
From: Fred Rodgers

Sent: Saturday, March 9, 2024 10:25 PM

To: Delves, Gemma

Cc: Richards, Gwyn; [Williams, Amy](#); [Gentry, Sarah](#); [Horkan, David](#)

Subject: Re: [Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC](#)

THIS IS AN EXTERNAL EMAIL

Dear Ms Delves,

I wonder when I can expect to receive an explanation as to what we are now being consulted on please. In the meantime, could you please post my email below to the planning portal as an additional objection please.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
UK

On 29 Feb 2024, at 13:52, Fred Rodgers wrote:

Dear Ms Delves,

Many thanks for your prompt response and explanation. Whilst I can understand there being a separate email address, it's not clear who this one belongs to. The City Surveyor's "London Wall West" website still appears to be live and, with respect, the meaning of "lpa" isn't clear. Also, the message in the emails stating that it was sent on your behalf suggests a remoteness that could be anywhere in Guildhall.

In any event, now there is a further consultation, it would be helpful if you could explain what, exactly, we're being consulted on? I appreciate that your Division engaged Trium Environmental Consulting to carry out its 53 page EIA review. At least, I presume it was your Division as the review simply states its client is City of London Council.

Buro Happold has, of course, responded in a 288 page defence which is also split into nine separate documents, with contributions from Vanguardia, Waldrams, MOLA, Tavernor Consultancy and RWDI. Are we being consulted on Trium's document, Buro Happold's or both?

According to Buro Happold, in addition to Trium, seven other consultants have responded to the ES, although I've only seen Greengage Environmental's response to the PEA which was posted last week. Can you point me to where I might find the comments from the other six?

In the meantime, I've heard nothing further on my request to Gwyn Richards that both MoL and Bastion House be recognised as UDHAs. Interestingly, this point is raised by Trium in paragraph 5.57 on page 36 of its review. As, it's raised on behalf of City Corporation, it deserves proper consideration. Certainly, the response to "ES REF BH13" pages 69/70 does the City Corporation no favours.

There is no justifiable case against recognising both buildings as UDHAs since the third consecutive application for a COIL is now being considered by Historic England. If City Corporation has any fears that either or both could be listed, then it must accept that both qualify for recognition as UDHAs.

The omission of both buildings and Ironmongers' Hall from the CA is even more blatant. Before listing, the latter was recognised as an UDHA but the attention to detail in City Corporation's appraisal of its unilaterally designated Zone 5 simply failed to include any details of the three buildings. It referred to MoL and Bastion House by reference to the then COILs and Ironmongers' Hall, listed Grade II under 12 years later, as an UDHA and the whole of Zone 5:

The area to the south of the Barbican Estate, bounded on the south by London Wall does not sufficiently satisfy the criteria for designation as a conservation area. Whilst the area has significant designated heritage assets within it, the original design intent of this commercial fringe has been dramatically altered over time, and has lost much of its original character.

It isn't clear if that appraisal was down to Annie Hampson, Paul Wilkinson or Chris Hayward and/or Alastair Moss, the then Chair and Deputy Chair of PT&C. However, the effort was heavily criticised by attendees from other LBs at the subsequent HE/20C workshop celebrating the 50th anniversary of CAs. I was invited to that because of the proposed CA.

By the way, it seems the statutory date for comments expires on 28 March in some letters and 29 March in others. Again, is there any reason for this?

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
UK

On 29 Feb 2024, at 09:27, Delves, Gemma wrote:

Dear Mr Rogers

Thank you for your email. The lpalondonwallwest@cityoflondon.gov.uk email address has been set up by the Local Planning Authority (lpa at the start of the address being Local Planning Authority). We created a dedicated inbox for the London Wall West case in anticipation of a lot of correspondence (as an aside the same was done for the Liverpool Street Station case). The inbox is used as a way to monitor, organise and respond where necessary to the correspondence received. It is monitored by the multiple Planning and Administration Officers that are working on the case this is so as to ensure that correspondence is dealt with efficiently. The inbox is set up so that only Planning and Administration Officers working on the case can view its content, no one from Surveyors can view the sent or received emails. The email address was published on consultation letters, site notices and press notices for people to use.

Please do not hesitate to come back to me should you have any further queries.

Kind regards

Gemma



Gemma Delves | Principal Planning Officer

Environment Department | City of London | Guildhall | London
EC2V 7HH
T: 020 7332 1704

www.cityoflondon.gov.uk

Please note that my working days are: Tuesday, Thursday and Friday

From: Fred Rodgers

Sent: Wednesday, February 28, 2024 5:20 PM

To: Delves, Gemma

Cc: Richards, Gwyn

Subject: Re: Planning Application/Listed Building Consent

Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC

THIS IS AN EXTERNAL EMAIL

Dear Ms Delves,

I've just received eight emails from you similar to the one below. However, all nine emails are from the email address "lpalondonwest@cityoflondon.gov.uk" and not your email address as above.

Why is this, as I was under the impression that there was a "dividing line" between the City Surveyor's application team and the Planning and Development Division? That 'line' is set out in an approved handling note, although the only such that I've seen is now denuded by various comings and goings.

In any event, it doesn't seem appropriate for you, as Case Officer, to seemingly be on the City Surveyor's team. An explanation would be appreciated, please.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ
UK

On 28 Feb 2024, at 16:59, lpalondonwallwest
<lpalondonwallwest@cityoflondon.gov.uk> wrote:

Dear Consultee/Contributor,

Please see attached consultation for 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).

Reply with your comments to
lpalondonwallwest@cityoflondon.gov.uk.

Kind Regards,

Planning Administration

On behalf of

Gemma Delves
Environment Department
City of London

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Website: <http://www.cityoflondon.gov.uk>

From: Mary Bonar
Sent: Wednesday, March 27, 2024 9:18 AM
To: Delves, Gemma
Subject: Re: London Wall West Planning Application-Objection

THIS IS AN EXTERNAL EMAIL

Dear Ms Delves

I refer to my email of 21 January below

You indicated that you were referring this to colleagues in the Transportation team but I have not received a substantive reply .

In the absence of such a reply to a matter of considerable concern will you please treat my original email as an objection to the planning application and the Phase 2 of the St a Paul's Gyrotory

Regards

Mary Bonar

On 23 Jan 2024, at 15:37, Mary Bonar wrote:

Thank you and I look forward to hearing further

Regards

Mary Bonar

On 23 Jan 2024, at 09:59, Delves, Gemma wrote:

Dear Ms Bonar

Thank you for your email which has been passed to me as case officer for the London Wall West application. I will review your questions with

colleagues in the City's Transportation team and come back to you with a response.

Kind regards

Gemma

<Outlook-
Descriptio> Gemma Delves | Principal Planning Officer
Environment Department | City of London |
Guildhall | London EC2V 7HH
T: 020 7332 1704

www.cityoflondon.gov.uk

Please note that my working days are: Tuesday,
Thursday and Friday

From: Mary Bonar
Sent: Sunday, January 21, 2024 3:25:53 PM
To: Richards, Gwyn
Cc: Matthew Rees
Subject: London Wall West Planning Application

THIS IS AN EXTERNAL EMAIL

23/01304/FULEIA

Dear Mr Richards

In reviewing the Transport Strategy relating to the proposed development and Volume1 of the Environmental Management Statement I have noted that the LWW development and Phase 2 of the St Paul's Gyratory Transformation Scheme (Phase 2) are in several places stated to be interdependent or Co-dependent and I understand that the design for Phase 2 has been carried out as part of the Planning Application Because I live in Wallside the vehicular access to which is

via Monkwell Square I am particularly aware of access routes .

You will be aware that currently vehicles travelling West on London Wall can only access Wood Street North by navigating the Rotunda roundabout and driving East to the Wood Street junction to turn left into Wood Street North

You and colleagues will also be aware that there is a barrier across Moor Lane at night time and at weekends to protect residential amenity and that there have been proposals to create a Low Emissions Neighbourhood at Moor Lane and to restrict Beech Street to LEVs

Currently access to Wood Street North can be obtained via Gresham Street and Wood Street South but that is less efficient than using the roundabout. Wood Street South has a cycle lane going South and is not particularly wide .

It will also be affected by construction works to convert Wood Street Police Station into a hotel and by proposed works to the Southern face of 125 London Wall.

The traffic forecasts show a considerable increase in traffic in Wood Street by 2034

Wood Street north provides the access to

125 London Wall loading bay ,

Monkwell Square,

The Postern

St Giles Church Wood Street Wine Bar and CLSG at street level

Andrewes Hose Car Park which also serves Gilbert House and the Wood Street Wine Bar ,

1 London Wall Place and 2 London Wall Place Loading bays

Salters Hall

Roman House

le a mixture of commercial and residential premises and livery halls requiring 24 hour vehicular including emergency vehicle access

The removal of the Rotunda roundabout and the proposed Phase 2 Gyrotory do not cater for access to Wood Street North

Would you or appropriate colleagues let me know how it is to be accessed

1 during demolition and construction

2 subsequently

if these Co-dependent developments take place ?

Regards

Mary Bonar

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<mime-attachment>

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: Dr Cathy Ross

Address: 306, Mountjoy House Mountjoy Close London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to the application on the grounds of the impact on the City's heritage caused by the demolition of the Museum of London building. The building should be listed on the grounds of its special historic interest as the United Kingdom's first modern 'city museum', pioneering museological approaches which have had enormous and long-lasting impact on museum practice, nationally and internationally.

The layout of the original building and the interdisciplinary nature of the displays was key to the Museum's approach - as the then Director Max Hebditch noted in the 1990s: 'in Britain this was probably the first attempt to tell the story of a place in a single sequence from prehistoric time to c.1950. The exhibition approach has also shaped the way the Museum thinks about all its work'. ('Reflecting Cities', 1993). The idiosyncracies of the internal spaces were directly responsible for turning the Museum into a space for experiment and debate, generating activities which are now standard practice in UK museums - among them exploring cultural identity through community engagement, contemporary collecting, outreach and co-curation. The building thus has substantial associations with a valued aspect of UK history (the UK's rich history of public museums); and, of course, the City's own heritage achievements. The original building should surely be listed and

saved, not least as a testament to the City's role in pushing forward public understanding of London's past and present..

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Brenda Szlesinger

Address: Flat 112 Thomas More House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:As a local planning authority, the regulations regarding the use of section 106 agreements do not apply. In short, a LPA cannot enter into a legally binding agreement or planning obligation with itself as landowner as part of the grant of planning permission. These applications are all by the City of London Corp. Consequently, any suggestions that s106 obligations have any relevance to the applications under consideration are wrong and misleading. Furthermore, the outcome of the HSBC St Paul's s106 negotiations should be a reminder of how the promise of s106 agreements to make a development palatable is so easily broken.

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Case Officer: Gemma Delves

Customer Details

Name: Ms Lila Rawlings

Address: Flat 719, Willoughby House, Barbican London London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:- Having reviewed the extremely high number of documents supplied by the City of London concerning this application - I'd like to question why there has been no consultation or explanation given? The entire process to date has been convoluted and overly complex - not least being asked to restate our objections already given for the previous deadline. Both the pre and post application consultations for this application contain misleading and unconfirmed information.

- Bastion Hse and the previous Museum of London have been deemed to be in danger of collapse - yet both the City of London School for Girls and the CoL Police have confirmed they will be leasing both building until 2025 - this clearly makes no sense and is proof that the buildings are functioning and fit for purpose - so why is this being used as one of the reasons for demolition?

- The carbon emissions and waste that will be generated by demolition rather than refurbishment is non-compliant with the City's own carbon target of achieving net zero carbon emissions across their own investments and supply chain by 2040. How can this be justified?

- The sheer bulk and mass of the proposed buildings bears no relationship to the local plan and has no relationship to the surrounding area and will set an unacceptable precedent.
- Currently there are no tenants for this scheme and a record amount of office space remains unoccupied in the square mile - what is the reasoning behind creating more empty offices when working patterns have so radically changed? One only needs to look at the number of closed shops and cafes in the Square Mile to see how the demand for office space has drastically fallen.
- This scheme has no relationship to objectives set out in The Cultural Mile, nor will it encourage visitors to Destination City.
- Both building have significant importance in terms of heritage and are valuable examples of British Modernism by highly regarded architects.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Luke O'Doherty

Address: 39 Queens Drive Billingham

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: The development, visually misrepresented in multiple ways within the brochure, will cause substantial harm to the setting of neighbouring listed & unlisted assets. The City Corporation proposes to demolish both buildings and build massive office blocks, while the planning authority is only considering best value; it must ALSO consider best use of the land, rather than resorting to a sacrifice of public cultural heritage by ignoring the site's rich history. The development is also incompatible with the City's Climate Action Strategy and national policies, the refusal to consider retention and retrofitting set against the tens of thousands of tonnes of CO2 that will be released during demolition and construction. Highway safety will also be adversely impacted, with more traffic lights making for increasingly poor air quality for cyclists and pedestrians, as well as a potential traffic hazard with two-way traffic.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Miss Samantha Logan

Address: Barbican 519 Bunyan Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I object to this scheme for the carbon and waste impact on the environment, non-compliance with the City's own carbon targets, guidance and the emerging Local Plan, the impact on heritage, on transparency, procedure and governance. Also on dealing with the impracticality of understanding and dealing with the many new and amended planning documents on the portal that have no explanation or consultation.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Ali-Murtazah Vindhani

Address: Flat 41 John Trundle Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: We have an office oversupply; especially in the current area.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Gareth Owen

Address: Flat 19 Andrewes House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Having objected to the scheme previously, we would object to the updated plan on the following grounds:

- Carbon and waste impacting the environment and everyone living and working around the site
- Lack of compliance with the City's carbon targets, guidance and emerging Local Plan
- Rich history of the site is ignored- Roman, Shakespeare, Wesley, Jewish cemetery, which is public cultural heritage. The impact on these historical aspects will be huge with the updated plan
- A lack of practical ways to view and understand the many new and updated documents on the planning portal. Without any explanation or consultation, the sheer amount of updated documents is obstructive to the public.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Richard Stonehewer-Smith

Address: 313 Ben Jonson House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Does not align with green targets. Shall release CO2 needlessly, when there is a perfectly good building there already.

Shops and office space is already in this area and all unused/empty. Obviously not a good use of the space

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Martin Luff

Address: 207 Mountjoy House Barbican London

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am writing as the Chair of the Mountjoy House residents group (I objected separately in my personal capacity as well). I object on behalf of the residents of Mountjoy House to the plans to demolish and redevelop 140 and 150 London Wall for the following two principal reasons:

1. The proposed vehicular access down the ramp adjacent to Thomas More and Mountjoy Houses will cause significant noise and air pollution for local residents and school children at the City of London School for Girls. It will also cause a loss of amenity with reduced access to the residents' car park, including the loss of spaces and access to the EV chargers. The car park is used both for resident parking as well as the sole access for emergency vehicles, taxis and food deliveries. Many residents - including elderly residents and children - use the car park as pedestrian access to the residents' gardens as well as the ramp up to Aldersgate Street. The plan creates significant danger to residents. Given the size of the site, there is no reason the planners could not have designed better access from another part of the site that would not cause such significant harm to the school and local residents. There has been no consultation with residents at all over this aspect of the plans.

2. The enormous mass of the proposed new office blocks will cause substantial harm to our block and to the whole neighbourhood and cause loss of light to neighbouring residents and the local school. The new office buildings will loom over the local area, degrading the quality of the surrounding neighbourhood. The presentations and visualisations prepared by the City are PR pieces that do not honestly depict how overbearing and massive the buildings would be. There are many vulnerable residents living in Mountjoy, many of whom lack the ability to make objections. The plans will have a significant impact on the quality of their homes (including loss of light, pollution and noise)

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Case Officer: Gemma Delves

Customer Details

Name: Dr Valerie Fraser

Address: 97 Speed House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I could list many objections to this proposal, but perhaps first and foremost is the waste this will involve. The Museum of London and Bastion House are both good strong buildings and their destruction will involve environmental damage, as will the construction of the two new proposed office blocks. And are these new office blocks really necessary? It is very clear that many office blocks in the City are under-utilized, with people still preferring the pandemic practice of working from home, or only coming in to the office on a part-time basis.

Then there's the history: the Museum of London and Bastion House are both iconic buildings that are very much part of the on-going history of the city, examples of the ambitious post-war recovery. They may no longer fulfil their original requirements but repurposing them would obviously be environmentally and economically much better value than destroying them, and they would retain their architectural significance.

And what happened to the proposal for a Centre for Music? I'm guessing that, to put it crudely, the immediate financial returns were not sufficient.

From:

To:

Subject: Objections to London Wall West planning application nos 23/01304/FULEIA, 23/01277/LBC, 23/01276/LBC

Date: 03 April 2024 08:02:00

THIS IS AN EXTERNAL EMAIL

I wish to register my objections to the London Wall West planning application on the following grounds:

It is clear from reading the most recent planning application that the plans have yet to be agreed by Transport for London. The impact of the loss of the roundabout that the new development proposes will be substantial on traffic flow throughout the area. Given the forthcoming new St Paul's gyratory system it is self-evidently crucial that the proposed LWW scheme be examined and approved by TFL. It is unacceptable that the scheme is being put to the Planning Committee for a decision without the vital assessments and approval or comments from the Government body which is legally responsible for traffic flow and planning in London. How can a scheme that proposes such a major change to the existing road layout be assessed by Officers and the Members of Transport and Planning without the input of TFL?

Sincerely - Barnaby Spurrier

291 Shakespeare Tower
Barbican
EC2Y 8DR

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 Roger Mavity

Address: Corner House 118a Highlever Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The destruction of two architecturally significant buildings will create eco havoc in the immediate term and remove forever two distinctive buildings, to be replaced by yet more office blocks. With working from home now a standard part of business life it is hard to see why more office space is needed. The areas around the Barbican and neighbouring Smithfield have unique character: this change will erode that. London is a city for living in as well as for working in. Creating a wasteland of half empty office blocks is a civic tragedy.

From:
To:
Subject: Objections to London Wall West planning application nos 23/01304/FULEIA, 23/01277/LBC, 23/01276/LBC
Date: 03 April 2024 11:00:30

THIS IS AN EXTERNAL EMAIL

I wish to register my amended objections to the London Wall West planning application on the following grounds:

SUSTAINABILITY AND CLIMATE CHANGE

Demolition and new build will release over 57,000 tCO₂e. (page 35, figure 10-2 of the Carbon Optioneering Study, Including Dashboard 1 and Dashboard 2.). And that figure is low as it is based on the ‘hypothetical aim’ (the report’s language) of 50% GGBS cement replacement of conventional reinforced concrete. Given that GGBS cement is increasingly scarce, it is more than likely it will remain a hypothetical aim and final construction will not use this material, as constructors will have no legal obligation to do so.

The City have failed to examine the carbon efficiency of a deep retrofit to Bastion House despite the Chief Executive of the City publicly stating that henceforth all developments in the City must prioritise refurbishment over demolition. Every city in the world is moving away from demolition to renovation to re-use. It seems that “credible” interest was received by the City to their request for offers to re-use the existing buildings but these expressions of interest have not been further explored.

False and misleading information has been used to justify the demolition of Bastion House (originally the City claimed that the building was at risk of “disproportionate collapse” but this was disproved by an independent report.) Given that the City Police are now moving into Bastion House it can only be assumed that either the City is prepared to put their safety at risk or that the building is in fact not at risk of collapse.

The same report on page 19 “*Existing floor-floor heights (3.3m) and floor-to-ceiling heights are very low (2.5 m) compared to modern office standards. The BCO (British Council for Offices) recommends that for refurbishments 2.45m to 2.8m floor-ceiling heights are acceptable in some circumstances, however for new-build offices with deep plan floor plates, floor to ceiling heights should be 2.8m to 3.2m.*” However, according to the approved plans, (held by both LMA – file references COL/PL/01/168/B/001-023 - and City Corporation – planning file 4648) , the floor-to-floor height of Bastion House is 3.35 metres - with a floor-to-ceiling height of 3.10 metres – and a floor to false ceiling height of 2.74 metres. The floor to false ceiling height may be significantly increased with the use of exposed services, a very common practice in many contemporary office designs.

Without false ceiling or with false ceilings at the top end of the height bracket for refurbishments, Bastion House performs much better than portrayed and complies with BCO recommendations. Importantly, because Bastion House is a narrow building, the light penetration will perform far better than in the proposed new building, which will have floorplates between 2 to 2.5 times the depth of the current building.

It seems very obvious that the City’s proposals from the very beginning of this process have not taken the possibility of a deep retrofit seriously and their use of data and information has been selective in order to portray the current building as being unfit for re-use.

These buildings can be retained and refurbished causing much less environmental damage. National and local planning policies clearly set out crucial targets for a net zero future and this proposal ignores them and makes a mockery of the City’s climate action policies. We now know that there are credible alternatives and that a more enlightened approach could and should be pursued by the City to match its own publicly stated and much advertised ambitions for net zero. Arguments about long term carbon efficiency ignore the fact that we are in a claimed crisis. We need to take action now to limit carbon waste.

Furthermore it is clear this application is not compliant with the emergent City Plan 2040 which now has Regulation 40 status. Nor is it compliant with the December 2023 Planning Document on Sustainability.

Simon Sturgis (advisor to the UK Government and the GLA) states that the application is incompatible with the Government’s commitment to reduce emissions by 68% by 2030. Furthermore the City and the GLA are now prioritising retrofit over demolition, and it was notable that Mr Chris Hayward publicly stated that the City would always now expect developers to look to retrofit in the first instance, so why is this scheme in

contravention of his own policy?

Sincerely - Barnaby Spurrier

291 Shakespeare Tower
Barbican
EC2Y 8DR

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Claire Pike

Address: 111 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I have previously submitted an objection to the London Wall redevelopment and write to highlight the impracticality of dealing with the new documents which give no detail of the proposed changes .

My previous objections covered the carbon crimes and heritage vandalism inevitable with the proposed new development .

I urge the City to reconsider their plans which appear to put profit before the wellbeing of people and will destroy the human scale of this historical area for future generations.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Graeme Gordon

Address: Flat 704 Gilbert House, Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposed development does not comply with the City's own planning and environmental policies, targets and plans - and so should obviously not be approved as it stands. Refurbishment of the existing buildings, rather than demolition and new build, should be pursued for this site, in order to preserve the architectural heritage of the area and support achievement of the City's climate change targets. The very large office blocks proposed are out of scale and out of keeping with their surroundings, particularly the Grade II listed Barbican Estate. It is hard for a layperson like myself to respond in more detail to the plans when a huge quantity of new and/or amended documentation is added at short notice, without any explanation - but surely the bare minimum the City should do is amend their proposals to comply with their own policies, targets and plans.

From:
To:
Subject: Objection to planning applications for London Wall West
Date: 03 April 2024 17:37:25

THIS IS AN EXTERNAL EMAIL

Dear all,

I object to all the planning applications for London Wall West.

23/01304/FULEIA - Demolition of 140 & 150 London Wall to provide a phased development etc

23/01277/LBC - External alterations to existing highwalks at the Barbican Estate etc

23/01276/LBC - Demolition of Ferroners' House etc

The proposed demolition and development goes against the Corporation's stated plans to prioritize retrofitting over demolition, its environmental strategy, climate action goals, draft local plan, and aspiration to be an environmental leader.

The massive size of the new buildings will overshadow and reduce sunlight for nearby residential properties, potentially increasing their heating costs significantly in the winter months. These increased utility costs for residents should be factored into any assessment of the development's environmental impact.

There are concerns that the developer has no real intention of actually building the proposed development. Residents question why the Corporation is even considering this speculative project that may end up wasting money without providing any return on investment.

The impact on traffic congestion and pollution on streets like Aldersgate St, the Thomas More ramp, and London Wall is unclear and needs study, especially given the newly implemented traffic system around St Paul's Cathedral. Increased traffic could negatively impact road safety and air quality for residents.

Removing the high-walk pedestrian links will force people to walk alongside traffic to access St Paul's station and St Bartholomew's Hospital, raising safety concerns, especially given the increased traffic from the new development.

The proposed buildings replace architecturally significant buildings that should potentially be listed for preservation as part of the historically important Grade 2 listed Barbican Estate. Demolishing these culturally valuable buildings goes against the City's built heritage.

In summary, there are serious concerns about the environmental impact, traffic/safety issues, removal of pedestrian infrastructure, destruction of historic architecture, lack of real intent to build, and wasted money - leading residents to strongly object to this development proposal.

I object to this development and all applications associated with it.

Regards,

N Sonpar

291 Lauderdale Tower

Barbican

London

EC2Y 8BY

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Dr Bob Harris

Address: 22 Thomas More House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Over the past ten days I have been reviewing the additional 50+ documents (comprising hundreds of pages of text and many diagrams) submitted by the applicant that have been uploaded to the City's planning portal in the last 3-4 weeks. This task has been made more difficult both because there was no explanation of where revised documents had been changed and because the portal was subject to intermittent periods when the documents could not be accessed.

However, it became apparent after detailed review that there were a number of significant changes to and clarifications of the proposed development, including many that resulted from the applicant's comments on external critiques of the original proposals. As a result, I am revising and updating my original objection submitted in January to reflect this new information, with a view to submitting it before the final date of 6 April for comments.

It was therefore a major surprise to receive yesterday (2 April) a letter from the City's Environment Department stating inter alia that: "...the Chief Planning Officer will recommend that they [the applications] will be approved." The clear inference from this is that any further objection that I make will be disregarded.

I wish to object to this major breach of proper procedure and ask that this statement be publicly withdrawn. Furthermore that the Chief Planning Officer should explain, prior to the scheduled date for the Planning Applications sub-committee to consider this application, how he intends to deal with those objections received after he had prematurely decided on his recommendation in a way that is demonstrably fair and objective.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Philip Katz

Address: Flat 131, Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This application is yet another by the Corporation which hardly even pays lip service to the loss of heritage involved in the demolition of significant elements of the Barbican scheme.

It is appalling that the Corporation refuses properly to acknowledge or understand the UK and London architectural heritage to which the existing, coherent, listed scheme contributes. People visit from around the world in order to see for themselves what City Planners were able to see when the Barbican was built.

The proposed new buildings will occupy a significant corner of the estate and will affect the first impression of the Barbican received by those who approach from the west, north or south. It will be obvious to any such person that whoever allowed the proposed development had no pride in this part of the City heritage. Rather, they are likely to ask themselves, "Who the hell allowed that?"

The existing buildings should be restored, refitted and reused. This would, in any event, be in better compliance with the City's own carbon targets and guidance.

From:

To:

Subject: Objections to London Wall West planning application nos 23/01304/FULEIA, 23/01277/LBC, 23/01276/LBC

Date: 04 April 2024 08:00:53

THIS IS AN EXTERNAL EMAIL

I wish to register my amended objections to the London Wall West planning application on the following grounds:

RESIDENTIAL AMENITY

The proposed new development will reduce daylight and sunlight will be reduced for residents of certain blocks of the Grade 2 listed Barbican Estate and the Girls' School will be overlooked by the new offices. London House will be dramatically affected.

The Thomas More Car Park and ramp will be the only access point in and out of the development for all traffic. This will seriously affect how emergency vehicles would ever be able to gain access. No thought has been given to this. It is clear from the proposals that this has not been considered. The use of the ramp for all construction traffic and then at a later date as the main access for service vehicles for the new buildings is nonsensical.

There is in reality little new green space being created by this development and what there is will receive only minimal sunlight, making them of very limited value as recreational spaces and will offer little biodiversity.

Sincerely - Barnaby Spurrier

291 Shakespeare Tower
Barbican
EC2Y 8DR

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Felicity Guinness

Address: 333 Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I strongly object to this proposed development for very many reasons including:

1. The carbon footprint of this development is against all recommended guidelines
2. The development will cut out light and overshadow the residential housing of the Barbican complex.
3. The traffic flow in this area will be seriously curtailed
4. The COL Girls' School needs more space and could use the re-furbished existing buildings
5. It is evident we do not need more office buildings, but housing for hospital workers and teachers.
6. The COL could have a more imaginative and visionary view of development in this area and not be 'hemming in' what is an example of visionary thinking in the building of the Barbican complex

From:

To:

Subject: Objections to London Wall West planning application nos 23/01304/FULEIA, 23/01277/LBC, 23/01276/LBC

Date: 04 April 2024 11:00:20

THIS IS AN EXTERNAL EMAIL

I wish to register my amended objections to the London Wall West planning application on the following grounds:

MASS AND SCALE

Destroying these heritage buildings will adversely affect neighbouring assets such as the Grade 2 listed Barbican Estate, the Grade 2* Thomas Moore gardens, St Giles' Church, Postman's Park and St Botolph's Church. The towers will obscure important views from street level of St Paul's as one approaches from Aldersgate. They are of an entirely inappropriate size and their design and aesthetic pays not attention to the local townscape. Other new buildings have been erected in the vicinity which have successfully echoed and mirrored the vision of the area, but these proposed buildings do quite the opposite. The proposed development pays no attention to the local townscape and has no relation to the scale and mass of surrounding buildings

These massive towers will dominate the surrounding area which was carefully designed to be of a certain scale and volume, allowing for open spaces between buildings. . Recent developments such as the Schroeder building recognised the need for a scale and mass which complemented the Barbican Estate but which did not limit excellence of design or functionality of the new buildings. The new Bastion House will be two and a half times the size of the current one, bringing it damagingly close to the bedroom windows of two Barbican blocks and will be clearly visible from the Barbican Lakeside Terrace adjacent to the Arts Centre.

The sky will be filled with these buildings and they will dominate the skyline around this historic area in a way which will change the architectural integrity of the neighbourhood forever. The views from other key points in the neighbourhood will be forever blighted by these inappropriate and oversized buildings.

Sincerely - Barnaby Spurrier

291 Shakespeare Tower
Barbican
EC2Y 8DR

From:
To:
Cc:
Subject: Ref. 23/01304/FULEIA(planning permission),23/01277/LBC (Listed building consent), & 23/01276/LBC
Date: 04 April 2024 12:38:54
Importance: High

THIS IS AN EXTERNAL EMAIL

To Whom it May Concern,

I wish to object in the strongest terms to the proposed plans as they are currently presented to redevelop the London Wall West site. I have visited the model of the proposed redevelopment, and this confirmed my need to object to these plans in their current form. I am unhappy about the ‘information dump’ of multitude, additional and amended planning documents shared on the City portal. The latter has been done with no explanation nor consultation. This is contrary to the City’s commitment to and legal requirement for full, meaningful consultation with local stakeholders, communities, and residents. By their volume and formal, technical language and late-in-the day availability so close to the comment’s deadline, these additional documents are in the main an impenetrable barrier to most intelligent lay readers, who want to properly understand the revised proposals. This process feels designed to push through these proposals with out due regard to legitimate objections or the need to consider the concerns of local communities and residents.

In summary , I object to the plans as they stand in all three categories in the subject heading of my email as follows:

The redevelopment as currently proposed will have extreme negative impact on the carbon and waste emissions to the local environment and will result in non - compliance with the City’s own carbon targets, guidance, and the emerging Local Plan. As a Barbican resident – Thomas More House – the enormous new tower blocks will crowd our locale, impacting on light , noise, and pollution levels and on our privacy. Aesthetically the redevelopment as proposed with be detrimental to heritage; the entire scheme will swamp and render insignificant our treasured local listed buildings. The scale of the proposed redevelopment is alarming by its disproportion in scale to what exists currently and the actual need to such a ‘ Dubai on Thames’ scheme.

Back to the table, please. Listen to your residents and local communities. We live and work here.

Thank you.

Sincerely yours,
Nicholas Stone
25 Thomas More House,
Barbican Estate EC2Y 8BT.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Mr Keith Davies

Address: 220 Bunyan Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment:As a resident of the Barbican I vehemently oppose the proposed project. In no particular order; is retail space really necessary? Has the retail capacity at the One New Change been monitored? Despite being located in the busier area, a number of units are empty which illustrates the pointless creation of additional retail 'opportunities' just several metres away.

Re-purposing of the existing buildings is the progressive development decision. Aside from years of noise, it will be vandalism of the Barbican complex which should be left in its state of improbable design.

The part of the plan to demolish a livery hall must surely be blocked by government and is a disgraceful suggestion.

I urge you to cancel this development which adds no benefits to local residents.

Review of:

23_01304 FULEIA-CONSTRUCTION_AND_ENVIRONMENTAL_MANAGEMENT_PLAN_PART 5_
1476041

1. General Points

Page	Text	Comment
3	This report has been compiled as an outline Construction Environmental Management Plan (CEMP) and includes outline logistics strategy, construction methodology and associated environmental controls to be adopted during the proposed redevelopment of Museum of London site, known as London Wall west. The report also contains a draft master programme identifying key dates, indicative durations, proposed sequence of works and phasing of all major elements of the scheme.	The Plan offers little acknowledgement of the unique nature of the site and its proximity to residential accommodation
	The implementation of measures will mitigate or minimise the potential environmental effects associated with works	“mitigate” says nothing. A firmer target of minimisation should be adopted
	The CEMP, including the CLP, will be updated to a Final CEMP for agreement with the City of London based on actual planned methodologies before works commence on site. As such the proposals within both of the above documents may be subject to further development, the agreed approaches being captured in the Final CEMP.	There appears to be no acknowledgement by the applicant that noise minimisation measures will also have to be reconsidered in the light of the final adopted technologies. This should be spelled out.
4	Ongoing liaison with all local residents and business will be maintained in accordance with good construction practice and requirements of the Considerate Constructors Scheme including consultation via meetings and discussions, plus information via newsletters and general mail shots via agreed email accounts.	

2. Specific Points in the application

Page	Text	Comment
5	Super Structure and Cladding Phases For the superstructure phase it will be possible to utilise the new ground floor slab to bring vehicles into the site for off-loading. This will include concrete wagons for the	This should reduce the need to use the Barbican car park and thus is an important contingency for residents in

	new cores, steel beams / metal decking for the new structural frames and the unitised cladding panels and other construction material.	terms of noise effects and loss of amenity
8	The use of an off-site consolidation centre to collate materials prior to delivery will be further developed to address the increase in deliveries required during the fit out stages of the project – this approach would need to be reviewed for suitability for this project when the scope of the fit out is defined.	The consolidation centre is crucial in reducing the volume of vehicle movements and attendant noise. It should be a firm commitment on the part of the developer, whereas here it is only to be “developed”, on page 20, it merits “full consideration” and at page 31 of appendix A it “will be used”
	Deliveries will be restricted to be within working hours of the site* *The exception will be when the Police direct specific loads to be transported through the City to an area of safety outside normal hours, often prior to 0700 and after 1900hrs. This is normally restricted to exceptionally long, wide or slow deliveries. Such activities will be planned in advance by the Contractor and notified to the residents and local business.	There seems to be no data in the application regarding how frequent these out-of-hours movements might be or whether it would be possible to restrict them to specific days or times
	The histogram, found within the Construction Logistics Plan in Appendix A, shows that the anticipated daily number of vehicles is expected to peak at approximately 80-90 vehicle movements per day during the piling and superstructure phase of the works	This is a high volume of movements in a residential area. This is presumably the best outcome hoped for by the applicant. In addition, the plan contains no sensitivity analysis and specific provision for mitigation measures if the level of movements exceeds the specified level.
13	4.1 Site Operating Hours The Contractor proposes to manage the works within the following site working hours: • Mon – Friday 08.00 – 18.00 • Saturday 09.00 – 14.00	This already means that residents can only hope for one quiet day a week, though that will also be subject to any exceptional needs that may arise.
	In the event that works need to continue after 18:00 (Monday to Friday) or 14.00hrs (Saturday) the Contractor shall notify the CoL Environmental Officer and provide the following details: • Reason for extended working • Contact on site (inc mobile phone number and email) • Specific works to be undertaken • Mitigation measures to be deployed • Predicted time of finish The Contractor may also be requested to notify effected neighbours or business to informing them of the over running works and the likely time the activities will complete. Requests for over running of working hours will only be made in the following scenarios.	There are a number of concerns with this section: <ul style="list-style-type: none">• Residents should always be informed when the late working affects their amenity• The reasons for seeking late working include factors outside the contractor’s control, but there are cases here where better planning and scheduling would avoid the need for late working. It would be preferable if the contractor was required to assess alternatives to late working on a routine basis

	<ul style="list-style-type: none"> • For Health and Safety reasons where an element of the work cannot be completed to a safe condition within the normal working day. • For safe engineering reasons – where an element of the work needs to be complete to give structural stability. • Circumstances beyond the Contractors control, for example where concrete deliveries fail to arrive on time and there is a need to complete the pour for health and safety reasons or to ensure the structural stability of the elements is not compromised. • Where required by CoL due to other restrictions i.e. erecting and dismantling of tower cranes, road closures and similar. • Exceptional wide / long or slow loads where the police restrict travel through the City during normal site hours. Works outside the agreed site hours will only be considered for Health and Safety or safe engineering reasons ie where the works cannot be completed in the normal working day and to leave them in a semi complete state will compromise safety of the workforce, public or the structural stability of the works. Out of hours activities applied for would have acceptable minor noise impacts. The request for extended hours will need to be fully explained on this basis 	<ul style="list-style-type: none"> • How will the contractor ensure that “Out of hours activities applied for would have acceptable minor noise impacts.”
	<p>The Contractor will:</p> <ul style="list-style-type: none"> • Ensure considerate site behaviour of the contractors’ staff, subcontractors employees and visitors (such as delivery drivers). • Ensure the noise from vehicle reversing alarms and mobile working platforms (MEWPS) are kept to minimum levels; 	<p>The plan should spell out how this is to be achieved</p>
<p>14</p>	<p>4.4 Complaints Register and Actions</p> <p>Any complaints received in relation to any site activity, whether given verbally, in writing or both, will be recorded in a site complaints book retained in the site office.</p> <p>Sub-contractors shall immediately notify the Contractor should they receive any complaints.</p> <p>All complaints will be investigated, and any corrective action will be implemented and feedback given to the complainant.</p> <ul style="list-style-type: none"> • All complainants will be contacted by the Project Manager or Community Engagement Manager or their representative for further discussion within 24 hours and identification of a mutually acceptable resolution within one week. Where a valid grievance is raised, measures will be put in place where practicable to fully investigate and take action so as to avoid recurrence of the complaint. • The CoL will be advised of any justifiable complaints and 	<p>As a general point, the procedure described here will not address noise concerns in an appropriate way.</p> <p>It would also be helpful if residents had online access to the complaints book both at the time of complaints being made and for subsequent review of the contractors performance</p>

	actions taken to investigate the validity and any actions which have been put in place to rectify the situation as deemed necessary.	
	A marshalling yard will be set up on the south side of the ground floor slab with direct vehicle access from London Wall. This will be used throughout the super structure phase with concrete, reinforcement, steel frame members, metal decking etc off loaded from vehicles stood on the ground floor slab. This will keep this level of activity away from the more sensitive side of the project.	The applicant should asked to look at options for providing earlier site access from London Wall.
22	Movement and vibration monitoring to establishment base line readings for above and below ground assets. <ul style="list-style-type: none"> • Baseline readings for noise and dust. 	The protocol for developing baseline readings should reflect the fact that residents are present on site 24/7 and not just during working hours
27	Fit-out Phases Deliveries / waste removal during the fit out phase will use the new permanent loading bays created in the new lower ground service areas. These vehicles will use the existing ramp from Aldersgate to reach the new loading bay facilities in line with the long-term servicing arrangements for the proposed development	The noise impacts of the long-term site servicing arrangements are not addressed in the application. However, measures to monitor and minimise noise and loss of amenity should be put in place for the fit-out and normal operation phases of the project
31	It is assumed that the rear service yard will be restricted to construction traffic only from the commencement of the main demolition post museum closure and will remain restricted until the project's completion	This is an assumption that has important implications for resident amenity and the achievement of the contractor's objectives for noise management. It seems highly unlikely that the proposed alternative arrangements for residents, deliveries and emergency vehicles can be made to work
35	The construction of each of the three new office buildings will follow a similar sequence. To reflect the east to west phasing across the site, it is proposed that the new Bastion House will commence first, followed by the new Rotunda building, with the north west building third	Noise pollution effects depend on where residents live. The assessment of baselines and measurement of impacts should reflect this.
40	The Contractor will seek formal consent to our proposed methods of work including the measures we propose to minimise noise, dust and vibration. This consent, if granted by the CoL under Section 61 of Control of Pollution Act 1974, shall remain in place for the duration of the construction project. The Contractor will have discussed in detail and agreed the proposed noise, dust and vibration control measures with the CoL and the proposed construction supply chain prior to such an application to ensure the proposals are appropriate and crucially, achievable. Such applications are carried out to a high level of detail. Throughout the construction period, Best Practicable Means of noise control will be	It is unclear what is meant by "sensitive times". Residents live next to the site 24/7 and many are retired. This should be acknowledged by the contractor.

	<p>applied to avoid and minimise noise at neighbouring properties and other sensitive receptors arising from the construction activities. Liaison will be ongoing with the neighbours and in particular the residents within the Barbican Estate and local businesses to avoid sensitive times</p>	
	<p>The Contractor will undertake a noise assessment as part of the Construction Noise and Vibration Report to predict noise levels at adjoining properties. The noise assessment will be undertaken in accordance with BS5228-1: 2009+A1: 2014 'Code of Practice for noise and vibration on construction and open sites'. This assessment allows the Contractor to select the most appropriate tools, methodology and controls to minimise disruption to occupied buildings that are in close proximity of the site during the demolition, enabling, piling and basement construction periods. Vibration is recognised as a key environmental risk during the demolition stage, the subsequent pile enabling stage (when the existing foundations are removed) and during the construction of the new foundations when the reduced level dig is undertaken to form the new basement. However, the risk can be substantially reduced and mitigated by the careful selection of plant and methodologies such as equipment that crushes concrete slabs and columns and the use of hydraulic bursters to split the old foundation pads in lieu of the more traditional heavy breaking techniques. These measures will also assist with the mitigation of noise on neighbours.</p>	<p>The “tools, methodology and controls to minimise disruption to occupied buildings that are in close proximity of the site during the demolition, enabling, piling and basement construction periods” should be selected in consultation with the Planning Authority rather than solely by the contractor and on the basis of much clearer goals for their use than is provided by “assist with the mitigation of noise”. This section leaves compliance entirely in the hands of the contractor.</p>
46	<p>The following will be undertaken as part of the liaison and consultation strategy</p> <p>A detailed complaints/comments/compliments register will be set up.</p> <p>Throughout the project lifecycle, neighbourhood engagement will evolve in line with the programme of works and will align with the reasonable demands/needs of the local community. The overriding deliverable will be to manage communication proactively and to disseminate information in a co-ordinated and controlled manner, bringing local neighbours and stakeholders along on the journey and mitigating any potential disruption</p>	<p>This is presumably an excerpt from a PR brochure rather than a serious contribution to the application. How are the reasonable demands of the local community to be determined? Should this not be done in advance of the project starting? Why is the only goal of the exercise the controlled and managed dissemination of information?</p>
	<p>8.2 Complaints/Compliments/Queries Procedure Any complaints received will be acknowledged, investigated, and closed out. The status of which will be monitored, reviewed and regularly reported to the Project Director and shared with the wider project team By the SCVM and other custodians. The SCVM will be responsible for managing, making the suitable arrangements, and</p>	<p>Same comments as for page 14. In addition, this section opens the question of the independence of any “technical, commercial or legal advice”. How is this to be assured?</p>

	<p>recording the receipt of complaints with as much relevant information as possible. All complaints will be recorded in our in-house system which is Info Exchange. Investigations into complaints shall be conducted promptly and, where necessary; technical, commercial or legal advice sought from an authorised source. Corrective actions or action plans arising from an investigation will be delegated to any relevant parties to address and close out the complaint. Contact with the originator of the complaint will be maintained until the matter is addressed. This protocol is also included within the Neighbourhood Liaison Strategy</p>	
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Appendix A: construction logistics plan

Page	text	comment
31	<p>The Contractor will seek formal consent to our proposed methods of work including the measures we propose to minimise noise, dust and vibration. This consent, if granted by the CoL under Section 61 of Control of Pollution Act 1974, shall remain in place for the duration of the construction project. Planned measures checklist Committed Proposed Considered Measures influencing construction vehicles & Deliveries x Adherence of designated routes x Delivery Scheduling x Use of consolidation x Use of holding areas x Re-riming deliveries to avoid school start & end times x Sustainable Freight x Use of electric vehicles x Use of cargo bikes x Material procurement x Offsite manufacture x Local procurement x Re-use of material x Other Measures Staff travel plans x Project collaboration x</p>	<p>The limitation of delivery times to avoid school start and end times is welcome, but should be referenced elsewhere in the plan, as this is an additional constraint of the delivery plan. In general some form of sensitivity analysis should be carried out given how many factors need to work optimally for the delivery plan to meet its targets.</p>

3. Sections dealing specifically with noise

There are two sections in the document that deal specifically with noise, at page 42 of the main document and page 34 of the appendix. The two sections largely duplicate each other.

page		
42	<p>These real-time monitoring systems can incorporate noise, dust and vibration monitoring. They can provide text or email alerts, and live display screens to warn both operatives and management of any disruptive work which may come close to the agreed limits, allowing the management of site activities to prevent reaching trigger limits</p>	<p>The applicant should be asked to specify what the buffer and trigger limits will be. The application also lacks any specifics about the location of noise monitoring devices.</p>

	Quiet working hours will be agreed with the CoL as part of the Section 61 agreement.	Residents should be involved in this discussion
	The following precautions will be made to minimise nuisance to the public and neighbouring occupiers caused by noise:.....	Greater use of pre-review would be welcome in particular in relation to work sequence planning
	In addition, the Contractor will: <ul style="list-style-type: none"> • Undertake monitoring of the noise and vibration levels on Site; • Reporting noise complaints, or occasions of exceeded action levels to the Contractor and immediately investigated. • Carefully selecting and construction methods and plant used to minimise noise at source as far as reasonably practical; • Minimising disturbance from reversing beepers through use of ‘white sound’ beepers, site layout to avoid reversing of vehicles where ever possible and provision of permanently erected acoustic screens; • Using electric and electro-hydraulic plant and equipment where practical; • Siting noisy activities away from sensitive receptors, where ever possible; 	Many of the commitments in this section are conditioned on the feasibility of actions (“wherever possible”, “where practical”). The applicant should be invited to be more specific or to clarify the limits of feasibility.
34	Predicting sound levels will enable the Contractor to be proactive, rather than reactive and enables control of the construction impact. By taking this proactive approach the Contractor can build better relationships with authorities and work with the community.	This is very welcome and is a key activity which should be required by the Planning Authority as part of the finalisation of the construction plan. It is not clear whether the applicant is committing to using the tool

4. Concluding points

- a. The Plan is insufficiently sensitive to the location of the site close to residential accommodation and includes no analysis of the needs of the resident population
- b. There are no guaranteed quiet days
- c. In view of this, a stronger target than noise mitigation must be required of the applicant.
- d. Too many factors are left to the contractor – reasonable of requests, monitoring technology choice, sources of expertise, feasibility of different interventions
- e. The Plan lacks any concrete detail about how noise will be monitored beyond general references to the technology to be used
- f. The noise generated by deliveries is sensitive to the assumptions in the delivery plan which may not be realistic
- g. There is no provision for ongoing monitoring of noise and loss of amenity after project completion
- h. The proposed complaint management procedure will not provide for real-time remediation of noise complaints. Residents access to information is inadequate.
- i. The control of out-of-hours movements could be made more robust
- j. The plan is vague on whether the applicant will use noise modelling or not.

Overall comments

The table below summarise grounds for objection to the application based on documents received from the Corporation under freedom of information. Due to the fact that the applicant has not provided any form or overall index to this very complex application (in itself a barrier to proper consultation) I have not been able to verify the presence or absence of some documents in the application. Nevertheless, it is noted that the applicant may have failed to properly address the Authority's concerns regarding

- The cultural gateway function of the site
- The creation of a sustainable cultural activity
- The role of the anchor cultural tenant
- Retention and reuse of the existing buildings
- Waste minimisation targets
- BREEAM and NABERS targets
- Choice of façade materials and appearance
- The function of the North building
- The safety factors associated with conjunction of public space and busy roads

There are also a number of specific and useful recommendations that the Corporation made regarding specific studies to be carried out where it is unclear whether this was actioned by the applicant.

Meeting Date & Document Title	Text		Comments
13.5.21 PPA meeting 2	none		Reference to COLC vision document. The document should have formed part of the application
3.6.21 mail from Gerard Eve to COLC	"We are working on the sustainability/re-use piece in the background"		

	<p>“appreciate that we haven’t reached any level of agreement on retention, however in either scheme we would be looking to add bulk, height and mass at the same places”</p>		<p>This is prior to the first phase of public consultation which began in May and which the developer has noted were “ high-level and exploratory and not related to any design proposals specifically for this site.” Despite this it appears that at elats two concepts were under active consideration and could have been consulted with the public at that time. It is also clear that the retention option was still open. What are the two schemes under discussion?</p> <p>The statement shows that the applicant had already rejected any a scheme which would preserve the existing massing of the buildings</p>
<p>20.7.21 COLC comments on circular economy</p>	<p>COLC headline communicated to applicants:</p> <p>“Maximise circular economy principles in terms of prioritising the retention and re-use of existing built form and structure. Apply principles of longevity, adaptability, modularity and the use of recycled materials to all new built elements.”</p> <p>Pre-app meeting of 6.7.21 considered 4 options:</p> <p>Refurbish existing Redevelop rotunda</p>		<p>The applicant’s ability to properly investigate retention and re-use in line with COLC guidance was constrained by erroneous advice regarding the structural integrity of Bastion House. Now that the advice has been refuted, this remains a unmet expectation. The initial 4 options should have been re-examined.</p>

	<p>Redevelop rotunda and major extension to Bastion House (Just) Retain north wing</p> <p>Replacement of Bastion House was recommended by the applicant following structural assessment</p> <p>In response, COLC comments</p> <p>“However, further to the outstanding site investigation, it should also be considered whether residential use would suit a retained, adapted and extended Bastion House structure better”</p> <p>“greater efforts to assess opportunities for at least partial retention and adaptation should be afforded to this (<i>retention of MOL</i>) . Openings could be created to improve the relationship to street level”</p> <p>“a townscape assessment should be carried out with regard to the architectural and townscape character of the area – there may be elements and features that can be retained and that link into the Barbican development to support the</p>		<p>The applicant claims in the presentation ““...Over a sixty year lifespan we estimate that we could provide office space for almost twice the number of occupiers for the same whole life carbon budget with a new build option compared to a comprehensive refurbishment option...” and commits to ensure that 90-95% of materials are recovered</p> <p>The residential and hotel options for Bastion House are among the options reviewed for sustainability purposes. However, they do not seem to have been evaluated more broadly in terms of their capacity to support the City’s wider strategic aims or in terms of whether adaptation to either of these uses would be more feasible than other purposes.</p>
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	<p>legibility of the history of the Barbican and its special character”</p> <p>“Overall, any substantial demolition must be justified by strong and convincing benefits of redevelopment with regard to circularity principles in the first place. This should also be supported by comparing embodied carbon impacts of the “major extension option” and the “retain north wing” option, including sub options relating to the retention of the 4-6 storey base or parts of it”</p> <p>“Lastly, the preferred redevelopment option was presented to aim for being “net waste positive”. 90-95% of demolition material would be “reclaimed”. It seems unlikely that the demolition material would be recycled at least at equal value, and also unlikely that the demolition material could be processed on site. Further information and creative ideas about achieving a net waste positive development, that would support redevelopment of the site would be expected at an early stage.”</p>		<p>Of the 6 development scenarios considered in the application, three provide for the retention of all or part of the existing buildings.</p> <p>these options are analysed in the application and perform better in carbon terms than the demolition option until the 25 year point (in the case of 3(a) and 45 year point (in respect of 3(b). This cannot be a compelling argument for demolition given the priorities defined by the City at the 2021 meeting.</p> <p>The construction and environmental management fails to commit the constructir to this target and instead states “The Government has set broad targets of the use of reclaimed aggregate, and in keeping with best practice, the Contractor will be required to maximise the proportion of materials recycled.” Unless the commitment exists elsewhere, the waste management aspect of the plan</p>
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			should be revised to meet the target explicitly
30.7.21 Mail exchange between Gerard Eve & COLC	<p>COLC feedback on meetings PPA3 (10.6.21) and PP 4 (6.7.21)</p> <p>“New development should not have a detrimental impact on local or strategic views.....</p> <p>“.....It was identified that the tested massing option would result in some diminishment to the setting of St Paul’s Cathedral, St Bride’s Church and St Giles Cripplegate. Opportunity should be sought to increase the massing on the site without harm to heritage assets.</p> <p>If the proposal would result in harm to heritage assets this harm would need to be outweighed by the public benefits of the scheme as set out in the NPPF.....</p> <p>..... We would encourage a study to be undertaken that looks at successful examples of useable public realm areas that are immediately adjacent to a busy carriageway.....</p> <p>The architecture should be bold, innovative and signify entry to the Culture Mile.....</p>		<p>I have not been able to access the relevant documents from the COLC portal at the time of writing. However, I note that there is considerable emphasis in the dialogue with the developer regarding the unsafe nature of the existing road network adjacent to</p>

	<p>please provide an update on discussions with the NLA and details of how they are being embedded into the scheme.....”</p>		<p>the public realm, It is not clear whether such a study was carried out and whether it was included in the application</p> <p>The role of the NLA does not appear as part of the description of the evolution of the design of the site in the application documents. This appears to be a serious omission.</p>
<p>13.8.21 Mail from COLC to applicant (Gerard Eve?)</p>	<p>Feedback to presentation of 3.8.21</p> <p>“further discussions are still needed at this early stage in respect of circular economy principles and Bastion House.....</p> <p>Further understanding is needed of how the NLA would figure in the site layout.....</p> <p>The role of the Culture Cap needs to be understood. We would want reassurance that the cap would not be a high end box and restaurant.....</p> <p>How could the cap act as a visual marker and attractor? How could the southern flank draw people north to the Culture Mile? What would the exterior look like - vertical artwork up the facade? To enhance wayfinding it would be beneficial if its exterior could be read and understood.....</p>		<p>The culture plan within the application states “.The Culture Cap Restaurant is integrated with cultural activation across the site through tenancy by an ethically focused commercial restaurant offering potential for skills development for people from less advantaged backgrounds. During the daytime, when not programmed or in use as a learning space by anchor tenants, the Culture Cap Venue would</p>

	<p>A last mile logistics hub is required to be incorporated within the site. Such a facility should be able to accommodate current and future demand for such a facility.....</p> <p>The impact of servicing the development must be reduced by the use of an offsite consolidation centre, off-peak servicing, and a cap on the number of vehicles to the site.....</p>		<p>serve the restaurant as a non-practical, theory/ lecture learning space. This model would present a genuine upskilling opportunity for a wider community beyond the immediate London Wall West community and a high-end, commercial restaurant offer all in one” The application confirms the intention to create a high-end restaurant.</p> <p>Is this still a requirement and if so, is it included in the application?</p> <p>The applicant has provided traffic modelling but has not committed to a cap on vehicles</p>
<p>19.10.21 Mail from COLC to applicant</p>	<p>Feedback following circular economy meeting of 7.10.21</p> <p>“Applicants need to demonstrate an appraisal of retention/demolition options, most likely of a realistic refurbishment/new built combination and full redevelopment to achieve the desired development type, comparing Whole Life-Cycle</p>		<p>The applicant has failed to do this even to the extent of investigating the most appropriate of their (self-selected) options for the site</p>

	<p>carbon emissions in line with the relevant GLA guidance for each option. An evaluation of each option then should include other benefits such as circularity, quality of buildings and spaces and public benefits. This evaluation should inform the planning proposal. Can we please agree details of the options prior to work starting on this assessment.....</p> <p>The retention of structure for Bastion House may not be a sustainable option, subject to addressing comments and confirmation of this for both commercial and residential uses. However, we have not seen detailed information about the opportunities of the Museum of London and the whole base structure. It would be disappointing if none of the sub and superstructure of these elements could be retained and adapted, given the importance of circular economy.....</p> <p>Waste: a net-zero waste strategy would be welcome that goes beyond generic intentions and aspirations. This would go a long way to support the application, and if retention of parts of the structure is not an option, a thorough waste elimination strategy would mitigate this somewhat. As discussed, our Cleansing department is developing a circular economy strategy, and an important action of this is to facilitate the processing of demolition waste at highest value and material exchange, e.g. by using an unused waste site just outside the City.</p>		<p>See comments above</p>
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	<p>Perhaps LWW could act as a trial scheme to set a positive precedent....</p> <p>We are conscious of the limited lifespan of standard commercial glazed or panelled façade systems and would recommend the consideration of more solidly built external walls. This would not prevent future alterations to facilitate different uses or up-to-date glazing/opening elements.....”</p>		<p>It is unclear whether the applicant responded to the Planning Authority’s concerns</p>
<p>21.10.21 COLC mail to applicant</p>	<p>Feedback from LWW workshop and site visit</p> <p>“Further discussions are needed in respect of the extent of the red line, land ownership demises and any plans to bring the proposal forward on a phased basis.....</p> <p>TfL Buses team need to be consulted on the new road layout.....</p> <p>... The design of the lower block adjacent to the turret needs to be understood.....</p> <p>..... The architecture has elements of both a corporate and residential feel. It is also very glazed. Further discussions are needed around the architecture.....</p>		<p>Have these issues been resolved?</p> <p>If this has not been done, it is difficult to see how the application can be advanced at this point</p>

	<p>The bulbous apex of the rotunda needs a bold treatment as a way of celebrating the site as a destination and a celebration of the cultural cap.</p> <p>The NLA or other potential occupier plus the Cultural Cap all need help to be fit for purpose and flexible and avoid duplication and matched to need and support social value.....</p> <p>Need to explore a link to the archaeology running east - west - look at Bastion basement spaces and link buildings to cultural use (the point that made in the meeting)...</p> <p>The impact of the height reduction and massing alterations need to be understood in terms of impact on the daylight and sunlight to surrounding residents. The residential turret scheme should also be factored into the daylight/sunlight assessment.....</p> <p>The mix and layout of uses needs to continue to be understood alongside how our aspirations for the provision of affordable workspace would be provided.....</p>		<p>Was this done?</p> <p>The application has always been framed in terms of providing the highest standard of commercial accommodation. There appears to have been very little consideration of affordability despite the importance of this issue to occupancy rates. This</p>
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			contradiction runs through the whole application.
11.11.21 Mail from Gerard Eve to COLC	Confirms that design team has updated the re-use document to provide “an alternative, realistic re-use study. Subject to confirmation from yourselves, we would then use “option 2” in this document to carry out a more detailed WLC analysis”		This exchange happens just before the start of the second phase of public consultation which was based on initial ideas for the site. If more than one option for the site was available at this point and option 2 included a re-use option, why was it not part of the public consultation?
10.12.21 Mail from COLC to applicant	Confirms that option 2 should be worked up in WLC terms and sets out expectation as follows: “The exercise should start with the 4 options, brief description and discussion as to why only option 2 is further worked up to be compared to the redevelopment option in whole life-cycle carbon terms. It should be demonstrated that the final 2 options are both meaningful with a realistic balance between circularity and other benefits.”		See above. At this point the public consultation has started when it should clearly have been delayed pending the elaboration of the alternatives. It is also unclear, if only from the point of view of full transparency, why the four options could not have been publicly-presented.
14.1.22 Feedback table provided by COLC (11 pages)	Table is laid out with Current position and Moving forward columns Key comments (current position	Key comments (moving forward)	
	Uses Section The City’s Vision Strategy (discussed in the early pre-app meetings) sets out the land use aspirations for the site – culture led in substance and style, a destination in the	<ul style="list-style-type: none"> Define how the proposed quantum, siting, design and mix of uses would provide the right conditions to create a new vibrant, inclusive City destination. 	This is an office-led development, directly contradicting the City’s vision

	<p>Culture Mile, provision of a cultural anchor and a vibrant ecosystem of uses.</p> <p>Space suitable for the NLA has been incorporated into the lower levels of the scheme alongside retail space, affordable workspace, community spaces and office space. The provision of space for a cultural anchor is welcomed.</p> <ul style="list-style-type: none"> Limited discussion has taken place as to how the 'NLA space' could be used if the NLA do not occupy the site. Details of similar spaces have been shared e.g. Brown University Creative Arts Center and the Centre for Architecture, NY. Needs to be evidenced that the proposed quantum and layout of space dedicated to this anchor offer would be attractive to other organisation of a similar status to the NLA <p>Some discussion has taken place as to how the Cultural Cap could be used. The current proposal includes performance and restaurant space. Clarity is needed as to the value of this offer. Need to be convinced that the space is a viable proposition and that it would not become an exclusive corporate area</p>	<ul style="list-style-type: none"> Discussions need to continue in respect of how the 'NLA space' could be used if the NLA do not occupy the site. Essentially what is the need and evidence base for providing this space? How is it flexible and fit for purpose? It needs to be demonstrated that it would be a viable proposition for alternative anchor occupiers. We would want to see examples of other potential occupiers (organisations with a similar status to the NLA) that could realistically be attracted to the site and details of how the space would be suitable for them. Further details are needed in respect of the Cultural Cap, how this would be used and examples of potential occupiers. We need assurance that it would be fit for purpose, adds value and is adaptable with inclusive access. It should not become an exclusive, high end corporate offer. Opportunity for linkages with St Paul's Cathedral should be explored. 	<p>See comments above regarding NLA's role in the design</p> <p>Refer to application – does the culture plan brief make the requirement clear? Brown university creative arts centre is 35,000 sq ft.</p> <p>Culture plan : “*Consultancy has identified these potential discussions through our extensive research and consultation regarding the cultural activation of London Wall West. They are not to be interpreted as agreements or active negotiations. Conversations regarding the level of interest and rental expectations will need to be</p>
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	<ul style="list-style-type: none"> • At this stage we still need to understand how the proposed mix of uses would work together to create a distinct inclusive, diverse and vibrant destination for the City that contributes to the Culture Mile, Good Growth and fulfils aspirations in recent publications including Levelling Up, London Recharged document i.e. that the City is a seven day a week destination, inclusive, with appeal to a wider audience etc. • There is concern as to how the siting and mix of uses would activate the London Wall Plaza and the highwalk level given the quantum of office space that is now being proposed at the lower levels of the site. This is particularly in the case of the Rotunda building which at ground floor level mainly comprises lobby and circulatory space. 	<ul style="list-style-type: none"> • Clarity is needed on how the proposed community spaces and community programming area would operate. Example users and the evidence base for the provision of this space need to be defined. 	<p>initiated after the planning agreement.” Clearly the necessary work has not been done to ensure the viability of the cultural offering.</p> <p>Culture Plan “Further conversations with cultural and community stakeholders, as well as with City developers and planners, will inform the City of London Corporation's decision-making and ensure that the final cultural offer at London Wall West answers requirements across the City of London to offer a cohesive approach to culture that aligns with Destination City objectives and City-wide development policy” . these discussions have not taken place.</p>
	Culture section	Culture section	See above

	<p>Officer feedback has emphasised that the site is key gateway into the Culture Mile. The LPA's vision strategy for the site set out that development should be culture led in substance and style.</p>	<p>The cultural elements of the scheme need to be further defined both in terms of design and use (see above and below also).</p> <ul style="list-style-type: none"> • It needs to be understood how this site is culturally distinct, how its cultural elements create a sense of place, how it signifies entry to the Culture Mile and how it fulfils the aspirations of the Culture Mile look and feel strategy. • What is the relationship with and how will the proposed uses enrich and support existing cultural experiences including the Culture Mile, the revamped Barbican proposals, Guildhall School of Music and Drama, St Pauls Cathedral etc. Need to evidence how the proposals will support the area as a strategic cultural quarter of national and international stature. • Deliver a Cultural Plan with strong measurable ESG indicators and tied into London Plan and post covid recovery aspirations – related to data and community and user stakeholder engagement 	
	<p>Design section</p> <p>Detailed discussions have not been undertaken regarding how the North Commercial building</p>	<p>Design section</p> <p>We need to see progression in this respect and see evidence that the</p>	

	<p>works in terms of uses or architecture and relationship to place making.</p> <ul style="list-style-type: none"> • Still need to be convinced of the architectural approach from a design, sustainability and use perspective. • Architecturally Bastion House and the Rotunda still feel very corporate, glassy and formulaic with consistent modules and this needs to evolve to make this northern cultural quarter distinctive as a place. <p>Sheer facades to the east and west and the fins are not convincing. They are visually repetitive although it is recognised devices need to be introduced to reduce overlooking and address solar gain. Visuals were presented to show a more dynamic façade and sense of movement at the December workshop but this needs to be developed further.</p> <ul style="list-style-type: none"> • The emerging architecture needs to transition between the Corporate glassy City along Aldersgate Street and London Wall to the character of the Barbican Estate and surrounding finer grain of residential areas to the west. 	<p>architectural approach is evolving in response to matters that are being raised by CoL Officers. Further evolution is needed to deliver a world class exemplary sustainable design rooted in context that celebrates the site as the gateway to the Culture Mile.</p> <p>Need to see activation of the lower levels of the building at different Highwalk levels – not just large swathes of lobby space that would be dead on weekends and evenings and some of the service areas deliver blank facades in prime locations eg: the ground floor of the Rotunda building along Aldersgate Street. The site needs to be an active, vibrant hub and destination.</p> <ul style="list-style-type: none"> • The appearance and architectural value of the cultural cap needs to be defined whilst ensuring that it would not harm local views. Explore relocation of cultural cap entrance to southern apex of building and for this cultural element to be a beacon – for this to be successful need to think about this in context of the public realm quality, desire lines stemming from highways and pedestrian studies, and pleasantness of public realm. Possible narrative from St Martin le Grand to the apex to the roof top looking back to St Pauls. 	<p>Has the applicant addressed the points below to the satisfaction of the authority.</p>
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		<ul style="list-style-type: none">• Break up massing and facades, make softer more playful, humanise, more undulating, increase solidity, introduce elements of surprise and delight, randomness in modelling projections and sets backs, create variety in the cascades. This would address concerns that the buildings would read as a cascade of glassiness and balconies. The architecture needs to work well with and without the greening.• Explore a different softer materiality in respect of the east and west facades. Can the blank cloaked facades be less of a consistent veil and be visually broken up? Address the inward looking feeling that is created by this approach.• Explore opportunities to outwardly express different internal uses and activities and add visual interest for example a shared works space has a prominent entrance and presence with an external shared garden or a related café. This would support activation.• The overhang to the ground floors could be more varied and broken up and less dominant, varied in height, form part of the interior to add variety to the pedestrian experience. Explore a bespoke crafted approach. Further consideration should be given to the relationship between the base of the buildings and the surrounding public	
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		<p>realm. The use of columns and cantilevers should be rigorously analysed in all locations to ensure the public realm is of sufficient quality. The column thickness should be presented accurately.</p> <ul style="list-style-type: none">• Review the relationship between the two blocks. They need to have a dialogue but do not need to be identical in language. Explore shared and contrasting forms, details, proportions, materials Architecture in terms of layout, orientation, materiality needs to be a direct response to sustainability and ideally be innovative in terms of materiality and perhaps introduce a new palette of materials which are recycled – could introduce elements of artwork to the architecture.• Consider the crown and silhouette of the buildings and how this will be experienced in views to add interest to the skyline and local views.• Would be useful to dive down further into the rationale of the architecture and how its related to its context and how sustainability, adaptability and circularity are embedded and work through the different approaches to the site as a kinetic journey experience to understand how the buildings integrate into the local townscape.	
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		<ul style="list-style-type: none"> • Dedicate some sessions that focus purely on architecture 	
	<p>Sustainability section</p> <p>Work on circular economy/WLC is progressing. A feasible refurbishment scenario has been agreed with a view to assessing WLC impacts of refurbishment versus new build scenarios.</p> <ul style="list-style-type: none"> • A commitment has been made to ensure that 90 -95% of materials are recovered. • Concern has been raised about the quantum of glazing and curtain walling to the proposed facades from a sustainability perspective in terms of high embodied carbon impact and lack of longevity. • The extent of the greening to the facades and roof areas has been queried. It needs to be substantial, effective and enhance biodiversity. • Potential proposals in respect of Citigen have been discussed and the ability of the site to accommodate a Citigen extension. • A BREEAM overview has been provided. BREEAM outstanding is targeted and should be achieved 	<p>Continue to gain a more detailed understanding of the sustainability credentials of the scheme and understand the entire package of what is being proposed.</p> <ul style="list-style-type: none"> • See the results of the WLC impact of the new build versus refurbishment scenarios asap to justify the extent of the proposed demolition. • Continue discussions to show that the proposals have been designed to optimise circularity principles and WLC impact. • Continue to develop proposals that aim to be net waste positive as set out in the sustainability related pre-app meetings to date. This will be expected in order to mitigate the impacts of demolition. • Create an environmental and architectural response to the concerns over the quantum of curtain walling and glazing. A balance needs to be struck between environmental impact and response to context. The site should mitigate between the solidity of the 	See above

		<p>Barbican and the modern office buildings on Aldersgate and London Wall. Clarify what is being proposed at roof level. Need to strike a balance between amenity, biodiversity and building services.</p> <ul style="list-style-type: none"> • Proposals should include substantial and effective greening on the facades and at roof level, continuing the spirit of the landscaping of the Barbican across the site. The greening for the site should have a UGF in excess of 0.3. • Demonstrate that the greening maximises biodiversity. Need ecology baseline of existing urban greening and biodiversity including any trees to understand uplift. • Drive forward the proposal to incorporate the Citigen extension into the development. This could constitute a public benefit of the scheme. <ul style="list-style-type: none"> • Demonstrate how the proposal has been designed to incorporate climate resilience measures. • Demonstrate that BREEAM outstanding could be achieved with maximum credits in the City's priority areas. In addition to BREEAM benchmark against other assessments: (1) a highest NABERS UK rating that includes an assessment of the building in operation including controlling tenanted areas. NABERS bridges the performance gap between 	<p>The applicant has committed to outstanding but has not explicitly committed to maximum credits in the Design Plan. The City should ensure that any standards commitments are included in the application</p>
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		<p>the design and inuse energy performance of offices; and (2) a highest LEED standard rating which is a green building project and performance management assessment that focusses on green building design, construction, operations, and performance.</p> <ul style="list-style-type: none"> • Maximise opportunities for innovation in respect of recycling water; planting for climate resilience and rewilding 	
	<p>High ways section</p> <p>It is accepted that London Wall is a major vehicular route. The peninsula layout was tabled in one of the initial meetings. However, there are concerns about vehicle priority and the domination of road infrastructure in the public realm. The site is intended to be a destination for the City and signify entry to Culture Mile. Information is still needed on how the proposals outline wider placemaking aspirations for the area and we need to understand how pedestrians navigate across the road to get to the site. The relationship between desire lines, views/vistas, active frontages, crossing/arrival points, road junctions and landscaping should be considered carefully.</p> <ul style="list-style-type: none"> • Loss of the highwalks will be contentious and to date robust justification has not been provided for their removal. We need to understand more about how they are used at present. Suitable public realm interventions 	<p>Discussions are needed around the traffic flow modelling used to inform the proposed design in terms of use of anticipated post pandemic data, as opposed to pre-pandemic traffic data .</p> <ul style="list-style-type: none"> • Pedestrian flow modelling and a pedestrian comfort assessment should be undertaken for the existing and proposed schemes. We need to understand origins, destinations, desire lines etc. A Healthy Streets assessment should be carried out for the proposed road layout and should in turn inform revisions to the proposed design. • Retention of highwalk links needs to be explored. Removal of highway links need to be justified. • The design team should explore options to improve the pedestrian experience – which could take the form of widened footways, urban greening, 	<p>What traffic and pedestrian flow modelling has been carried out and did this include the review of other locations where public realm and busy roads are in close proximity as proposed by the Authority</p>

	<p>should accommodate the needs of pedestrians resulting from the loss of any highwalks.</p> <ul style="list-style-type: none"> • High level discussions have taken place concerning cycle parking, delivery and servicing and the delivery on strategic priorities e.g. last mile delivery hub. Further detailed discussions are needed in these respects. • The location of the entrance to cycle facilities should be visible to active travellers and could make a positive contribution to the public realm. • The complexity of the route down to the underground cycle route has been questioned. • Further information required on the break down of highway land designations. What would be dedicated as public highway and what would be private land? *These comments may need to be updated further once we have digested the information presented in the meeting on the 11.01.2022 	<p>tree planting and pedestrian priority junctions. Pedestrians and cyclists should be given priority where feasible.</p> <ul style="list-style-type: none"> • Find innovative ways to promote and support active travel for example Kingston Station Go Cycle. • Discussions in respect of cycle parking and servicing need to continue. • Need to establish TfL's stance on the highway changes. • Discussions on the site's delivery of strategic highway aspirations e.g. last mile delivery hub need to continue. • Further sessions are needed on land designations i.e. what will be allocated as public highway, city walkway and permissive path. The scheme should deliver uplift in public highway and city walkway. 	<p>Has TfL confirmed its position?</p>
	<p>Public Realm section</p> <p>There are some positive concepts emerging in respect of the extent of the greening and character of the spaces. Further design development is needed and we need confirmation that it is feasible to deliver what is proposed</p>	<p>Demonstrate that landscaping proposals on London Wall are feasible given the footway depth and the extent of the services underneath the pavement. Undertake a wider placemaking study which analyses the sites role in the wider neighbourhood and use this study to inform the public realm and ground floor proposals.</p>	<p>Was this study undertaken?</p>

	<p>Wind/thermal comfort section</p> <p>Initial CFD wind analysis has been presented. There is concern that landscaping has been included within the model all be it the landscaping has not been finalised and it is not yet clear on what landscaping could be delivered where.</p> <ul style="list-style-type: none"> • An area of the London Wall Plaza would be suitable for standing in the winter season. This is likely to be unacceptable and would need to be mitigated. It is envisaged that this area would ideally be designed to be suitable for frequent sitting or occasional sitting as we would want this to be a place where people dwell. • Areas to be used for outdoor seating should be clearly defined to enable further analysis of the results. • Mitigation potentially needed to terrace areas. 	<p>Re-run the CFD analysis without the landscaping.</p> <ul style="list-style-type: none"> • Provide wind analysis for the existing scenario for comparison purposes. • Provide a plan that identifies the proposed areas for outdoor seating/dwelling. • Wind tunnel testing should be carried out. • Further analyse the wind experience on the terraces and what form mitigation would take 	<p>Has the applicant provided evidence of the wind effects on the terraced areas?</p>
	<p>Daylight/sunlight section</p> <p>Consultant appointed to independently review the daylight/sunlight survey.</p>	<p>Awaiting results of independent assessment to inform way forward. Careful consideration needs to be given to alleviating moderate/major adverse impacts, use of radiance analysis, the need for information on daylight and sunlight to ground new and existing public realm and gardens within the site and surrounding areas which could be impacted and how impact on local</p>	

		resident's private amenity areas would be assessed	
	Health cities and wellbeing section Encouraged the introduction of leisure activities and specifically looked at possibilities of skate boarding within car park	Need to understand how this would be built into architecture , public realm and uses – find opportunities for play – children play area/sport/outdoor gym.	These appear to be excluded from the final application
10.2.22 public realm pre-application feedback further to 10.2.22 meeting	It is acknowledged that a revised configuration of uses was presented at ground and podium level, in addition, we are aware that an upcoming meeting will give further clarity to the intended ground floor uses. Notwithstanding, we still need to understand the rationale behind these spaces going forward: o The ground floor plan does not show clear demarcation between the coffee shop, office lobby and the lobby of the cultural cap. In the current arrangement, the cultural cap lobby and the coffee shop have no division and appear ancillary to the office use. Is it intended that these spaces are separated with internal walls to have distinct occupiers/uses or will they have a flexible and fluid relationship with programmable events? It is important for us to understand how will these spaces be used, occupied and managed in practice, how accessible will these spaces be at evenings and weekends? o Further detail of the proposed use classes is required. o How would the uses add vibrancy seven days a week over the weekend and evenings? Thought should be given to the potential role of hybrid spaces, particularly in respect of the office lobbies, the coffee shop	Way forward section (rotunda, ground floor and active frontages) The design team should undertake a wider placemaking study which analyses the buildings' role in the wider neighbourhood and use this study to inform the design of the public realm and ground floor. The placemaking study should undertake a detailed examination of arrival points, routes, desire lines, nodes, edges, active frontages and how the façade terminates views and vistas. The analysis should inform the proposals and the design should respond accordingly. • A reduction in the size of the office lobbies would allow for an increase in other active uses and should be explored. • Consider the distribution and location of uses at ground floor level and respond to the use related questions set out above.	Has this study been carried out?

	<p>and the cultural cap. o Could the office lobby be placed at a mezzanine level to give over additional ground floor space to retail/F&B/flexible use? o Are the proposed uses fit for purpose and adaptable? This should be benchmarked against comparable uses? o What are the determining factors behind the proposed quantum of space particularly in respect of the culture cap and the lobby (also relevant to the community rooms and the affordable workspace in Bastion)? o Who is it envisaged would use the spaces and who are potential occupiers? o How do they create a destination for the City and the Culture Mile? • The south side of the rotunda is positioned on a key vista at the north end of Aldersgate Street and the design is beginning to respond to its context. On the south elevation, around the culture cap lobby, floor to ceiling glazing allows pedestrians to ‘read’ the building from the outside and will help to draw the eye of pedestrians into publicly accessible spaces. However, floor to ceiling glazing may not be an appropriate treatment for all facades and alternative approaches to glazing should be explored in other locations. The facades need to be responsive to the deliverability of potential uses.</p> <ul style="list-style-type: none"> • Glass curtain walling behind the columns feels repetitive in some areas and its visual and qualitative success needs to be demonstrated HVM compliant 	<ul style="list-style-type: none"> • Activation of ‘blank’ or ‘inactive’ facades through the implementation of green walls and public art. • Explore options for varying façade treatments at ground level (behind columns), solid panels could create more variety and interest. • Alternative entrance arrangements should replace the revolving doors 	
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	<p>Revolving doors feel unwelcoming to the public and present accessibility challenges. Consideration needs to be given to alternative entrance arrangements. This is a general comment applicable for the entire development.</p>		
	<p>Having further studied this area and viewed the proposals in more detail through the model, the interface between the glade, the façade/entrance to the multi-use event space and the surrounding ground floor public realm needs further consideration. Whilst a central, green public space is a positive feature, alternative options for the layout of the glade, the building frontage and the central public space should be explored. There is concern that the current design would not create a usable, convivial public space.</p> <ul style="list-style-type: none"> • In the current design, the stairs up to the glade are narrow and tucked away. The stairs are overshadowed by the lip of the glade and Bastion House and would not be clearly visible to pedestrians. The staircase should be a strong and positive feature in the public realm with landscaping and seating, where pedestrians feel 'invited' up to L01 . The stairs should be wider and more prominent and be an active part of the public realm. The shape and geometry of the glade should be revised to accommodate this 	<p>Way forward (the glade)</p> <p>The feasibility of shifting the multi-use event space westwards should be investigated, to create a more generous route and public space which draws people up to L01. Increasing the width of the stair by 2m would allow for the creation of a more prominent new route and public space which encourages people to sit and dwell. The shape and geometry of the glade and the soffit of Bastion House should be revised to open up the route and give it a sense of presence within the public realm.</p> <ul style="list-style-type: none"> • Further design development is needed in respect of the glade to address concerns over its functionality, gradient, feasibility of landscaping and relationship with the central staircase (including the awkward voids). It is preferable that the hole in the centre of the glade is removed, and options are presented to show the provision of a landscaped area that allows people to use the space. The glade should be a 	<p>Have these points been actioned in the application?</p>

	<p>The Glade and the performance space concept looks interesting and dynamic within the CGIs but in reality the functionality of the space is questioned and it requires further design development. The gradient towards the edge of the glade is significant (at L01) and it makes the central grassed space small and impractical, also, the overhanging lip overshadows the stairs up to L01. Having seen the model, we continue to have concerns regarding deliverability and operation of the glade and its relationship with the amphitheatre. Perhaps consider lawn rather than planting to make the space more usable and accessible. Awkward voids under the lip could accommodate root ball and may enable a tree to be included.</p> <ul style="list-style-type: none">• The hole in the centre of the glade which cantilevers over the public space offers little benefit and results in multiple glazed balustrades which would detract from the planting. It negates the benefit of shelter and creates a residual space on the south side of the glade (L01) where people are not likely to go. Provision of a central landscaped space (at L01) is positive, however, it should play a stronger placemaking role by following a form, geometry and shape that allows for people to fill the principal public space with activity.• The relationship between the entrance doors to the auditorium and the subtle changes in level under the lip of the glade feels uncomfortable and could present accessibility issues. It is likely to be used principally for	<p>densely planted, tranquil, landscaped space where people can dwell.</p> <p>Present revised options for the area underneath the glade to overcome concerns about the design and role of the exterior amphitheatre (unclear why people would dwell here, the steps act as a barrier to movement in such proximity to the entrance and the rise in each step looked too short to sit and dwell).</p> <ul style="list-style-type: none">• Provide further details on the role of the main plaza.	
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	<p>movement as opposed to dwelling and the proposed steps act as a barrier to movement. It seems unlikely people will stop and dwell on these steps as shown in the 3D model.</p> <ul style="list-style-type: none"> • Further consideration should be given to the design and use of the central public space at ground level between the Rotunda and Bastion building. Landscaping should play a key role in creating a noise and visual buffer between the square and the road. The design of the glade and staircase should relate to the main plaza, the role of which needs to be further understood – what happens here – why will people linger – what makes it distinctive and special – what's the anchor and draw 		
	<p>The public space underneath the cantilever of the Rotunda at L01 requires further consideration. Views into the NLA space below are positive, but further thought should be given to how the space will be used.</p> <ul style="list-style-type: none"> • The east-west passage on the north of the rotunda could lack activity, is likely to be overshadowed and could lack natural surveillance. Ideas on how the space would be enlivened should be considered and demonstrated. Active frontages and lighting along this route are key to ensure a and pleasant environment for pedestrians 	<p>Way forward (spaces under the rotunda)</p> <p>Continue design development of public spaces under the Rotunda. The role of lighting, public art/culture, seating and the design of the soffit should be explored.</p> <ul style="list-style-type: none"> • At L01, there is potential to integrate sports facilities to activate the space, for example, a brightly coloured basketball court, a street football pitch or somewhere to skateboard could activate the space and broaden the age group of users. 	<p>Have these points been addressed by the applicant?</p>

	<p>The plans and 3D model show an additional Highwalk above Ironmongers Plaza. The Highwalk would help to enclose the space, and planting/landscaping on the column or overhanging the public space would be an attractive feature. The highwalk will also create interesting layers of public space</p>	<p>Consider the role between the highwalk and Ironmongers Plaza, and how it could help to shape the public space</p>	
	<p>There is an opportunity to create a stronger relationship between the Highwalks and the London Wall Garden. Places to dwell and sit and information about the London Wall could be accommodated on the high walk. The green wall on the eastern side of Bastion House facing the London Wall Garden helps to create a tranquil green space around the remains of the London Wall.</p> <ul style="list-style-type: none"> • The Highwalk which runs along the eastern edge of Bastion House presents an opportunity to provide seating and spill out space for restaurants, however, there are concerns about the privatisation of public space. Space for members of the public to sit along the Highwalk would be positive. • What is envisaged for the community room in L01 of Bastion House? Who can use this space and what purpose will it serve? Engagement with appropriate stakeholders should be undertaken. What does community space mean? Is this needed and is there an evidence base to support the proposal? • Further information on the affordable workspace is required. 	<p>Bastion House lobby, London wall gardens and the high walks Section</p> <p>Consider activation of highwalks/walkways around Bastion house at L01.</p> <ul style="list-style-type: none"> • Provide examples/ a vision for look and feel of affordable workspace and community rooms. • In due course we need to explore the look and feel of the lifts, highwalks and public routes. • The southern corner of the Bastion building, at highwalk level, needs to be presented in views or CGIs. • Discussions in respect of the accessibility of the public realm for different users need to progress along with the appointment of an independent access consultant. • Further design development of the underground route between the cycle lane ramp and the exhibition space is required. Is there potential to incorporate archaeology 	<p>Has the consultation with local groups taken place? The Culture plan suggests not.</p> <p>Has an independent access consultant been appointed to address the concerns in this section and the preceding sections?</p>

	<ul style="list-style-type: none"> • At ground level, there is a sharp corner on the southern edge of Bastion House. The plans show a double height lobby with the High walk wrapping around the outside of the building at L01. How this corner functions should be demonstrated in views/CGIs. • The look and feel of the Highwalks outside Ironmongers Place should be shown and this arrangement needs to be understood. • A below ground corridor into the exhibition space from the cycle lane was shown. Introducing a light well from street level into this public space is positive, however, the use of this space needs to be considered. Is this a space that relate to the London Wall as an exhibition space – currently it feels undefined and not integrated and unsafe 		
	<p>North Building</p> <p>The design of the routes and spaces needs to be developed and discussed in due course to understand levels, intended use and the look and feel. Connectivity It is essential that the development opens existing gated routes around the site. This would enrich the public realm and integrate the site and provide tangible links from St Pauls, Moorgate and Smithfield to the wider Barbican site. These should connect key public routes and destinations beyond the site boundary. It would be useful to have a separate session on permeability, connectivity and accessibility. Highwalks The loss of public highwalks is contrary to policy and therefore</p>	<p>North Building</p>	<p>There is no evidence of the North building providing the connectivity requested by the Authority</p>

	<p>there needs to be some clarity around the amount of lost and gained public realm area. There is a possibility that an additional highwalk could be retained and upgraded to provide direct access into the rotunda. The loss of all three highwalks needs to be justified further as the proposed pedestrian crossing at grade to the site are currently unconvincing in terms of a qualitative experience for pedestrians (a follow up highways meeting needs to be arranged.</p>		
	<p>Relevant Overarching issues</p> <p>The scheme should:</p> <ul style="list-style-type: none"> • Respond to thermal comfort and pedestrian comfort assessments. • Integrate appropriate HVM measures at this stage of the design process particularly given the quantum of columns at ground floor level that could need protection. • Follow the Mayoral Public London Charter principles of; “public welcome, openness, unrestricted use, community focussed, free of charge, privacy, transparency, good stewardship”. <p>https://www.london.gov.uk/publications/public-london-charter.</p> <ul style="list-style-type: none"> • Be supported by a management strategy for all internal and external public spaces. <p>Management details should be provided at an early stage as they impact on how space is used and perceived with a view to delivering an inclusive environment.</p>		<p>Has the management strategy been provided as part of the application?</p>

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: Dr Michael Pike

Address: Flat 111, Lauderdale Tower 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 strongly object to these plans.

They will:

Destroy an area of Grade 2 listed amenity at Bastion House, Museum of London and Ironmongers Hall.

This is a coherent and much-loved set of structures which will be destroyed.

There are adjacent buildings (and inhabitants) which will experience environmental impact.

It will reduce light, increase noise, increase pollution, increase carbon and waste.

All this will be in order to create another office block.

There is a pressing need to approach this area with sensitivity and imagination to maintain/enhance the built environment for its inhabitants and visitors.

The current plans are profoundly destructive and I object to them strongly.

From:
To:
Cc:
Subject: Fwd: Ref. 23/01304/FULEIA (planning permission) 23/01277/LBC (Listed building consent), & 23/01276/LBC (Listed building consent)
Date: 04 April 2024 14:19:40

THIS IS AN EXTERNAL EMAIL

Dear Sir

Please see my objections below - my original email to you had a typo in your address.

Yours faithfully

William H Cresswell
25 Thomas More House
Barbican Estate
London EC2Y 8BT

Sent from my iPhone

Begin forwarded message:

From: Howard Cresswell
Date: 4 April 2024 at 14:11:02 BST
To:
Cc:
Subject: Ref. 23/01304/FULEIA (planning permission) 23/01277/LBC (Listed building consent), & 23/01276/LBC (Listed building consent)

Dear Sir

I am submitting my strong objections to the current plans to redevelop London Wall West site to replace Bastion House and former Museum of London.

Whilst I have visited the model and display on the proposed development at the London Centre I struggle to deal with the wide range of new and amended planning documents the City of London has recently published without any explanation or consultation which in my opinion represents a very poor standard of governance.

I am particularly concerned about the environmental impact of the proposals which run counter to current policies at national level and within the City of London. If implemented these proposals will unleash tens of thousands of tonnes of embodied carbon.

Bastion House and the former Museum of London are an important part of this country's architectural heritage of the 1950/1960s period and I believe that the City of London has not given serious consideration to their retention and reuse.

My most serious concern about the proposed new buildings is their sheer scale with a bulk which is completely out of proportion with the original plan for

the area and has no regard to the existing townscape. The design of these proposed new buildings is totally unsympathetic to this unique historical site and the post war vision for its redevelopment after the blitz.

As a resident of Thomas More House the much increased scale of these proposed new buildings in comparison to the existing ones will severely reduce sunlight into my flat.

The existing ramp which gives access to the Thomas More car park will become the only vehicle access point into the new buildings which would have a major adverse impact with regard to emergency vehicles, deliveries, postal services, taxis cyclists and pedestrians. I ask that serious consideration is given to the adverse impact this part of the proposal has on residential access, air quality, noise, disturbances and safety of pedestrians and cyclists.

I note that the City of London has no tenant for this site and there are other locations within the City more suitable for major office development should demand exist. It is regrettable that these proposals largely ignore the value of London Wall West as a cultural gateway which appears to have been forgotten along with the disastrous environmental consequences of these proposals in pursuit of reckless speculation to maximise financial gain.

Yours faithfully

William H Cresswell

25 Thomas More House
Barbican Estate
London EC2Y 8BT

Sent from my iPhone

From:
To:
Subject: Objections
Date: 04 April 2024 15:35:02

THIS IS AN EXTERNAL EMAIL

Although I have already emailed you with my objections to this scheme I understand that it is necessary to re submit my objections before the Consultation ends on 06 04 2024

It seems that the City has placed many new or amended details on its portal without any explanation or consultation.

This in itself seems to represent a very cavalier and cynical attitude towards the many residents of the Barbican who are deeply uncomfortable with the way that the City interacts with anyone who disagrees with their plans.

As I have stated previously, along with many others, this application has caused huge concern over the impact on the environment (carbon and waste), non compliance with the City's own carbon targets and the emerging Local Plan. Surely the City of London should be seen to be leading the way in terms of good governance and setting an example on how to begin to put down foundations for a sustainable future for all of us.

Penelope Gillinson
Thomas More 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 Greg Grant

Address: 4 Greville Close Twickenham

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I strongly object to the proposed development outlined in this planning application. After careful consideration, I firmly believe that the scale and design of the proposed buildings are unsuitable for the area and would have significant negative impacts on the local environment and community.

Firstly, the size of the proposed development is completely out of proportion with the surrounding area. It towers over neighbouring properties and disrupts the established character of the area. The sheer scale of the project would result in overshadowing, loss of privacy, and a sense of oppressive overcrowding for nearby residents.

Furthermore, the design of the proposed development is, frankly, unappealing and lacks any architectural merit. The design is completely out of keeping with the aesthetic charm of the neighbourhood. Its sheer bulk and uninspired appearance would create an eyesore that detracts from the visual appeal of the area.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Mr Philip Wheatley

Address: 252 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I have raised objections previously to this excessively large and inappropriate development. My original objection remains valid but at this stage I wish also to object to the way the City of London is progressing this application which seems designed to ensure the development goes ahead and does not have the level of scrutiny and judgement a sensitive development in the centre of our historic City requires. The very late release of a large quantity of amended planning documents makes it impractical for objectors like me to read and properly analyse the information in them. In my view is another improper attempt to push through this application without ensuring proper consideration of the proposal.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Ms Rosemary Simmonds

Address: Cromwell Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The demolition involved in the scheme will create MASSIVE pollution, going against the City's much professed carbon targets and climate goals.

The City proposes to monetise the site by replacing two buildings, distinguished for their integration with the Barbican Estate (Bastion House and the former Museum of London) with a pair of banal and OVER-SIZED office blocks.

The cultural and educational benefits of this scheme are not convincing in any way. The former Museum of London was both a cultural and educational attraction. Why would the public want to visit this scheme - a windy canyon beneath two hulking office blocks?

The City takes little account of the thousands of Barbican residents and the widely admired planning of the Barbican Estate.

From:

To:

Subject: Objections to London Wall West planning application nos 23/01304/FULEIA, 23/01277/LBC, 23/01276/LBC

Date: 05 April 2024 08:01:46

THIS IS AN EXTERNAL EMAIL

I wish to register my amended objections to the London Wall West planning application on the following grounds:

HERITAGE, HISTORY AND CULTURAL POTENTIAL

Bastion House and the former Museum of London are heritage assets and should be retained. This area of London is a valuable and much loved area of cultural and historic significance. Within sight of St Paul's Cathedral, overshadowing the Grade 1 listed St Giles Cripplegate and adjacent to the world renowned Grade 2 listed Barbican, on the site of the ancient Roman Wall and one of the original gates to the City, it is a location that should be celebrated and used to further the City's cultural offering to residents, City workers and visitors. Postman's Park - one the largest open spaces in the City will be completely dominated by the new development and a vital haven of peace and green space will be forever compromised, The City talks of "Destination City" and the need to increase footfall to the area, but then fails to act to realise its own laudable ambitions. This site is on a crucial pathway from the Elizabeth line station at Barbican/Farringdon to the Barbican, on to St Paul's and then to Tate Modern. Add to this the new Museum of London site in Smithfield and the potential for vibrant new development in Smithfield East, and there is the potential to create an area that will rival and surpass the greatest cities in the world. Building new blocks of office space is not only a desecration of this hugely significant site which will destroy our ability to understand the history of this area of London, but is also an astonishing lost opportunity to create something that will bring lasting financial and cultural stimulus to the City. The additional application still pays no attention to this failure of the scheme and contains no material improvements to the scheme.

Sincerely - Barnaby Spurrier

291 Shakespeare Tower

Barbican

EC2Y 8DR

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Mr John Spicer

Address: 272 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Dear sirs

We object to this planning application for the following reasons.

- 1 Demolishing the buildings appears to be the worst option for releasing carbon emissions and the impact on the environment.
- 2 They are heritage buildings and should be protected.
- 3 Alternative use should be fully considered e.g the Girls school has been looking for extra space for years.

Your proposal does not accord to your own stated aims. In the very recent City Corporation Corporate Plan 2024, one of the six outcomes is leading sustainable environment and in a recent press release you talk of Protecting heritage buildings.

Yours sincerely

Mr & Mrs J Spicer

Objection to planning application 23/01304/FULEIA - London Wall West - by Dr Bob Harris

This objection is submitted by Dr Bob Harris of 22 Thomas More House, Barbican, London EC2Y 8BT.

This is a further, updated objection following the two re-consultations notified on 28 February and 14 March 2024. I am OBJECTING to this application on the grounds set out below and ask that it be REJECTED by the City of London acting as local planning authority and/or WITHDRAWN by the City of London Corporation acting as the applicant.

1. The timescale for inviting comments is completely unreasonable

The submission of this planning application was originally notified in a letter dated 12 December 2023 with a deadline for comments of 31 January 2024. The application was accompanied by several hundred documents comprising many thousands of pages of text along with many tables and diagrams. It required a huge effort to digest this material and prepare well-founded comments on the proposals.

Since my original objection was submitted on 24 January, two re-consultations have been notified to me and over 50 further documents relating to the application have been uploaded to the COLC planning portal – comprising many hundreds of pages of text and many tables and diagrams. Some of these documents are completely new, whilst others appear to be revised versions of previously uploaded documents. There has been no public explanation of the reasons for the new documents, nor any guidance provided as to the changes that have been made to previous versions.

Furthermore, the notice from the City's Environment Department dated 2 April stated that: "...the Chief Planning Officer will recommend that they [the applications] be Approved". Since the closing date for comments on these proposals is 6 April this statement can only be made if the intention is to ignore any further objections. This appears to me to be ultra vires and possibly illegal.

I therefore request that the closing date for further public comment – and hence any determination of the application – be deferred until an appropriate explanation has been provided and interested parties have had a realistic timetable for comment.

2. The application fails to comply with the City's Climate Action policies

The City of London Corporation (COLC) aspires to be a leader – nationally and internationally – in addressing the global emergency of climate change caused by the emission of CO₂. As part of that initiative, it has developed a Climate Action Strategy and has adopted a Planning Advice Note¹ " to guide developers putting forward proposals for building (re)development. The PAN requires (WLC carbon reduction principle 1) "confirmation that options for retaining existing buildings and structures have been fully explored before considering substantial demolition".

In addition, the Court of Common Council approved at its meeting on 7 March 2024 that the draft City Plan 2040 should be issued for public consultation before submission for inspection prior to approval by the Secretary of State. This plan sets out in section 9.2 Policy DE1 Sustainable Design:

¹ Whole Lifecycle Carbon Optioneering Planning Advice Note

1. Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options.
2. All major development must undertake an assessment of the options for the site, in line with the City Corporation's Carbon Options Guidance Planning Advice Note and should use this process to establish the most sustainable and suitable approach for the site.

Whilst the planning application sets out a WLCA assessment for a number of refurbishment and redevelopment options, it dismisses these in favour of complete demolition and redevelopment (Scenario 9). It dismisses other possible refurbishment options on the spurious grounds of a risk of disproportionate collapse to Bastion House despite: a) having received an assessment from renowned experts that this is not a risk, and b) having carried out a soft market test which led to three developers expressing well-founded interest in refurbishment and redevelopment.

This is not acceptable and should not preclude such options being explored. Indeed, the Chair of the Policy & Resources Committee gave such an assurance (see Appendix 1) in his letter of 29 September 2023 which stated: "The submission to planning, however, does not preclude options for re-use. In effect, all options remain on the table.....We intend to ask the market to formally come forward with bids for the site which could be on a redevelopment, reuse, or partial reuse basis."

Furthermore the WLCA analysis of the limited range of options presented in the planning application mis-represents the conclusions in two ways, see² pages 32-43:

- i. The use of a 60-year timescale: Table 10-1 shows that the huge addition of embodied carbon required for Option 9 means that it takes 30 years before its estimated carbon usage is the lowest (as noted in section 12 of the report).
- ii. The comparison is made per square metre: this means that the absolute size of the development is ignored. Because Option 9 has the largest GIA of any of the options examined, it will emit more CO2 over a 60-year life than any other option examined. The data in Table 9-1 and Table 10-1 of the document show that Option 9 is projected to emit 98,000 tonnes of CO2 over 60 years while Options 3a-6 are projected to emit 80-86,000 tonnes over the same period.

It cannot be over-emphasised that the climate emergency is here and now. An option which (even on the applicant's own analysis) would not be the best in carbon terms until 2058 (30 years after project commencement) would hamper both the City's own targets and the national targets for CO2 reduction. But the analysis above shows that the situation is actually worse than that as Option 9 would lead to more CO2 in the atmosphere until beyond 2088.

In summary, the WLCA analysis is flawed, the conclusion drawn will inhibit the achievement of City and national CO2 targets for 2040, it is morally unjustified in the light of the climate emergency, and it runs counter to the assurance given by the Chair of P&R that all options remain on the table.

² Carbon Optioneering Study

3. The proposed use of the LWW site as an office-led development is inappropriate

The LWW site covers an area with a rich heritage and which has had a world-leading museum at its heart for over 50 years. When the decision was made to move the Museum of London to a new building in Smithfield, the COLC launched a feasibility study in May 2017 for the development of a new Centre for Music on the site. This was seen as a key piece in “opening up a cultural corridor from Tate Modern, via the Millenium Bridge and St Pauls into the emerging cultural hub...including the Barbican, Guildhall School, London Symphony Orchestra and Museum of London” (see Appendix 2). The then Chair of Policy & Resources said: “This is an important step towards the transformation of this vibrant area around the Barbican Centre and Guildhall School of Music & Drama into a world-class cultural hub.”

When the decision was taken in February 2021 to abandon the Centre for Music due to financing challenges, it was widely anticipated that a revised cultural strategy for the LWW site would be developed, but despite many requests for such a strategy to be developed it has not been progressed. It came as great shock when we learnt that the COLC had charged the Property Investment Board to develop proposals for the site with a view to generating the maximum financial return. This has led directly to the current planning application.

I object strongly to the use of the LWW site primarily for offices (over 80% of the GIA). It is adjacent to the largest residential area in the City, it has had a major cultural institution there for over 50 years, and there is a significant amount of empty class-A office accommodation in the vicinity.

The application should be rejected and/or withdrawn in its entirety to allow a more appropriate use of the site to be drawn up.

4. The height and mass of the proposed buildings is excessive

I have met with members of the LWW Project Team on several occasions over the last 2-3 years to discuss the emerging proposals. It was stated on more than one occasion in respect of the height and mass of the two proposed tower blocks that: “we plan to build them as high as we can get away with”. There was no concept of blending in with the existing/retained buildings. The result is an application which more than doubles the footprint of Bastion House, along with a second tower block of a similar height and a similar footprint that results in an increase of 230% in office space on the site. There are several consequences of this very large increase:

4.1 The local townscape would look exceedingly unsightly. Approaching from St Pauls to the south up St Martin-le-Grand, the buildings are 6-8 stories high on either side of the road. The proposed new Rotunda Building will rise to 14 stories and dominate the northward view and surrounding buildings. An even worse townscape will be seen from Aldersgate St looking southward, with the massive Rotunda Building blocking the view (see Appendix 3).

4.2 The adverse impact on daylight and sunlight. My flat is in Thomas More House on the First Floor above Podium Level. Since it was first built, it has experienced the loss of sunlight and daylight from developments to the south and east. The proposed Rotunda building would be a new, massive obstacle which would further reduce the sunlight and daylight which I currently enjoy.

The tables and analysis set out in the application documents³ are misleading in that they claim that key measures (Vertical Sky Component VSC, No Skyline NSL, and Annual Probable Sunlight Hours AP SH) meet the BRE target values – when in fact these measures are already below the target values and would be reduced further by the proposed new buildings. In the case of Thomas More House:

- i. Table 13-16 shows that only 36 of 331 windows and 18 of 213 rooms meet the VSC criterion set by the BRE in the baseline (current) situation. Since the proposed LWW will reduce sunlight, the analysis in Table 13-21 that allegedly shows that 255 out of 331 windows ‘meet the BRE target value’ is patently untrue.
- ii. Table 13-16 also shows that 186 of 213 rooms meet the NSL criterion set by the BRE in the baseline. Again, the analysis in Table 13-23 that allegedly shows that all 213 rooms will ‘meet the BRE target value for NRL’ with the proposed LWW development is not true.
- iii. Table 13-18 contains the baseline sunlight analysis which shows that 153 south-facing windows out of 326 meet the AP SH criterion. However, the analysis in Table 13-25 that allegedly shows that 322 out of 326 windows will ‘meet AP SH criteria’ with the proposed development is not true.

This mis-representation has been noted in the critique “Daylight Sunlight Review Redacted” by Delva Patman Redler dated 6 February 2024 where on page 5 it states:

“It is noted that the chapter suggests that where windows/rooms within receptors considered are BRE compliant that they ‘meet the VSC/NSL target value’. However, this is not the correct terminology as the windows and rooms around the site considered generally do not meet their default target values...”

The submitted documents treat every adverse impact of less than 20% in these measures as acceptable and thus to be ignored. For those locations (ie residences) where the adverse impact is greater than 20% (in aggregate over 1,000) a range of excuses are used to dismiss them as negligible and/or not significant. This has a particular impact on Thomas More House, Mountjoy House and London House.

The estimates provided for my own flat (page 29 of the document⁴) show that:

- i. The existing VSC of 14% is well below the BRE target of 27% and will deteriorate further to 12% if the LWW proposals proceed.
- ii. The baseline AP SH of 30% annual sunlight and 17% winter sunlight will deteriorate to 28% annual and 15% winter if the LWW proposals proceed.

In summary, the planning application would have a widespread adverse impact across all of the neighbouring residential buildings and my own flat in particular. I therefore object to the height and mass of the proposed development and, if approved, submit that the height of the proposed Rotunda Building be limited to a maximum of eight stories.

³ ES Vol I – Chapter 13 – Daylight, Sunlight, Overshadowing, Solar Glare

⁴ ES Vol III – Appendix 13B -Sunlight Amenity Analysis (1st floor, windows W7 and W8)

5. Congested access to residents car park

The design proposals set out in the Delivery and Servicing Plan⁵ state (page 13) that “All service vehicles will access the Site via the existing ramp from Aldersgate Street. This ramp is shared with vehicles entering and leaving the Barbican residents’ car park”. Later in that document it is explained that this will require a control point with barrier on the ramp, along with traffic light controls and an intercom system to the two underground yards.

There are several deficiencies in the analysis set out in the document:

- i. There is inadequate recognition of the current volume of vehicle traffic using the TMH Ramp. These are not just vehicles owned by residents who park in the TMH car park (from Thomas More, Mountjoy, Seddon, Lauderdale Tower and other blocks), but also delivery vehicles and contractor vehicles.
- ii. The area in front of the current Car Park Attendants office is often congested with delivery vehicles, but the LWW plans assume that this can be used as a new thoroughfare.
- iii. The projected volumes of delivery and service vehicles set out in the document make over-optimistic assumptions about the steady and managed flow of vehicles into the underground yards but take no account of the likely increases in peak arrival rates due to traffic conditions in the wider area.
- iv. No estimates are made of the number of vehicles expected for service and maintenance visits which by their nature require extended periods of parking.
- v. The proposal that pedestrians no longer use the TMH ramp (see Barbican Pedestrian Access Clarifications – uploaded 25 March 2024) is a significant change of use.

There is a high likelihood that vehicle access to the proposed new buildings, by residents to their current parking facilities, and by suppliers to residents will become heavily congested.

A further concern is that the vehicle access arrangements for the proposed development have not been approved by the London Fire Brigade – see Fire Statement dated 6 March 2024 which was uploaded to the COLC planning portal on 14 March 2024.

Prior to determination of the application, the applicant should be required to review the proposed vehicle access arrangements, and to put forward arrangements approved by the LFB which ensure adequate access by residents to their existing long-standing facilities.

6. Impact of the retention of Ferroners’ House

The design proposals for the LWW site submitted by the applicant assume that Ferroner’s House will be demolished. However, the freehold of Ferroners’ House is owned by the Ironmongers’ Company who have submitted an objection dated 30 January 2024 which concludes:

“...the scheme will be unable to proceed if the City Surveyor is unable to agree terms with the Company over a potential acquisition of the freehold of Ferroners’ House...”

⁵ Delivery & Servicing Plan Part 1 & Part 2

Prior to that objection letter, the Ironmongers' Company submitted an application (23/01320/FULL) - dated 1 December 2023 but uploaded to the portal only on 27 February 2024 - for the renewal of planning permission for a two storey extension to Ferroners' House.

Taken together, these two documents throw huge uncertainty into the proposals for the LWW site. Without the demolition of Ferroners' House, it will not be possible to provide the proposed stairs and lift which form the pedestrian link from the lower to the upper level at the centre of the site. This would result in a need for a major redesign in that area.

The planning application should be rejected as it clearly cannot proceed without the uncertainty over Ferroners' House being resolved.

7. Impact on traffic and public transport in the vicinity of the LWW site

There has been no up-to-date modelling of traffic flows undertaken by TfL to reflect the removal of the Rotunda roundabout and the changes to the St Pauls Gyratory system (see paragraph 6.4.43 in the document ES Full Revisions 27Feb2024) which states:

" It is correct that the MAP process has not been finalised and this is a consequence of a separate delivery/approval mechanism for the Gyratory works, which have been progressing through the City's 'Gateway' process, which involves several stages of public consultation and committee approvals. It is valid to note that there is a risk that layout changes could be required following TfL review..."

Earlier traffic modelling indicated that there could be a significant increase in bus journey durations on some routes at certain times of the day.

There is also the likelihood of traffic queues building up during peak periods at the proposed Rotunda junction traffic lights at peak periods – particularly London Wall westbound and Aldersgate St southbound. The estimated Mean Maximum Queues for these two points indicate likely significant backlogs at peak periods – see page 13 in the document Response to Comments on Transport which was uploaded to the planning portal on 25 March 2024. This document also contains many unresolved issues around transport and access.

The planning application should not be approved before a full analysis of the consequences of the proposed removal of the Rotunda roundabout has been undertaken and agreed by TfL.

8. Deficiencies in the draft Construction Management Plan

The documents submitted by the applicant include a draft Construction & Environmental Management Plan⁶. I was informed by the LWW Project Manager at the public exhibition of the proposals in January 2024 that because the COLC planned to sell the site to a developer, the sub-contractor who prepared the CEMP was not assured of working on the actual development – and hence everything in the plan could be changed!

However, amongst many concerns that I have with the draft CEMP, I would like to observe two elements that would not be acceptable in any revised version:

⁶ Construction & Environmental Management Plan

- i. On page 36, it is stated: “Meanwhile, for safety reasons and to minimise construction delays, residents and service vehicles should access the car park using the back exit which can be found c.90m north of the rear service yard ramp along Aldersgate Street. This entrance provides access to the entire car park. Service vehicles that do not fit through this entrance will be able to use the existing ramp access, however should only be utilised when absolutely necessary”.

This would be a major disruption to all current users of TMH car park and Lauderdale car park, and it is proposed to be in place for at least 5 years. The ‘back exit’ on Aldersgate St can only be accessed by a 180 degree turn from the road. The entrance height into the underground car park is too low for vans and possibly SUVs. The route through the Lauderdale car park to the TMH car park is very narrow and would very easily become congested.

- ii. On page 61, it is stated: “Staff Welfare - For the main construction and fitting out phases, a large set up will be required to accommodate up to an estimated 900 operatives and staff. It is proposed that the new concrete infill structure is constructed above the north service yard early in the programme to provide space for a multi-level accommodation building”.

This would be a huge temporary structure which would overlook the CLSG sports field and most residents’ flats in Thomas More House and Mountjoy House for at least a 5-year period.

If the planning application were to be approved, conditions should be applied that preclude either of the above elements to be included in a revised Construction & Environmental Management Plan.

Dr Bob Harris

5 April 2024

Appendices

Appendix 1: Letter from the Policy Chairman 29 September 2023

Appendix 2: City of London Press Notice – 11 May 2017

Appendix 3: View of proposed Rotunda Building from Barbican Station overbridge

Appendix 1: Letter from the Policy Chairman 29 September 2023

Policy Chairman
Chris Hayward

Adam Hogg and Averil Baldwin
Joint Chairs
Barbican Quarter Action

[Sent Via Email]



29 September 2023

Dear Adam, Dear Averil,

I write to inform you of the City of London Corporation's decision as landowner of London Wall West to submit a planning application and associated listed building consent for redevelopment. This includes the former Museum of London buildings and Bastion House (140-150 London Wall) at the London Wall West site.

At our Policy and Resources Committee meeting on 21 September and Investment Committee meeting on 22 September, Members agreed to proceed with a planning submission, in keeping with our duty to achieve best consideration. The submission to planning, however, does not preclude options for re-use. In effect, all options remain on the table.

As we have previously discussed, the City Corporation is under a duty to achieve "best consideration" for the London Wall West site. This means that the Corporation, as a local authority, is under legal obligation to gain the maximum financial return, as with all local authorities in a comparable situation.

With this duty in mind, we are seeking to market and eventually sell the site with the benefit of planning. The planning application would deliver c.456,000 sqft of vibrant, thriving, and inclusive spaces, a cultural programme and improved public space, footpaths and walkways. Our research indicates that there is significant demand for more office space in the Square Mile and we are confident that the development will bring added benefits to the local area.

In parallel, we listened to those concerned about a demolition planning application and reduced the scale of the proposed plan. We also completed a successful soft market testing exercise earlier on this year which sought to establish the market's interest in re-use schemes for the London Wall West site. This work will help to inform our marketing and sales process, when we intend to ask the market to formally come forward with bids for the site which could be on a redevelopment, reuse, or partial reuse basis. Ultimately, the City Corporation will not redevelop the site, it will be the market that will advance the optimum use of the buildings and occupancy mix.

We will continue to engage with you and our communities across the Square Mile to ensure the best outcomes for this important location.

Sincerely,


Chris Hayward
Policy Chairman
City of London Corporation

Appendix 2: City of London – Press Notice 11 May 2017: The Centre for Music project

The Centre for Music project, led by partners the Barbican, London Symphony Orchestra and Guildhall School of Music & Drama, has today announced the competitive process, funded by the City of London Corporation, for the recruitment of an expert design team to develop a concept design for an inspiring and innovative new Centre for Music in the City of London.

The three partner organisations, which are leading on the development of a detailed business case for the new Centre backed by the City of London Corporation, are seeking applications from internationally recognised experts from across the globe to develop plans for a state-of-the-art building of acoustic and visual excellence.

The partners are looking to appoint a design team comprised of creative and world-leading experts in their field that share the partners' vision, that can engage with the multi-faceted nature of the brief, and who can work with them towards a concept design to ensure the most exciting and dynamic outcome for the project.

The procurement process, submitted as Contract Notices to the Official Journal of the European Union, will lead to the appointments of the following roles [...] to develop a concept design for the new Centre, with the intention of continuing the contracts to project completion. The concept design will form part of the detailed business case to be submitted to the City of London Corporation in December 2018.

The City of London Corporation has provided up to £2.5 million in funding to complete this detailed business case for the Centre for Music. The Centre would contain a world-class concert hall, education, training and digital spaces, excellent facilities for audiences and performers, and significant supporting commercial areas. It would be a place of welcome, participation, discovery and learning fit for the digital age.

At the heart of the City of London's thriving arts venues and its emerging cultural hub, this landmark new building would be a visible signal of commitment to the future of music that enhances London's position as a world leading centre for the cultural and creative industries. The preferred site for the Centre for Music, which the City of London Corporation has agreed in principle to make available, is currently occupied by the Museum of London, and will become available when the Museum of London fulfils its ambition to move to a new site at West Smithfield. The current Museum of London building would be demolished with the site reimaged and redesigned to accommodate the new landmark Centre for Music.

The strategic location of the site would open up a new 'cultural corridor' bringing visitors up from Tate Modern, via the Millennium Bridge and St Paul's into the emerging cultural hub developed by the City Corporation and its four core partners the Barbican, Guildhall School, London Symphony Orchestra and Museum of London. 1.5 million additional visitors a year are expected in the area from 2018 as Crossrail opens stations at Farringdon and Moorgate, and the North-South Thameslink line is also upgraded.

Dr Andrew Parmley, Lord Mayor of the City of London, said:

“We support the ambitious plans for a Centre for Music at the heart of the City of London, one of the finest cultural hubs in the world. This vibrant area has supported creativity and innovation to flourish across every sector and helped secure London’s position as the pre-eminent financial centre. Visually striking, acoustically perfect and open to all, a new Centre for Music – facing St. Paul’s Cathedral, Millennium Bridge and Tate Modern – would be an important investment in the strength of the Square Mile and our neighbouring communities.”

Catherine McGuinness, Policy Chairman at the City of London Corporation, said:

“This is an important step towards the transformation of this vibrant area around the Barbican Centre and Guildhall School of Music & Drama into a world-class cultural hub. Culture, open and available to everyone, attracts people to work in, live in, and visit the Square Mile. We want to keep this vision at the heart of the City experience.”

Sir Nicholas Kenyon, Managing Director, Barbican; Kathryn McDowell CBE, Managing Director, London Symphony Orchestra and Lynne Williams, Principal, Guildhall School of Music & Drama said:

“Today’s announcement is the latest stage in the development of this potentially transformative cultural project. Our aim is to recruit the strongest possible team of outstanding architects and experts from across the globe to seize this once-in-a-generation opportunity to create a landmark new building that inspires current and future generations through the power and excitement of live music.”

Appendix 3: View of proposed Rotunda Building from Barbican Station overbridge



From:
To:
Subject: London Wall West planning applications 23/01304/FULEIA and 23/01277/LBC
Date: 05 April 2024 09:55:33

THIS IS AN EXTERNAL EMAIL

London Wall West: Additional CoLAG Feedback from Terry Trickett, CoLAG Member, 605 Mountjoy House, Barbican, London EC2Y 8BP

-
These notes address LWW Design Team Comments (22/03/2024)

Primarily, they address LWW Design Team Comments in sections 21 and 22 but, also, they are applicable to sections 6, 14 and 17.

The headings adopted in sections 21 and 22 are followed in these notes so that easy reference can be made between initial CoLAG member's comments and responses by the LWW Design Team.

21 Proposed use of Thomas More Service Yard

Thomas More Car Park

Calculations have been submitted by the LWW Design Team which forecast vehicular activity to and from new Bastion House at a maximum of 10 vehicles per hour (5 in and 5 out). There are reasons to believe that this estimate is too low..

In arriving at the above figure, an inaccurate assumption has been made on the eventual use and users of new Bastion House. If it is let to a single occupier the estimated figure is understandable, but the declared intention of the Applicant is that LWW will provide '*affordable workspace and maker space*' to support '*a global hub of commerce and become a centre of culture*'. This policy of mixed-use, multi-occupancy will require that new Bastion House (and the Rotunda building) will be let to an, as yet, unknown number of tenants, each of whom will be responsible for fitting-out shell and core space and, then, organising their own separate servicing requirements. On the assumption that new Bastion House will be let eventually as, say, 20 separate tenancies, the forecast activity of vehicles per hour can be expected to increase substantially - say 100 per hour (50 in and 50 out) - but, it could become many more if the number of separate tenancies increases.

The LWW Design Team's assumption of 10 vehicles per hour is based on the anticipated use of a consolidation centre; without this, the forecast activity could be, say, 20 vehicles per hour. For a multi-occupied new Bastion House, the effective use of a consolidation centre is much less likely with the result that a forecast of 50 in and 50 out would increase to say, 80 in and 80 out per hour. On top of this, there is additional traffic to and from Ironmongers' Hall to be accounted for. All in all, the CoLAG member's previous statement that anticipated traffic within the Thomas More Service Yard will be '*considerable and constant*' remains valid.

It is true that the majority of pedestrian activity within the Thomas More Car Park can be accommodated beneath the existing playing field. But, currently, this space is occupied, in part, by electric charging service bays; always, cars are parked either temporarily or permanently within the potential pedestrian area. The work required to change this situation will need to be listed, along with other substantial work in the Thomas More Service Yard, in applications for planning permission. Currently, these items are omitted from 23/01304/FULIA (planning permission) and 23/01277/LBC (listed building consent), whereas other much less significant work to high walks and hard and soft landscaping etc. is itemised. For clarification of intent, these omissions should be rectified.

Noise and Air Quality

The noise and air pollution caused by traffic accessing and egressing via the Aldersgate St ramp will be significant although CoLAG members appreciate that by 'enclosing' the Thomas More Service Yard the levels of noise and air pollution experienced by residents living in the immediate vicinity will be reduced. However, for pedestrians in the Thomas More Car Park (disabled people and non-disabled people) the resulting 'tunnel' approach to the car park attendants' hut will be unpleasant, to say the least.

Car Free

The LWW Design Team has explained the priorities under review when arriving at a decision for shared access/egress (ie. LWW and Barbican estate traffic using the same space). It's a decision that is the cause of many expressions of opposition to the overall LWW scheme. CoLAG members recognise the value that the LWW Design Team places on the potential delivery of substantial public realm improvements, as proposed around the Roman Wall remains and Barber Surgeons Garden (and elsewhere). In fact, one member has gone on record in saying: *'proposals score in their promise of providing new landscaped open and accessible spaces, which will ensure that LWW becomes a magnet for visitors'* (Barbican Life, Spring Edition 2023). However, it's possible to have just too much of a good thing. The LWW Design Team has achieved a scheme with green spaces connected as an oasis of glades, which will make LWW a sought after destination but, in the process, Barbican Estate residents (those with protected conditions and those without) are being asked to endure too much. In the proposed scheme, the inalienable rights of residents have been pushed to one side. For this reason, in a project which is still pixels on a screen or lines on paper, CoLAG members are urging the LWW Design Team to re-evaluate the current traffic circulation routes. It can be anticipated that the public realm will lose very little in such a reassessment of priorities, whilst the private realm of life in the Barbican Estate will be able to continue relatively unscathed by exposure to neighbouring LWW traffic.

22. Impact on accessibility and inclusion caused during the construction of LWW

Estimated numbers of construction related vehicle journeys for demolition and construction periods have been calculated based on volumes of excavated waste materials, together with anticipated deliveries for concrete, brick/blockwork, steel frame, cladding panels and fit-out materials. The anticipated daily numbers of vehicles is expected to peak at approx. 80 to 90 trips per day during the piling and superstructure phases of the work (mostly 7.5t vehicles). In the submitted Construction and Environmental Management Plan, Multiplex Construction Europe Ltd. state that from the commencement of the main demolition onwards, vehicles requiring direct access into the site will enter and exit via the existing Aldersgate St. ramp. (With no reason given, Multiplex states that it will not be possible to use the existing ramp from London Wall following the commencement of hard demolition of the museum building. Why has this decision been made when, at first sight, it appears that an alternative ramped access off London Wall could perform a vital function as an alternative point of access/egress?)

During subsequent super-structure, cladding and fit-out phases, additional access will be provided within the boundaries of the LWW site – *‘the new ground floor slab will be utilised to bring vehicles into the site for offloading’*. But these same vehicles will exit the site via the Aldersgate St. ramp. Additionally, during fit-out phases, vehicles delivering materials and removing waste will use the new permanent bays (ie. the new lower ground and basement service yards for new Bastion House and the new Rotunda building) with vehicles entering and exiting via the Aldersgate St. ramp and Thomas More Service Yard.

For Barbican Estate residents living in close proximity to the, as yet, uncovered Thomas More Service Yard, construction noise and disturbance from a heavy volume of traffic will commence in 2027 before being ‘contained’ sometime before completion in 2033. During construction, the provision of vehicular access at a central point within the boundaries of the LWW site is shown to be a vital necessity, which indicates that, with a degree of planning ingenuity, the amount of construction traffic entering via the Aldersgate St. ramp can be substantially reduced or eliminated. Further, this same provision of access to a central point within the boundaries of the LWW site can become, also, the means of egress. Overall, in evaluating traffic circulation procedures during construction, it appears that no determined effort has been devoted to minimising the amount of traffic that needs to access/egress via the Aldersgate St. ramp. CoLAG members are requesting, therefore, that alternative plans are submitted for review before the start of construction procedures.

It is noted that the LWW Design Team has amended the position on residents’ exiting and entering the Thomas Moore Car Park during construction procedures. Two options are now available: an entrance/exit via a shuttered ramp 90m. north on Aldersgate St. and access/egress via the current means (ie. the Aldersgate St. ramp) although this route cannot be made available at all times. This suggested amended position is not acceptable. In making it, the LWW Design/Construction Team is putting Barbican residents (ie. disabled people who need easy access to their cars and non-disabled) between a rock and a hard place; whichever way residents choose to go the result will be hazardous to the point of

being unworkable. CoLAG members have explained previously why the shuttered ramp is unworkable. The usability of the alternative (via the Aldersgate St ramp), given the extent of traffic during the construction period, will be similarly hazardous. For these reasons, CoLAG members are requesting that alternative vehicular routes are identified for accessing/egressing the Thomas More Car Park during the LWW period of construction.

Terry Trickett RIBA
CoLAG member

25/03/2024

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 Alan Newman

Address: 79 Thomas More House Barbican LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I have already objected to these proposals and my stance has not changed.

My further objection is that, within a very tight time frame, comments are invited on a very large number of additional documents which have been submitted without any explanation, to a largely residential population who have very little or no knowledge of planning matters.

It confirms my opinion that the City Corporation has no regard for its residents, without whom it would have no representation in Parliament.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Ms Paola Murguia

Address: Flat 14 Cotherstone Court 25 Mint Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This proposal compromises the city's historic architectural skyline and is unethical to the environment!

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Dr Neil Sanders

Address: Flat 162 Defoe House LONDON

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: Adverse visual impact. Would dominate, overshadow and compromise the architectural integrity of the neighbourhood including the Barbican Estate. Other developments have done this over the past few decades, and this problem should not be added to.

Causing substantial harm to the setting of nearby listed and unlisted assets including the Barbican, St Giles Cripplegate, Ironmongers' Hall.

Overshadowing and thus large negative effect on residential amenity in the Barbican Estate - loss of privacy, daylight, and sunlight and overlooking.

Unacceptable noise disturbance over years, much more so than refurbishment.

Ignores the history of the site including Roman remains, the Museum of London building and views of St Paul's. Loss of iconic 1960s buildings, replacing them with lower quality architecture which would not stand the test of time.

Not sustainable, releasing tens of thousands of tonnes of CO2, far more than refurbishment. New

buildings might be a bit more energy efficient but the 'payback time' to reach overall lower CO2 would be very long, if at all.

Retention and retrofitting more compatible with the City's stated Climate Action Strategy, national policies and broader current views.

Adverse effect on highway safety for cyclists and pedestrians, and on air quality, due to more traffic needing to attend the much larger proposed buildings; and proposed additional traffic lights. Documentation misrepresented the impact, making proposed public spaces look bigger, providing only selected views and failing to show the overshadowing effect on the neighbourhood including the Barbican Estate.

No convincing case that more office space is needed. Occupancy levels are well below pre-Covid times. WFH is a long term trend. Multiple other large office buildings in the City coming onstream in the meantime. Best use of the site overall must be considered, not just financial return.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Ms Corinne Estermann

Address: Flat 112 Shakespeare Tower, Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Impact on environment (carbon, waste); impact on heritage; poor transparency, procedure and governance

From:
To:
Subject: OBJECT - to the following planning permission and listed building consent applications - references below -
location London Wall West 140-150-etc
Date: 05 April 2024 15:24:25

THIS IS AN EXTERNAL EMAIL

I am writing to **OBJECT** to the applications under the following references.

Please acknowledge receipt of this objection.

23/01304/FULEIA

23/01277/LBC

23/01276/LBC

I **OBJECT** on the following grounds:

Transparency, procedure and governance - a substantial new bundle of documents published at short notice, with no indication of what had changed from the previous documents and without explanation or consultation; apparently, despite 'consultation' the proposal will be presented to Committee with a recommendation of approval from the Chief Planning Officer so I query exactly how my objection will be 'taken into account'

Non-compliance - non-compliance with the City's carbon targets, guidance and the emerging Local Plan

Office demand – I do not believe that there is a demand for new office buildings in this location. Working patterns have changed permanently.

Sustainability – immense carbon release from demolition / construction. Contributing to climate change. Wrong thing to do.

Heritage – why not keep and adapt the former Museum of London and Bastion House which are extremely important architectural assets?

Setting – very material adverse impact on surrounding historic and architectural assets, including the Barbican Estate, St Giles, Postman's Park, St Botolph's.

Residential amenity – very material adverse impact on local residents – loss of light, major impact on access to neighbouring residential blocks in the Barbican Estate.

Design – very material adverse change to the existing design of the Barbican Estate and local streets – overwhelming bulk of proposed buildings would adversely affect the existing design which incorporates spaces / light between buildings. You are proposing a pumped up, dominant development which is a material downgrade from what currently exists.

Mary Gilchrist
21 Shakespeare Tower, London EC2Y 8DR
Neighbour / City resident

From: Mary Gilchrist

Sent: 28 January 2024 19:17

To: lpalondonwallwest@cityoflondon.gov.uk <lpalondonwallwest@cityoflondon.gov.uk>

Subject: OBJECT - to the following planning permission and listed building consent applications - references below - location London Wall West 140-150-etc

I am writing to **OBJECT** to the applications under the following references.

Please acknowledge receipt of this objection.

23/01304/FULEIA

23/01277/LBC

23/01276/LBC

I **OBJECT** on the following grounds:

Office demand – I do not believe that there is a demand for new office buildings in this location. Working patterns have changed permanently.

Sustainability – immense carbon release from demolition / construction. Contributing to climate change. Wrong thing to do.

Heritage – why not keep and adapt the former Museum of London and Bastion House which are important architectural assets?

Setting – very material adverse impact on surrounding historic and architectural assets, including the Barbican Estate, St Giles, Postman's Park, St Botolph's.

Residential amenity – very material adverse impact on local residents – loss of light, major impact on access to neighbouring residential blocks in the Barbican Estate.

Design – very material adverse change to the existing design of the Barbican Estate and local streets – overwhelming bulk of proposed buildings would adversely affect the existing design which incorporates spaces / light between buildings. You are proposing a pumped up, dominant development which is a material downgrade from what currently exists.

Mary Gilchrist
21 Shakespeare Tower
London EC2Y 8DR

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 Kathrin Speidel

Address: 88 Defoe 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:As a Barbican resident I strongly object to the plans for London Wall West.

The plan is to demolish Bastian House and the former London Museum which have formed a part of the Barbican for the past decades. Two new gigantic glass office buildings are meant to be built which can only become an eyesore to the neighbourhood apart from taking away daylight from the residential Barbican.

Most importantly the demolition and construction are extremely expensive in terms of CO2 cost.

How can such an unsustainable plan with huge environmental costs be even considered especially at a time when companies need less office space.

The City should follow its Climate Action Strategy and plan for refurbishment.

From:
To:
Subject: RE: Applications 23/01304/FULEIA, 23/01276/LBC and 23/01277/LBC - London Wall West - OBJECTIONI
have previously
Date: 05 April 2024 16:16:17

THIS IS AN EXTERNAL EMAIL

I am a long-leaseholder of a flat in Thomas More House, Barbican and have already objected to these applications and refer to my letter date 30 January 2024.

I wish to add the following further points:

1. I have read the detailed objections submitted by Leigh Day on behalf of Barbican Quarter Action dated 31 January 2024 and would wish to adopt the points made in that response as if they were my own.
2. I note that in recent weeks a large number of new and amended documents have been uploaded to the portal by the applicants. No details have been provided as to the purpose of these documents or what has changed from the original application. This seems to me to be effectively an abuse of process by the Applicant. It is impossible to comment sensibly on these revised proposals without a proper explanation of what has changed.
3. It is clear from the comments that have been made by other objectors that the Applicant's proposals to make use of the existing Thomas More Car Park and ramp during the construction of the development is both dangerous and will have a very substantial effect on the amenity of this part of the Barbican estate and will effectively prevent vehicular access (including access by emergency vehicles) to this part of the estate.
4. I note that although the deadline for comment has not yet passed, the planning officer has already published a report recommending approval. As both the planning authority and applicant it should be incumbent upon the Corporation of London to ensure that natural justice and fairness is properly applied to a planning application such as this. For the planning officer to pre-empt the deadline for objections in this way is *prima facie* a breach of these obligations and does nothing to assuage concerns about the conflicts of interest that exist in relation to this application.

Yours sincerely

David Rees
74 Thomas More House, Barbican

5th April 2024

Ms Gemma Delves
Development Division
Corporation of the City of London
Email: lpalondonwallwest@cityoflondon.gov.uk

Dear Ms Delves,

Further objection to the London Wall West applications for:
Planning permission (ref. 23/01304/FULEIA)
Listed Building Consent (ref.23/01277/LBC)
Listed Building Consent (ref.23/01276/LBC)

Thank you for your letter dated 14th March 2024, in which you say that the above development “does not accord with the provisions of the development plan in which the land to which the application relates is situated”. You requested observations by 06 April 2024 in order for these “to be taken into account in the consideration of this application” giving rise to a legitimate expectation that this would happen. Your further letter, sent at 8.32pm on Tuesday 02 April 2024 however says that the Chief Planning Officer has already decided to recommend the applications for Approval at the Planning Applications Sub-Committee on 17th April 2024.

In light of your letters I do not understand how the City as Local Planning Authority (LPA) intends to meet its legal obligations of providing sufficient information to enable intelligent consideration and response, nor of conscientiously taking consultation responses into account.

I wish to make the following objections, which I would be grateful if you could register against each application individually.

As applicant, the City has allowed narrow commercial interest to over-ride best practice, and in some cases legislative obligations, spending over £11m on a planning application that has very little chance of being developed, but which sets a precedent on site for a commercial developer to profit hugely from.

The culture encouraged by City political leadership to “be flexible” and “take risks” is endangering impartially in the public interest and upholding the highest standards of public life. The Chair of Policy’s recent direction to officers, quoted in the Financial Times, is chilling. He said: “I always say to my planning officers: remember ...these [developers] are our clients, they are the people who are investing, taking the risk investing in our city. And we have to make it work for them.” It is noteworthy that the City as Local Planning Authority has recently taken decisions out of committee scrutiny (81 Newgate St and 65 Gresham St) and recommended approval before the close of consultation (CLSG). It has done so again with these applications for London Wall West.

Perhaps this explains the many procedural missteps which, taken together, have resulted in a scheme at London Wall West which falls short of the City’s commitment to Net Zero, which fails to deliver any housing on public sector land, which has not evolved in response to meaningful consultation, and which is being pushed through the planning process regardless of rules, guidance and policy.

1. Pre-application information failed to disclose material aspects of the scheme – frustrating the legitimate purpose of improving the scheme through early consultation

The City as applicant failed to disclose factors likely to be of substantial importance to the decision, leading to clear prejudice against consultees who had a legitimate expectation that a public body would be straightforward in providing relevant information. In the first few months claimed as consultation in 2021, the City as applicant failed to show any visuals at all. Later on, the City as applicant failed to provide a 3-D model of the scheme; its visuals were misleading, particularly by not showing the full height of the scheme; heritage protections which the City as applicant should have been aware of were not disclosed; the structural condition of buildings was mis-represented; the s106 problem (see 8. below) and the City's intention as a landowner/developer was not made clear. The consequence of this lack of disclosure is that neighbours and affected landowners did not have a fair chance of making meaningful comments and of shaping the final scheme in clear breach of the Localism Act 2011 and relevant guidance.

2. Pre-application comments not taken into account

My pre-application comments, together with those of many others, have not been taken into account by the applicant in the submitted applications in contravention of the Localism Act 2011 and the legitimate expectation that the City as a public body was consulting at a formative stage, and would have regard to responses by considering them in an objective and meaningful way. For example, "Option 2" for the WLCA (Major Refurbishment), which would have reflected the views of a significant number of responders as well as me, was specifically ruled out by the City as applicant. This was apparently with the co-operation of the City as LPA in pre-application discussions – quite at variance with legislative requirements.

This is only one example; the City as applicant has also failed to respond materially to my consultation responses about height, massing, access/servicing, construction, pollution, daylight/sunlight and overlooking etc, as it is obliged to do before submitting an application.

3. Formal separation of functions does not appear to have been in place during pre-application negotiations

The undated Handling Note made public on 28 March 2024 only appears to cover the application stage. Pre-application negotiations, according to the PPA, started on 20 April 2021. There is the risk therefore that during the period where decisions prejudicial to the retrofitting option were made, insufficient controls were in place to uphold proper process and ensure the public interest prevailed. Emails disclosed under FOI show that Bob Roberts, for one, played a significant part in discussions of the application and the consideration of carbon options and structural matters but he is not listed on the Handling Note as either applicant or LPA and was therefore not covered by separation of function protections. The City's own Planning Protocol gives rise to the legitimate expectation that a Handling Note would be in place from the earliest stage possible and updated and re-issued along the way; there is clear evidence that this was not the case.

4. Material information withheld

This scheme was shaped by the City as applicant and as LPA during a prolonged pre-application phase starting officially on 20 April 2021 and possibly before then, informally. This phase included the rejection of important options for carbon optioneering, and failure to properly review the structural analysis leading the LPS's independent assessor of carbon options to conclude that it is "unclear on what the structural calculations are based"; both crucial to the WLCA. Information from this phase of scheme evolution has been withheld, as has information about the separation of functions during this phase. It

appears, therefore, that decisions could have been made on incorrect information and/or not in the public interest. Neighbours and interested parties been denied access to fundamental details relevant to the planning consultation and decision, to their detriment and in contravention of information disclosure regulations affecting public bodies, and the legitimate expectation that a public body would deal with the public on a straightforward basis.

5. The applicant's Statement of Community Involvement does not provide a reliable basis for the Planning Committee Report

The City, as applicant, did not consult properly at pre-application stage (see 2.). It is therefore unsafe for the City as LPA to now rely on the City as applicant's Statement of Community Involvement alone as a record of the changes made to the scheme through pre-application consultation. It is far too cosy; it is detrimental to objectors, effectively presenting the City as applicant's view that "we consulted thoroughly" as gospel without independent scrutiny, in the face of plenty of evidence that this was not a lawful consultation. Given that this is a local authority scheme, Members on the Planning Application Sub-Committee need an independent analysis of how the pre-app consultation was conducted; what it disclosed, what it withheld; what it found, and whether the City as applicant responded in a material fashion.

6. Applications were invalid

An accurate site plan is fundamental to planning applications. It is relied on by the public in assessing the impact of the proposed development. Significantly it is also relied on for land & property ownership information in transactions and when determining rights. It is surprising that the City as LPA didn't pause validation until the application could be properly registered. Going ahead with an invalid application and only allowing for 21 days for response when crucial missing information was supplied (an EIA application requires 30 days) gives the impression the City as applicant benefits from short cuts that would not be granted to other applicants. Failure to "stop the clock" at validation stage also has a material impact on the decision, as it means this application is judged within a policy context more favourable to the applicant (see 8. and 9. below).

7. The s106 problem and its relationship to the planning decision

One consequence of the City being both applicant and LPA is that, as a single body, it cannot bind itself to agreements to secure planning obligations in the same way that it would with a separate entity such as a commercial developer. This is a problem because most, if not all, EIA applications in the City – like this one – cannot be made acceptable in planning terms simply by the use of planning conditions alone. Consultees in the City have an expectation that an application such as this would have a s106 and a s278 to mitigate adverse effects. However, with this scheme, there has been no information as to how this problem will be overcome, either at pre-application or at application stage, nor any opportunity for meaningful consideration of how the dis-benefits of the scheme could be mitigated. Only two months has been allowed to negotiate a legal agreement post-Committee, which is insufficient given the complexity. As the City is conflicted as both applicant and LPA, the proposed s106 deed should return to Committee for approval. At the very least a Grampian/Arsenal negatively-worded condition should be attached to restrict the applications from being implemented until a full s106 can bind the whole site.

8. Premature validation allows the City to avoid the 5-yr land supply being a material consideration for the site (introduced in the NPPF on 19th December 2023)

Premature validation of the application enables it to escape the requirement of new National Planning Policy Framework (NPPF), brought in on 19th December 2024, that 5-

year land supply for housing is now a material requirement for decision-making. There is a lack of sites for housing in the City, the City's own Plans identifying that new housing should go near existing housing, specialist housing is in short supply locally, and high levels of homelessness persist throughout London. Shamefully, the City as applicant is pursuing this scheme on a key area of public land, without devoting a scrap of it for housing.

9. Deferring formal consultation on the City Plan 2040 to 18th April – a day after the application is due to be determined – avoids the further weight attached to emerging policy

The new draft City Plan 2040 contains a number of emerging planning policies, such as “retrofit first”, that are applicable to this scheme. Additional weight is attached to these policies once formal consultation on the draft City Plan 2040 starts. This was due to begin on 15th April 2024. Now this has been put back to 18th April 2024. By deferring this until after the target committee date of 17th April 2024 the City as applicant will benefit from a less onerous planning policy regime. This hardly reflects well on a City leadership supposedly keen on Net Zero. It should be embracing planning policies that it has decided must apply to everyone else, not side-stepping them.

10. Material information from the applicant was still being uploaded to the public register on 25th March 2024 – consultation deadline needs extending

Given that material information from the applicant was still being uploaded to the public register on 25th March 2024, the timescale for determining the application should certainly have been extended. In addition, some of the information on the register, such as the BRUKL detailing operational CO2, is unreadable. Other documents have been classified misleadingly, such as the Tavernor memo, which is presumably a paid-for piece of work on behalf of the applicant and not the consultation response that it appeared as. Rather than rushing to meet a target committee date of 17th April, the City as LPA should acknowledge its responsibilities under legislation, make sure all the public information is correct, comprehensive and legible and then allow for a full 30 days' consultation as the EIA regulations require.

11. Letter delivery delayed, Planning Portal down, consultation period too short

Although dated 14th March, 2024, please note that your first consultation letter was hand-delivered to me the following week, several days after this date. Over the Easter weekend the City's planning portal was down, making it impossible to access the relevant documents. The effective window for consultation was less than 21 days.

12. The City as LPA should be extending the deadline for decision

The City as applicant has waived its right to have the application determined within the legislative time limit through the PPA. Although this sets out an agreed target date of April 2024 for a decision, there are numerous reasons why the City as LPA must insist on extending the deadline for decision. These include; the City as applicant's own mistakes in failing to provide accurate information on submission; the fact that material information was still being uploaded to the planning register on 25th March 2024; the lack of a 30 day period as required by EIA regulations for consultees to consider and respond to that material information; the City Planning Officer's pre-judgement of the application before the close of consultations on 06 April 2024.

With a scheme as complex as this, with material information being made public so late in the day, and with so many respondents, it is not acceptable to use an “addendum” after the committee report is published on 10th April 2024; giving decision-makers less than a

week to review the detail. Denying members of the planning committee sufficient time to scrutinise papers is unfair.

Finally, a few words on the evolution of this scheme and the risks for neighbouring land and property owners/occupiers, and businesses. In 1996 an ill-judged scheme for the Rotunda History Centre was rejected by the Heritage Lottery Fund/ Millennium Commission. The Museum of London was re-modelled from 2001 to 2010 by Wilkinson Eyre, at a cost of at least £20.5m, but poorly maintained since. In 2014 the Corporation of the City of London applied for immunity from listing. Five years later, in 2019, being no further forward it applied again, this time for “a new world-class concert hall” with “a funding package” for “a 2000 seat concert hall and also performance, rehearsal and education spaces in a world class landmark building”. The cost? £288m. In February 2021, the City announced that it was scrapping the Centre for Music; re-purposing the Diller Scofidio + Renfro design as a speculative development by the Corporation itself. More recently, the City says it intends to dispose of the site to a private developer and “all options are on the table”, whatever that means.

Instead of a proper strategic review and consultation in which the City’s responsibilities as a local authority to deliver housing, services and regeneration to meet local need and demand are balanced with its need to raise revenue and manage the attendant risks, this site has been subject to over twenty years of inconsistent, costly and damaging decision-making with no tangible end in sight. The Chair of Policy & Resources, Councillor Chris Hayward, has said that the City will not implement this development. In fact, it cannot. A planning permission lasts for three years and the site is unlikely to be vacated before then.

The attendant planning blight is damaging the economy locally and is enormously stressful for neighbours. The opportunity cost and financial risk, borne by City voters, is huge. This application is an abuse of process and contravenes the City’s responsibilities to manage its assets with due care and attention in the public interest. Instead the City is merely offering an enormous public subsidy to whichever developer eventually buys it.

Surely the Corporation of the City of London can do better with such a significant asset?

Yours sincerely,

E Hirst

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: JOHN HOLLAND

Address: Flat 262 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: I am writing to reinforce my earlier objections to this proposal representing, as it does, over-development of the worst kind. It lacks, imagination, consideration of the needs of those who live in the barbican and any understanding, in planning terms of the need to have developments that fully recognise the differing needs of the community.

Building more and bigger blocks of offices singularly fails to have regard to any of these factors.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Ms Sinead Hanley

Address: 104 Edge Lane Greater Manchester Manchester

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Environmental impact (carbon and waste)

Non compliance with the City's own carbon targets

Impact on heritage

Lack of transparency

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Dr Benjamin Mohamed

Address: 88 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:As. Barbican resident, I see we are being walled in. Two refurbishments on Aldersgate, one Golden Lane raise the skyline and blocking light and views. LWW will be an egregious worsening of this trend. It will block my view of St Paul's, a view I have enjoyed for nearly 30 years. Instead a developer will monetise this at the expense of residents. Any raising of skyline around the Barbican, a residential place, is strongly objected to.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Dr Mary Chard

Address: 171 Lauderdale Tower Barbican Barbican

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment: This height is grossly disproportionate and will dominate the surrounding neighbourhood of the Grade II listed Barbican Estate

The. Plans convey an unsustainable development - release tens of thousands of tonnes of CO2 during demolition and construction with no consideration given to retention and retrofitting. This is not compatible with City's Climate Action Strategy.

There will be a compromise on highway safety for cyclists and pedestrians.

In addition a likely increase in poor air quality with more traffic lights/potential traffic hazard with two-way traffic

From:
To:
Subject: 23/01304/FULEIA - OBJECTION
Date: 05 April 2024 17:55:05

THIS IS AN EXTERNAL EMAIL

Hi - I'd like to object to the London Wall West demolition. The environmental damage would be catastrophic and is utterly counterintuitive given climate change concerns.

Please send me a receipt of this email for my records.

Best,

Nina Barber

From:
To:
Subject: Re: Planning Application/Listed Building Consent Consultation: 23/01304/FULEIA, 23/01277/LBC, and 23/01276/LBC
Date: 05 April 2024 18:17:49

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I refer to the above planning and listed building applications, my objection dated 31 January 2024, and write to further object to the proposals.

I respond to additional information which continues to be added to the planning register, some of which has been the subject of further neighbour notification letters some of which has not.

Despite extensive objections from residents and others, no changes have been made to the scheme and the further supporting information provided by the Applicant has not addressed concerns raised. As I come on to explain, I remain extremely concerned about the design and impacts of the proposals and the flawed process that has been followed.

Conflicting Interests

As I explained in my original objection, the City Corporation's multiple role as the promoter of the development, the Local Planning Authority or 'LPA' (decision maker) and freeholder/managing agent of the Barbican Estate means that it has a great responsibility to demonstrate objectivity and best practice.

However, the LPA has completely ignored the importance of undertaking an independent design review of the proposals, contrary to Policy D4 of the London Plan which requires independent expert advice to truly influence design. I have queried this serious omission with the case officer, Gemma Delves who confirmed via email (dated 22 March 2024) that it did not undergo independent design review as follows:

'The proposal was not put before a design review panel pre or post submission. At pre-application stage it did undergo a local 'borough' process of design scrutiny and additional feedback was provided from Historic England and the GLA. At post application stage the GLA have indicated that the application is not of strategic importance and The City of London Access Group and the Conservation Area Advisory Committee have been consulted'. [My Emphasis]

This is justified on the basis that reviews took place by other (non design) independent experts and that the Mayor did not consider the proposals to be of strategic importance. However, this fails to recognise that actual requirements of policy D4 which states as follows:

"D....In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made.

or demonstrate that they have undergone a local borough process of design scrutiny....”[My emphasis]

The Mayor of London’s 15 March 2024 consultation response confirms that the application was referable under the Mayor of London Order (and indeed the LPA had referred it) and the Officer’s response wrongly relies upon the Mayor of London’s advice stating that it didn’t raise strategic planning issues, not about whether it is referable (which is the test in the policy). Accordingly the absence of design reviews means that the proposals is clearly **inconsistent with the requirements of Policy D4** of the London Plan. Given close relationship between the LPA and Applicant this omission is very concerning.

I understand that elected Councillors have stated that they may support the proposals due to wider property considerations. However in its role as LPA, the Corporation can only rely upon what is contained in the application submission and consider these against planning policy and other material considerations. Officers and Councillors can not for instance give any weight to the matters set out in the 21 September 2023 Policy and Resources Committee and 22 September 2023 Investment Committee, where various justifications for the redevelopment of the site (including achieving ‘best consideration’) and timescale imperatives (relative to the timescales for a new Local Plan and Certificate for Immunity for Listing) were described. These matters were not cited as the justification for the proposals in the formal planning application and can not be relied upon in the determination of this application by Members at the Committee on 17 April 2024.

Procedural Errors

As noted in the original objection, the red-line for both applications directly overlaps Mountjoy House, including the south western corner of the building itself and the ancillary areas beneath. It remains the case that residents of Mountjoy House have not been formally served notices on as required by the DMPO (as confirmed by the Applicant’s application form). Whilst additional sites notices have been erected, this is an entirely separate requirement in the DMPO for the LPA to undertake and does not recognise that the leaseholders may not live at the address and may not be aware of the pending applications. The Applicant must correct any omissions and serve notice. It is not sufficient to rely upon the LPAs consultation nor any newspaper advertisement given that it has certified that appropriate steps were taken to identify owners. The only course of action is to withdraw the application and address it through full resubmission/ reconsultation with the appropriate certificates being served.

Amenity (particularly noise)

In my original application I raised concerns about Table 4.1 of the Environmental Statement (ES) which indicated construction commencing in January 2028 and completing in November 2033. Specific concerns were raised about how the Applicant has underplayed the specific construction impact in residents. On behalf of the LPA, consultants Trium raised methodological concerns in respect of the SOEAL and LOEAL (Table 7.14) which are similar to my concerns about the under-estimation of noise. However the applicants ES consultants have failed to fully explain the implications of the noise and how this will effect sensitive

receptors including residents (27 February 2024 Buro Happold response, page 26)

Having queried the proper consideration of noise issues and the severe effects on residents and other sensitive receptors with the Case Officer Gemma Delves (in an email dated 12 March 2024), I was advised that the City's Environmental Health Officer (EHO) is working on the case and representations will be given full consideration.

However, unlike external statutory consultees and representations from the public, it is not possible to see the internal consultation responses (from the EHO and others) as these are not made available on the planning register. Given the multiple roles of the City on this application, these internal consultation responses should have been made available. Doing so would allow appropriate scrutiny to take place and ensure that conflicts of interest are not taking place across the various departments within the Corporation.

Conclusion

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

Given the multiple roles that the City of London Corporation has on the project (Applicant, Decision Maker and Freeholder), there was a real opportunity for the process and scheme to be class leading. It is hard not to come to the conclusion that this is not the case and, instead, the Corporation will nod through its own sub-standard proposals.

Yours sincerely

Sean Bashforth BA, MA, MRTPI

404 Mountjoy House

Barbican

EC2Y 8EJ

On Thu, 14 Mar 2024 at 16:06, lpalondonwallwest
<lpalondonwallwest@cityoflondon.gov.uk> wrote:

Dear Consultee/Contributor,

Please see attached consultation for 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).

Reply with your comments to lpalondonwallwest@cityoflondon.gov.uk.

Kind Regards,

Planning Administration

On behalf of

Gemma Delves

Environment Department

City of London

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Website: <http://www.cityoflondon.gov.uk>

From:
To:
Subject: Objection to London Wall West planning application
Date: 05 April 2024 19:19:18

THIS IS AN EXTERNAL EMAIL

Dear Sir or Madam,

I would like to reiterate my objection to the London Wall West planning application (references: 23/01304/FULEIA, 23/01276/LBC and 23/01277/LBC) on the basis of:

- ecological nonsense to demolish instead of refit and repurpose buildings that are foundationnally sound
- chipping away at an historical site and the vision that was put into the Barbican
- the sheer size of the project adding to the feeling of entrapment that residents feel more and more with all those bulky buildings popping up everywhere around the estate (Moor lane, Silk street applications...)

Furthermore I would like to know what happened to my previous objection and why I need to resubmit it ?

The planning application process seems purposefully confusing for people that don't have legal backgrounds.

And I would like to have a receipt of my objection so that it can be traced.

Thank you.

Guillaume Faucompre

From:
To:
Subject: Objection to Planning Application 23/01304/FULEIA, 23/01276/LBC, 23/01277/LBC
Date: 05 April 2024 19:18:17

THIS IS AN EXTERNAL EMAIL

To City of London Planning Administration, Environment Department:

As a resident at the Barbican Estate and a professional in environmental services, I strongly oppose to the following planning 23/01304/FULEIA, 23/01276/LBC, 23/01277/LBC due to the following reasons:

1. Sustainability and carbon footprint: the lowest carbon footprint will be to refurbish and continue to use existing buildings (that are still in excellent standing). Only through such measures that we'll be on track to national net zero goals, and London's 2030 net zero goal.

2. Heritage - the application will substantially disturb the designated and non-designated heritage assets in this area (St Giles, the Barbican Estate and surrounding landscape, Bastion House, the Museum of London, etc.) and the Golden Lane Conservation Area which adjoins it. The application intrudes on important views to and from St Pauls and St Botolphs in Postmans Park.

3. Construction impacts and pollution are underestimated as they do not include fit-out, which can add two years and many thousands of lorry movements to the impact (we are currently experiences long and disturbance with building 'touch-ups" on Moorfields and Moor Lane with many work done outside of normal working hours - early mornings starting at 5am and after midnight).

4. Harmony with the neighborhood - it is too massive for the site, has zero harmony with the surrounding townscape.

5. Contradicts with the national planning policy of "retrofit first". The city must comply with this on its own site.

6. Amenity - due to the massive scale, neighbouring properties will lose sunlight and daylight, and office vis-a-vis. Light pollution at night will also damage amenity.

7. Permanently worsent traffic, emergency access and residents' use of the car park.

Please consider these reasons and rethink the London Wall West projects.

Regards,

Anne Huang
327 Willoughby House, Barbican.

On Tue, Apr 2, 2024 at 8:23 PM Speaking At Committee
<SpeakingAtCommittee@cityoflondon.gov.uk> wrote:

Dear Sir/Madam

Please see attached notification that:

- 23/01304/FULEIA - 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
- 23/01276/LBC - Livery Hall Ironmongers' Hall Shaftesbury Place London EC2Y 8AA
- 23/01277/LBC - 140 London Wall, 150 London Wall, Shaftesbury Place, And London Wall Car Park, London, EC2Y

Are being presented to the Planning and Transportation Committee on 17 April 2024.

Request to speak form and consent form included.

Kind Regards

Planning Administration

Environment Department

City of London

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Website: <http://www.cityoflondon.gov.uk>



Jan-Marc Petroschka
on behalf of: **Barbican Quarter Action**

349 Ben Jonson House
Barbican
London
EC2Y 8NQ

05 April 2024

Ms Gemma Delves
Development Division
Corporation of the City of London
Email: lpalondonwallwest@cityoflondon.gov.uk

Dear Ms Delves,

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

This letter sets out a formal objection to all three applications which together comprise the proposals for the site known as “London Wall West” as follows:

23/01304/FULEIA - Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office (Class E(g)), cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking and highway works including reconfiguration of the Rotunda roundabout, part demolition and reconfiguring of the Ironmongers Hall (Sui Generis), creation of a new scheduled monument viewing area, public realm alterations to Plaisterers Highwalk, John Wesley Highwalk, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the void, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of new City Walkway. | 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.

FAILURE TO EVALUATE RETROFIT FIRST

1. Despite existing and emerging planning policy and guidance on national, London wide and local level, the applicant (CoLC) has never seriously assessed a major refurbishment and retrofit scheme for the site, **in contravention of the Localism Act 2011 and National Planning Policy Framework.**
2. On 11 November 2021 the architects Diller Scofidio + Renfro with Sheppard Robson issued Re-Use Study Options for the Museum of London and Bastion House. Three options were appraised: 1) Existing Condition; 2) RE-Use; 3) Partial Re-Use. Existing condition included light refurbishment without recladding to improve energy performance, neither full upgrade of MEP systems, nor change of use or upgrade of lifts. Option 2 and 3 proposed partial demolition and new build to different degrees; both options removed Bastion House due to structural safety concerns. **The study concluded about Option 2, Re-Use: “We believe this option is the most viable scenario that retains a significant portion of the existing building.”** (This study was only released following a FOIA request.)
3. From the outset, due to stated safety concerns, **a full retrofit option was never appraised.** However, these concerns were not substantiated and were in fact later disproved. Please refer to point 6., 15. and 16.
4. The applicant (CoLC) stated in its own **Whole Life Carbon Assessment of Part Retention and Redevelopment Proposals for London Wall West, May 2022**, Point 4. Existing Site & Buildings Analysis, 4.2.3 Disproportionate Collapse: *“Disproportionate collapse is the most significant engineering challenge for Bastion House. (...) Disproportionate collapse was likely to be a contributing factor in the catastrophic failure of (...) the Ronan Point disaster in London in 1968. (...) Accordingly, the challenges associated with potential disproportionate collapse which arises from the unique transfer structure and column design at Level 3 of Bastion House, means that **reuse of Bastion House is not considered feasible from an engineering perspective.**”*
5. Ronan Point was built using Large Panel System (LPS). **Bastion House, however, is a monolithic, in-situ (poured in place), reinforced concrete form of structure, and is not prone to disproportionate collapse** – by the very nature of its construction.
6. Bob Stagg of Alan Conisbee and Associates, Consulting Engineers, was commissioned by the Barbican Quarter Action to carry out a structural peer review of Bastion House and the Museum of London in September 2022. He reported that Bastion House and the MoL complied with all current Building Regulations and the buildings were in better condition than many other concrete buildings of that era. Strengthening of either building was not needed (the report

is attached in the appendix). At a meeting in October 2022 between Bob Stagg and the applicant's (CoLC) structural engineer, Duncan Campbell from Buro Happold, **Stagg's assessment and report were discussed and not contested.** However, the applicant (CoLC) never withdrew their claims.

7. As a result of the disproportionate collapse hypothesis, the May 2022 Whole Life Carbon Assessment only considered two options for their interim appraisal: Part demolition and full demolition. **In both options Bastion House was demolished “due to the inherent engineering safety challenges”.**
8. Despite the previous and un-retracted safety concerns over the structural integrity of Bastion House, in April/May 2023 the CoLC undertook a brief 30-working day **Soft Market Test, inviting developers to put forward detailed proposals for the retention and adaptation of the Museum of London and Bastion House for a new use.** The CoLC received several credible offers for the existing buildings, as confirmed by Christopher Hayward, Chair of Policy and Resources, at City Question Time 15 June 2023.
9. The results and proposed schemes of the Soft Market Test were neither published, nor shared. Developers had to sign non-disclosure agreements. Why? The answer is clear: **the greenest building is that which already exists** and with a deep retrofit almost any existing building would outperform a demolition and new build option. This was demonstrated shortly before by the City of London's own **Planning Advice Note, Whole Lifecycle Carbon Optioneering, by Hilson Moran 2022, page 20, Figure 11. Examples of initial embodied carbon payback during building operational lifecycle for different options, indicative only.**
10. The credible Soft Market Test proposals and offers were around and above £50,000,000.00 for the Museum of London and Bastion House – that figure is in the public domain. **All proposals would have resulted in a change from museum and office block to alternative uses. All would have required substantial investment and major refurbishment to change, convert, adapt, subtract and add to the buildings, and upgrade their fabric.**
11. In response to the BQA peer reviews and the Soft Market Test, the Whole Life Carbon Assessment of this planning application **retrospectively** appraises eleven options from *Do Nothing* to Redevelopment, however, without any change to prior conclusions. Contrary to the results of the market test, this WLCA, albeit mentioning a major refurbishment as one of the options, **dismissed and excludes this Option 2 from the full evaluation.**
12. We consulted Simon Sturgis, of Targeting Zero, expert, an innovator in delivering a low carbon, resource efficient, built environment. He is a member of the British Council for Offices Sustainability Group, an advisor to the EU Commission,

UKGBC, Green Construction Board, RICS, BRE, CIC, CIH, BSi and an 'Architects Journal' Awards judge. He has lead UK thinking and produced industry guidance and advises the UK Parliament, the Greater London Authority, British Land, English Heritage, and many others. **Sturgis demonstrated clearly that Option 2, Major Refurbishment, performs far better than any other option in relative terms (per m2) and in overall terms.** With only a small amount of (embodied) carbon released by a major refurbishment through internal and external alterations, and upgrade of the façade, we achieve a radical reduction of operational carbon emissions. (Please refer to appendix of first BQA objection.)

13. **The fundamental flaw in the applicant's (CoLC) approach is the baseless, unproven and misleading initial assumption that Bastion House could not be retained for structural reasons.**
14. Surprisingly the structural issue was only questioned by the LPA (CoLC) shortly before submission of the planning application, on 02 October 2023. According to an email from Bob Roberts, Interim Executive Director Environment, CoLC, the Arcadis (third party) report *"did include relatively minor comments regarding the optioneering methodology, one of them was that **it was unclear on what the structural assumptions were based.** I am quite sure that the applicants have done a structural survey – can you send this over, please?"* (Please refer to email released following FOIA request in the appendix.)
15. Even their own engineers distance themselves in this submission from the applicant's (CoLC) prior hypothesis of disproportionate collapse: ***"We would stress that in its present condition and left unaltered the Bastion House structure is not considered inadequate. It is only in scenarios where the structure is to be significantly alternated or extended that compliance with the current regulations would need to be demonstrated."*** (Carbon Optioneering Study, Including Dashboard 1 and Dashboard 2, Buro Happold, page 11.)
16. After all, original structural drawings of the buildings were available: In Appendix **15 – Archaeology** of this planning application is the archaeological desk-based assessment **Museum of London and Bastion House, November 2023**. Author is the Museum of London Archaeology. The assessment included **structural drawing by the engineers Charles Weiss & Partners**: Figure 42, Existing Foundation Details Museum of London (dwg. no. 964-L-251, 30/10/1979); Figure 43, Basement and Lower Ground Floor Sections Museum of London (dwg. no. 964-MI-50, April 1970); Fig 44 Existing Foundation Plan Museum of London (dwg. no. 964-MI-56, February 1971); and Fig 45 Access Ramp and Road Details Museum of London (dwg. no. 964-M-9/1, September 1971).

17. This information was available despite the applicant's claim in their Whole Life Carbon Assessment, May 2022, page 11: *"The original structural design calculations for the development are not available in the London Metropolitan Archive. The original calculations would have provided information on the building's structural design life. In the absence of the original brief and calculations we need to rely on what we know was good practice at the time of the building's conception and development."*
18. **Demolition and construction account for 62% of UK waste and are responsible for 15% of CO2 emissions.** Their environmental impact goes far beyond waste and carbon emissions; it includes: 1) The depletion of raw materials, such as sand, gravel and virgin wood; 2) Air pollution, particularly in urban areas: Dust, particulate matter and toxic substances are released during demolition, clearing and excavations, from the production and transportation of materials, and site activities causing a serious threat to our health and the natural environment; 3) Transport issues through increased road traffic. 4) Water contamination from demolition waste and run-off; 5) Habitat disruption and biodiversity. 6) High energy consumption through use of heavy machinery.
19. A comprehensive **retrofit scheme would have significantly minimised all these environmental impacts** over the proposed redevelopment and contributed to achieving Net Zero by 2050.
20. We **object to the exclusion of a retrofit scheme** from the Whole Life Carbon Assessment, when this would have delivered the least carbon intensive and the most environmentally friendly scheme. Retrofit first is a better fit for national, local and City of London planning policies, guidelines and net zero targets. The deliberate exclusion stands in direct contravention to good planning practice, to planning law and to meaningful pre-application consultation.
21. We **object to misleading information being released**, and knowing or intentionally not being withdrawn or rectified, which has or may have unduly prohibited proper process, influenced advice and decisions by the Local Planning Authority (CoLC), and therefore the outcome of this planning application.
22. We **object to the environmental damage** of this planning application, which, in a best-case scenario, would release around 56,000 tonnes of embodied carbon through demolition and construction. Calculations show that a comprehensive retrofit scheme could have been saved over 65% of carbon waste. Furthermore, the estimated Whole Life Carbon intensity ($\text{kgCO}_2\text{e/m}^2$ GIA) of a retrofit scheme would outperform the proposed demolition and new build scheme, even over a 60-year period.

23. We **object on the grounds that carbon has to be saved now to achieve net zero by 2050**. Time is running out. We do not have the luxury of waiting for 60 years for a new build to outperform an existing structure. We need urgent action now. We need to radically reduce the amount of carbon released and waste produced today by demolition and new build.
24. Instead of the CoLC showing clear leadership and vision in addressing climate change it falls short of its own promises, policies, guidance.
25. Below a selection of existing and emerging policy and guidance ignored with the unfounded hypothesis of disproportionate collapse:
- City of London, Local Plan 2015.
Core Strategic Policy CS15: Sustainable Development and Climate Change. 3. ***Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.***
 - City of London, Local Plan 2040.
10.2 Policy DE1: Sustainable Design. ***Development proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options. All major development must undertake an assessment of the options for the site, in line with the City Corporation’s Carbon Options Guidance Planning Advice Note, and should use this process to establish the most sustainable and suitable approach for the site.***
 - City of London, Planning for Sustainability, Supplementary Planning Document, November 2023:
“In the City of London context, retrofitting existing buildings contributes to preserving and enhancing the sensitive character of conservation areas, creating an architecturally innovative environment, and contributing towards making the City a leading leisure and culture destination. The CoLC will welcome applications that set strong precedents in this regard and that promote new ways of thinking about repurposing buildings as the most effective way to drive down carbon intensity of development and create a unique sense of place. Thus, retrofit and reuse respond to developers’ and occupiers’ wishes to create, live or work in the most sustainable environment possible. CoLC is strongly supporting shifting the creative focus of architects, engineers and designers to the transformation of existing buildings into sustainable, characterful and interesting architecture.”

- National Planning Policy Framework, December 2023:
Chapter 2. *Achieving sustainable development, **paragraph 8.** Achieving sustainable development means that the planning system has three overarching objectives, a) economic – to help build a strong, responsive and competitive economy; b) social – to support strong, vibrant and healthy communities; and c) environmental – **to protect and enhance our natural, built and historic environment**; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
- National Planning Policy Framework, December 2023:
Chapter 14. *Meeting the challenge of climate change, flooding and coastal change, **paragraph 157.** The planning system should support the transition to a low carbon future in a changing climate (...) It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, **including the conversion of existing buildings**; and support renewable and low carbon energy and associated infrastructure.*

Appendix:

For further clarification please find attached:

- Peer Review: Stop Rethink Reset, Why the City of London’s Carbon Assessment for London Wall West Is Misinformed and Misleading, September 2022.
- Email from Bob Roberts, Interim Executive Director Environment, City of London, to Gerald Eve, 02.10.2023, Regarding: LWW - Optioneering



STOP RETHINK RESET

**WHY THE CITY OF LONDON'S CARBON
ASSESSMENT FOR LONDON WALL WEST IS
MISINFORMED AND MISLEADING**

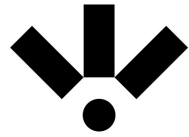
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INTRODUCTION

HAVE MEMBERS OF THE COURT OF COMMON COUNCIL BEEN MISLED?

Barbican Quarter Action* believes that in the case of the City's London Wall West (LWW) proposals the Court has been misled.

We have commissioned two reports by leading UK experts, Bob Stagg of Conisbee Structural Engineering and Simon Sturgis of Targeting Zero, which are presented here.

These reports contest the reliability of the City's own Whole Life Carbon Assessment (WLCA 31/05/22) and call into question the legitimacy of the decisions that have been made on LWW to date.

Simon Sturgis is the UK's leading expert in delivering a low carbon, resource efficient, built environment. Most recently he has been responsible for the review of the plans to demolish the M&S flagship store in Oxford St, as a result of which the scheme has been called in by the Secretary of State.

Bob Stagg is a structural engineer specialising in the appraisal, repair and refurbishment of buildings. He was involved with the final dismantling of Ronan Point after its partial collapse in 1968.

Their reports show that the WLCA is flawed and misleading. It is built on the assumption that Bastion House is at risk of disproportionate collapse. The review by Conisbee Structural Engineers emphatically contradicts this.

The actual carbon assessment falls short as it does not consider the retention and retrofit of Bastion House and ignores the impact of its demolition on the scheme's carbon footprint.

Sturgis states "National Legislation sets out a net zero trajectory to 2050 with demanding interim targets for 2030 and 2035. The demolition and new build approach proposed for this site will not meet these targets. A more comprehensive retrofit approach than the one proposed, with Bastion House retained and retrofitted, would have far lower carbon emissions, and help meet these targets."

The City's justification for demolishing the existing buildings does not stand up to peer review.

We urge the Court and Officers now to STOP, RETHINK and RESET current plans for London Wall West in the light of these expert reports. Failure to do so will result in damage to the Corporation's reputation, not just on a local but on a national and international stage.

Key Points

The Whole Life Carbon Assessment (WLCA) justifies the need for demolition, claiming *“that retaining the existing building fabric does not achieve the most sustainable outcome for this transformative and strategic site”*.

What underpins their argument is the assertion that Bastion House is at risk of disproportionate collapse and thus not safe for retrofit and reuse:

“reuse of Bastion House is not considered feasible from an engineering perspective on account of the risk of disproportionate collapse which arises from the unique transfer structure and column design at level 3 of Bastion House” (WLCA 4.2.3).

In fact, only buildings using the Large Panel System of construction are at such risk. Bastion House is not built using the LPS system. Bob Stagg reports that Bastion House and the MoL comply with all current Building Regulations and the buildings are in better condition than many other concrete buildings of that era. Strengthening of either building is not needed. Bastion House is not unsafe

Having assumed that Bastion House must be demolished on the grounds of safety, the LWW team chose to consider and compare only two options: complete demolition and a part retention option – both of which include the demolition of Bastion House.

“the Whole Life Carbon Assessment concludes that that the redevelopment option would perform 10% better than the partial retention option” (WLCA executive summary)

Simon Sturgis of Targeting Zero refutes this claim, pointing out that *“The demolition and new build approach proposed for this site will not meet these targets. A more comprehensive retrofit approach than the one proposed, with Bastion House retained and retrofitted, would have far lower carbon emissions, and help meet these targets.”*

Simon goes on to state that *“The London Wall West Report appears to be designed to pay lip service to the requirement to examine retrofit, and to set out to prove that new build is the only realistic solution. If the City of London is serious about its ambitions with respect to climate change, then this project needs to be re-examined in the light of these stated ambitions.”*

We repeat our call from the Open Letter sent to Members of the Corporation by the Barbican Association and Golden Lane Estate Residents Association in May 2021: *“given the international significance of the Barbican and Golden Lane, and its commercial and cultural contribution, the City needs to bring together all the different interest groups in an inclusive, forward-looking process to create a proper Blueprint; not just a jigsaw of unconnected, and often competing and wasteful initiatives”*.

Adam Hogg and Averil Baldwin, joint chairs Barbican Quarter Action

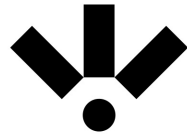


*Barbican Quarter Action (BQA) is a campaign group, working on behalf of residents from the Barbican Estate, Golden Lane, Monkwell Square, Little Britain, London House and the wider neighbourhood, to challenge any proposed development that could potentially damage areas of cultural, social, historical and geographical significance as well as injuring the reputation of the Corporation of London on an international stage. BQA is supported by the Barbican Association.

These reports were presented by their authors on a webinar organised by BQA on Monday 26th September. A recording of the webinar is available on our website: londonstartshere.co.uk

Appendices

- i. Open letter to C.Hayward
- ii. Bob Stagg full report
- iii. Simon Sturgis full report



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APPENDIX I

BQA OPEN LETTER TO MR. C. HAYWARD
23rd JUNE 2022



To Chris Hayward
Chairman of the Policy and Resources Committee
City of London Corporation
Guildhall
Aldermanbury
London EC2V 7HH

23 June 2022

LONDON WALL WEST – RESPONSE TO PROPOSALS PUBLISHED 18 JUNE 2022

OVERALL COMMENT

We are dismayed that the fundamentals of the proposed design remain the same as those we saw last December. The scheme proposes the demolition of Bastion House and the Museum of London. In their place is planned a huge office-led development of some 780,000 sq. ft, including two massive new towers, with limited cultural and green space. The scheme is wholly inappropriate for a site of such significance, both in its physical form and in terms of its proposed usage. Moreover, it undermines the City's desire, as expressed in Destination City, to be one of the world's premier destinations through its cultural offerings.

OUR OBJECTIONS

We have been told repeatedly that the principal objective of the proposed development is to raise funds – for the move of the Museum of London and other City projects. By focusing on this objective, the City will:

- Ignore the site's rich history, which features the Romans, Shakespeare, and John Wesley and many other historical features. The opening up of the Roman Fort Gate will be severely diminished by its commercial setting.
- Sacrifice the site's public cultural heritage: as the home of the Museum of London for 50 years and the previously intended location of the world-class Centre for Music. It remains the Southern gateway to Culture Mile linking the South Bank and Tate Modern to St. Paul's Cathedral and beyond.
- Confront visitors instead with a huge commercial development, with a cultural offering representing just over one per cent of its space.

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- Compromise the nature and architectural integrity of the Barbican Quarter. The Barbican is world-renowned and one of the City's major post-war achievements. The Museum complements the public benefit of the Barbican while Bastion House reflects its admired Brutalist design. The new proposals include little in the way of public benefit while the height and mass of the buildings will dominate and diminish the surrounding neighbourhood.
- Undermine many of its own policies and statements: the draft City Plan; the Open Space, Responsible Business and Climate Change strategies; the aims expressed in Destination City and the desire for the City to be a cultural hub, as expressed in the Barbican/Golden Lane Strategy .

There are also questions concerning the scheme's compatibility with the National Plan and the National Planning Framework . How can the City ask others to respect its policies if it fails to do so itself?

THE CITY'S CLIMATE CHANGE STRATEGY

It is now widely agreed that, because of the devastating impact of carbon emissions on global warming, and the large proportion of carbon emissions resulting from major construction projects, serviceable buildings should not be demolished if re-fitting them is a feasible alternative. Our polling showed that 88% of Barbican residents opposed demolition of Bastion House and the Museum of London. However, the Whole Life Carbon Assessment report prepared by the City's project team dismisses the option of retaining Bastion House without providing the necessary factual evidence. The judgement is based on a hypothetical assessment of risk rather than a full structural survey.

Moreover, if the scheme were to go ahead in its current proposed form, it would add over 45,000 tonnes of CO₂ to the atmosphere during the demolition and construction phases. This is more than the entire CO₂ annual output of the City Corporation's operational activities. How would this be compatible with the City's stated aim of achieving Net Zero in its own operations by 2027?

THE CONSULTATION PROCESS

The City has stated its *commitment to transparency and delivering a robust consultation process*. We have commented elsewhere that this is far removed from our experience. Above all, the City has failed to engage with local stakeholders



on the fundamental issues about the site as recommended by the National Planning Policy Framework.

While the Project Team has specified the nature of the consultation undertaken to date and highlighted the key concerns that arose (the height and mass of the proposed buildings, and issues of sustainability) they have provided *no information whatsoever* on the extent of those concerns, and why so little has been done to address them. We can only assume that the City's failure to provide us with detailed information is because there is widespread opposition to these proposals.

In addition, the Project Team's graphics are selective and misleading. There is little assessment of the scheme's impact on the Barbican Estate and neighbouring conservation area. No 3D models demonstrating the full scale of what is proposed have been made available although we know they exist and their availability for stakeholders is encouraged in the London Plan .

We urge the City to live up to its commitment to transparency and consult meaningfully with the local community. The current process falls far short.

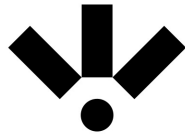
CONCLUSION

This remains a short-sighted proposal, lacking vision and apparently driven solely by the desire to raise money. Furthermore, the intention to enter into a long lease with a developer carries the risk that even the limited public benefits of the proposal would later be jettisoned by the developer.

As our polling showed, there is no evidence the scheme has the support of the local community. It is contrary to many of the City's own policies. This is an outstanding site crying out for an imaginative scheme respecting its heritage and location. We once more invite the City to stop, think again, and work with us and the wider community to develop a scheme worthy of the site, the City and London itself.

Adam Hogg and Averil Baldwin Joint Chairs Barbican Quarter Action

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APPENDIX II

REPORT ON STRUCTURAL ASSESSMENT OF BASTION HOUSE
AND MUSEUM OF LONDON

BY

CONISBEE CONSULTING STRUCTURAL ENGINEERS
2nd SEPTEMBER 2022

REPORT ON STRUCTURAL ASSESSMENT

BASTION HOUSE AND MUSEUM OF LONDON

BARBICAN QUARTER ACTION



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Alan Conisbee and Associates

220800/B Stagg

2nd September 2022



Executive Summary

1. Alan Conisbee and Associates were commissioned by the Barbican Quarter Action to carry out a structural engineering review of Bastion House and the Museum of London, considering specifically disproportionate collapse and durability. I, Bob Stagg (consultant to Conisbee, CV included as Appendix A) have prepared this report. I reviewed the structural engineering aspects of the report "London Wall West – Whole Life Carbon Assessment" dated May 2022 prepared for the City of London. I undertook a limited visual survey from around the exterior of the buildings and inside the Museum. I reviewed some original architect's drawings but the structural engineer's drawings were not available. The evidence I examined is sufficient to inform and confirm the clear and positive conclusions of this assessment.

2. The detailed summary of the structures of Bastion House and the Museum of London in section 4 below illustrates that the buildings are clearly of a monolithic, in-situ (poured in place), reinforced concrete form of structure. The detailed explanation of disproportionate collapse in sections 5 and 6 below considers the risk of it. It occurs when damage to a building is disproportionate (much larger) than would be expected from the cause of the damage. This concept followed a gas explosion causing partial collapse of Ronan Point, a residential tower block in east London in 1968, with large concrete panels (LPS) forming the walls and floors, acting as the primary structure. The explosion which would normally have damaged perhaps 2 or 3 dwellings, caused 21 to be affected. It resulted in major changes to the Building Regulations over the subsequent years.

3. The LPS form of construction is very different to the in-situ concrete frames forming the Museum of London and Bastion House. It is accepted wisdom in the structural engineering design industry that the very nature of a framed structure most probably prevents collapse of this type. In addition, noting the substantial size and arrangement of the structural elements in the buildings, I consider it most unusual to even question this aspect. I do not understand why it should even be a factor to be considered in deciding the future of the buildings. I would be pleased to discuss this issue with CoL's structural engineering advisor, presumably Buro Happold, to better understand their position.

4. If disproportionate collapse is considered to be a risk by the CoL which therefore requires demolition or strengthening, I would expect detailed guidance on how big the risk was, and when action (evacuation and demolition/strengthening) should be taken. CoL's report reference to a "short-term" solution (their executive summary) is not clear and may not be helpful to the current users of the buildings.

5. In summary, and based on this assessment, I am of the opinion that both buildings comply with recognised disproportionate collapse requirements including Part A (Structure) of the current Building Regulations. The resistance to collapse would be achieved by "Method B, the key element method", i.e. a load bearing element, such as a column would not be displaced by load from an explosion. The floors above the location of an explosion would not fail, the columns and cores would remain in place, so disproportionate collapse would not occur. Strengthening of either building is not needed.

6. The long-term durability, based on the visual evidence of the exterior of the buildings is and will be good. The concrete and tiles are in satisfactory condition and will not require undue maintenance to remain so in the future. Occasional localised repair may be found necessary and perhaps the application of an anti-carbonation coating every 15 to 20 years or so. The quality of the build was clearly high and as a result, the buildings are in better condition than many other concrete buildings of that era.

7. In addition to re-use as office space, conversion of Bastion House to residential use or as a hotel would be feasible from a structural perspective. The installation of additional lift shafts through the existing reinforced concrete structure would be possible if carefully designed and executed. An external additional lift/stair core could be considered which would achieve stability from the existing structure of Bastion House.

8. The Museum of London could remain as museum space, or in view of the generous floor loading, even perhaps storage or workshop usage would be possible.

1. Brief

1.1. On 11th August 2022, Alan Conisbee and Associates, consulting structural engineers were commissioned by Mr Adam Hogg of the Barbican Association, on behalf of Barbican Quarter Action (BQA) to carry out a structural engineering review of Bastion House (BH) and the Museum of London (MoL). The brief is detailed in our email dated 9th August 2022 and BQA's email dated 11th August.

1.2. The brief was to consider the future of the buildings from a structural engineering standpoint, specifically disproportionate (or progressive) collapse and durability. I, Bob Stagg (consultant to Conisbee, CV included as Appendix A) have prepared this report. I have not considered such issues as whole life carbon issues, the internal spatial arrangements of the buildings, fire risk and compartmentation, presence of asbestos, the condition of the general fabric such as facades and roofs etc.

2. Assessment Procedures

2.1. A review has been carried out of the structural engineering aspects of the report "London Wall West – Whole Life Carbon Assessment" dated May 2022. It was prepared for the City of London (CoL) by a multi-disciplinary team comprising Buro Happold (sustainability consultants), DS+R (lead designers), Sheppard Robson (collaborating architect) and Gerald Eve (planning consultant).

2.2. A limited visual survey was carried out on 30th August 2022 from public areas around the exterior of the buildings and inside MoL. Access into BH was not attempted. The survey was to assess the form of structure of the buildings and gain an initial impression of their structural condition and hence durability.

2.3. A limited review of the original architect's drawings (Powell and Moya (PM)) was undertaken although they are poor condition microfiche prints, and much is illegible.

2.4. The original structural engineers were Charles Weiss and Partners (who also designed Trellick Tower) but were bought by White Young Green many years ago. In 2018 Tetra Tech (a large American engineering practice) bought WYG. It would be of interest if Weiss' original drawings were available, but the recent visual inspection and the architect's drawings provide sufficient evidence on the structural form of the buildings to inform and confirm the conclusions of this report.

2.5. I have considered changes regarding robustness requirements to the Building Regulations over the years and have referred to the NHBC Technical Guidance Note "The Buildings Regulations 2004 Edition Requirement A3 – Disproportionate Collapse" and the Institution of Structural Engineer's (IStructE) document "Appraisal of Existing Structures" 3rd Edition, dated October 2010.

2.6. I have also referred to the Building Research Establishment's (BRE) report BR511 "Handbook for the structural assessment of LPS dwelling blocks for accidental loading", dated 2012, which is extremely comprehensive (245 pages). Although it considers residential buildings comprising large concrete panels forming the structure, some aspects of it are relevant to all buildings, for example the risk of explosions occurring.

3. This Report

3.1. The findings and conclusions of this assessment, along with my knowledge and experience of disproportionate collapse issues and durability of concrete buildings, form the basis of this report which reaches clear, positive conclusions.

3.2. Whilst the study has been taken far enough to satisfy the brief, it has not of necessity, been exhaustive and cannot therefore constitute a warranty as to the soundness of BH and MoL. This report has been prepared for BQA and no responsibility to other parties is accepted.

3.3. Section 4 of this report describes the form of structure of the buildings. Section 5 gives some background to the issue of disproportionate collapse. Section 6 assesses the effects of explosions on the buildings and considers the concerns raised in the CoL report. Section 7 considers durability and comments on the CoL report's view of this issue. Section 8 is a summary of the conclusions of this report and includes initial thoughts on possible re-uses of the buildings.

4. Construction

4.1. The basic arrangement of the buildings is explained in the CoL report (Introduction, paragraph 2), which also confirms that construction took place c.1971 to 1976. There is no mention of the form of construction however. Based on the architect's drawings, our background knowledge and visual inspection, it is evident that the structure of both BH and MoL comprise frames of cast in-situ (poured in place) reinforced concrete, i.e. slabs supported by beams and columns forming substantial, monolithic structures.

4.2. The front cover photo shows BH, some 7m or so above the "roof" of MoL, supported by a lift core (11m x 6m in plan) at the south end, a stair/ducts core at the north end (same plan size) and 4No 1.2m diameter concrete columns. 2No beams, 2.1m deep (partially within the floor zone) and 1.4m wide span from core to column to column to core (see P+M drawing 172-T1-15). The bearing of the beams on the cores appear to include a sliding joint, possibly to minimise horizontal movement, (initial shrinkage and ongoing thermal) which would induce a moment in the columns (photo 1).



Photo 1 – Soffit of Level 03 – note waffle slab, downstanding part of the beam, column and the south core

4.3. The columns and cores continue down through the MoL to foundations below basement level (photo 2). The superstructure of BH comprises 200mm thick insitu concrete slabs supported via shear heads (1.2m x 1.2m x 200mm deep concrete downstands) on a grid of 600mm diameter columns. The column spacing is approximately 5m x 5m. The core walls comprise reinforced concrete approximately 400mm with openings to suit lift doors and riser access panels.

4.4. The transfer structure at the base of BH is referred to as level 03 and comprises a cast insitu reinforced concrete waffle slab. The waffles reduce the volume and weight of the concrete needed. It is referred to as a transfer structure since it transfers the point loads from the BH internal columns from above onto the cores, beams and external columns below (photo 1). The slab is clearly carefully and economically designed with an overall thickness of 700mm with varying depth of waffle across the width of the building to account for the varying bending moment and shear forces resulting from the load pattern (see P+M drawing 172-T1-15).



Photo 2 – South end of BH over MoL – note core continues down to basement level

4.5. The superstructure of MoL is complex both in plan and levels, and fundamentally the same as BH but with more extensive use of waffle slabs.

4.6. In both buildings, where exposed, the concrete is bush-hammered (photo 1). Much of the exterior of the MoL is covered in ceramic tiles (photo 3). The exterior of BH is typical 1970's façade comprising glazing and possibly metallic spandrel panels and jambs (front cover photo).



Photo 3 – East elevation of MoL – note extensive use of tiling and their good condition

5 Background to Disproportionate Collapse

5.1. As a response to the housing shortage following the Second World War, the government encouraged local authorities to build new housing quickly and efficiently. Residential blocks up to 22 storeys were given additional grants. The building industry developed a system of construction for dwellings formed of panels of precast concrete walls and floors, commonly known as LPS (large panel system).

5.2. It was unclear to the designers at the time (c.1945 to 1968) how well tied together the panels needed to be. The consequences of an explosion within buildings were not formally considered in codes of practice at the time.

5.3. In May 1968 a gas explosion occurred in a 22 storey LPS residential block called Ronan Point in Newham, east London. This caused the floors and walls above the explosion to fall, and their weight overloaded the floor below causing a domino effect down the full height of one corner of the block. Although gas explosions (and occasionally other sources of the explosion) had occurred in buildings previously, the LPS form of construction exacerbated the extent of damage, resulting in disproportionate collapse.

5.4. There seems to be a misunderstanding in 2nd para of section 4.2.3 of the CoL report. Disproportionate collapse cannot be a contributory factor in the failure of a building. It is the failure, and whether it is disproportionate or not is dependent on the extent of the collapse and the significance of the cause. The Ronan Point collapse was disproportionate since an explosion which would normally have only affected 2 or 3 dwellings, resulted in 21 being severely damaged.

5.5. The subsequent enquiry into Ronan Point reported in late 1968 produced recommendations (Ministry of Housing and Local Government (MHLG) Circular No.62/68) requiring all buildings to be tied to avoid disproportionate collapse. This requirement initially referred to buildings where piped gas was provided, and hence the risk of an explosion significantly higher, and required the structure to withstand a force, referred to as an equivalent static pressure (e.s.p.), of 34kN/sq.m. To put that in context, that is 23 times more than domestic floor loading.

5.6. Another MHLG circular soon followed however (No.71/68) which allowed that load to be reduced for buildings if gas was not supplied. The Institution of Structural Engineers advised that the load should be halved, i.e. an e.s.p. of 17kN/sq.m. For two years these requirements only applied to buildings over 6 storeys but in 1970, the revised Building Regulations clarified that the requirement applied to buildings above 4 storeys.

5.7. The ability of a building to resist an explosion became known as structural robustness and a more general term for an explosive load became known as accidental or abnormal loading, meaning any load not normally expected during the life of the structure. Avoiding disproportionate collapse, i.e. providing robustness, is a fundamental requirement concept for the design of new buildings and for checking existing ones. Explosions, usually gas, do occur and can cause collapse of buildings. Avoiding disproportionate collapse ensures that the structure of a building is designed to ensure that damage is relatively limited and within society's acceptance of risk.

5.8. Following Ronan Point, the emphasis was on LPS buildings with the assumption being that a framed building (steel or concrete, such as BH and MoL) would resist the force of an explosion without a column (or beam) being blown out. As a result, disproportionate collapse would not occur. Brick structures were considered acceptable without tying, since they were mostly not taller than 4 storey, similarly for timber structures.

5.9. The Building Regulations (Part A - Structure) were revised in 2004 requiring some aspects of robustness, specifically the horizontal tying requirement, to apply to all buildings regardless of height. They also require an abnormal load to be taken as 34kN/sq.m regardless of whether gas is supplied or not.

5.10. The robustness of a building can be provided by satisfying either a Method A or a Method B. In simple terms, Method A (known as the alternative load path method) is satisfied if an abnormal load causes the loss of a load bearing wall or column or beam but the damage is not disproportionate because the loads previously carried by the missing element finds an alternative route down to ground. Method B (key element method) requires the structural element to be strong enough to resist the abnormal load, stay in place and continue to provide support. In both cases, significant cracking and deflection should be expected but not disproportionate collapse.

5.11. It is impossible to accurately model the behaviour of a building under abnormal loading but recognized techniques, combined with engineering judgement and reference to the BRE's report 511, enable a reasonably realistic assessment to be made. The behaviour of a building depends on many factors, such the form of structure, the strength of materials used, loading, design, accuracy of construction, workmanship and so on.

5.12. Much study was carried out on Ronan Point in 1968 and the pressure of the gas explosion which occurred has been estimated to be between 20 and 80kN/sq.m. This large spread illustrates that there is, inevitably, substantial uncertainty when dealing with explosion effects. The requirement of 34kN/sq.m is a reasonable estimate. In the event of an explosion within a building, venting is likely to occur whereby some of the pressure would be reduced by the blowing out of windows and spandrel panels, for example the façade of BH.

5.13. It is also of interest to note that a structure can withstand a much larger transient load such as an explosion than a permanent load such as dead or live load. This effect could be as much as double the resistance of the structure and is caused by the rate of change of strain in the structural materials (BRE's report 511 Appendix E Section E.2).

5.14. The BRE Report 511 (2012) considers in detail the statistical chance of accidental loading occurring in a building and compares it to other types of hazards. Section 6.4 and Appendix B of the document include a very large amount of statistics but the summary is that the risk of a disproportionate collapse is very small indeed. The BRE's report states that "rationally the risks might be regarded as insignificant and adequately controlled".

6. Collapse

6.1. Both BH and MoL are framed buildings and will include reinforcement which effectively ties the structural elements (columns, beams and floors) together. The sizes of the buildings, the sizes of the elements and the excellent reputation of the design engineer indicate that the tying will have been extensive and comply with contemporary and current requirements. The suggestion (3rd para of section 4.2.3 of CoL report) that the design was carried out ignoring the implications of Ronan Point seems extremely unlikely. Charles Weiss and Partners will have been well aware of the issue of disproportionate collapse. The construction of a reinforced concrete framed structure could not be carried out without adequate tying by reinforcement between the elements.

6.2. By inspection, a 600mm thick reinforced column would resist an abnormal load of 34kN/sq.m. It is likely that a 200mm thick reinforced slab would also, either above or below, albeit it would be significantly cracked. Even if the floor slab is blown out, the columns are sufficiently robustly designed to span vertically the 6.8m between two floors. The transfer slab is able to support 14 storeys so clearly the additional load from an abnormal loading incident from above i.e. within BH, would not cause failure.

6.3. It is difficult to envisage a circumstance of the standard abnormal loading of 34kN/sq.m being applied to the soffit of level 03 since it is external space. Abnormal loading, perhaps beyond that amount could occur for example if a bomb was detonated under BH. It is not possible to quantify that however and previous and current regulations recognise that. Society accepts that buildings cannot be sensibly designed to resist a force greater than 34kN/sq.m. If an explosion was powerful enough to cause significant damage to the concrete structure supporting BH, for example removal of one of the columns, the subsequent possible collapse could not be considered as disproportionate to the cause.

6.4. In practice, the removal of one of the columns below level 03 would possibly result in the structure above acting as a deep beam spanning between the cores, with the slabs and columns forming “Vierendeel girder” at each level, thus avoiding collapse. Very significant cracking and distortion would occur however.

6.5. The 3rd para of section 4.2.3 of the CoL report states that it is unlikely that BH design complied with the Building Regulations and goes on to “There is further evidence that this is the case from the design of the Level 3 transfer structure.” The 4th para mentions strengthening works and then ends with the sentence “However, for Bastion House, the level 3 transfer structure would be of particular risk”.

6.6. It is unclear on what the further evidence is if the structural drawings and calculations are not available. If in CoL’s opinion the building needs strengthening and the transfer structure (the most significant structural element) is at “particular risk”, it would be useful to review this further evidence and be clearer on when the risk becomes unacceptable. The 3rd para of the CoL’s Executive Summary refers to “a short-term solution”. Short-term is not defined but presumably at that juncture, BH would be evacuated and MoL would already have been vacated?

6.7. Based on the evidence available to ACA, I do not consider there is a concern regarding safety. If there were to be, I would consider it essential to be unambiguous on when the building should be vacated. Apart from all else, the wellbeing of the current users should be considered.

7. Durability

7.1. Based on the limited inspection, both buildings are considered to be in good condition with regard to the concrete structure, with no obvious visible examples of spalling concrete fragments, exposed rusting reinforcement and/or detached/missing tiles.

7.2. The first para of Section 4.2.1 of CoL report suggests that in the 1970s, buildings would have been designed for 50 years. The accepted figure at that time was 60 years but this is of academic interest. The ageing of a concrete structure depends very much on appropriate design, particularly the amount of cover to the steel reinforcement, the porosity of the concrete and good quality workmanship. The current visual evidence suggests these aspects were correctly addressed.

7.3. That same para seems confused regarding the process of carbonation. Carbonation occurs in the concrete, not in the steel reinforcement. The carbon dioxide in the atmosphere slowly penetrates the concrete. It is a significant process with carbonated concrete having a lower level of alkalinity. This allows the process of rusting of the steel to occur providing oxygen and water is also present. It is not possible to predict that rate of carbonation but certainly the amount of cover is a very significant factor. The amount of exposure to the environment of the concrete element is not relevant. Wet concrete reduces the rate of carbonation so for example in UK, the south and west elevations would in theory be less carbonated due to the increase in rain compared to the north and east elevations. In practice however a wet west elevation would dry sooner than a north facing one. In an internal environment, the concentration of carbon dioxide is greater than externally. Internally exposed concrete is generally more carbonated but generally the absence of water minimises the rusting.

7.4. The bush hammer effect on the concrete surfaces requires the cover to reinforcement to be increased during design and construction. This allows for the reduction in cover depth which results from the hammering. From the absence of significant spalling concrete on BH and MoL, it appears this requirement was properly followed.

7.5. Concrete behind ceramic tiles or mosaics are less affected by carbonation if there is good adhesion between the two materials. If however water/air seeps into the joint, the tiling ceases to act as protection and carbonation progresses as in exposed concrete. In time, rusting of the reinforcement occurs which expands, (rust is approximately 7 times more voluminous than the steel from which it came), with spalling concrete and tiles detaching. The condition of the tiles on MoL (photo 3) appears to be good.

7.6. In due course, the external envelope of the buildings will need to be checked and possibly remedial treatment, such as an anti-carbonation coating, as highlighted in the last para of section 4.2.1 of the CoL report.

8. Summary

8.1. The reasonably detailed summary of the structure of BH and MoL in section 4 above illustrates that the buildings are clearly of a monolithic, in-situ, reinforced concrete structure. The detailed explanation of disproportionate collapse in sections 5 and 6 considers the risk of disproportionate collapse.

8.2. Based on this assessment as detailed in this report and using reasonable skill, care and judgement, I am of the opinion that BH and MoL comply with recognised disproportionate collapse requirements including Part A (Structure) of the current Building Regulations. This is achieved by Method B, the key element method, i.e. a load bearing element, such as a column would not be displaced by the abnormal loading of 34kN/sq.m. The floors above would not fall, so disproportionate collapse would not occur. Strengthening is not needed.

8.3. The LPS form of construction is very different to the in-situ concrete frames forming the Museum of London and Bastion House. It is accepted wisdom in the structural engineering design industry that the very nature of a framed structure most probably prevents collapse of this type. In addition, noting the substantial size and arrangement of the structural elements in the buildings, I consider it most unusual to even question this aspect. I do not understand why it should even be a factor to be considered in deciding the future of the buildings. I would be pleased to discuss this issue with CoL's structural engineering advisor, presumably Buro Happold, to better understand their position.

8.4. If disproportionate collapse is considered to be a risk by the CoL which therefore requires demolition or strengthening, I would expect detailed guidance on how big the risk was, and when action (evacuation and demolition/strengthening) should be taken. CoL's report reference to a "short-term" solution (their executive summary) is not clear and may not be helpful to the current users of the buildings.

8.5. The long-term durability, based on the visual evidence of the exterior of the buildings is and will be good. The concrete and tiles are in satisfactory condition and will not require an undue amount of maintenance to remain so in the future. Occasional localised repair may be found necessary and perhaps the application of an anti-carbonation coating every 15 to 20 years or so. The quality of the build was clearly high and as a result, BH and MoL are in better condition than many other contemporary concrete buildings.

8.6. The buildings will have been designed at least in accordance with the codes of practice current at the time. Floor loading for example in the MoL will be high, at least 5kN/sq.m. BH will be at least 2.5kN/sq.m or possibly the office agent's requirement of 4+1 – 4kN/sq.m for the floor loading plus 1kN/sq.m to allow for non-load bearing partitions between the individual offices.

8.7. In addition to re-use office space, conversion of BH to residential use or as a hotel would be feasible from a structural perspective. The installation of additional lift shafts through the existing reinforced concrete structure would be possible if carefully designed and executed. An external additional lift/stair core could be considered which would achieve stability from the existing structure of BH.

8.8. The MOL could remain as museum space, or in view of the generous floor loading, even storage or workshop usage would be possible.

Appendix A

Following retirement from Conisbee after 23 years, I am currently a consultant to them. I have nearly 50 years experience of appraisal, repair and refurbishment of buildings, working in the public and private sectors. My experience includes work on all types and ages of building ranging from historic structures such as Christ Church Spitalfields and the Royal Albert Hall, through to the high-rise residential estates of the 1960s and 70s, including Ronan Point, east London. I was involved with the final dismantling of that particular block in 1987 after its partial collapse in 1968.

I have a particular interest in how buildings perform throughout their life and an extensive experience assessing buildings with regard to disproportionate collapse. I am currently involved in considering this fundamental issue for several housing blocks in north and east London. I advise contractors on the temporary works needed to alter the structures of existing buildings and am also involved in checking show rigs such as for Cirque du Soleil, at the Royal Albert Hall.

I had a long association with the Institution of Structural Engineers at national and local level, becoming a fellow in 1998, serving on its council and committees, and lecturing on CPD courses on the assessment of existing buildings. I served on the task groups which authored the Institution's publication 'Appraisal of Existing Structures (2nd and 3rd Editions), the former under the chairmanship of Ted Happold, the founder of Buro Happold in the late 1980's.

Bob Stagg BSc CEng FIStructE

Consultant, Alan Conisbee and Associates



**BARBICAN
QUARTER
ACTION**

APPENDIX III

REVIEW OF CARBON POLICIES AND LWW WHOLE LIFE CARBON
ASSESSMENT

BY

SIMON STURGIS

30th AUGUST 2022

London Wall West

Review of Carbon Policies

and

The London Wall West

Whole Life Carbon Assessment

Of May 2022

On behalf of

Barbican Quarter Action

30 August 2022

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1. Introduction
2. Summary
3. Recommendations
4. Review of London Wall West Proposal May 2022
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1. Introduction

This report is produced by Targeting Zero on behalf of Barbican Quarter Action.

The report examines the City of London's own assessment for the London Wall West proposal, which offers two options: Option 1 – Partial retrofit plus New Build, and Option 2 – Full demolition and larger New Build. A comparison using the City of London's own figures shows that the retrofit option produces less lifetime carbon emissions than new build.

This report also sets out the carbon policy context for this scheme. for the United Kingdom, the Greater London Authority (GLA), and the City of London (the City). It makes the case that at all policy levels, in order to meet Government Targets and transition to a net zero economy, retrofit should be prioritised over new construction.

Carbon Terminology:

Embodied carbon: All greenhouse gas emissions associated with materials, fabrication, transport, construction, maintenance, replacement, demolition, and disposal of a building.

Operational carbon: All greenhouse gas emissions associated with use of energy within a building, for example energy used for heating or cooling.

Whole-life carbon (WLC): The combined total of embodied and operational carbon emissions over the whole life cycle of a building.

Retrofit: A refurbishment and possible extension of a building that specifically involves improved environmental performance, usually to current standards.

2. Summary:

- National Legislation sets out a net zero trajectory to 2050 with demanding interim targets for 2030 and 2035 (see *Item 5.1 below*). The demolition and new build approach proposed for this site will not meet these targets. A more comprehensive retrofit approach than the one proposed, with Bastion House retained and retrofitted, would have far lower carbon emissions, and help meet these targets.
- The GLA has declared a 'Climate Emergency' with policies to match, the City of London has started this process with good intentions, but these are not yet being followed through. The choice to proceed with this scheme for London Wall West is a prime example of this conflict. Examples of City publications calling for action on the Climate issue include:
 - The Global City – Climate Action: Managing Climate Risk for Financial Investments 2021
 - City of London – Climate Action Strategy 2020-2027,
 - City of London – Draft Local Plan 2021
 - City of London – Whole Lifecycle Carbon Optioneering 2022
 - City of London – Climate Action Strategy 5th June 2022

The intent expressed in these reports conflicts with the choice to proceed with full demolition and new build at London Wall West.

- This lack of follow through on climate action puts the City at a disadvantage in comparison with our European and north American competitors. It also puts the City in a 'catch up' position with respect to the GLA's more forward-looking policies. The City of London is therefore falling behind in both action and deed with respect to Global, UK, and GLA Climate Action. Proceeding with the London Wall West proposal is in direct conflict with Global, UK, and GLA policies and intentions.
- An issue of concern is that the 'London Wall West – Whole Life Carbon Assessment' of May 2022 shows that the full demolition and new build has a greater carbon cost that the suggested alternative partial demolition and retrofit, although the Executive Summary gives the opposite impression. There are other issues in the report that need further examination as outlined below.
- Globally tenants and occupiers are becoming more knowledgeable about climate change. It is worth noting that around the time this project is completed it will no longer be possible to buy a petrol or diesel car in the UK. This level of awareness will inevitably feed through into the attitudes of employees of major City Occupiers with a detrimental impact on buildings that are substandard from a Net Zero perspective.

- The London Wall West Report appears to be designed to pay lip service to the requirement to examine retrofit, and to set out to prove that new build is the only realistic solution. If the City of London is serious about its ambitions with respect to climate change then this proposal needs to be re-examined in the light of these stated ambitions.
- Both the UK's National Planning Policy Framework (NPPF) (Item 5.8 below), and GLA Policies SI2 – Whole Life Carbon and SI7 – Circular Economy (Item 6 below), clearly state that retention and retrofit should be prioritised over new build. The most Circular Economic option for this site is to retain as much as possible. Option 1 is paying lip service to this requirement with a structural assessment being used to demonstrate that Bastion House, for example, is not suitable for retention. This needs to be examined more thoroughly and more positively. The assessment for Option 1 produces surprising high kgCO₂e/m² rates, especially cladding. These should be examined more closely to see what is causing this high figure, and how it could be reduced. One carbon reduction option would be to retain and retrofit Bastion House.
- The City of London Planning Policies on net zero are in the process of being updated, and for referable schemes align with / are superseded by GLA policies. Nevertheless, the City is making a significant effort to transition to a zero carbon planning approach, and certainly sees this as part of an overall strategy for promoting the City for the future. This ambition and intent are in opposition to the promotion of schemes such as this which are high carbon in construction and use. It is not possible on the limited information provided to understand the actual performance of the materials proposed for the new build. If however the facades are to be substantially glazed, this will be fundamentally carbon inefficient and should be rethought. Fully glazed facades have a comparatively short life (30-40 years) requiring regular replacement and are therefore a high embodied carbon solution as well as often producing high operational carbon emissions.
- The City of London's London Wall West WLC assessment clearly shows that the retrofit option produces less whole life carbon emissions than the new build option. However, in the 'Executive Summary' the report suggests the reverse is true by only emphasising the /m² rate of carbon emissions. To those unfamiliar with carbon assessment and jargon this would give entirely the wrong impression.
- The City of London Report suggests that Bastion House is at risk from disproportionate collapse and therefore this is significant reason for demolition. This assumption needs to be

further tested, and with a more positive attitude to see what the most carbon and cost-effective solution is for this building.

- As new construction produces an immediate and large carbon emissions 'hit' all efforts should be made to retain and reuse existing structure and material as far as possible to reduce the sites impact on climate change.
- The London Wall West Report appears to be designed to pay lip service to the requirement to examine retrofit, and to set out to prove that new build is the only realistic solution. If the City of London is serious about its ambitions with respect to climate change then this project needs to be re-examined in the light of these stated ambitions.

3. Recommendations:

- The disproportionate collapse issue needs to be further examined and more positively in terms of how it can be economically, in both carbon and money terms, resolved.
- The retrofit option and its carbon assessment needs to be re-examined in the light of the above and possibly from the perspective of alternative use types and specifically for ways to reduce the carbon cost in both /m2 rates and in overall terms.
- For any proposal, as required by the GLA Policies, the assessments should include:
 - Carbon Emissions from pre-construction demolition should be reported.
 - Reporting the key actions undertaken to reduce WLC emissions and the associated carbon savings, including those associated with the retention, reuse and recycling of existing structures and materials that are already on-site.
 - Confirmation that options for retaining existing buildings and structures have been fully explored before considering substantial demolition, including incorporating the fabric of existing buildings into the new development. In practice for London Wall West, this would include minimising demolition and maximising retention and reuse.
 - An estimate of the percentage of the new build development which will be made up of existing façades, structures, buildings
 - Policy SI7, Clause 2.3.4.: How the proposals comply with this clause, prioritizing retrofit and contributing to a circular economy.
 - Policy SI7, how any proposal responds to Clauses 2.4.2., 2.4.3., 2.4.5..
 - An explanation of how the proposal meets Core Strategic Policy CS15: Sustainable Development and Climate Change'; which states "To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate", by, in: Point 3: Avoiding demolition through the reuse of existing buildings or their main structures.

- How the proposal complies with the City's Draft Local Plan 2021: Policy CE1 states that: "development should be designed to promote circular economy principles throughout the life cycle of the building. This can be achieved by the 're-use and refurbishment of existing buildings, structures and materials to reduce reliance on virgin resources and retain embodied carbon."
- Illustrate the carbon performance of the proposed options on a graph as per the May 2022, Planning Advice Note; Whole Life Cycle Carbon Optioneering by Hilson Moran (see page 10 above).
- It should be noted that by 2030 it will not be possible to buy new petrol or diesel cars. In this rapidly evolving environmental context will prospective investors and tenants be happy to own or occupy buildings that are substandard from a net zero perspective?

4. London Wall West – Whole Life Carbon Assessment, May 2022

4.1. This report for the City of London sets out to make the case on carbon emissions grounds for new build instead of a major retrofit for this site. The 'Executive Summary' makes the following points:

- *"The analysis concludes that retaining existing building fabric does not achieve the most sustainable outcome for this transformative and strategic site". On the information provided in the Report this is clearly not the case.*
- *"It also concludes that it is not possible to undertake a "light touch" refurbishment due to inherent safety concerns with the existing buildings, that make them unsuitable for retention and adaption".* If the Bastion House is subject to such 'safety concerns', why is it still occupied? The analysis provided in the LWW report appears to have the intent of assisting the case for demolition. It is recommended that the existing structure be examined for the potential for local strengthening from a more positive viewpoint, and/or by investigating design and occupier solutions that make retention achievable.
- *"A Whole Life Carbon Assessment has been prepared to compare the two options, on a kgCO₂e/m² basis, the assessment concludes that the redevelopment option would perform 10% better than the retention option".* The Executive Summary does not however mention that the report also concludes that the retention/retrofit is better than the new build in terms of overall carbon emissions. This gives a misleading impression that is the opposite of the actual total emissions.

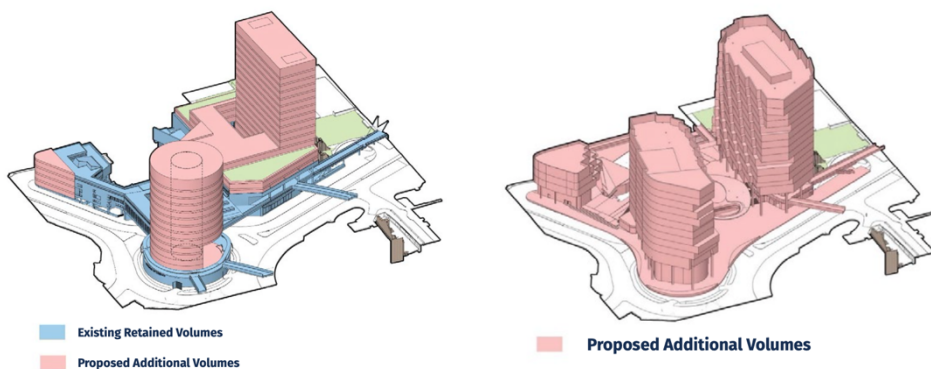
4.2. Bastion House: There are several points made within the report to try and justify its demolition:

- That the floor to ceiling height is too low: The report states that the Floor/ceiling dimension is 2.54m, and also states that the BCO recommends that for refurbishments a floor to

ceiling dimension of between 2.45m and 2.8m is acceptable. The existing building therefore complies with this recommendation.

- Unacceptable column grid: The report states that the existing building has column grids of 5.1m x 5m and 5.1m x 4.4m, it also notes that the BCO recommends structural grids of 9m, 10m, 12m, or 15m. What is not mentioned is that these dimensions are recommendations are for new build office. The existing grid dimensions have been successfully used for decades, and whilst not ideal are by no means unusable, and perfectly acceptable for a range of uses including office.
- Fire Safety and façade performance: Unsurprisingly the standards to not meet current requirements. This is capable of remedy and is a standard retrofit issue. If the facades were upgraded (secondary glazing, fire compliance) or replaced, the fire related concerns could also be addressed.
- Services and Amenities substandard: All capable of an upgrade with a retrofit.
- Material Design Life: various assumptions have been made as to the original construction and associated design life however these comments are not proven. Clearly investigations need to be undertaken to examine these assumptions. There are many examples of buildings of this period and construction type being retained and retrofitted.
- Disproportionate collapse: The explanation is that any remedial action would be complex, expensive, and not recommended. As the whole tone of this section of the report is clearly intended to support the case for demolition, a second opinion is therefore essential.
- Façade and Energy performance: The façade is single glazed and substandard in energy performance terms. This is a standard retrofit issue, solvable either through secondary glazing and other additional insulation, or a new façade designed for today's conditions.

4.3. Comparison of Retrofit and New Build. Consistent with the Hilson Moran Report requirements (see section 4 above), a comparison between 'Option 1- Part Demolition' and 'Option 2- Full Demolition' has been assessed.



Option 1 - Part Demolition and Retrofit

Option 2 - Full Demolition and Redevelopment

- It is worth noting that Option 1 has not retained Bastion House, and restricted retention to only the lower floors on all areas of the site. Option 2 involves complete demolition and a new significantly larger new build. Retention of Bastion House would make a positive difference to the assessment for Option 1.
- There is no actual breakdown of the embodied carbon assessment provided, but a question that needs to be answered is: Why is the embodied carbon for the façade for Option 1 larger than Option 2, given that Option 2 has a considerably more façade area? This would make a big difference to the overall whole life carbon figures as well.
- It would be useful to assess a major retrofit option that retained and strengthened the existing structure of Bastion House and upgraded or replaced the existing cladding. This would be expected to produce additional carbon savings as well as improve the performance of the existing building.
- The analysis undertaken on behalf of the City of London and included within the London Wall West Report shows the following comparisons over the whole life of the buildings.

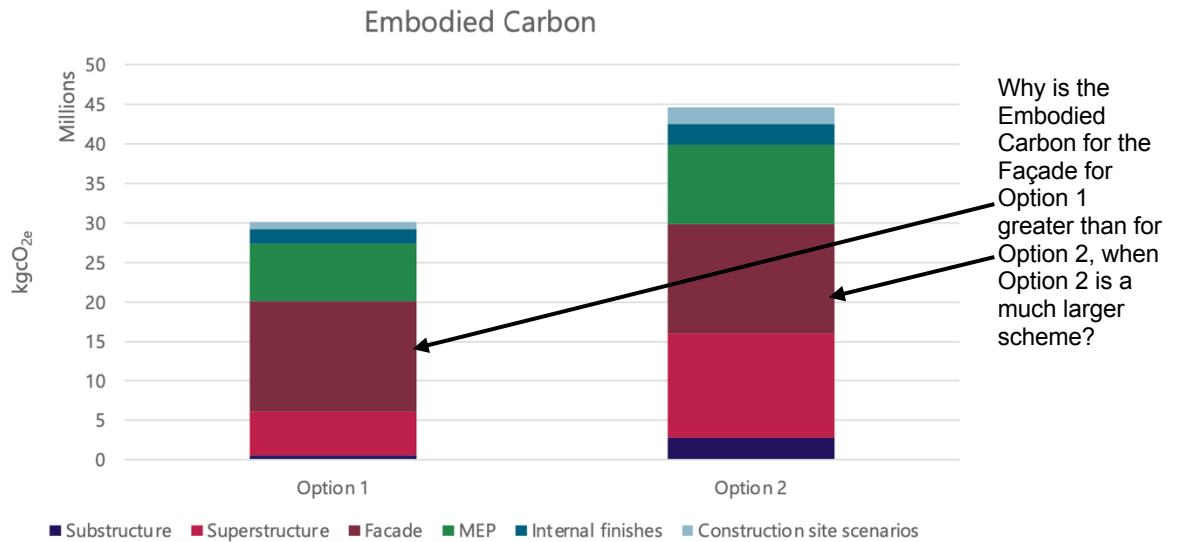


Figure 6—4 Comparison of Embodied Carbon

Fig 6-4 Comparison of Embodied Carbon – Option 1 vs Option 2

Option 1 Retrofit is clearly less than Option 2 New Build

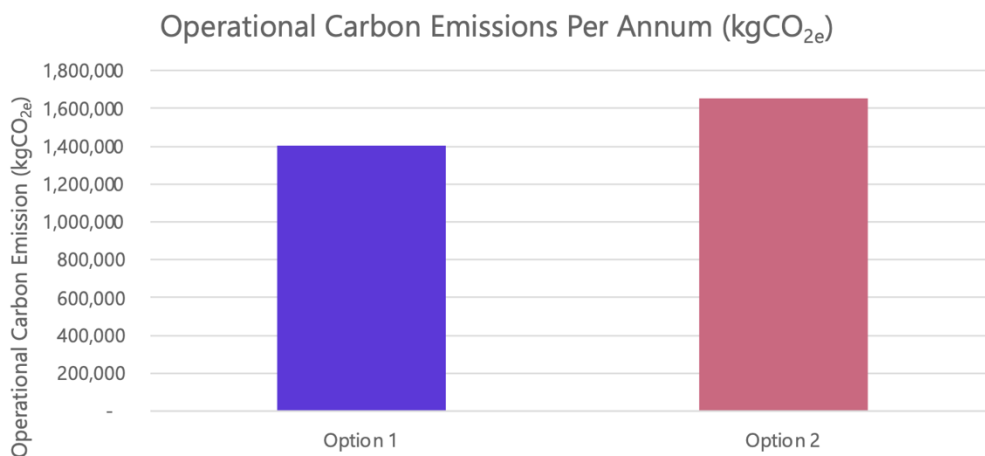


Figure 6—6 Operational Carbon Emission per Annum

Fig 6-6 Comparison of Operational Carbon Emissions – Option 1 vs Option 2

Option 1 Retrofit is less than Option 2 New Build

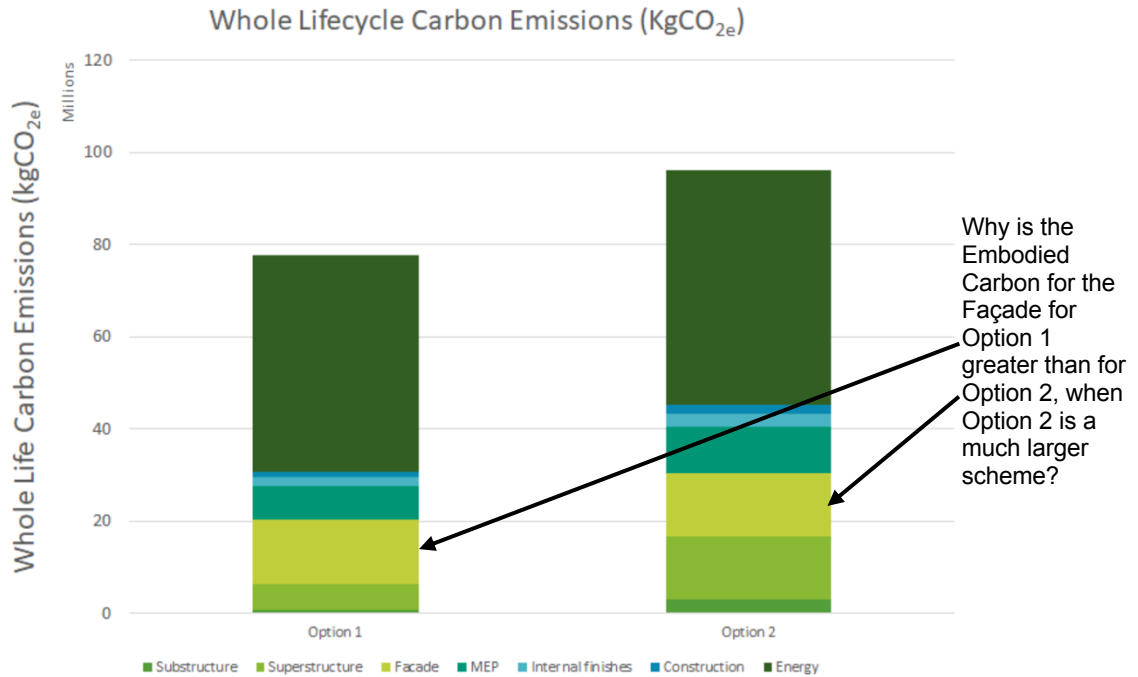


Figure 6—8 Whole Lifecycle Carbon Emissions in millions of kilograms of CO₂ equivalent

Fig 6-8 Comparison of whole Life Cycle emissions— Option 1 vs Option 2
Option 1 Retrofit is less than Option 2 New Build

- In all cases the total whole life carbon emissions, embodied and operational are less with Option 1 than with Option 2.
- Precise whole life carbon figures have not been provided for the options in the LWW Report, however from the graphs in Fig 6-8 above, it would appear that Option 1 – Partial Retrofit is some 75,000TCO_{2e}, and Option 2 – All New Build is about 95,000TCO_{2e}. This means that the new build is about 20,000TCO_{2e} more than the partial retrofit. This extra carbon cost for the demolition and new build is equivalent to:
 - 101,520,000 miles travelled by an average family car or
 - 138,060,000 miles travelled by one economy class air passenger.
 - Or will take 340,000 trees 10 years to absorb.
- Based on the reports analysis the /m² rate of carbon emissions is lower with Option 2 than with Option 1. However, this is not relevant, as the key environmental issue is the total carbon emissions / GHG emissions impact of the scheme on the environment. A larger scheme with larger amounts of air conditioning will also have a larger amount on refrigerant loss with its larger GHG impact. This is not included in these figures. The rate quoted for Option 1 is surprisingly high and should be re-examined.

- New construction will produce an immediate and large carbon emissions ‘hit’ to the environment. The greater the extent of retention and reuse, and the less the use of new materials, the greater the reduction to this initial carbon emissions ‘hit’. This is very beneficial as carbon emissions released now have a greater long-term impact than those released over a building’s life.

5. Planning Policy Context – UK Net Zero Carbon Policy

5.1 The UK national political context is to achieve a ‘Net Zero’ carbon economy by 2050. This was passed by parliament in 2019 as a legally binding amendment to the Climate Change Act of 2008. This commitment was further updated by Parliament in April 2021 by creating an interim commitment of achieving 78% carbon reductions by 2035. In addition, the UK made a commitment at COP26 in November 2021 to reduce emission by 68% by 2030, only 8 years away. These objectives cannot be achieved through ‘business as usual’.

5.2 The global built environment sector is generally held to be responsible for some 40% (*World Green Building Council*) of global CO₂ and other Greenhouse Gas (GHG’s) emissions (UK approx. 25%) and therefore there is particular pressure on the built environment to reduce carbon emissions significantly and rapidly. To achieve 78% of reductions by 2035 means that schemes under consideration today already need to be making significant reductions in their overall carbon footprint. The RIBA’s 2030 Climate Challenge/LETI set out interim targets for this.

5.3 The carbon emissions covered by the Government’s net zero commitment are both in use ‘operational’, i.e. day to day, energy use, as well as the ‘embodied’ carbon emissions from the sourcing of materials and products, fabrication, transport, construction and the in-use emissions due to maintenance, repair and replacement of components, as well as final demolition and disposal. What is known as ‘Whole Life Carbon’ (WLC) assessment brings together embodied (material related) and operational (day to day energy use) emissions over the entire life cycle of the building.

5.4 Under the UN’s Greenhouse Gas Protocol operational emissions are covered under Scope 1 (*direct*) and Scope 2 (*energy indirect*) emissions with embodied emissions covered under Scope 3 (*purchased goods and services, which includes construction*) emissions. The UK Government’s objectives are to reduce ‘all greenhouse gas emissions to net zero by 2050’.

5.5 HM Government has backed up its intentions with the following guidance, 'The Construction Playbook', published in December 2020 which says that it's use will create the right environment to:

- *"Take strides towards our 2050 net zero commitment and focus on a whole life carbon approach to fight climate change and deliver greener facilities designed for the future".* (Introduction p3)
- And that: *"contracting authorities should adopt the use of whole life carbon assessments (eg PAS2080) to understand and minimise the GHG emissions footprint of projects and programmes throughout their lifecycle."* (Build Back Greener p5)

5.6 Many Local Authorities have declared a Climate Emergency with some now actively pursuing low 'whole life carbon' policies. For example, the Greater London Authority, in the new London Plan, requires all referable schemes to undertake a full 'whole life carbon' (i.e. operational and embodied emissions over the buildings entire life cycle) assessment at planning submission, and with an 'as built' update post completion.

5.7 In May 2022 the Environmental Audit Select Committee published a report into its inquiry on carbon and construction: "Building to Net Zero: Costing Carbon in Construction". The Committee report included the following (p60, para 213, p70, para 38.)

- *"Retrofit and reuse of existing buildings, where practicable, should be prioritised over new build to conserve resources, minimise embodied carbon emissions, reduce demolition waste and deliver cost-effective solutions to delivering on housing demand. Local authorities and housing developers are expected to balance multiple objectives when meeting housing needs, and therefore require a coherent policy framework to support the balancing of retrofit and new, low-carbon housing delivery. The Government states it is promoting the benefits of re-using and retrofitting ahead of demolition, but we have seen limited evidence to demonstrate that this is yet the case. In some cases, reforms to permitted development rights appear to have created a perverse incentive for demolition and new-build over retrofit. We are concerned that the amendment to permitted development rights which allowed demolition and replacement was introduced without full consideration of its potential impact on sustainability and on carbon emissions".*

5.8 In the National Planning Policy Framework (NPPF) of July 2021, in Section 14; Meeting the challenge of climate change, flooding and coastal change, Item 152 states:

- *The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that*

contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

6. Planning Policy Context – Greater London Authority (GLA) - Planning Policy

6.1. In December 2018, the **London Assembly** declared a climate emergency, and called on the mayor to do likewise and put in place specific emergency plans so that London is carbon neutral by 2030. The mayor, Sadiq Khan, declared a climate emergency shortly after the Assembly and in early 2020, set a target for London to be net zero-carbon by 2030.

6.2. In **March 2022 Policy Guidance SI2** was published requiring **Whole Life Carbon (WLC)** assessments for schemes referable to the Mayor. This Guidance included the following:

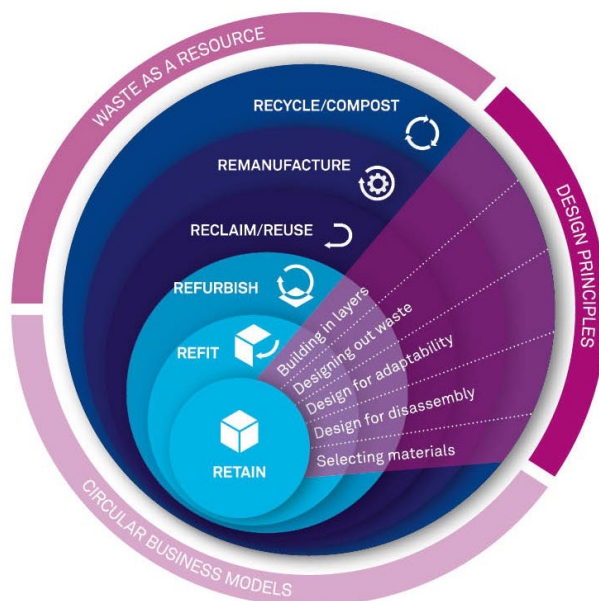
- **Item 1.2.3.:** Designing a development that follows a WLC approach will: *“achieve resource efficiency and cost savings, by encouraging refurbishment, and the retention and reuse of existing materials and structures, instead of new construction”*
- **Table 2.1.** WLC Principles: Principle 1: Reuse and retrofit of existing built structures: *“Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option”.*
- **Item 2.4.1.:** *“WLC assessments should demonstrate the actions that have and will be taken to reduce WLC emissions. The assessment should cover the development’s carbon emissions over its lifetime, accounting for:*
 - *any carbon emissions associated with pre-construction demolition*
 - *any carbon savings associated with the retention, reuse and recycling of existing structures and materials that are already on-site”*
- **Box 1.** *“Key requirements of this guidance that differ from the RICSPS methodology:*
 - *Carbon Emissions from pre-construction demolition should be reported.*
 - *Reporting the key actions undertaken to reduce WLC emissions and the associated carbon savings, including those associated with the retention, reuse and recycling of existing structures and materials that are already on-site – see section 3 for further details.”*
- **Item 2.5.3.:** *“Each module should be presented separately, as identified in the WLC assessment template. The reference study period (that is, the assumed building life*

expectancy) for the purposes of the assessment is 60 years. Where the design life of the project exceeds or is less than 60 years, the assessment should still be done to 60 years but with an accompanying explanation of the life cycle and end-of-life scenarios for the actual design life”.

- **Box 3:** “The pre-application assessment should include the information listed in Box 3.
 - “Confirmation that options for retaining existing buildings and structures have been fully explored before considering substantial demolition, including incorporating the fabric of existing buildings into the new development.”
 - “The carbon emissions associated with pre-construction demolition.
 - An estimate of the percentage of the new build development which will be made up of existing façades, structures, buildings.”
 - “The WLC principles that are informing the development of the site”.
- **Item 3.1.3.:** “If substantial demolition is proposed, applicants will need to demonstrate that the benefits of demolition would clearly outweigh the benefits of retaining the existing building or parts of the structure. Retention should be seen as the starting point; this will usually be the most sustainable option as it can make an immediate contribution toward the Mayoral objective of London becoming a zero carbon city by 2030, as well as reflecting the need to both move towards a low-carbon circular economy (set out in Good Growth objective GG6 – Increasing efficiency and resilience) and to push development up the waste and energy hierarchies (see Policy SI 2 – minimising greenhouse gas emissions; and Policy SI 7 – reducing waste and supporting the circular economy)”.
- **Item 3.1.4.:** “To calculate the carbon emissions associated with pre-construction demolition, actual figures should be used where possible. If actual figures are not available, applicants can apply a standard assumption of 50kgCO₂e/m² to the GIA of the existing areas being demolished that fall within the boundary line”.
- **Item 3.2.2.: Box 4:** “Planning application submission stage information requirements:”
 - “Confirmation that options for retaining existing buildings and structures have been fully explored before considering substantial demolition, including incorporating the fabric of existing buildings into the new development. See paragraph 3.1.3 for further guidance.”
 - “The percentage of the new build development that will be made up of existing façades, structures, buildings. “
 - “Summary of key actions to achieve the WLC emissions reported and the emission reductions they are expected to achieve, including from the retention, reuse and recycling of existing structures and materials that are already on-site.”

6.3. In March 2022 Policy Guidance SI7 was published requiring **Circular Economy (CE)** Statements for schemes referred to the Mayor to promote CE outcomes, and to aim to be net-zero-waste. This Guidance included the following:

- **Item: 1.1.3.:** *“This guidance explains how to prepare a CE statement to comply with Policy SI 7, including the information that must be submitted under Policy SI 7(B). It also includes guidance on how the design of new buildings, and prioritising the reuse and retrofit of existing structures, can promote CE outcomes.*
- **Item 2.3.4:** *“Figure 3 sets out a hierarchy for building approaches that maximises the use of existing materials. Diminishing returns are gained by moving through the hierarchy outwards, working through refurbishment and reuse through to the least preferable option of recycling materials produced by the building or demolition process. This provides an overall strategy for the redevelopment of buildings, with retention as the starting point. The decision trees in the following sections (Figures 4 and 5) expand on this, setting out a hierarchy of CE design approaches for development.”*



Source: Building Revolutions (2016), David Cheshire, RIBA Publishing ©

Figure 3: CE hierarchy for building approaches

- **Item 2.4.2:** *“To follow the approach set out in Figure 3 (London Plan Policy D3 Figure 3.2), retaining existing built structures totally or partially should be prioritised before considering substantial demolition, as this is typically the lowest- carbon option.”*
- **Item 2.4.3:** *“The CE statement should set out the justification for whichever of the four approaches set out in Table 4, above, is being proposed for the development.*

Proposals that are further down the hierarchy will require more detailed and compelling justification.”

- **Item 2.4.5.:** *“When assessing whether existing buildings are suited to the requirements for the site, applicants should robustly explore the options for retaining existing buildings (either wholly or in part). Where disassembly or demolition is proposed, applicants should set out how the options for retaining and reconstructing existing buildings have been explored and discounted; and show that the proposed scheme would be a more environmentally sustainable development.”*

7. Planning Policy Context – City of London - Planning Policy

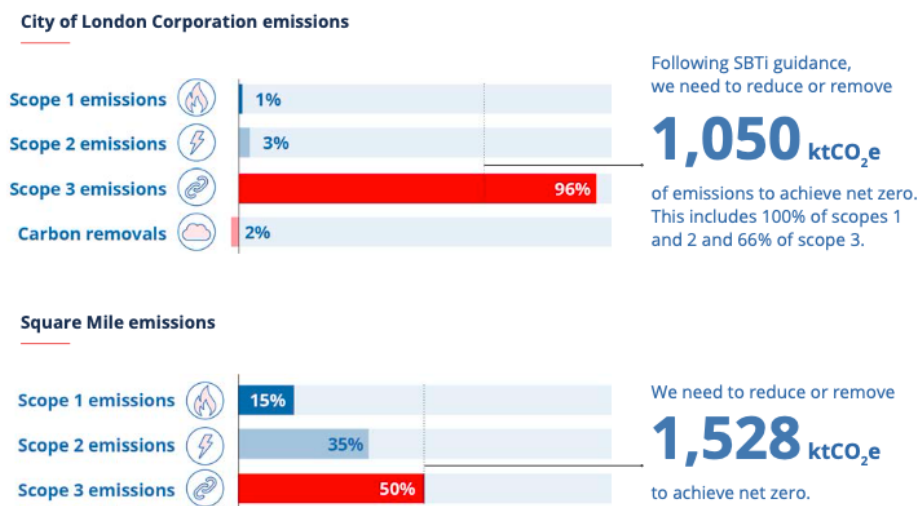
7.1. In 2015, the City of London published the ‘Local Plan’, this set out Policy in the section ‘Environmental Sustainability’ Policy around Climate Change and Sustainable Development. This policy focussed on Energy Consumption, Air Quality and the Urban Heat Island and climate change.

- The 2015 Policy document includes in ‘Core Strategic Policy CS15: Sustainable Development and Climate Change’; which states *“To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate”,* by, in: Point 3: *“Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources”.*

7.2. To redress this omission, and to align with national and the GLA’s Environmental Policies, The City of City has launched a number of initiatives these include:

- **Published November 2018: City Plan 2036:** This is a statement of intent and includes the commitment: *“The draft Plan promotes innovative, sustainable and high-quality buildings, streets and spaces. The design policies aim to move towards a Zero Emission City”.*
- **The City’s Draft Local Plan 2021:** Policy CE1 states that: *“..development should be designed to promote circular economy principles throughout the life cycle of the building. This can be achieved by the ‘re-use and refurbishment of existing buildings, structures and materials to reduce reliance on virgin resources and retain embodied carbon.”* The most circular economic approach by far is the retention and reuse of existing buildings.
- **Published 2020: Climate Action Strategy 2020-2027:**
- This included the headlines:

- Net Zero by 2027 in the City Corporations operations.
- Net Zero by 2040 across the City Corporations full value chain.
- Net Zero by 2040 in the Square Mile
- Climate resilience in our buildings, public spaces and infrastructure.
- Work with all stakeholder groups to accelerate the transition to net zero.
- *In the context of climate action, this means we can support the achievement of net zero, build climate resilience and champion sustainable growth to achieve a truly sustainable City. We will do this by means of the following actions, committed to in our Corporate Plan, 2018-23, against which we drive our performance.*
- **Under ‘Our Approach’:**
 - Many organisations and authorities focus on driving down the emissions they have most control over – scope 1 and 2. Addressing scope 3 can be daunting as it covers everything an organisation buys, sells, invests in, leases to others and disposes of as well as commuting and business travel.
 - But for organisations and financial centres like ours, scope 3 makes up a large portion of the total carbon footprint. Measuring it can lead to the design of innovative solutions to reduce carbon emissions significantly.
- **Under ‘Our Baseline’** is a breakdown of City of London Corporation emissions and Square Mile emissions:

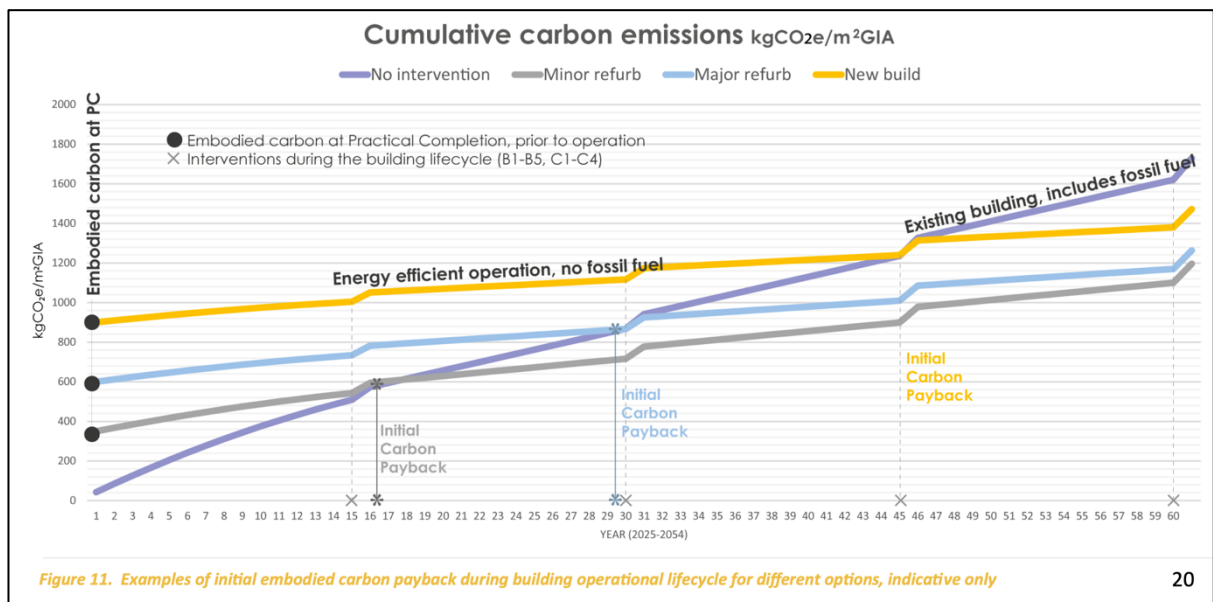


What this shows is that Scope 3 emissions, which would normally include development (purchased goods and services) are responsible for half or all emissions.

- The aims for ‘The First Six Years’ include the following actions under ‘Actions to support the achievement of net zero’, and ‘Actions to champion sustainable growth’: *“Use our planning role to influence others to embed carbon analysis and circular economy principles in capital projects”.*

- **Published May 2022, Planning Advice Note; Whole Life Cycle Carbon Optioneering** by Hilson Moran for the City of London:
 - This document sets out how the City of London proposes to meet its commitments with respect to achieving; *“The City of London Corporation (CoL) has committed to Net Zero Carbon (NZC) for both embodied and operational carbon emissions by 2040”* through the planning system.
 - The Climate Action Strategy also commits to: *“The City of London Corporation has adopted a radical Climate Action Strategy which breaks new ground and sets out how the organisation will achieve net zero, build climate resilience and champion sustainable growth, both in the UK and globally, over the next two decades.*
 - *By adopting the strategy, the City Corporation has committed to:*
 - *Achieve net zero carbon emissions from our own operations by 2027*
 - *Achieve net zero carbon emissions across our investments and supply chain by 2040*
 - *Support the achievement of net zero for the Square Mile by 2040”*
 - The document also states that: *“The property and construction industry has a moral duty to act and reduce the environmental impacts of this sector as well as mitigate the effects of Climate Change”.*
 - Under Section 1: ‘Carbon in Planning Policy’, The first section specifically outlines the GLA’s WLC Policy and what these mean for development. It also points out that that currently the City of London’s own policies do not yet require Whole Life Carbon assessments, but do require a minimum BREEAM ‘Excellent’ rating which does require a limited WLC assessment. However, it should be noted that the GLA Policies SI2 (requiring a full WLC assessment and prioritising retrofit) and SI7 (CE – prioritising resource efficiency) apply to all schemes referable to the Mayor of London.
 - Also specifically referred to is the GLA’s requirement for applications to demonstrate that:
 - Options for retaining existing buildings and structures have been fully explored before proposing substantial demolition, including incorporating the fabric of existing buildings into the new development (aligned with London Plan Guidance for Circular Economy Statements, March 2022);
 - Carbon emissions associated with pre-construction demolition are reported separately.
 - An estimate of the percentage of the new build development which will be made up of existing façades, structures and other key components is reported

- Specifically highlighted is the GLA WLC Reduction Principle 1 on the Reuse and Retrofit of existing Buildings: *“Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option”*.
- This document also specifically refers to GLA Policy SI7 on the Circular Economy (see Section 2.2 above).
- Under Section 4 ‘Carbon Optioneering’, the document notes that: *“It has become clear to the industry that the construction of new buildings using current construction techniques and materials result in high carbon emissions over the buildings lifecycle”*. It goes on to show the following Graph which compares the overall carbon impacts of new build vs retrofit:



- This diagram clearly shows that the refurbishment route (whether major or minor) represents a lower carbon option than new build. This is of significance as it clearly supports GLA Policy Principle No 1 to prioritise retrofit and illustrates that to achieve its net zero objectives, the City of London should be following this route.
- Section 6, ‘Other Policy Opportunities, specifically reference the GLA’s ‘Circular Economy Statements Guidance’.
- Planning Applicants are required to complete ‘Dashboard 1: Pre-Application Options Appraisal’. This shows the above graph and recommends that where applicable, all options from minor through major refurbishment to new build, be included.



BARBICAN QUARTER ACTION



**LONDONSTARTHERE.CO.UK
@BARBICANACTION
@BARBICANQUARTERACTION**

[REDACTED]

From: [REDACTED]
Sent: 02 October 2023 09:11
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: LWW - Optioneering

Hi [REDACTED]

Thank you for sending the revised options – I think they reflect what we have discussed. I will pass them on to Arcadis to get their view.

The draft Arcadis report did include relatively minor comments regarding the optioneering methodology, one of them was that it was unclear on what the structural assumptions were based. I am quite sure that the applicants have done a structural survey – can you send this over, please? Otherwise we have been discussing the extent of options with them, and your spreadsheet with the revised options is useful.

Amy will arrange a meeting with yourselves and Arcadis.

Kind regards,
[REDACTED]

[REDACTED] | [REDACTED]

Environment Department | City of London Corporation | Guildhall | London
M: [REDACTED] | E: [REDACTED] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment



From: [REDACTED]
Sent: Friday, September 29, 2023 6:52 PM
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: LWW - Optioneering

THIS IS AN EXTERNAL EMAIL

Hi [REDACTED]stin,

Further to our meeting last week, I don't think we have heard from Arcadis this week?

We have been reflecting on your feedback however and I attach a long and short list of options for WLC optioneering.

These lists build on the team's previous work to date.

Please could we request a 30 mins Teams meeting early mid next week to take you through the proposed short-list.

Kind regards

[Redacted]

[Redacted]

Tel. [Redacted]
Mobile. [Redacted]

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London, EC4M 9BE
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From:
To:
Subject: LWW planning app 23/01304/FULEIA; 23/01277/LBC; 23/01276/LBC
Date: 05 April 2024 21:06:53

THIS IS AN EXTERNAL EMAIL

I am writing to object to the proposals for the redevelopment of the London Wall West site.

To choose to demolish and rebuild will result in the unnecessary release of thousands of tonnes of CO2, in wilful disregard of national policies and the City's own Climate Action Strategy. When we have examples less than 100m away on Aldersgate of the successful adaptation and re-use of existing buildings, then this is inexcusable.

And these are not just some tired and undistinguished office buildings, but an integral part of the Grade 2 listed and internationally recognised Barbican Estate, an exceptionally coherent and distinguished piece of large scale urban planning and architecture.

In any other capital city of the world, the plans for such a significant site would be the subject of an international architectural competition, with world class practices invited to participate, and a requirement that any proposals respect the legacy of the Barbican Estate. This would be vastly more productive in raising the profile of the City, furthering the aims of the Cultural Mile, and economically revitalising the area in a way better suited to the 21st Century.

Kind regards,

Joanna Turvey
163 Lauderdale Tower
London EC2Y 8BY

From:
To:
Subject: 23/01304FULEIA; 23/01277/LBC; 23/01/LBC276
Date: 05 April 2024 22:30:26

THIS IS AN EXTERNAL EMAIL

I strongly object to all the above proposed developments because:

1. They run contrary to CoL's expressed aims of reducing carbon footprint and waste, make a mockery of CoL's own recommended guidelines, and are evidence of the shameful hypocrisy of the London Wall West scheme which rides roughshod over local objections and CoL's own guidance;
2. The whole process of consultation has been a travesty. The production of a multitude of new and amended documents, inaccurate or badly designed plans and imperfect explanations make informed commenting exceedingly difficult. Matters are made worse by the lack of trust created by the strong impression that the CoL has every intention of breaching its own (admirable) guidelines, and giving priority to making the maximum amount of money and ignoring the harmful effects on environment, heritage, and aesthetic and historical considerations;
3. The overall aim of the programme should be to create an environment worthy of and complementing the vision and imagination of the Barbican Estate and other precious buildings and areas of special historical and architectural interest such as Smithfield, the old London Wall, Bastion House, the former Museum of London and the Ironmonger's Hall;
4. Preference over creating yet more office space should be given to refurbishing existing buildings and creating affordable housing for hospital workers, teachers etc and worthy organisations such as the CoL Girls' School and the police which both need more space;
5. The development will cut out light and overshadow the residential housing of the Barbican complex;
6. Traffic flow will be seriously curtailed, creating traffic jams and causing more pollution.

Simon Ricketts CB, 92 Shakespeare Tower, Barbican, EC2Y 8DR
5th April 2024

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 Scott Lebon

Address: 44 Dobson Close London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: The area around the Museum of London is currently drab and unappealing. This proposal is a vast improvement and will benefit the City of London.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Mr Simon Aldridge

Address: Flat 55, John Trundle Court Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: These buildings under threat are an important part of the city of London's architectural history and ought to be protected and repurposed as part of the Barbican estate as a whole- they are an integral part of the community and deserve to be reused for future generations to enjoy and love.

To demolish these amazing buildings would not only mean they are lost forever - but would affect the Barbican estate as a whole- part of its soul would be ripped out - stolen even.

The corporations stated aim to become net zero by 2040 seems like pie in the sky.

Please don't allow this iconic architectural to be lost - use it as is and repurpose it to be of positive benefit to the community and London as a whole as it has been since the museum opened

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Franzisca Moeller

Address: Lyoner Straße 38c Frankfurt, Germany

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I hereby object against the demolition plans. Having lived in London for a long time, the Barbican is very close to my heart and an absolutely unique site in London, which should be all means be protected and preserved in its entirety.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Ms Sibylla Duffy

Address: 33 Links Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I strongly disagree with the Corporation of London's strategy of building speculative offices at this time as there is a decline in demand for office space and there is a high carbon cost to new building.

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: Louise Ketley

Address: 221 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Concerned about environmental impact of demolition which seems to be against the City's net zero carbon emission ambition.

The new scheme is disproportionate to the existing buildings severely impacting the listed Barbican estate and surrounding area diminishing the existing amenities.

Planning changes submitted are opaque, illustrations are not to scale which are misleading.

From:

To:

Subject: LWW planning app 23/01304/FULEIA; 23/01277/LBC; 23/01276/LBC

Date: 06 April 2024 11:42:02

THIS IS AN EXTERNAL EMAIL

I am writing to express my objections about the London Wall West planning applications.

It is a great shame that the plans do not take into account the rich cultural heritage of the area and add to the cultural benefit that was originally promised by a new concert hall.

I am concerned about the impact on safety due to moving pedestrians closer to traffic, further reducing the highwalks that were part of the original Barbican vision of separation of pedestrians from traffic.

The potential negative environmental impact has been well documented by others. Further consideration should be given to reducing the carbon impact and repurposing existing buildings.

The noise, pollution, and disruption resulting from demolition on such a massive scale would negatively impact residents, workers and visitors alike. There are very real concerns about the loss of daylight.

The buildings are likely to dominate the area, negatively impacting the listed, heritage buildings in the area.

Overall, are new office blocks the best use of this space - occupying a unique central location in the heart of the City? Such a lost opportunity to enhance the architectural heritage of our area.

Yours sincerely

Melissa Collett
411 Lauderdale Tower
Barbican
London EC2Y 8NA

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Iona Adair

Address: 707 Bryer Court The Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The Barbican is part of a Conservation Area and is of Special Architectural and Historic Interest. The demolition and redevelopment of Bastion House and the London Museum sites go against protecting the important history and heritage of the estate and surrounding post-war architecture. These must be preserved.

Repurpose not rebuild! The negative environmental impact & non-compliance with the City's own carbon targets must be considered. Demolition and new build will unleash tens of thousands of tonnes of carbon, even though industry experts have shown that these buildings are suitable for reuse.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Matthew Jones

Address: 2 Pier Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Traffic or Highways

Comment: This work will needlessly damage the unique heritage landscape of the Barbican whilst causing considerable noise and traffic disruption to those living and working in the area. This building should be refitted to a modern standard but its exterior appearance preserved

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Ms Hannah Cousins

Address: 115a Evering Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Bastion House and the Museum of London are rare and important parts of the architectural history of the City of London. A re-imagining of these buildings would be far more suitable, sensitive and sustainable. And it's what I - as a Londoner - want to see.

To : Gemma Delves - case officer
From : Averil Baldwin,
1 Thomas More House
Barbican
London
EC2Y 8BT
Tel : [REDACTED]

6 April 2024

Dear Ms Delves,

This is a further objection to :

London Wall West Planning Application (ref 23/01304/FULEIA)

Listed Building Consent (23/01277/LBC)

Listed Building Consent (23/01276/LBC)

Background and earlier objection

I have already objected strongly to this application on heritage and sustainability grounds.

The former Museum of London and Bastion House are fine buildings designed by distinguished architects, Powell and Moya. They should not be demolished. They should be adapted and retrofitted.

Their demolition would not only result in their complete loss, but the mass, height and design of the proposed redevelopment would have a highly detrimental impact on a large number of local heritage assets.

All the evidence shows that adaption and retrofitting would also result in fewer carbon emissions. However, this option has never been fully and honestly explored, contrary to sustainability planning policies and guidelines at National, GLA and City level.

The application should be dismissed on those two grounds alone.

Current objection

My current objection focusses on failures in process both pre-application and post-application.

When the City is the applicant, as well as the planning authority, the process should be scrupulously fair and transparent.

This is even more important with a scheme so obviously controversial, not to say, unpopular as London Wall West. (At the time of writing there are 821 objections recorded with just 13 statements of support.)

Process -Pre-application (failure to comply with NPPF, Chapter 12, para 137)

Many objectors have already commented on this. There was a failure to engage the community properly at every stage, including developing fundamental options for the site, evaluating a major re-fit option, making adjustments to reflect public feedback, sharing the results of the soft-market test, and keeping the community

updated. Despite promises to the contrary, there was no public consultation at all for the eighteen months leading up to the application.

Process Post - application (the current consultation stage)

Since the consultation process begun, some 681 documents, many several hundred pages long, have been submitted by the applicant. These were a challenge to absorb and comment upon. Of course, there was little help available to those wishing to respond and the planning portal was often down.

However, since the original closing date of 31st January was extended to 6th April, it has become even worse! Another fifty or so documents have been uploaded since 31st January, some as late as 25th March. There has been no explanation or guidance on what they contain. Some are completely new: some are critiques of earlier documents. Some require extensive cross-referencing with what has gone before. A few are relatively straightforward to understand, most are not, and a fair number are almost incomprehensible.

And now, to add insult to injury, those who have commented received a letter on 2nd April - four days before the closing date for doing so, not only confirming that the Planning Committee's hearing was as early as 17th April, but that the Planning Department was recommending approval of the application. So what is the status of those objections yet to be submitted, such as this one? How can this in any way be a fair process?

Why the unseemly haste?

As well as unacceptable process issues, it is apparent from the documentation, that the application in its current form is simply unworkable. Too many access, safety and transport issues remain unresolved and have not been signed off by the relevant authorities.

The only conclusion one can draw is that the application is being rushed through because planning policy in favour of adaption and retrofit is developing rapidly at all levels in response to commitments to tackle climate change . The application would have even less chance of arguing that it in any way met planning criteria , were it to be further delayed. Is it a coincidence that consultation on the City Plan 2040, with stronger policies against demolition and in favour of retrofit , is starting on 18th April, the day after the planned Committee hearing?

Best wishes

Averil Baldwin (Mrs)

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Ms Janie Price

Address: 273 Shakespeare Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: I object to the part demolition of a listed building, Ironmonger's Hall, the only livery hall to be constructed between the wars, whose authenticity and craftsmanship are stated in the listing and would be severely compromised if altered or rebuilt. The proposal would impact on the significance of the listed building and its setting, a delightful juxtaposition of quirky traditionalism within the brutalist context.

The proposed scheme would impact negatively on the heritage significance of Barbican flats, the scheduled park and high walks.

The proposed height and massing of the buildings will impact negatively on light and views from existing flats. A noise assessment should take into account the potential loss of enjoyment of the sound of St Pauls' bells from the flats and leisure spaces including the tennis courts whose impact should also be assessed for traffic noise and pollution both during and after construction - the courts and sound of the bells are very important to the enjoyment of the Barbican residents.

The height and bulk of the proposal would alter the character of this end of the Barbican which

benefits from the lower density and height and an oasis of peace in the gardens below.

Has the wind impact of the proposal been adequately assessed?

There has been an unfortunate lack of consultation especially on

- the retention / adaptation / retrofit of the existing buildings
- use mix
- potential for affordable housing in compliance with Policy DM 21.1 of the CoLC adopted Local Plan - this site would be a perfect fit
- carbon emissions of demolition and newbuild
- impact on many heritage assets and their setting and significance

I am opposed to the proposed development as it stands and would welcome reconsideration to address the points above.

- 23/01304/FULEIA - Demolition of 140 & 150 London Wall to provide a phased development etc
- 23/01277/LBC - External alterations to existing highwalks at the Barbican Estate etc
- 23/01276/LBC - Demolition of Ferroners' House etc

In addition to my previous comments, I also OBJECT on the following grounds:

1. Tavernor Report (responding to Historic England's comments)

- The report states: "Due to its footprint being slightly larger than the existing Bastion House, [New Bastion House] will extend slightly further on the skyline than the building it replaces.." This statement is factually incorrect. The footprint of New Bastion House is 2.5-3 times that of the existing building. Such a basic error/misrepresentation undermines the accuracy and reliability of this report. Similarly, the statement that "there would be very little apparent change to the view" is implausible.
- The claims in this report that the scheme represents an enhancement to the heritage settings is contested.
- "The existing Bastion House would be replaced with a pair of high-quality buildings which would have a lighter skyline presence than the existing Bastion House. " It is unclear what is considered "high quality". It is also illogical to claim that the increased mass of the buildings would result in a lighter skyline presence. These claims are spurious and fantastical.
-

2. Further comments on ES Further Info uploaded 27 February 2024

- 2.2.15 Have the appropriate Neighbour Notifications been served on those neighbours with a legal interest and who share a boundary?
- 4.3.2 It is understood that the bus stop by the roundabout will be removed permanently.
- 4.3.21 No overnight works should be permitted in a residential area.
- 4.3.25 contradicts the applicant's response on transport. The applicant has stated that the ramp will be closed to residents during the construction phase. The alternative Aldersgate/Lauderdale ramp is not adequate.
- 6.4.43/44TFL has not approved any aspect of the scheme being considered.
- The impact on Thomas More residents is underplayed. Access via the ramp by pedestrians, cyclists and vehicles has existed since the construction of the Estate.
- The St Paul's Gyrotory scheme is not independent of LWW. Both schemes should be looked at together as the interplay between them will be critical. Looking at LWW in isolation is not logical.

- Table 7-12: The assumptions provided by the contractor do not appear to have been scrutinised – just accepted. This is unacceptable.
- 7-E: The limits do not allow for simultaneous use. Why not? Noise from people speaking and amplified music has not been properly considered given the proposed use of the outdoor space. The proximity of the outdoor area to residents' homes should require this. The spaces cannot be used for their stated purpose.
- 7.4.2 Noise from demolition is not just “potential”. The impact on residential amenity has not been adequately considered. A prolonged period of demolition and construction is not reasonable. The applicant insists it will not develop the site. No developer has been identified. Consequently, the site may stand empty for many years following demolition. This will lead to a marked deterioration in the urban landscape and inflict a prolonged period of works on neighbours.
- 8.6.11 Where is Barbican Blake House?
- Please explain how an evergreen hedge will help reduce the impact of amplified music? Given the fact that much of the area will have low levels of sunlight, how will that evergreen hedge grow let alone reach maturity?
- How will the lawn grow in such a dark area with low levels of natural light? The towers surrounding it will block sunlight reaching the space.
- 11.4 The CLSG is currently using space in the museum building and will use more space from the summer.
- Lighting Supplementary SPD- the City has since withdrawn funding for this and is not promoting the charter. It is therefore irrelevant to this assessment and the review resubmitted. This part of the review should be disregarded. Light spill remains an on-going issue in the area. Enforcement proceedings are not an option and anyone impacted can rely only on a “good neighbour” to close their office blinds after dark.
- 14.5.6 Construction costs are relevant to this assessment. They are relevant to the viability of this scheme and the less risky retrofit and extend option.
- BH13: There is no evidence that the buildings were considered to be NDHAs. Evidence of those deliberations should be included in this assessment.
- BH14: Even a cursory glance at the materiality of BH, the Museum of London and the Barbican confirms the close relationship across the wider area. The scale and position of the buildings are inter-related.
- 6.4.43 TFL has not approved this scheme.
- Archaeology: This update provides little reassurance that the site will be excavated without damaging the layers currently unexplored. The reference to “if required” is obsolete given the comments uploaded by Rabbi E Schlesinger on 20 March 2024. I refer in particular to the statement: “...the majority of the graves are still in situ under the surface..”

3. Fire Statement uploaded 14 March 2024

- This version of the Fire Statement confirms the fact that access arrangements for all buildings including residents' homes have not been approved by London Fire Brigade.
- There are no references to access restrictions via the Thomas More ramp. As stated in an earlier objection, the Thomas More ramp is the fire safety spot for Barbican residents at this end of the Estate. The Fire Statement is nebulous.

4. EIA Review uploaded 27 February 2024

- The Trium review reconfirms the fact that TFL has not approved this scheme. Concerns over congestion and the impact on all users are not dealt with.
- Both Bastion House and the Museum of London should have been considered as Non-designated Heritage Assets. There is no evidence that any discussions took place to consider the heritage significance of the buildings. It is important to note that Ironmongers' Hall was only recently listed. Prior to that, the City of London Corporation pursued its demolition over many years through a number of failed CPO applications.

5. Delivery and Servicing

- The City of London has form on underestimating the area required for vehicles to turn in a confined space eg on Silk Street by the Heron which, despite assurances of the adequacy of the space at the time, proved to fall far short of the space required for certain vehicles.
- The "modelling" is not robust.

6. The Glade and public realm improvements

- The public realm "improvements" by the City cluster remain a cause of deep embarrassment. This is how many so-called public realm improvements are realised – dark, wind-swept and hostile.
- The claims of some sort of urban oasis are fantastical.

7. The Officer's recommendation should be based on comments received during the consultation period. Why did the officer publicly state his recommendation that the scheme be approved earlier this week?

8. Continuing to perpetrate the myth/untruth that Bastion House and the Museum of London are unsafe while knowingly being

in possession of evidence of the fact that their designs were adapted post-Ronan Point is concerning. Failing to substantiate its wild claims and acknowledge its lack of due diligence is not the standard that it is reasonable to expect of an LPA. As Simon Sturgis says: “The City should be an exemplar”.

I urge you to REJECT all three linked applications on the grounds that the scheme is not fit for purpose and unworkable. This is no way for a local authority to plan for the future of our City.

Brenda Szlesinger

Flat 112 Thomas More House

Barbican

EC2Y 8BU

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Joseph Duckworth

Address: 5 Queens Walk London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Objecting for numerous reasons:

- destruction of iconic 20th century buildings
- carbon footprint of restrains rebuilds far higher than a retro refit. Surely goes against City of London net zero ambitions?
- office over-capacity in the Central London due to new working from home practices. There seems to be little evidence that there is a demand for these new offices.
- traffic issues as there appear to be few discussions with tfl on this project

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Case Officer: Gemma Delves

Customer Details

Name: Mr Gary Brown

Address: 114 Defoe House Barbican

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I strongly object to this scheme. This development will dominate the area the south of the Barbican, making the Grade 2 listed estate feel even more closed in. The sponsor of this development project has not properly considered proposals to reuse the existing premises- only doing a token exercise - instead they have focussed on maximising financial returns and not taken into account the environmental impact of releasing all the inbuilt CO2 in the building. The public realm is exaggerated in the website. It is sad that given the importance of the site and proximity to important nearby sites that the City is going to another office block/mixed use development, when they could have repurposed the existing brutalist museum.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Roger Hall

Address: 607 Seddon House Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: The Barbican estate was designed with a low profile for the Museum of London at the north end of St Mary Le Grand.

The sight line along from the St Paul's area will be destroyed by the building of another skyscraper which will hide the distant view of the Barbican's own towers.

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Case Officer: Gemma Delves

Customer Details

Name: Erin Summers

Address: 40 Defoe House London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would like to strongly object to the proposed planning.

It is getting rid of a perfectly good and beautiful building and replacing it with another office block which is entirely not needed.

Increased pollution, noise and building work and also contradicts the city's view to try and be Net Zero policy.

The plans are unclear, it's completely unneeded and there has been no thought of people who live in the city.

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Alison Hope

Address: 107 Breton House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I object to the proposal on a number of grounds including the fact that the interests of local residents have not been considered. The plans are not sustainable and show disregard for the rich culture of the city of London.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Andrew Hope

Address: 107 Breton House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I have grave concerns about the proposal and wish to object to it. My concerns include the fact that it does not represent the wishes of local residents, does not respect the environment nor the city's rich culture. I would also like to express my concerns about the future management of such a proposal.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Dr John Bredican

Address: 67 Defoe House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The building is too large and imposing and will restrict views to the south. Likely to increase traffic to area. It does not reuse what is already there and takes away heritage buildings. Will increase carbon use.

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: Dr VEENA RAVAL

Address: 143 Andrewes house Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: New planning takes away the famous heritage of London

There are too many office blocks around and taking away the natural beauty and destroying the history of the place, similarly as a new comer to the area it is inundated with the eating places .

What ever history is remained here it would be a great shame to destroy it

We are definitely against it

Comments for Planning Application 23/01304/FULEIA

Application Summary

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Case Officer: Gemma Delves

Customer Details

Name: Ms Tanja Goudarzi Pour

Address: 67 Defoe 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: This is an unacceptable proposal and I vehemently object for the following reasons:

- huge carbon crime and increase in pollution , - this is heritage vandalism to the barbican
- flawed processes without enough consultation of neighbours and affected residents
- threatens the City's flagship Destination City strategy,
- flouting the City's own policies in particular the City's Net Zero aspirations,
- there is serious question about demand for new offices and offices at this location,
- not properly thought through future traffic without TFL being properly consulted,
- risk to life with all traffic for the development going through the TMH car park,
- why was there rejection of the retrofit options despite credible offers through the Soft Market test ?
- light pollution and threat to quality of life to me as a resident of the barbican.
- heavy restrictions on quality of life without sky view and insufficient sun access

i demand you withdraw and consult including barbican residents .

Comments for Planning Application 23/01304/FULEIA

Application Summary

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Case Officer: Gemma Delves

Customer Details

Name: Lukas Dengl

Address: Ben Jonson House Flat 517 London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: To whom it may concern,

I am writing to express my strong opposition to the planned development at London Wall West. The site, which holds a special place in the heritage of London, is faced with proposals that, I believe, pose a threat to the very fabric of the Barbican area's identity.

As someone who appreciates the remarkable post-war architecture that defines our neighborhood, the proposed demolition of buildings like the former Museum of London and Bastion House is nothing short of heritage vandalism. These structures are emblematic of Britain's resilience and foresight, qualities we should be striving to uphold rather than discard.

Moreover, the environmental cost of this project is too significant to ignore. The substantial carbon footprint generated by such developments runs counter to the City's environmental commitments and the urgent need for climate action. At a time when the City should be leading by example, this project could instead signal a regressive step away from the UN Sustainable Development Goals.

Additionally, the potential "canyonization" effect of the new oversized buildings on our public realm concerns me greatly. The importance of sunlight, open vistas, and the human scale of our built environment cannot be overstated. I fear that the overshadowing of public spaces and the privatization of views will have a profound and irreversible impact on our community.

It is my sincere hope that the City will take these objections into account and work towards a solution that respects the historical significance, cultural value, and environmental sustainability of our beloved Barbican.

Best regards,

Lukas Dengl

Ben Jonson House Resident

Comments for Planning Application 23/01304/FULEIA

Application Summary

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Fiona Meyringer

Address: 173 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I don't think more office space is the best use for this land, when so much existing office space is empty not least because hybrid working is here to stay.

The buildings will be huge. They will reduce daylight and privacy for those who live / work nearby, and will dominate the surrounding neighbourhood. This is bad enough, but the surrounding neighbourhood in this case happens to have enormous architectural, historic and cultural significance. The Barbican Estate is listed, but the CoL seems not to understand its significance, having already allowed CLSG extensions to ruin parts of it.

I am concerned about the negative impact on cyclists and on air quality, having participated in local air quality monitoring projects, and I think the CoL ought to be able to come up with a more sustainable solution that has less impact on the environment.

A previous proposal was a world-class concert venue. This space does not have to be more office space, and the already ridiculously wealthy CoL does not need to prioritise financial gain. Please

consider other proposals which promote our unique cultural heritage, enhance our architectural environment and benefit our local community.

From:
To:
Subject: Application reference 23/01304/FULEIA, 23/01279/LBC, 23/01277/LBC
Date: 06 April 2024 16:57:15

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

I object to the proposed demolition of the Museum of London and Bastion House.

The oversupply of office accommodation worldwide means that the proposed redevelopment is not sustainable in the long term.

Given the relatively short timescales before full refurbishment of any replacement buildings will be required for commercial reasons, the only sustainable option will be for the existing buildings to be retained and refurbished given the huge ecological costs associated with demolition and rebuilding. Refurbishment labour skills need to be developed rather than old-style demolition and reconstruction skills.

The current height and scale of the Museum of London site and Bastion House are more in scale with important historical buildings adjacent to the site. The proposed height and scale of the proposed new buildings are wholly disproportionate. This will significantly detract from the aesthetic and amenity values of the adjacent buildings - particularly the Barbican estate.

The design of the proposed development is uninspiring: there are no "stand out" features that come close to the striking aesthetics of the Barbican estate or the beauty of the other historic buildings in the locality. Having attended the public viewings of the model of the proposed redevelopment and seen the promotional videos, it is telling that so much emphasis in support of the proposed development highlights the [limited] open space rather than the intrinsic design of the buildings.

In my view the promotional videos were misleading as to the aesthetic impact of the development (e.g. only showing the site at the height of summer etc.). For most of the year the new buildings will simply be a huge ominous presence looming over the adjacent buildings exacerbating the gloom of months of dreary wet weather we now seem doomed to by virtue of climate change.

On a personal note, the loss of daylight to many parts of the barbican estate (and I suspect other buildings in the locality such as St. Giles Cripplegate) will have a significant detrimental effect.

Developments adjacent to St Paul's Cathedral are (rightly) subject to significant constraints to reduce their impact on St. Paul's. Similar considerations should also be taken into account in respect of St. Giles Cripplegate.

I would be grateful if you would kindly acknowledge safe receipt of this email.

Yours faithfully,

Mr Robin Caley OBE
31 Defoe House
Barbican
London
EC2Y 8DN

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Ms Olivia Romeni

Address: Flat 517, Ben Jonson House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: To whom it may concern,

I am compelled to voice my concerns regarding the proposed development at London Wall West.

It's disheartening to witness the potential dismissal of low-carbon, re-use strategies that could serve as a model for urban development. The envisioned replacement structures threaten to irreparably alter the essence of the area, converting it from a historically rich tapestry into a characterless commercial enclave. The proposed demolition seems particularly egregious, given the carbon implications and the current office space surplus in the city.

Furthermore, the rich historical narrative that our neighborhood weaves, stands at risk of being overshadowed by towering office blocks that pay no homage to the intrinsic value of public realms such as Postman's Park and the internationally recognised examples of post-war civic design, integral to the world-renowned Barbican Townscape.

Introducing more office spaces into the Square Mile's already monofunctional urban fabric risks further deepening its desolation during weekends and after working hours, exacerbating the area's stark disparity between built square meters and actual residents. This prevailing issue underscores a missed opportunity to cultivate a vibrant, multifunctional environment that serves the community beyond the conventional 9-to-5. Particularly in a part of London known for the highest imbalance of commercial space to residential living, the potential for retrofitting landmarks like the London Museum and Bastion House into mixed-use developments focusing on residential and leisure spaces is immense. Such a transformation could significantly enhance the area's liveliness, drawing on and amplifying the vibrancy that the Barbican Centre introduces.

In light of these concerns, I urge you to reconsider the current proposal and explore alternative plans that prioritise cultural value, historical preservation, and our collective environmental future.

Sincerely,

Olivia Romeni

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Ms Silvia Kolbowski

Address: 109 Seddon House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: There are so many reasons for objecting to this scheme, but everyone who comes to this site should take a moment to read the TWO documents submitted by Terry Trickett regarding how unprofessional and idealized have been the projected construction traffic and new, expanded post-construction traffic entering and exiting the modestly-sized Thomas More Car Park, an essential aspect of any developer's capacity to carry out such a mammoth project and satisfy tenants thereafter. Basically, the unworkability of the projected traffic routes should alert any developer who might be interested in this gargantuan scheme as to the problems and resistance to them that will arise. This is a site that, even if it were not, ideally, subject to a retrofit of the existing buildings, should be developed in a modest manner befitting the infrastructural limitations of the site. The CoL knows this, of course, and given that it can sell the site for whatever amount it wants (or just make it available for the development of cultural use), there is absolutely no reason why a more modest scheme shouldn't have been proposed. One does wonder whether this

preposterously outsize scheme is being rushed through for approval so as to lock down the top scale and density for the site, so as to privilege raw profit without sufficient thought to the people who actually live next to the site or those who work in and visit the area and will also be subject to toxic pollution released by the scheme. Any developer undertaking such a scheme would have to be a novice player, at best. [This comment is also signed by Kenneth Frampton, 109 Seddon House, Barbican.]

From:
To:
Cc:
Subject: Objection to planning application 23/01304/FULEIA
Date: 06 April 2024 17:58:52

THIS IS AN EXTERNAL EMAIL

This objection is submitted by Shelagh Wright, 205 Seddon House, Barbican, London EC2Y 8BX. It is a further updated objection following the two re-consultations notified on 28 February and 14 March 2024.

Firstly, the applicant has not consulted properly. Members of the Planning and Transportation Applications Sub Committee cannot rely on the applicant's Statement of Community Involvement and require an independent analysis of what the pre-application consultation discovered, disclosed or withheld. Given that this is a local authority scheme, independent scrutiny is needed. Without this the application should be either rejected or withdrawn.

Secondly, the planning application states the development will comprise 'cultural uses (Sui Generis) and food and beverage/cafe (Class E(b)), access, car parking, cycle parking,...creation of a new scheduled monument viewing area, public realm alterations'. However, the submitted Culture Plan (submitted 20 November 2023) is highly speculative and contains no definitive partnership or business case modelling. In addition, the City has just removed public roof terraces from the development at 81 Newgate Street under delegated powers. Members of the Planning and Transportation Applications Sub-Committee (and importantly members of the public) can have no confidence that the public and cultural plans submitted in this application will be provided. Given the levels of harm projected by the application and the probability that any public benefit on the site may be diminished or removed, the application should be rejected.

Thirdly, the application states that it includes 'part demolition and reconfiguring of the Ironmongers Hall (Sui Generis)'. However, the Ironmongers Livery has objected to this application. In fact it has its own planning application in process for the development of Ferroners' Hall which forms a key area of this scheme. If a key area of the scheme is contested and unresolved, it cannot be possible for this application to proceed. The application should be withdrawn to enable this issue to be resolved.

Please acknowledge receipt of this objection.

Many thanks

From:
To:
Subject: Objection to the London Wall West planning application 23/01304/FULEIA: Risk to Life
Date: 06 April 2024 18:01:52

THIS IS AN EXTERNAL EMAIL

OBJECTION: RISK TO LIFE

I am writing to object to the London Wall West planning application 23/01304/FULEIA.

Should the development proceed it will result in a Risk to Life. A risk not only to the physical and mental health of residents, workers, school and nursery school students and visitors, possibly for some for generations to come, as a result of the carbon emissions, air pollution and noise during many years of demolition and construction but also a risk caused by the chaotic plans for vehicle access to the new office buildings which will threaten lives. The current proposal to channel all construction traffic, and subsequently channel office users, office visitors and delivery vehicles, from Aldersgate Street down the Thomas More ramp and then through the Thomas More House Car Park is dangerous and yet it appears that the LWW design team has not taken this danger into consideration and that Planning Officers have only recently come to realise this fundamental flaw. The car park is much more than a place for parking cars and other vehicles. It represents a major element of estate infrastructure relied upon on a daily basis by residents and workers for deliveries that have increased enormously since the Pandemic, for bin emptying and other servicing, for access by carers and others supporting vulnerable people living in the neighbourhood. Most importantly of all the car park is essential for emergency vehicle access: police, ambulance and fire. Therefore the suggestion that there is a Risk to Life cannot be dismissed as an over-the-top exaggeration. It is a fact. And this danger would be made yet worse by the traffic carnage in the immediate vicinity resulting from the current plans for traffic circulation which are unworkable and I understand have still not been agreed with Transport for London. I hope therefore that Members will take extremely seriously the risk to people's lives that this development threatens, consider their personal role in taking such a decision that has potentially perilous consequences and reject the planning application.

Please acknowledge receipt of this objection.

Yours sincerely,

Peter Jenkinson
205 Seddon House
Barbican
London

EC2Y 8BX

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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

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Case Officer: Gemma Delves

Customer Details

Name: Miss Carolyn Larkin

Address: 702 Willoughby House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The solution is not sustainable and is in conflict with the City's retrofit first claims. There is already a surplus of office space. We need more affordable housing and creative spaces. There is evidence of the buildings being worthy of retrofit and are structurally sound. Nor do we require more concert space - we need to invest in our existing Barbican Centre which is in need of refurbishment. People come from all over to film and photograph our amazing urban community. Do people photograph the new architecture surrounding the Barbican? No. Let us celebrate and preserve what we have.

From:
To:
Subject: London Wall West Objection
Date: 06 April 2024 19:09:53

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

Planning Permission for ref. 23/01304/FULEIA
Planning Permission for ref. 23/01277/LBC
Listed Building Consent for 23/01276/LB

I oppose the London Wall West plans. The recent release of new and amended planning documents has been timed to coincide with the Easter break. This has given insufficient time to assess them. The City, hand in hand with its construction friends, is suspiciously gaming the system in order to push through the plans for London Wall West. These tactics are unfair.

Kay Lee
301 Seddon House
EC2Y 8BX

Comments for Planning Application 23/01304/FULEIA

Application Summary

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Case Officer: Gemma Delves

Customer Details

Name: Victoria Raffe

Address: 143 Lauderdale Tower Barbican

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I would like to object in the strongest terms to the process by which this consultation has taken place. I have worked in the public sector for twenty years, and am very familiar with the legal requirements on conducting meaningful consultation. From the start of this particular process it has been evident that no regard has been given to making this a genuine consultation process, rather than one of going through the motions. This includes the way that insufficient communication has been made, the refusal at outset to consider outcomes other than the demolition and expansionary programme of rebuilding, the cynical omission of showing views from the bridge near Barbican tube station, and now the flooding of the process with hundreds of pages of new and revised documentation with no attempt to signpost what we are being presented. It is disgraceful, and badly lets down the community that should be at the centre of the plans, riding roughshod over the City's own policies especially on environmental grounds. I wish to lodge a complaint.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Philip Crawford

Address: 73 Lauderdale Tower, Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: I am writing to lodge an objection to the proposed redevelopment of 140 & 150 London Wall. While I recognize the potential benefits of redevelopment, my concerns lie with the environmental implications of such a large-scale project. The demolition and construction phases are likely to contribute significantly to the carbon footprint of the area, which seems at odds with the City's commendable carbon targets. Additionally, the waste generated from demolishing existing structures could have been mitigated through more sustainable practices. As a resident who cherishes the heritage of our area, I am also concerned about the impact on the scheduled monuments and the character of our historic highwalks. The lack of transparency and sufficient consultation on these changes has left me and my fellow residents feeling disregarded in a process that will greatly affect our daily lives and the legacy of our beloved City.

Comments for Planning Application 23/01304/FULEIA

Application Summary

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Silvia Crawford

Address: 73 Lauderdale Tower, Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment: As a long-term resident, I submit this objection to the redevelopment plans for London Wall. The breadth and complexity of the new and amended planning documents recently made available lack clarity, making it extremely difficult for concerned citizens like myself to fully comprehend the scope and consequences of the proposed changes. This, paired with the absence of proper consultation, undermines the trust and procedural governance expected in such significant urban planning decisions. Moreover, the plans seem to overlook the crucial aspects of our local heritage, especially regarding the historical highwalks and their integration with the cityscape. This is not just about preserving the past but about respecting the sense of place that is intrinsic to the City of London's identity. I urge the committee to reconsider the approach to public engagement and the preservation of our cultural landmarks.

Comments for Planning Application 23/01304/FULEIA

Application Summary

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Case Officer: Gemma Delves

Customer Details

Name: Mrs Sally Woodward

Address: Flat 223, Lauderdale Tower 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 have already submitted objections to this proposal - writing in my capacity as long leaseholder of 62 Thomas More House and now as a long leaseholder of 223 Lauderdale Tower. I cannot find any reason in the latest plethora of documents submitted that undermines any of my previous objections. In substance and in all material respects the revised application is as ill conceived as the original one; in summary it should be rejected in its entirety because of 1 its adverse impact on the environment - from the huge quantities of carbon emissions and waste associated with demolition and replacement with buildings of such a massive volume; the emissions report has been demonstrated by experts to be flawed and the plans manifestly do not comply with the City's own carbon and related targets

2 its adverse impact on the residential amenity of those living on the Barbican estate including loss of privacy, light pollution, and interference with facilities (especially but not only) in Thomas More House

3 its adverse impact on the whole Barbican estate as a listed estate and the heritage buildings associated with it; it will make a nonsense of the idea of the cultural mile and destination London

4 the proposed use for yet more massive office buildings takes no account of changing work patterns and the fact that what we lack in the city is housing and hotel accommodation not offices

5 the lack of transparency and confusing consultation process used by the applicants - in particular the string of letters with different dates for responses; and latest deluge of documents with no attempt to help readers understand what actually has been changed in the plans .

6 the additional traffic chaos and risk to pedestrians

I also note that the existing buildings previously (wrongly) stated to be structurally unsound and not fit for use - are now to be occupied by the City of London School for Girls and the City Police which further undermines the integrity of the applicant's case

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 Keith Woodward

Address: 223 Lauderdale Tower Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I have previously objected to what appear to be a very similar applications in relation to the same location.

My grounds for objection remain unaltered in the light of the further documentation made available. I am only guessing but I presume the time and cost in producing new materials were incurred to make the rubber stamping by the Corporation's Planning Committee less open to challenge.

Having to repeat my objection in order not to prevent the Corporation from being able to misrepresent the level of objections is an unnecessary and onerous burden.

From:
To:
Subject: Application reference is: 23/01304/FULEIA, 23/01276/LBC, 23/01277/LBC,
Date: 06 April 2024 23:47:44

THIS IS AN EXTERNAL EMAIL

Dear Planning Committee

My objections to the above proposed scheme are as follows:

1. Scale

The current site of the Barbican and London Wall area were developed as an entity. They fit together as a mass. The current proposal (in bulk and scale) is out of scale and proportion to its surroundings and will dominate them. The volume of New Bastion House will be 2.5 times the current building, and the Rotunda more than twice the current volume. It will have a significant impact on the rest of the area.

2. Heritage and visual impact

Much of the area comprises heritage sites such as the Barbican, St Giles, St Botolph's and St Paul's; and the intervening areas, with their historic remains such as the City Wall, are precious to the neighbourhood feel and civic amenity. I fear that substantial harm will be caused to the general area by the proposed development. There is already over development in this area eg the former BT HQ on Newgate St which affects the feel and visual amenity and impact in the neighbourhood and from the Barbican. Further development of the sort proposed will only make this worse. It will also have a significant detrimental effect on the Culture Mile, the City's own flagship scheme.

3. Residential amenity

I fear there will be a reduction in the amount of daylight for residents - already experienced from the high rise developments in the City such as on Bishopsgate. There are questions around privacy for residents and concerns about residential access, air quality, noise and disturbance for those residents living near the development.

4. Sustainability

The proposed demolition will cause serious harm to the environment, releasing tens of thousands of tonnes of CO2 during development, contrary to the City's own climate action and net zero policies. The City needs to give proper, serious consideration to sustainable solutions such as retrofitting and not run this planning application in tandem.

5. Demand for space

I understand there is no occupier for this site, so that the development is speculative. There are plenty of other sites being developed or available for this without the current proposed over-development.

Please would you acknowledge receipt

Yours faithfully

Nick Mott
Flat 58 Defoe House
Barbican

From:
To:
Subject: Objection to planning applications for London Wall West
Date: 06 April 2024 23:51:59

THIS IS AN EXTERNAL EMAIL

Dear all,

I object to all the planning applications for London Wall West.

23/01304/FULEIA - Demolition of 140 & 150 London Wall to provide a phased development etc

23/01277/LBC - External alterations to existing highwalks at the Barbican Estate etc

23/01276/LBC - Demolition of Ferroners' House etc

The Impact on local transport and traffic

The removal of the roundabout together with the removal of the existing service road entrance on London Wall would have an adverse impact to the local area. In my opinion, several aspects of transport, traffic and access have not been considered. These include access by fire-engines and vehicles exiting Thomas More carpark would require a long detour without the roundabout.

I have not seen any positive evidence on the impact on traffic flows by the removal of the roundabout and the changes of the St Paul Gyratory system conducted by Transport for London. Has any analysis been done on this? What are the traffic queues likely to be because of the changes? How much extra air pollution is likely to increase from fumes of vehicles? How would that support the City of London Corporation's Green agenda?

If the development was to go ahead the negative impact of increased congestion, noise and pollution would have a serious impact to the local community and therefore I object to the proposal and all applications relating to this development.

Regards,
NH Sonpar
291 Lauderdale Tower
Barbican
EC2Y 8BY

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Jonathan Wolf

Address: 4 Jeffreys Court Jeffreys Road London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The existing buildings are unique and high quality architectural heritage which would be better renovated and repurposed rather than replacing with bland generic new build which will be detrimental to the adjacent Barbican cultural heritage site and the wider city.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Tom Matthews

Address: 43 Cullum Welch House Golden Lane Estate London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: Bastion House and the Museum of London buildings are cultural landmarks and to demolish them and replace with glass office blocks is deeply disturbing. These buildings were built as part of the larger Barbican project and it sets a terrifying precedent that they can just be demolished. They should be kept and reused, not only to retain a congruent feel to the area but it is also an environmentally sounder option.

Comments for Planning Application 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Miss Hazel Brothers

Address: 86 Breton house Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The plans fly in the face of the City's own environmental aims. Demolition would be bad for the environment.

Comments for Planning Application 23/01304/FULEIA

Application Summary

Application Number: 23/01304/FULEIA

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Case Officer: Gemma Delves

Customer Details

Name: Mr Gordon Wise

Address: 283 Cromwell Tower 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 wrote in response to the original consultation to object and wish to reiterate here that despite several resubmissions of information by the applicant and Planning my objections remain not only as originally expressed in relation to the project as a whole but also with regard to the confusing nature of this whole process. The deluge of documentation is extremely hard for the lay person to discern and assess. Transparency, good process and good governance are in short supply here.

Further, I receive as a City resident regular communications about the City's carbon and environmental protection awareness and waste management programmes and targets but remain wholly unsatisfied that wholesale demolition of the London Wall West site - Bastion House and the former Museum of London, both buildings of significant architectural and contemporary heritage merit - can possibly comply with these targets versus an energy-efficient retrofitting and

repurposing.

The application comes just as a local plan is being framed and ambitious re-programming of traffic around St Pauls. To approve this proposal, with their enormous impact, makes a white elephant of those costly and much-consulted processes.

In this quarter of the City we have a treasure trove of built environment spanning almost two millennia, and the opportunity to provide a pioneering template for respecting post-war architecture and safeguarding the environmental future. I urge Planning not to waste this opportunity - the Square Mile is meant to be world-leading. Please reject this inappropriate scheme and its flawed process.