and Regulatory Reform Act (ERRA) has resulted in a relaxation of approaches to Certificates of Immunity from Listing (COI), which can now be applied for at any time, not just in relation to a planning application. COIs are useful mechanisms for ascertaining the listing status of a building and last for five years. Applications for a COI should be submitted to Historic England (HE) via the online [application form](#). The application should be supported by enough detailed information to enable HE to assess it. The more detailed the information submitted early on in the application process, the faster we will be able to take it forward.

The preparation of the application should be undertaken by a party able to supply HE with an objective appraisal which assists us in determining the case. The application should be set against the criteria laid out in the [Principles of Selection for Listing Buildings](#) (DCMS 2010) and make reference to the relevant HE [Designation Selection Guides](#). It should be noted that an application may be delayed if inadequate documentation is provided.

The supporting information should include a comprehensive history of the building, with a detailed description of its historic and architectural interest that explains the evidence for, and interpretation of, its development and phasing. This supporting information should include documentary evidence such as historic maps, images and research reports, and include a list of the sources used in completing the research, see our [Apply for Listing](#) page on the Historic England website for more information. As a minimum, the relevant [Historic Environment Record](#) (HER) and local studies archive should have been consulted, as should the [National Heritage List for England](#) (NHLE). The application should include recent colour photographs which give a clear overall impression of the building, including detailed shots of any elements of particular note such as a plaque or fixed sculpture. Internal photographs



Historic England

should be supplied showing the principal spaces and any noteworthy fixtures and fittings. Copies of any historic photographs of the building and any elements of particular note are also requested if available.

It should be noted that COIs offer immunity from listing only. Other designation outcomes such as the scheduling of ancient monuments and archaeological areas, and the registration of parks, gardens, and battlefields may still apply on any sites granted a COI. This is also the case for planning regulations (including heritage elements), as laid out under the [National Planning Policy Framework](#) (NPPF) managed by local planning authorities.

## Contact Details





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Catherine McGuinness



18<sup>th</sup> TO2018/08904/DC  
June 2018

*Dear Catherine,*

As Parliamentary Under Secretary of State for Arts, Heritage and Tourism, I am very pleased to give my in-principle support the proposed establishment of a Centre for Music, a new world-class concert hall with an innovative education programme in the heart of the Square Mile.

Subject to the City of London corporation generating the necessary private funding, I understand this landmark building would form a key part of the Corporation's ambitious Culture Mile plans, which has the potential to transform the north-west corner of the City into a vibrant cultural area for the arts, culture and creativity.


The Centre for Music has the potential to be a transformative cultural project that will inspire current and future generations through the power and excitement of live music. The plans accommodate a new world-class concert hall for London, education, training and digital spaces, excellent facilities for audiences and performers and be a place of welcome, participation, discovery and learning fit for the digital age.

I am pleased to acknowledge the City of London Corporation's generous support for the proposed Centre for Music by making the site available in principle for the project and providing £2.5 million in funding to enable the Barbican, London Symphony Orchestra and Guildhall School of Music & Drama to develop a detailed business case, due to be completed later this year.

I was pleased to see the pioneering international design team led by Diller Scofidio + Renfro, working in collaboration with UK-based architecture firm Sheppard Robson, has been recruited to create a design concept for the Centre for Music, which has the potential to deliver plans for a new world class building of visual and acoustic excellence.

I look forward to receiving further details about the proposed Centre for Music and, in the meantime, I send you my best wishes for Culture Mile's future success.

*Yours Sincerely,*

  
**Michael Ellis MP**  
Minister for Arts, Heritage and Tourism

# MAYOR OF LONDON

**Catherine McGuinness**  
Chairman  
Policy and Resources Committee  
City of London Corporation  
PO Box 270  
Guildhall  
London EC2P 2EJ

Date: 25 OCT 2018

*Dear Catherine,*

I am writing to express my continued support for the proposed new Centre for Music.

London is known around the world for its leading music scene. Music tourism brings £1bn to the capital every year and it is vital that we continue to support investment in our music infrastructure.

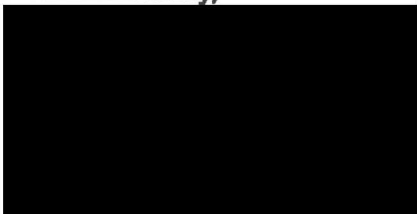
As I have previously expressed, I am pleased that the City of London Corporation is taking forward plans for the Centre for Music. The City's leadership demonstrates its commitment to London's communities and to the capital's global reputation as a creative powerhouse.

I want all Londoners to be able to experience world-class music opportunities. Together with Sir Simon Rattle, I care deeply about giving all young people the experience of live music, playing an instrument and performing together. The Centre for Music will be at the heart of the partnership that the LSO, Barbican and Guildhall School have developed with London's music education hubs. Together they will ensure that London remains a global leader in music education.

As the United Kingdom prepares to leave the European Union, it is more important than ever that we remain open to the rest of the world. The Centre for Music will be important as a beacon of accessibility, diversity and creativity.

Thank you for your continued leadership and commitment.

Yours sincerely,



**Sadiq Khan**  
Mayor of London



DP3850|BJC|lb

27 March 2019

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Dear Sir/Madam

**MUSEUM OF LONDON AND BASTION HOUSE, CITY OF LONDON  
APPLICATION FOR CERTIFICATE OF IMMUNITY FROM LISTING**

On behalf of our client, the Museum of London, we hereby submit an application for a Certificate of Immunity from Listing of the Museum of London and Bastion House.

You will be aware that, previously, an application for a Certificate of Immunity from Listing was made in December 2014 and a Certificate was subsequently issued on 25 July 2015. A copy of the Advice Report dated 21 May 2015 is attached. It is relevant to point out that this Report refers to a number of individual items located within or in the immediate vicinity of the buildings, not included in the assessment, such as the Wesley memorial, etc. It is confirmed that the City of London Corporation, as landowner, would be protecting these items relating to the site in any proposals.

In accordance with Section 6(2) of the 1990 Act, the effect of the 2015 Certificate is to preclude the Secretary of State from listing the Museum of London or Bastion House for a period of five years, expiring on 25 July 2020.

In 2014, the Museum of London wished to secure a Certificate in order to allow it to comprehensively assess all its options with regard to its long term future. Subsequently, it has been widely publicised that the Museum of London is moving to a new site secured at Smithfield Market and that the current site of the Museum of London and Bastion House will become the new site for the Centre for Music. We attach a copy for a letter from DCMS to the City of London dated 18 June 2018 and also a letter from the Mayor of London to the City of London dated 25 October 2018, both expressing support for the new site for the Centre for Music. In order to maintain the certainty provided by the current Certificate, and understanding that works on the new Centre for Music proposal will not start until 2024, the Museum of London seeks ongoing assurance that the buildings are immune from listing for a further five year period.



In so doing, this application contains the previous report prepared by Kenneth Powell HON FRIBA heritage consultant prepared in 2014 which has been reviewed and updated with an attached Foreword and Appendix. The update has referred to the DCMS Principles of Selection of Listed Buildings (November 2018), particularly paragraph 25 where reference is made to renewals of Certificates of Immunity not being assumed, on the basis that a second Certificate requires fresh assessment of any circumstances that may have changed since the issue of the original. Ken Powell's 2019 update provides this review of any changes that might have occurred, and concludes that there is no new evidence to challenge Historic England's advice of 2015, namely that neither the Museum of London nor Bastion House meet the criteria for Listing.

This application will be made online to <https://historicengland.org.uk/listing/apply-for-listing/>. We understand that a Certificate of Immunity application qualifies for fast track under the Enhanced Advisory Service for a fee. We will be applying to use this service and pay the relevant fee.

Please address your correspondence relating to this matter to Barnaby Collins at the above address.

Yours faithfully,

**BARNABY COLLINS**  
**Board Director**  
**DP9 Ltd**

***Attachments:***

Ken Powell Foreword 2019  
Ken Powell Appendix 2019  
DCMS Letter 18 June 2018  
Mayor of London Letter 25 October 2018  
Photographs (IMG1-6)  
Ken Powell Report 2014.  
Copy HE Advice Report dated 21 May 2015 and Site Plan  
Copy HE COI Decision Letter 22 July 2015

## The Museum of London: building timeline

*(note: all dates broadly correct but detail needs double-checking.)*

1959 Planning starts for new museum (uniting the older Guildhall and London museums)

1962 **Powell & Moya** appointed as architects

1976 Museum opened (first new museum building to open since World War 2)

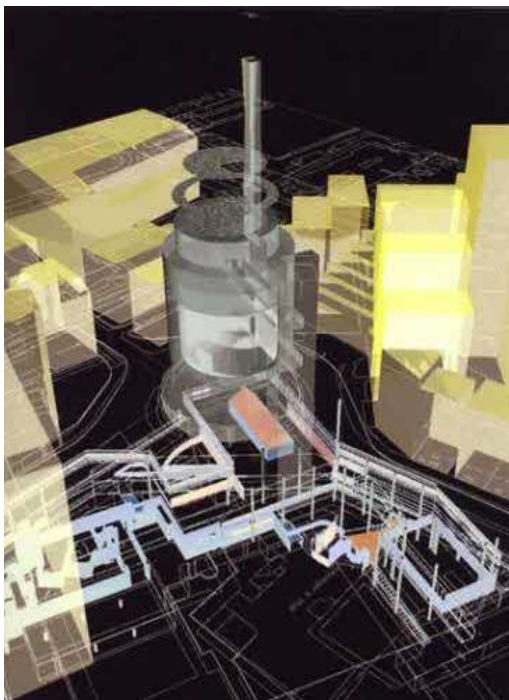
### **1977 – 1997 Max Hebditch, Director**

1976 – 1993 no substantial alterations to the building.

1993 entrance reconfigured and extended by **Levitt Bernstein**: the first instance of ‘filling in’ voids in the original design. Phased programme of roof renewal begins (cost estimated at £1 million - £1.5 million in 1993)

1994 museum devises its ‘Millennium Strategy’, the heart of which is ‘the redevelopment of the Rotunda to offer a new kind of experience for the visitor’. **Levitt Bernstein** undertakes an architectural study of the whole site’ in preparation.

1996 **Ian Ritchie** scheme for the Rotunda History Centre (a ‘dark ride’ in a glass cylinder) is rejected by the Heritage Lottery Fund and the Millennium Commission (much cheering from the curators!). A year later, the new Director describes the scheme as ‘dead as a dodo’.



### 1997 – 2003 Simon Thurley Director

1998 internal changes reflecting new focus on exhibitions and visitors: main upstairs exhibition gallery extended; entrance reorganised creating bigger shop space and 2 new small exhibition areas. Lecture theatre foyer remodelled. New signage and branding.

1999-2003 The 'Core Access Project' New exhibition gallery, *The Linbury Gallery*, constructed at lower level; entrance hall extensively extended to provide larger shop, new internal café and eye-catching canopy. New staircase transforms internal public circulation (with plan to extend public galleries to a third, lower, floor). **Wilkinson Eyre** architects. (Cost tbc)

1997-2003 Former café area in the Rotunda refurbished with corporate hire in mind

### 2003 – 2013: Jack Lohman, Director

2004 – 2010 The 'Capital City Project' **Wilkinson Eyre** architects. Cost £20.5 million: Main funders – Heritage Lottery Fund £11.5 million; DCMS £1million: City of London, £1million; BT group £250k. DCMS/Wolfson Fund £160k; Fidelity UK £100k; London Development Agency £50k. (source of figures: *Museums Journal*, August 2010, p47)

2009 education wing refurbished to become *The Clore Learning Centre*, complete with e-learning studio. Lecture Theatre refurbished to become *The Weston Theatre*  
2010. Lower floor entirely remodelled to form a new suite of galleries – *The Galleries of Modern London*. Ramp removed, replaced with new staircase and lift.

*The City Gallery* – a new space created from a void, with large 'shop window' to display the Lord Mayor's Coach; the coach's old location becomes *The Sackler Hall*, housing a second internal café and event space.

New toilets and other upgrades to internal facilities including a catering kitchen

2010-12 Further refurbishment of the Rotunda suite of rooms to attract corporate hire and catering income. Benugo's opens the restaurant, *London Wall Bar & Kitchen*, in 2012 (tbc)

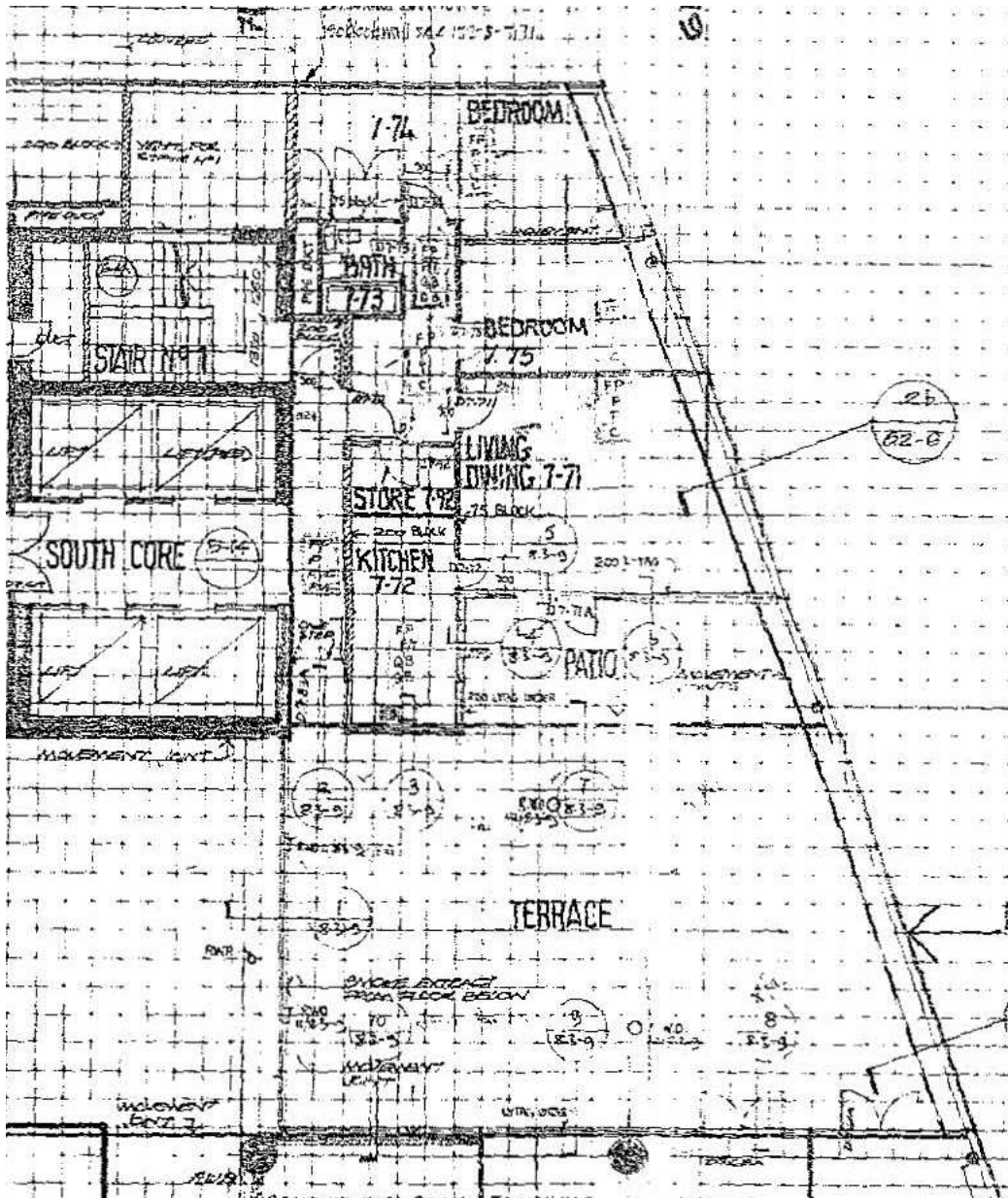
2010 Museum installs a green roof – one of the largest in the City at the time. Awarded the Mastic Asphalt Council's Green Roof of the Year award in 2010.

2011 - 13 Plans to extend the Roman gallery by cantilevering out over the no-man's land next door discussed but not taken forward

### 2013 – today: Sharon Ament, Director

2014 Part of the garden court roofed over to house Thomas Heatherwick's Olympic Cauldron. Described as 'a bespoke new pavilion' by the designers / engineers **Stage One**.

2014 – Aim of moving museum to Smithfield announced. No substantial changes to (or investment in) the London Wall building since; although internal office space has been reconfigured to create open-plan working areas.



Plan of Penthouse level flat in 150

## **Extract from ES Volume II: Townscape, Visual and Built Heritage Impact Assessment with my comments and amendments in red.**

### **Preface**

P1.1 This TVBHIA forms Volume II of the Environmental Statement (ES) and has been prepared by the **Tavernor Consultancy Ltd (TCL)**. Volume II of the Environmental Statement (ES) reports the findings of an assessment of the effect of redevelopment proposals for London Wall West (140 London Wall, 150 London Wall, Ironmongers' Hall, Shaftesbury Place, London Wall Car Park, London, EC2Y) (the 'proposed development'), on townscape, visual amenity, and the heritage significance of (above-ground) built heritage assets. It has been prepared on behalf of the City of London Corporation (the 'Applicant').

P1.7 Part 1 of this Volume II of the ES reports the likely significant effects of the proposed development on townscape and visual amenity and is referred to as the Townscape and Visual Impact Assessment ('TVIA'). The TVIA includes images of Accurate Visual Representations (AVRs) – also known as verified views – of the proposed development from a wide range of viewpoints agreed with planning officers at the City of London Corporation ('CoLC').

P1.8 Part 2 of this Volume II of the ES presents an assessment of the likely significant effects of the proposed development on the heritage significance of above-ground built heritage assets as defined in the National Planning Policy Framework (NPPF) and is referred to as the Built Heritage Assessment ('BHA'). The BHA provides an assessment of the effects of the proposed development on the heritage significance of designated and non-designated built heritage assets both within the redline boundary, and within the vicinity of the site. The full scope of the BHA was agreed with CoLC planning officers during pre-application consultation and is outlined in detailed in Section 12 of Part 2 of this Volume. The presence of built heritage assets in a given area of townscape around the site informs the assessment of effects on townscape and visual amenity in Part 1. This takes into account the presence of built heritage assets in a particular view image assessed in Part 1.

P1.10 ES Volume II has been prepared by **TCL** and is based on architectural drawings prepared by Diller Scofidio and Renfro (DSR) and Sheppard Robson (**SR**), and the AVRs. This report should be read in conjunction with the Design and Access Statement (DAS) produced by DSR and **SR**, ES Volume I and the full planning and LBC application documentation. Full details and scope of the Applications **are** described in the submitted Planning Statement, prepared by Gerald Eve LLP.

## **PART 1 – TOWNSCAPE AND VISUAL IMPACT ASSESSMENT**

### **1. Introduction**

1.5 Built heritage assets are referred to, where relevant\*, in the **TVIA**, however, an assessment of the likely effects of the proposed development on the heritage significance of the heritage assets both within the site and within its surroundings is included in **the BHA** of this report, including the works which are included in the accompanying LBC applications. The **BHA** provides a comprehensive assessment for all three applications that are being submitted for the proposed development. **Who determines "where relevant" and should the author be the judge of what constitutes a "comprehensive assessment"?**

1.7 The two main buildings on **the Site** comprise 150 London Wall, the **former** Museum of London (**150**) and Bastion House, **140 London Wall (140)**. The two buildings are linked horizontally, with the core and main structural columns of 140 intersecting 150 vertically