

22 November 2023

Christopher Hayward  
Policy Chairman  
City of London Corporation

Cc: Paul Wilkinson, City Surveyor;  
Gwyn Richards, **Planning and Development Director**<sup>1</sup>.

Dear Chris,

**LONDON WALL WEST (LWW)  
PRE-APPLICATION: A GLARING LACK OF CONSULTATION AND TRANSPARENCY**

**SUMMARY**

The purpose of this letter is to ask you to withdraw the planning application for LWW because the City has failed to:

- Consult properly in line with both National Planning Guidance and your own Statement of Community Engagement;
- Fulfil the specific commitments you made in 2022 for further engagement in advance of the submission of the planning application;
- Follow the City's own **Carbon Options Guidance PAN**<sup>2</sup>.

We note that you have now submitted full planning applications for LWW to your Planning Department, which you state follows over two years of consultation. We have also seen the recent exchange of correspondence with Fred Rodgers, City resident, in which Paul Wilkinson, City Surveyor, claimed that the City considers it *"has engaged extensively with residents and key stakeholders."*

We are advised that these engagements to date fail to fulfil your obligations regarding consultation on the submission of this planning application. We ask that you review this application immediately to ensure that genuine *"ongoing consultation"* in pre-application is respectful, open, reasoned, and meaningful engagement and to fulfil previous public commitments you have made.

**HOW THE CITY CLAIMS THAT IT COMMITS TO CONSULT ON PLANNING APPLICATIONS**

*"The City is committed to early and ongoing consultation engagement on planning applications. This means working with developers, local residents and other stakeholders from the earliest possible stage of the development process until the submission of an application to shape and guide the development proposals that are most suitable in their context. The pre-application process requires respect and understanding for stakeholders' interests, open, accessible and reasoned communication, and informative and meaningful engagement."* (The City's Statement of Community Involvement, May 2023, Pre-Application Advice, Consultation and Engagement, Paragraph 4.8 ff.)



## **WHAT "CONSULTATION" HAS ACTUALLY TAKEN PLACE**

There were just two rounds of public consultation. A two-day exhibition of sketch proposals took place in December 2021. In June 2022 the second and last consultation on the same scheme with more detail included a two-day exhibition at Frobisher Crescent, a one hour-long pop up event at One New Change on a day of industrial action, and another one at St. Luke's Community Centre.

The quality of the presentation material resulted in obfuscation of the proposed development, contrary to good practice as outlined in the City's own Statement of Community Involvement and Developer Engagement Guidance. In particular:

- Despite repeated requests for a physical model to allow an assessment of the impact of the impact of the scheme, no model was ever produced or shared;
- No material other than sketches, artists' impressions and a computer-animated 3D fly-through were presented;
- Despite repeated requests to show the scheme in context, no scaled architectural drawings of the proposal in relation to adjoining buildings and especially the listed buildings of the conservation area were ever shown whether in plan, section or elevation.

## **WHAT WAS THE RESULT OF THIS CONSULTATION?**

We see no evidence of the City using resident feedback to shape and guide the development proposals. We were told by the communications agency that managed the initial, extremely limited consultations that the responses were overwhelmingly negative and this was confirmed by the series of very well-attended public meetings convened by BQA. Thus "consultation" has not been open, accessible and reasoned communication nor informative and reasoned engagement.

On the other hand, too often it has been inadequate and misleading, as instanced by:

- The consultation response, which resulted in marginal reduction in girth of the two towers but failed to address widespread criticisms of the scheme's fundamental nature, made both locally and in the national press and media. These criticisms included environmental impact, damage to town and street-scape, impact on adjacent heritage assets and conservation areas and a lack of cultural strategy.
- No further consultation on the detailed design of the marginally modified scheme as promised. Indeed, no further engagement whatsoever, despite a City press release of 20 October 2022 announcing - *"The scheme's design team will now amend the design and prepare a 3D model so a final proposal for London Wall West can be presented next year, ahead of submitting a planning application"*.
- No direct communication with residents since April 2023, when you acknowledged a real desire locally for the retention of the former Museum of London building and Bastion House. You said that you had listened to these calls and wanted to explore the possibility of a viable alternative to demolition. You referred in that letter to the City's new policies urging developers to consider alternatives to demolition.
- No feedback on the results of the subsequent soft market test, in which developers were afforded a mere 30 days to respond, other than comments that it had been successful and that there had been what you described in a public meeting as "credible" expressions of interest. Where is the evidence



that options for retaining existing buildings have been fully explored before proposing substantial demolition? Where have you shown that the benefits of demolition clearly outweigh the benefits of retaining the existing buildings? These requirements are described in your own planning advice note on Whole Life-Cycle Carbon Optioneering (Pre-Application stage, page 16 ff.).

## **CONCLUSION**

The timing of the submission of this planning application is indicative of the City's approach to consultation and avoidance of scrutiny: over the festive holiday season levels of engagement with stakeholders including City residents will be predictably at their lowest.

A Barbican resident has just commented to us that in his view *"the process of consultation has been dead for over a year"*. We question whether it ever properly existed. We now call on you to withdraw the planning application in order to fulfil:

- The consultation commitments made in the City's Statement of Community Engagement; and
- The specific promises you made last year to present the final proposals for LWW, to include a 3D model, ahead of submitting a planning application.

We look forward to your urgent response.

Best wishes,

Adam Hogg and Averil Baldwin  
Co-Chairs, Barbican Quarter Action

### Corrections post submission:

1. Gwyn Richards is Planning and Development Director, not Interim Chief Planning Officer as in original letter.
2. Carbon Options Guidance PAN supersedes the Whole Life Carbon Optioneering Policy mentioned in the original letter.