

Gwyn Richards,
Planning and Development Director
Environment Department
City of London Corporation

23 June 2023

Dear Mr Richards,

Re: 22/01178/FULL and 22/01179/LBC – Phase 2 Barbican Podium Waterproofing

We support the above applications in principle but have some comments on the detail. In particular:

1. Sustainability Statement.

3.1 “Energy”. It’s good to see that a proposed 73% decrease in energy consumption;

3.2 “Embodied Carbon”. Some time ago, when the scheme was being discussed publicly and before it became a planning application, we were under the impression that, as far as possible existing tiles would be reused but, if that wasn’t possible, the broken tiles would be recycled. Hopefully, that is still the case.

There is a reference to litter bins being bronze. As regular unlockers of Fortune Street Park, we are used to being confronted with scattered litter, including food waste resulting from its litter bins being either overfilled or emptied by foxes, squirrels, crows and the like – or both. If there are to be litter bins on the podium, then proper provision has to be made to ensure that there won’t be a repeat of conditions in the Park. Ensuring that there are no litter bins is the preferable route as this wouldn’t require any additional resources.

3.5 “Environment”. Although the existing trees are said to be poor quality, this is an arboriculture assessment and not in respect of biodiversity. Indeed, the submitted Arboricultural Impact Assessment makes reference to the ambiguity of the physical condition of a tree and its biodiversity value. It seems, although the survey was carried out in August 2019, the applicant only refers to trees T003, T004, T005, T013, T014 and Group G018 as requiring any intervention and that only seems minor.

We should welcome more trees but all of them will be in containers and, from what we can see, devoid of natural irrigation. The ongoing lack of resources for maintaining green spaces, added to the likely mortality rate of new trees, suggests that new tree planting should be curtailed in favour of shrubs and hedges. According to the submitted statement, “tree planting will be used to bring structure to the ground level of the podium” – a podium surrounded by two 40-storey plus towers and other tall buildings – and “tree species are selected to maintain open views at eye-level” suggests that aesthetics come before biodiversity.

Although we understand that the play areas are to be surfaced with rubber crumb, there seems to be no reference to this surface in the submitted statement. That may be because the total area of the surface is small but, if that’s the case, is it not possible to specify something that isn’t a health risk, especially to young children? We appreciate this may not be possible but an effort should be made to do so.

As touched on above, the need for maintenance, particularly irrigation, and the depleted resources for this, calls into question the proposed planting regime, especially trees in containers. The intention to remove all existing growing media and planting, including shrubs and trees is obviously necessary for the scheme’s purpose. However, since the scheme will be progressed in stages,

there is an opportunity for removing trees and plants along with the growing medium and storing on site, with maintenance, pending completion of each individual zone.

Whilst replanting might have an adverse effect on the viability of the existing trees, the trees could be left to act as organ donors, providing life for thousands of organisms and thus enhancing biodiversity at little cost. The number of proposed new trees exceeds the number of existing ones, so additional trees could be planted but only if the purpose can be justified against the cost of acquisition and maintenance, particularly irrigation. The same would also apply to shrubs and, of course in both cases, the need to waterproof the podium seems at odds with the need to pour millions of gallons of water on it over time.

Large parts of the existing planting provide habitats, especially for birds. The area immediately to the west of Breton House is one such. Part of this area has been managed as a “wilderness” which house sparrows, blue tits and goldfinches call home. It would be a tragedy if this habitat were lost.

3.6 “Sustainable Growth”. The following sentence is under “Inclusive and accessible design - “Better routes to the northern access ramp will be enabled, improving connectivity for people coming from the North, e.g. from Richard Cloudesley School”. Its author clearly has no knowledge of the pupils who have to attend that school or those parents who are able to transport them but nor has the officer who approved this.

2. Tree Pit Typical Detail

Without any visible measurements, it’s difficult to understand the proposed size on the submitted drawing. However, there seems to be an excess of growing medium in relation to the size of the tree. This adds weight and cost.

3. Community Planter Detail

Both the proposed higher and lower planters also seem to have an excess of growing medium, again adding weight and cost. Surface water would drain off the podium easier were the planters to be mounted above the podium surface.

4. Inclusive Design Statement

The lack of step-free access is noted in the submitted statement along with its recommendations for future provision but there is a disconnect between the two. A recommendation is made in 3.4 for an access management strategy when the lift at the end of Speed Highwalk is out of order. However, there will be an alternative lift on the completion of the 21 Moorfields redevelopment, whenever that may be. Also, there is lift access from London Wall Place.

Unfortunately, all this step-free access is outside the immediate area of the scheme, leaving the ramps from Fann Street, Golden Lane and Whitecross Street to fulfil that requirement. The submitted statement is highly critical of all these ramps (3.2) but no solution seems to be proposed. Hopefully, as the scheme progresses, there will be interventions to address some of these issues but it is clear that no real attempt has been made to provide a solution to the lack of public lifts on the northern boundary of the site.

The submitted statement (3.4) recommends “that a step-free access from Barbican Underground Station is installed. We concur with this and look forward to TfL and/or City Corporation taking early action to provide this but fear that may be futile.

As far as Access Routes (4.2) are concerned, although cycles are banned from the podium, the submitted statement suggests claims that this is not the case. It also suggests “responsible cyclists ride safely with consideration for other users of a space”. This, though, ignores the fact that there are many irresponsible cyclists. That “nearly 20%” (4.2) and “approximately 17%” (4.9) of cyclists are disabled is offered as justification for allowing all cyclists to use the podium. This would be more antisocial than skateboarding, something the scheme’s detailed design aims to deter.

The promise of better signs and wayfinding (4.8) is welcomed, particularly if it will see the end of the current signage. Leaving aside the many mis-directions, the signs are hardly readable by anyone over 60, particularly if relying on bifocals or varifocals. The accuracy of smart phone GPS should mean that signage is directed towards those with disabilities rather than following corporate design limitations.

5. Ecological Impact Assessment

The absence of a third-party review, despite the commitment to the same in the draft City Plan 2036 is noted. That City Corporation will, once again, be marking its own homework in respect of both applications is also noted.

Best regards,



Fred Rodgers and Jo Rodgers