

By email only

City of London Corporation

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Your Ref: 23/01304/FULEIA,
23/01277/LBC and 23/01276/LBC

Our Ref: RGA/LEL/00575807/1

Date: 31 January 2024

Dear City of London Corporation

Proposed development of “London Wall West” site (application references 23/01304/FULEIA, 23/01277/LBC and 23/01276/LBC)

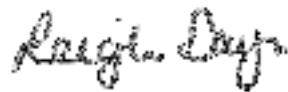
We act for the Barbican Association, on behalf of Barbican Quarter Action (“BQA”). BQA, an unincorporated association formed to campaign for environmentally, ethically and socially responsible decision-making for the built environment in the City of London, strongly opposes the proposed “London Wall West” development and objects to the planning and listed building consent applications referred to above.

Please find enclosed a detailed objection prepared on behalf of BQA by CarneySweeney, along with the following appendices:

- Appendix A: BQA letters submitted to the CoLC at pre-application stage
- Appendix B: Embodied Carbon Review by Targeting Zero
- Appendix C: BQA review of DAS by Jan-Marc Petroschka
- Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka
- Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw
- Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Horne
- Appendix G: Planning Policy Review table by CarneySweeney

Separately, our clients have also asked us to express their concern regarding the ongoing technical issues with the Corporation's planning webpage, which periodically ceases to allow representations to be uploaded. Please confirm that the Corporation will investigate this issue as a matter of urgency and accept representations beyond today's advertised deadline.

Yours faithfully

A handwritten signature in cursive script that reads "Leigh Day".

Leigh Day

Enc

Our reference: CSL287

31 January 2024

Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC

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

1. We have been instructed by the Barbican Quarter Action Group ("BQA") pursuant to the following planning applications pertaining to the development of London Wall West; Planning Applications 23/01304/FULEIA; 23/01277/LBC and 23/01276/LBC (herein referred to as "the LWW Proposals") on a site which comprises the current home of Bastion House and the Museum of London at 140 – 150 London Wall, EC2 (herein referred to as "the LWW Site").
2. This statement sets out BQA's concerns and objections to date to these planning applications. The planning application documentation is extensive and detailed and so BQA may submit further comments. They will, however, not procrastinate in this regard, and will ensure that any follow up comment is submitted as soon as they are able. In addition and notwithstanding, the comments below refer to the inadequacy of some of the planning application documentation, and so BQA will wish to review and comment on any further amended documentation submitted to rectify these inadequacies.

Background to the Proposed Development

3. Since the announcement in 2015 that the Museum of London would be moving, the LWW Site has been under consideration by the City of London Corporation ("CoLC"), the landowner of the LWW Site, for redevelopment and regeneration. Most significantly, the LWW Site had previously been considered for the Centre of Music for the Barbican London Symphony Orchestra (LSO), the Barbican Centre and the Guildhall School of Music and Drama (and it was in this context that the application for the Certificate of Immunity from Listing was made – see paragraphs 17-18 below) but these proposals were cancelled by the CoLC in February 2021 due to the impact of Covid-19 and the announcement by LSO's conductor, Simon Rattle, one of the main driving forces behind the project, that he was leaving the organisation

Public Consultation on the Emerging Proposals: May 2021 – June 2022

4. In May 2021 early engagement with various stakeholder groups was conducted by the CoLC and later in December 2021 a consultation document was published by the CoLC Property Investment



Board setting out their emerging vision and plans for the LWW Site. The report - The Future of London Wall West (December 2021) begins by setting out what are considered to be the current limitations of the LWW Site, as well as the challenges in relation to the difficult to navigate public realm and the lack of access to the historic Roman Wall on site. The report notes that Bastion House and the Museum of London site are at the end of their design lives and no longer fit for purpose. The report further advises that studies were undertaken to assess the case for refurbishment, extension or partial redevelopment but that a full redevelopment of the LWW Site (with a responsible approach to re-purposing and re-using existing materials on site alongside highly sustainable design standards) would be the best approach. The report did not, however, provide any greater detail on the studies or the types of uses considered in relation to refurbishment and the BQA later submitted a Freedom of Information Act (“FOIA”) request in February 2022 to obtain details of the structural report and carbon assessment that was directly referenced in the December 2021 consultation. The FOIA included a request for environmental information under the Environmental Information Regulations 2004 (“EIR”).

5. The initial design concepts for the LWW Site consulted on in December 2021 revolved around the vision to make a *“vibrant, thriving, inclusive and sustainable place that the City can be proud of”*. A number of key benefits that the development could deliver were identified with the intention that these would align with the CoLC planning policies as set out in the emerging draft City Plan 2036, the Culture Mile Look & Feel Strategy and the Square Mile: Future City document as well as the CoLC Climate Action Strategy 2020 – 2027 which was adopted in 2020. The consultation document stated that such intended benefits include: Celebrating culture and the City’s heritage; Creating a sense of community; Creating new public spaces for people to enjoy; Meeting modern sustainability standards; Creating stunning architecture; and Delivering a range of high quality office spaces. In terms of land uses, there was no explanation as to the approach to potential land uses, other than to advise that the inclusion of flexible, high quality office space was in line with the draft City Plan 2036 which confirmed that a good supply of modern, sustainable office accommodation was needed to meet the needs of the City’s commercial occupiers and to keep pace with growing business needs.
6. Comments resulting from this consultation were later reported by the CoLC in their ‘London Wall West – Public consultation Round 1 Feedback Report’ and were considered by the CoLC to be focussed on a number of themes:
 - Height and massing of the buildings and the impact on light, views, security and footfall;
 - The demolition of existing buildings and associated embodied carbon;
 - The demand for new office space;
 - Walking and cycling routes; and
 - Maintaining access to the highwalks and fixing the lifts around the site.



7. Having reviewed all feedback given from the December public exhibitions the City Surveyors on behalf of the CoLC (as future applicant) launched a second public consultation in June 2022 on their developing plans for the LWW Site and several pop-up events and a further public exhibition were held. A key criticism raised by the BQA is that this consultation (as with the earlier December 2021 consultation) focused on a single option for redevelopment of the LWW Site and did not present any alternatives.
8. The CoLC June 2022 consultation pack set out the intention to deliver approximately 40,000sqm of new office space alongside affordable workspace and maker space, community and learning space for a variety of functions, new café and restaurant spaces, cultural spaces including for exhibitions, lecture/auditorium spaces along with a new 'culture cap' with views of St. Paul's Cathedral alongside a series of new interconnected landscaped open spaces and public realm. Information was also provided on the types of open spaces proposed, the culture, learning and community offer, the sustainability and energy strategy for the project and how the office space will meet current needs.
9. The consultation pack set out the design approach to the LWW Proposals and how the scheme would fit into the wider area; intended traffic safety improvements, new routes and improvements to the existing highwalks network alongside details of the proposed massing of the new buildings and the townscape and microclimate considerations. The proposed three new buildings were referenced in the consultation material as follows:
 - New Bastion House – at 17 storeys (86.7m AOD) and c. 38,000sqm – equivalent in height to the existing Bastion House;
 - Rotunda Building – at 14 storeys (75.3m AOD) and c. 31,000sqm – approximately 20m lower than the adjacent 200 Aldersgate Street; and
 - Northern Building – at 5 storeys (39.6m AOD) and c. 3,500sqm.
10. This second stage of consultation was supported by an interim Whole Life Carbon Assessment report dated May 2022, commissioned by the CoLC for consultation with stakeholders, and which was stated to provide a qualitative assessment of the existing buildings on the LWW Site along with a quantitative study of the carbon impacts of two tested development scenarios; Option 1 - which retains some of the existing building fabric and creates new development through new and retained building fabric and Option 2 - which is for the full demolition of the buildings on site and erection of new buildings. The BQA highlight that despite their earlier FOIA/EIR request made in February 2022 to obtain details of the structural report and carbon assessment that was directly referenced in the December 2021 consultation, this assessment was released by CoLC instead.
11. The Whole Life Carbon Assessment ("WLC Assessment") concluded that Bastion House could be retained as offices as a short- term solution but that the current building contained many considerable limitations including floor to floor heights, poor lift provisions, outdated fire safety



standards and poor energy performance. Bastion House was also identified as having several structural issues including the risk of disproportionate collapse, fire integrity and carbonation.

12. Due to the above, the WLC Assessment considered that a change of use to residential accommodation would be unfeasible and unviable. The Museum of London building was also deemed to be heavily constrained in design, structural and engineering terms) with similar issues relating to disproportionate collapse) giving limited scope for adaption to other uses. Overall, the assessment concluded that on a per-square metre basis Option 2 performed 10% better than Option 1. However, as Option 2 is larger, in absolute terms it has a higher Whole Lifecycle Carbon emission. The absolute carbon emissions for Option 1 are approximately 20 million kilograms, equating to just over 20% lower for Option 1 compared to Option 2.
13. In response to the WLC Assessment and the structural assessment assumptions which underpinned the report, the BQA presented the CoLC with two peer assessment reports in September 2022. The peer assessment reports were produced by two leading experts – Bob Stagg of Conisbee Structural Engineering and Simon Sturgis of Targeting Zero. The review undertaken by Consibee Structural Engineering considered the structural engineering aspects of the WLC Assessment and contradicted the assumption that Bastion House and the Museum of London building were at risk of disproportionate collapse. Since this was the basis on which CoLC only chose to compare Options 1 and 2, the WLC Assessment does not consider the option of retrofit. This is further highlighted in the report by Targeting Zero which advised that *“a more comprehensive retrofit approach than the one proposed, with Bastion House retained and retrofitted, would have far lower carbon emissions”*.
14. The peer assessment reports highlighted several fundamental flaws in the WLC Assessment and an evidenced request to the CoLC to reconsider the retention and retrofit of Bastion House was made by the BQA (with the intent that good practice would have commanded the WLC Assessment be withdrawn and the options appraisal re-evaluated/started again).
15. The CoLC set up a dedicated webpage for the LWW Proposals (<https://londonwallwest.co.uk/>) and it is here that feedback from the June 2022 round of consultation is reported as being focussed on the following themes:
 - Questions about the principle of redeveloping the site and the vision for the scheme;
 - Concerns over the scale of the design proposals;
 - The need for more office space;
 - The impact of the new buildings on locally listed assets; and
 - Distrust of the City of London Corporation.



16. In October 2022 it was announced that the CoLC Policy and Resources Committee had made the decision to reduce the size of the LWW Proposals in response to feedback from public consultation. It was confirmed that the width of the building proposed to replace the Museum of London would be reduced by 3 metres whilst the width of the building proposed to replace Bastion House would be reduced by 2 metres. The press release also noted that a 3D model of the final proposal for the LWW Proposals would be presented in 2023 ahead of the submission of a planning application. This commitment was never met.

Immunity from Listing

17. Alongside the consultation process set out above, a Certificate of Immunity from Listing was granted by the Secretary of State for Culture, Media and Sport, for Bastion House in August 2019 and this expires in August 2024. It is noted that an application to renew the certificate has recently been submitted to Historic England on the basis that no new evidence in favour of listing has come to light.
18. In contrast to the above, in 2023, The Twentieth Century Society published their latest 'Risk List' - a selection of ten twentieth-century buildings currently facing demolition or disfigurement. Eighth on the list is the Museum of London and Bastion House. Designed by architects Powell & Moya, the Museum of London is recognised as the first post-war museum to be built in London and the largest urban history museum in the world. Bastion House is also acknowledged by The Twentieth Century Society as a rare survivor of a hugely important part of the City of London's post-war planning history, and both buildings are identified as being under threat for total demolition due to the museum's move to Smithfield Market.

Closure of Museum of London December 2022

19. The Museum of London closed in December 2022, with the intention that it will re-open in 2026 in its new location at Smithfield Market. The costs of this relocation were originally estimated at £250 million and current estimates now place the cost at £337 million (source: Architects Journal, Museum of London on target for delayed 2026 opening, article by Anna Highfield, 2 May 2023.)

CoLC Market Testing

20. On 3 April 2023, a tender opportunity was listed on the procurement pages of the CoLC website allowing developers to express their interest in refurbishing the LWW Site. Whilst the results of this tender have not been publicly reported, Chris Hayward (Chairman of the Policy and Resources Committee at CoLC) stated at the City Question Time event held on 15 June 2023 that the CoLC had received expressions of interest that were considered to be credible (albeit commercially



confidential)¹. In contrast, it is noted by the BQA that paragraph 5.5 of the Planning Statement submitted with the planning application advises that Bastion House is currently unoccupied following the primary lease expiring in 2023 and that the building and structure no longer meet the design needs and expectations of prospective office occupiers.

Consultation and Engagement

21. The paragraphs above summarise the pre-application consultation carried out by the CoLC as applicant. Throughout this process the BQA have consistently raised concerns about the proposals to redevelop the LWW Site and we note below the letters submitted to the CoLC by the BQA throughout this process (copies of which are attached at Appendix A to this statement) in addition to which eight FOIA requests were submitted to the CoLC, one of which included a request under the Environmental Information Regulations 2004;

- 03 November 2022, Open letter from the BQA to Chris Hayward
- 23 June 2022, Response to proposals published 18th June 2022
- 12 April 2023, Exploring the potential to refurbish the London Wall West Site
- 15 June 2023, London Wall West
- 7 November 2023, Open reply to your letter of 29 September 2023
- 22 November 2023, London Wall West (LWW) pre-application: A glaring lack of consultation and transparency

22. Fundamentally the BQA wish to highlight that at no stage did the consultation material allow a public debate on the fundamental question of redevelopment of the LWW Site versus a scheme which considered the retention and/or adaptation and retrofit of the existing buildings on the LWW Site. This is central to the consideration of development scenarios later to be reflected in the WLC Assessment undertaken both at pre-application stage and now later as submitted with the planning application. Similarly, alternative massing options were never shared with the community during the early stages of public consultation, nor was the commitment to share a 3D model of the proposal prior to the submission of the application met. Whilst the CoLC did make nominal reductions in the width of the buildings (the width of the building proposed to replace the Museum of London reduced by three metres and the width of the building proposed to replace Bastion House reduced by two metres), these are considered by the BQA to be minimal concessions and it is only now (post submission) that a model of the LWW Proposals has been made available for public viewing and the scheme's true height and scale (and subsequent impact) can be fully appreciated. As such the BQA continue to express significant concerns at the massing of the LWW Proposals along with

¹ Recorded event available to view at: <https://www.youtube.com/watch?v=EUOVSnkgOYs> (16:55 from start)



claims that the development will enhance the locality and its heritage assets (see paragraphs 79-82 and 83-86 below).

23. Criticism is also levied at the CoLC in relation to the market testing undertaken in April 2023. The CoLC advised that the purpose of the market testing was to respond to the local desire for the buildings to be retained and to explore a viable alternative to demolition. However, on 29 September 2023, the CoLC announced its intention to proceed with a planning application for the LWW Site which would include the demolition of the former Museum of London building and Bastion House. While stating that all options remained on the table, the CoLC argued that it had a duty to achieve “best consideration” and was under a “legal obligation to achieve maximum financial return”. The BQA make the following observations and criticisms in relation to this process:

- there was no engagement on the decision to market test (a process only publicised on the CoLC’s own website); or the process itself which allowed a mere seven weeks (a period encompassing both school holidays and Easter) for developers to submit proposals;
- the results of the market test exercise, which the CoLC subsequently described as credible and successful, were neither shared nor pursued;
- the CoLC only later made explicit its true motives for pursuing the application as maximising financial return, stating that it had a legal duty to do so (and no further cost analysis has been shared by CoLC to evidence (if relevant) that demolition and redevelopment of the LWW Site is more profitable than a scheme involving retention and retrofit).

24. In conclusion the BQA consider that whilst the CoLC may consider that pre-application community engagement has been extensive, in fact the CoLC has:

- Failed to involve the community in developing fundamental options for the future of the LWW Site once it had decided not to progress the Centre for Music. This is a major deficiency given the significant history and location of the site and the nature of its buildings.
- Failed to adjust the proposals sufficiently to reflect the public feedback received.
- Failed to share the results of the market testing or evidence that the buildings could not be successfully or viably retained and adapted.
- Failed to keep the community updated on the evolution of the project. The last presentations to the community were June 2022 and the current LWW Proposals were not presented or consulted on in advance of submission – particularly on any matters relating to access and transport considerations.
- Lacked transparency throughout e.g. its early whole life carbon assessment, including analysis of the re-use of the existing buildings and the results of the soft market test, have never been shared.



- Not acted in accordance with national policy guidance in the NPPF to take account of the views of the community and to reconcile local interests.

Principle of Development and Land Uses Proposed

25. The BQA instructed CarneySweeney to undertake a review of the principle of the proposed development and the land uses proposed.
26. For the purposes of Section 38 of the Planning and Compulsory Purchase Act (2004), which requires that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise, the development plan comprises the following documents:
 - London Plan (adopted March 2021)
 - City of London Local Plan (adopted January 2015)
27. Material considerations currently include the National Planning Policy Framework (December 2023) (“NPPF”) and National Planning Practice Guidance (“NPPG”). It is also appropriate to have regard to emerging policy, the following being a material consideration and a demonstration of ‘the direction of travel of policy’, albeit it does have limited weight at this stage:
 - City of London: Draft City Plan 2040
28. Whilst supplementary planning guidance (“SPG”), supplementary planning documents (“SPD”) and Planning Advice Notes (“PAN”) do not form part of the development plan, they assist interpretation of policy and are material considerations in the determination of planning applications.
29. In terms of the principle of redevelopment of the LWW Site, further consideration of this matter is set out below in relation to the discussion of retrofit and re-use vs demolition.
30. The planning application is supported by a Planning Statement which states at paragraph 5.6 that the development brief for the LWW Site is for a ‘commercial-led scheme, which aims to address the City’s strategic context and maximise the development potential for the Site’. Paragraph 5.6 goes on to advise that the City’s strategic context is considered to be formed of four main strands: Business, Culture and Leisure, Sustainability and Highways & Public Realm.
31. Chapter 9 of the Planning Statement considers the principle of the development. Reference is made to the NPPF and the presumption in favour of ‘sustainable development’ alongside the requirement that both planning policies and decisions should promote an effective use of land. This is further supported by reference to the London Plan Policies D3 (Part A) in seeking a design led approach to development and E1 (Part A) in terms of improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. Reference is then made to Strategic Objective 2 the City of London Local



Plan which seeks to ensure that challenges facing the five Key City Place are met, commenting that the area surrounding Cheapside and St. Paul's is identified as a vibrant office, retail and cultural destination for attracting visitors to the surrounding attractions.

32. Set against this background, BQA raise significant concern at the approach taken in defining the development brief for the LWW Site, and the lack of consideration that the CoLC as applicant has made to other strategic priorities set out in the NPPF and the development plan as a whole.
33. With regard to making effective use of land, this is addressed in Chapter 12 of the NPPF and Paragraph 124 advises that (our emphasis in bold); *“planning policies and decisions should support development that makes efficient use of land taking into account:*
 - *The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - *Local market conditions and viability;*
 - *The availability and capacity of infrastructure and services-both existing and proposed as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - ***The desirability of maintaining an area's prevailing character and setting (including residential gardens or promoting regeneration and change); and***
 - ***The importance of securing well designed, attractive and healthy places.”***
34. At a strategic level, the London Plan forms the Spatial Development Strategy for Greater London, setting out a framework for the city's development over the next 20 – 25 years. It is part of the development plan for London, and as such its policies inform decisions on planning applications within London boroughs. It is also the most up to date part of the development plan covering the City of London.
35. Chapter 2 of the London Plan sets out the overall spatial development pattern for London. In terms of key policy considerations, the BQA are aware that at a London wide spatial level the LWW Site is located within the Central Activity Zone (“CAZ”) which is described in the London Plan as *“the vibrant heart and globally-iconic core of London”*. The CAZ is considered to have several strategic functions which include, inter-alia, providing agglomerations of nationally and internationally significant offices and company headquarters; provision for arts, culture, leisure, entertainment; provision of tourism facilities and having a distinct heritage and built environment. The arts, culture, tourism and entertainment activities are stated within the London Plan as being a defining feature of the vibrant and distinctive character of the CAZ with its varied mix of daytime, evening and night-time uses, together making a vital contribution to London's culture and heritage. Noted within the London Plan are the locations considered to be rich in cultural activity, including the Barbican. The London Plan advises these areas and functions should be recognised, nurtured and supported in



line with the London Plan CAZ policy and other London Plan policies related to culture and supporting the evening and night-time economy.

36. Alongside such strategic functions, it is recognised that at a local level, the CAZ contains housing, social infrastructure and other community uses to address the needs of residents, visitors and workers. The London Plan advises that such locally orientated uses such as new residential are acceptable uses and are important to the character and function of the CAZ but should be complementary to and not compromise its strategic functions. To this end, Policy SD5 advises that offices and other CAZ strategic functions are to be given greater weight relative to new residential development except in certain locations, including predominantly residential neighbourhoods. The Mayor of London therefore advises that Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate.
37. The current City of London Local Plan was adopted in 2015 and explains the spatial strategy, vision and strategic objectives for the City of London, followed by the policies required to implement the strategy, set out though a series of five key themes. Each theme has a Core Strategy (“CS”) policy to address the strategic context followed by additional Development Management (“DM”) policies to be used when considering planning applications and other related consents.
38. At a strategic level the Local Plan highlights significant competing demands between the need to accommodate new office development alongside the need for new housing, social and community facilities and improved transport infrastructure. The plan is centred around five strategic objectives, the first of which is to maintain the City’s position as the world’s leading international financial and business centre. The remaining four relate to key City places, culture and heritage, environmental sustainability, and City communities. The table below taken from the Local Plan illustrates the overall scale and phasing of development that is anticipated by the plan to the period to 2026.

Land Use	2011-2016	2016-2021	2021-2026	Total 2011-2026
Offices	650,000m ²	250,000m ²	250,000m ²	1,150,000m ²
Retailing (A1-A5)	52,000m ² * * Figures relate to the 2009-2016 period	44,000m ²	40,000m ²	136,000m ²
Housing	667 units	430 units	550 units	1,647 units

Table 1. Indicative scale and phasing of growth in main land uses 2011-2026, CoLC Local Plan



39. In terms of distribution the plan highlights the scale of development that could take place in the five 'Key City Place' areas. These are identified in the plan's Key Diagram (see Figure 4 below) and include;

- The North of the City
- Cheapside and St Paul's
- Eastern Cluster
- Aldgate
- Thames and the Riverside

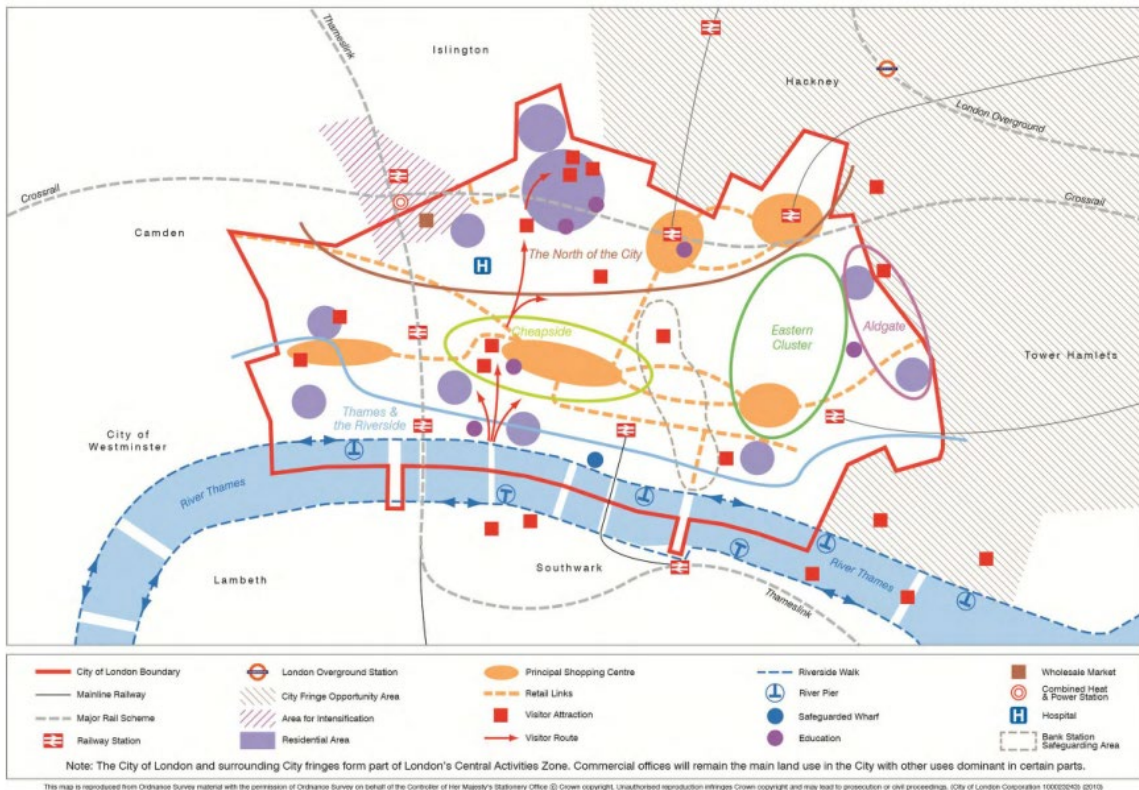


Figure 1. Key Diagram, CoLC Local Plan

40. Rather than placing the LWW Site in the area of Cheapside and St. Paul's (as is set out in the Planning Statement submitted with the application), CarneySweeney consider the LWW Site clearly falls within the 'North of the City' Key City Place area, the current spatial strategy for which is to address the impact of and accommodate growth resulting from Crossrail whilst maintaining the area's mix of uses, enhancing its cultural offer and delivering sustainable development. In terms of its capacity, the Local Plan anticipates the North of the City as indicatively accommodating 10-20% of the required office growth, 20-30% of the retail growth, 0-10% of the hotel growth and 60-70% of the housing growth. Whilst it is recognised that offices will be acceptable development across the City (unless indicated otherwise by policies in the Local Plan), this spatial strategy clearly identifies other uses as also being part of the vision.



41. In terms of maintaining the City's role as a world financial and business centre, the Local Plan advises that the North of the City contains a mix of uses, including the strategic cultural quarter centred on the Barbican and that careful planning is essential to retain the character and amenity of individual areas whilst managing growth.
42. The vision set out in the plan for the 'North of the City' is as follows:
"Passengers will emerge from new Crossrail stations to find a lively variety of restaurants and shops with attractive streetscapes and vistas. Attractive pedestrian routes will link pockets of well designed open space. Progressive building designs and sensitive refurbishments will mean residents, workers and visitors remain in a comfortable and safe environment that has adapted to climate change. The Barbican will form part of a wider strategic cultural quarter. Evening and night time activity will be well managed."
43. Paragraphs 3.5.1 to 3.5.5 of the adopted Local Plan provide further background on the 'North of the City' Key City Place area noting that the area has the potential to lead the way as an 'eco design' district within the City and that the area is to deliver approximately 60-70% of the new residential development the City is expected to take. Reference is also made to the role of the cultural quarter focussed on the Barbican, whose offer and environment should be 'further enhanced'. The delivery strategy for this vision is guided by Core Strategy Policy CS5: The North of the City which states:

Core Strategy Policy CS5: The North of the City

"To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure, by:

1. *Ensuring that disruption to the City is minimised during construction of Crossrail and requiring the restoration of worksites to deliver enhancement of biodiversity, heritage assets and the public realm, open space provision and integration with other transport modes.*
2. *Implementing proposals for the rejuvenation of Farringdon, Moorgate and Holborn jointly with neighbouring boroughs in the Farringdon / Smithfield Area for Intensification, taking account of urban design studies, conservation area management strategies and area enhancement strategies.*
3. *Requiring improvements to pedestrian and cycle routes to maintain safe, effective and efficient pedestrian and cycle flows, including for disabled people, within and through the north of the City.*
4. *Ensuring the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as Smithfield Market, Barbican, Golden Lane and Broadgate, whilst preserving privacy, security and noise abatement for residents and businesses.*
5. *Identifying and meeting residents' needs in the north of the City, including protection of residential amenity, community facilities and open space.*



6. Safeguarding the Citigen combined cooling heating and power (CCHP) network and ensuring that, where feasible, all new development is designed to enable connection to the CCHP network.
7. Requiring the incorporation of sustainable drainage solutions (SuDS), such as green roofs, into development.
8. Requiring developers to make use of innovative design solutions to mitigate and adapt to the impacts of climate change, particularly addressing the challenges posed by heritage assets whilst respecting their architectural and historic significance.
9. Further enhancing the distinctive character of the Smithfield area by retaining a range of buildings suitable for accommodating a mix of uses, whilst recognising the particular challenges arising from the 24 hour character of the area.
10. Recognising and supporting the continued presence of both Smithfield Market and St Bartholomew's Hospital.
11. Promoting the further improvement of the Barbican area as a cultural quarter of London-wide, national and international significance."

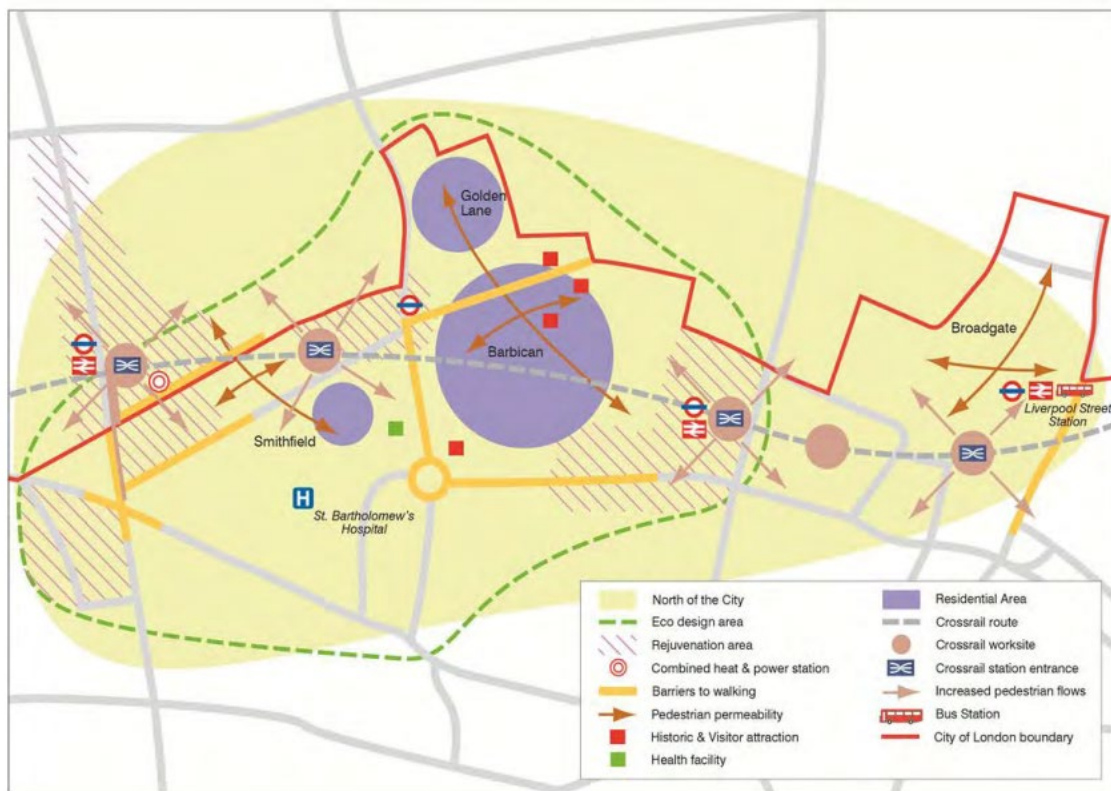


Figure 2. Strategic diagram representing the North of the City – CoLC Local Plan 2015.

44. CarneySweeney and the BQA are aware that the CoLC are currently in the process of producing a new Local Plan covering the period to 2040, setting out what type of development the CoLC expects to take place and where and that once adopted, it will replace the current adopted local plan. In



this regard, we refer to paragraph 48 of the NPF which advises that *“local planning authorities may give weight to relevant policies in emerging local plans”* according to a number of factors, principally:

- their stage of preparation;
 - the extent to which there are unresolved objections; and
 - their consistency with the broader Framework.
45. Due to the early stage of preparation of the new Local Plan, whilst indicating a ‘direction of travel’, at the current time this plan can only be given limited weight in decision making.
46. The emerging draft local plan is titled ‘City Plan 2040’ and is intended to set out the vision and framework for future development in the City until 2040, outlining what type of development should take place and where, along with the policies and proposals that will guide decisions on planning applications.
47. A new Spatial Strategy is introduced by City Plan 2040 which highlights that different approaches to development and growth will need to be taken in different parts of the City to ensure a sustainable pattern of development in a way that enhances the unique character of the Square Mile. Whilst all parts of the Square Mile will continue to see growth and development over the lifetime of the plan, some areas are identified in the plan as Key Areas of Change (“KAOC”) and will see a greater proportion of net additional floorspace than other parts of the City or will undergo more significant change to their built form. In addition, and with reference to the LWW Proposals, the draft Spatial Strategy also notes:
- *“Net additional office floorspace will primarily be delivered in the City Cluster KAO, supplemented by floorspace in the Fleet Street and Ludgate KAO and Liverpool Street KAO. Office growth will be encouraged in all parts of the Square Mile.*
 - *Additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas.*
 - *Active frontages, with uses that are suitable for their context, will be delivered in all parts of the Square Mile, bringing vibrancy to the City and meeting the needs of people who live and work here and those who visit the area.*
 - *Focal areas for culture have been identified in the cultural planning framework, informed by the existing cultural character of different parts of the City and the potential for each area to contribute to the ongoing transformation of the City into a vibrant destination.*
 - *New hotels will be encouraged in suitable locations across the City, particularly in places near to transport hubs and where there is good access to visitor destinations in and outside the City.*
 - *Designated strategic and local views will inform development, with tall buildings focused in the City cluster and the Fleet valley, which are identified as areas suitable for tall buildings.*
 - *The unique character of different parts of the City, including the area’s rich heritage (which includes nearly 600 listed buildings, 27 conservation areas, 48 scheduled ancient monuments*



and four historic parks and gardens) will be celebrated and enhanced, and help to shape new development in the Square Mile.”

48. Figure 3 below shows how these are presented in the Key Diagram in City Plan 2040.

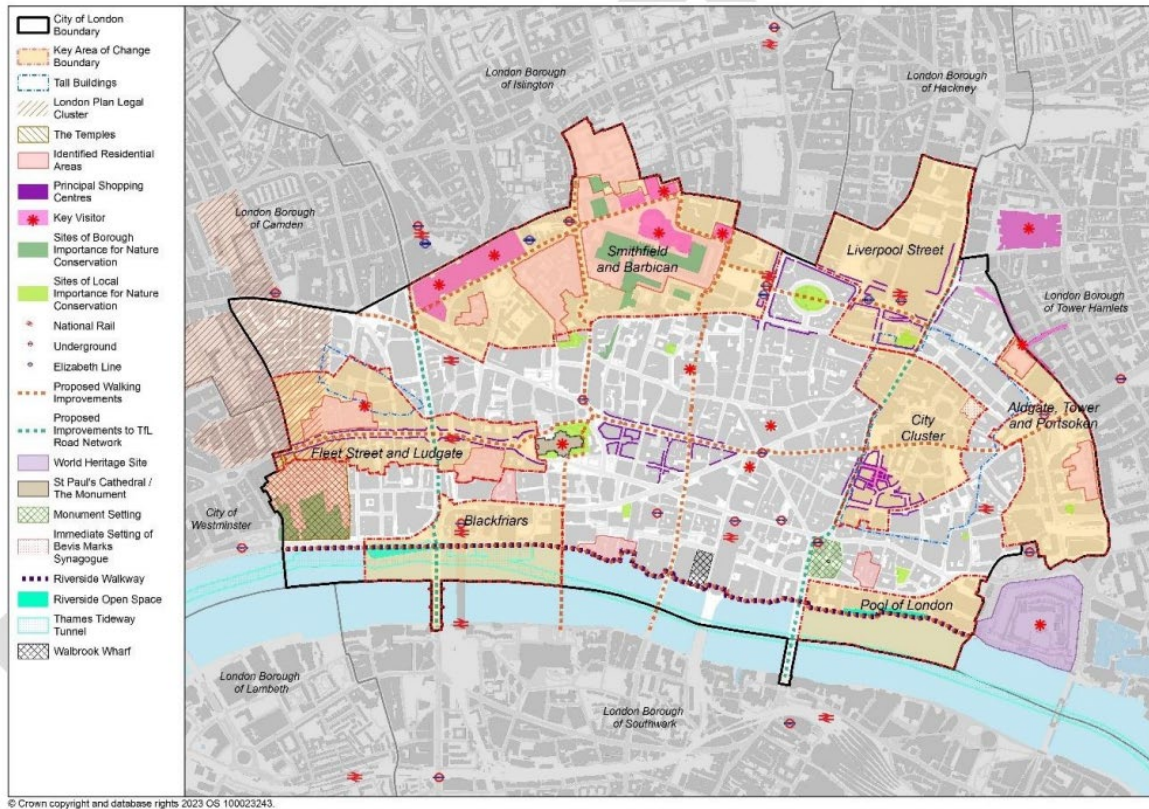


Figure 3. Key Diagram – City Plan 2040

49. The LWW Site falls within the Smithfield and Barbican KAOC and is adjacent to an identified residential area and draft Strategic Policy S23 (see below) sets out how the CoLC intend to improve the area. The supporting text to the policy highlights the Smithfield and Barbican KAOC as a vibrant, mixed-use area which is to undergo significant change and development over the life of the plan – specifically with reference to the relocation of the Museum of London to its new location at Smithfield.

Draft Strategic Policy S23: Smithfield and Barbican²

“The City Corporation will improve the Smithfield and Barbican area by:

1. *implementing the Culture Mile initiative, encouraging culture-led mixed-use development on major sites in the area as well as cultural infrastructure and complementary uses, and delivering art and cultural attractions and public realm improvements through the Culture Mile Look and Feel Strategy;*

² Draft policy wording as reported to Local Plans Sub (Planning and Transportation Committee) 18 October 2023.



2. *ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican whilst seeking to preserve privacy, security and noise abatement for residents and businesses;*
 3. *ensuring future alternative uses appropriate to the listed status of the market buildings in Smithfield if the existing uses are relocated;*
 4. *supporting and enabling residential development in appropriate locations;*
 5. *identifying and meeting residents' needs in the north of the City, including the protection and enhancement of residential amenity, community facilities and open space;*
 6. *making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and vitality;*
 7. *seeking to minimise pollution levels through traffic management measures and increased green infrastructure in the public realm and on buildings;*
 8. *requiring improvements to pedestrian and cycle routes for all within and through the north of the City;*
 9. *supporting continued connections to the Citigen district heating and cooling network and ensuring that, where feasible, all new development is designed to enable connection to the Citigen network;*
 10. *supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role;*
 11. *encouraging a diverse leisure, retail, food and beverage offer, particularly along the route between the London Museum and the Barbican;*
 12. *encouraging the provision of spaces and premises suitable for start-ups, digital and creative industries, and cultural organisations and artists, including meanwhile use of vacant premises; and*
 13. *enhancing the special character of the area through sensitive change."*
50. CarneySweeney, on behalf of the BQA highlight that this draft strategic vision once again does not focus on the delivery of office growth but encourages culture led mixed-use development, supports residential development in appropriate locations and seeks to enhance the special character of the area.
51. Whilst it is material to consider the extent to which emerging policies and evidence also accord with existing adopted policies, particularly those of the London Plan, the weight accorded to different policies will be a matter for the decision maker, but policies will generally gain weight as they progress through the process of consultation and examination process through to adoption, particularly where they do not attract objections. Policies that closely accord with adopted policy in the existing Local Plan or London Plan may also merit more weight.
52. The BQA are aware that City Plan 2040 is being taken through committee approval for consultation between January and March 2024 and that consultation on Revised Proposed Submission Draft City Plan 2040 is anticipated to take place in spring 2024. In this regard the BQA reiterate this is a



draft Local Plan and reserves the right to comment separately on these emerging policies and the strategic vision for Smithfield and Barbican KAOC.

Land uses proposed

53. In terms of the land uses proposed the LWW Proposals comprise of:

Land Use	Proposed (GIA sqm)
Office (Class E(g(i)))	56,211
Retail / Restaurant (Class E(b))	1,112.4
Cultural (Sui Generis)*	8,182.9
Livery Hall (Sui Generis)	480.0
Public Car Park (Sui Generis)	594.2
Cycle Hub (Sui Generis)	703.0
Total	67,283.5

* Cultural uses being further broken down into;

Food & Beverage/Retail	968.5sqm
Event/Exhibition/Venue	7,214.4sqm

54. By comparison the existing land uses at the LWW Site comprise of:

Land Use	Existing (GIA sqm)
Office (Class E(g(i)))	16,887
Retail / Restaurant (Class E(b))	0
Cultural (Sui Generis)	0
Livery Hall (Sui Generis)	439
Museum (Class F1(c))	15,188
Bar (Sui Generis)	287
Public Car Park (Sui Generis)	1,458
Cycle Hub (Sui Generis)	0
Total	34,259

Office Floorspace

55. In terms of office floorspace there will be a significant net uplift of 39,324sqm (GIA). It is recognised that the LWW Site is located within the CAZ and therefore the principle of protecting existing office space alongside the provision of new office floorspace is supported. However, given the strategic vision for the 'North of the City' Key City Place area, as set out in the adopted local plan, CarneySweeney, on behalf of the BQA, raise objection to this increased level of office provision on the LWW Site, primarily due to concern that such growth in this location will have a detrimental



impact on the distinct character, environment and heritage of this part of the CAZ, in conflict with Policy SD4 (Part C) of the London Plan and the NPPF.

56. Further details relating to the office needs within the City of London are set out in the Office Market Research Report, prepared by JLL (“OMRR”) and submitted in support of the application. The BQA have reviewed this report and raise the following key concerns;
57. The Terms of Reference set out at paragraph 1.1 in the OMRR are biased in favour of development. There is no meaningful economic analysis of construction cost / achievable rent / return on capital employed. There is no assessment of alternative economic scenarios, e.g. downturn / prolonged period of high borrowing costs.
58. Reference is made at paragraph 2.2.4 of the OMRR that future long-term demand will be boosted by occupiers displaced by older stock not meeting future minimum energy efficiency standards, however, no data is provided in relation to the percentage of office stock affected by the change in regulation.
59. More evidence is provided to support the statement at paragraph 2.25 of the OMRR that companies have been more footloose across central London, and focussing more on the quality of the building, connectivity, and immediate environment rather than traditional areas for industry.
60. The statement is made at paragraph 2.2.9 of the OMRR that *“TMT and general business services have grown, while the legal sector has seen a renaissance since the pandemic but prior to this had been an insignificant source of demand in the City. It is clear these sectors are still vital to market performance and are likely to do so moving forwards.”* The BQA contest that there is no analysis of the needs of these specific sectors and no indication of the likely source of tenants. The resurgence of traditional sectors is contradicted by the report taken to the Local Plans Sub (Planning and Transportation) Committee in June 2023 (“PCT Report”) which discusses the evidence base report “Future of Office Use” which was commissioned from ARUP to support the office policies review for City Plan 2040 and which states at paragraph 5: *“In 2023, 29% of take-up of office floorspace in the City of London was from “Media and Tech” firms, compared to 19% from “Financial” companies, indicating an increasing shift away from the dominance of financial services, and an increasing demand from new types of occupiers”*
61. The OMRR advises that there were three transactions over 100,000 sqft completed since the beginning of 2021, and all were pre-lets. The BQA highlight that given 100,000 sqft equates to 9,259 sqm, there would need to be six such transactions to fully occupy the LWW Proposals. Given that there were only three such transactions in a period of 2.75 years, it could take two years to find such ‘large tenants’ and so the demand would need to come from smaller occupants. No evidence is provided to suggest sufficient demand for “prime” in the lower size transactions. Furthermore, of the list of largest transactions given in Table 4 of the OMRR, the BQA highlight that at 25.185 sqm this is roughly the size of the new Rotunda building. The OMRR provides no evidence of demand from an individual tenant for a building as large as New Bastion House (which at 35,523 sqm GIA,



is almost 40% bigger than the largest transaction). Again, this indicates that this will have to be a multi-tenant building.

62. At paragraph 4.2.1 of the OMRR it is noted that JLL's Future of Work survey found that when asked about their attitudes towards space, 92% of those surveyed based in London said that investing in quality space is a more significant priority for their company than expanding the total occupied footprint. The BQA consider this to be an unbalanced analysis of demand as it suggests no increase in demand but provides no information about the willingness / ability to relocate to a higher quality office vs. refurbish existing space occupied. The PTC Report paints a more complex picture and states at paragraph 9: *"Grade B office take-up is predominantly by creative and emerging-office based firms who are interested in enhanced amenities. The protection of existing office space is important to ensure that there is a range of office stock to provide choice in terms of location and cost to potential occupiers. However, there are challenges facing Grade B office space. In 2022, take-up of second-hand Grade B space in the City was 10,000m2, accounting for only 2.2% of all leasing market transactions in the City. Pre-pandemic, Grade B office stock provided an affordable workspace option for small businesses but this market area has not recovered after the pandemic. There are challenges for retrofitting Grade B space but there are successful examples in the City, including Millennium Bridge House, 81 Newgate Street and Ibex House."*
63. Paragraph 5.1.1 of the OMRR notes that there is a good level of demand for office space in the City of London, but occupiers are demanding the best space in which to create modern working environments. The BQA consider this to be a vague comment but is understood to refer to current demand rather than future demand. The PTC Report from June 2023 notes at paragraph 18 that *"Additional technical work is underway to better understand not just the potential demand for office floorspace, but the capacity to accommodate additional floorspace, having regard to other policy constraints including strategic and local views protection and heritage assets."* It is not clear whether the CoLC as Local Planning Authority has provided input to the CoLC as applicant in the light of this technical work.
64. The BQA consider the statement at paragraph 5.1.3 of the OMRR that office space around Farringdon and Barbican stations is particularly sought after with creative occupiers favouring the mixed-use environment over the more corporate City Core is not evidenced in the OMRR. That it should be examined is again highlighted by the June 2023 PTC Report which states at paragraph 8 that *"As emerging office-based firms tend to value different typologies of office spaces compared to traditional office-based firms, their growing number and size might imply a new shift in the market in terms of demand for best-in-class office spaces, with the fastest growing firms over-representing in the micro and small categories."*
65. The BQA highlights the statement made at paragraph 5.1.3 of the OMRR that *"The existing Museum building and road configuration currently create a visual barrier between these two sub-markets. London Wall West is an opportunity to link these two sub-markets with a purpose-built mixed-use office scheme."* This does not appear credible as there remains a significant visual



barrier in the form of 200 Aldersgate Street. Similarly, the benefits of the LWW Proposals listed at paragraph 5.1.4 of the OMRR are not considered to be unique to the submitted proposals.

Cultural floorspace

66. In terms of the loss of the cultural floorspace on the LWW Site, both London Plan Policy HC5 and the CoLC adopted Local Plan Policies CS11 and DM 11.1 seek to protect existing cultural venues and facilities. Policy DM 11.1 further stipulates that such loss will be resisted unless replacement facilities are provided on site or within the vicinity or in other facilities without leading to a shortfall in provision or that there is no realistic prospect of the premises being used for a similar purpose. Any scheme that results in such loss also must be accompanied by evidence of the lack of need (including marketing evidence to demonstrate the existing floorspace has been actively marketed). For the LWW Site, the Museum of London is being relocated to another site within the City and in close proximity, nevertheless, given the strategic vision for this part of the City, it is considered that it should be demonstrated that there is no demand for a similar level of need given the vision for the 'North of the City' Key City Place area in which the LWW Site is located. This policy approach is repeated in City Plan 2040 through Draft Policy CV1, and with reference to the issue of retrofit/re-use, CarneySweeney highlight that the strategic policy direction set out in City Plan 2040 in Draft Strategic Policy S6 refers to protecting areas of cultural significance including cultural buildings where they provide an anchor for cultural regeneration.
67. The application is supported by a Culture Plan (and Culture Needs Assessment) which has been reviewed by the BQA. The BQA raise concern that the Culture Plan is vague and speculative with a weak vision and with no sense of a coordinated strategy. No specific cultural partnerships have been identified. There are no defined capital/revenue models and no business models presented. The BQA are concerned it will therefore be left to any future developer to interpret as they wish and therefore the generic arts, culture and creative features of the LWW Proposals as referred to in the Culture Plan will be value engineered down or scoped out. Furthermore, the Culture Plan draws heavily on the CoLC flagship Destination City strategy, including the statement that the programme and events "will be led by Destination City". The BQA wish to highlight that the Destination City strategy is acknowledged by the CoLC as requiring a 're-set' and, as of January 2024, is currently under comprehensive external review (the terms of reference for which were discussed at the Culture, Heritage and Libraries Committee meeting of 20 November 2023).

Residential floorspace

68. Returning to the criticisms raised by the BQA on the pre-application consultation process and the evolution of the LWW Proposals, given the strategic vision for the North of the City as set out in the adopted Local Plan, the question is asked as to the decision to promote an office led redevelopment of the LWW Site. Whilst the policy requirement to ensure the reprovision of office floorspace and cultural floorspace is recognised, CarneySweeney, on behalf of the BQA, query why the CoLC have



ignored the opportunity to also deliver much needed housing in a part of the City that is considered compliant with Policy DM 21.1 of the CoLC adopted Local Plan which states that new housing will be provided in the City in or adjacent to identified residential areas (such as the Barbican) but this should not prejudice the business function of the City (as per Policy DM1.1).

Retrofit and Re-use vs Demolition – Embodied Carbon Review

69. The NPPF states at paragraph 157 that the planning system should support a transition to a low carbon future in by 'encouraging the reuse of existing resources, including the conversion of existing buildings' – conversely it is recognised that the NPPF also provides clear policy guidance on making the most effective use of land and requires local planning authorities to take a proactive role in bringing forward land that may be suitable for meeting development needs.
70. The London Plan provides the most up to date adopted strategic policy direction (together with related SPGs/LPGs) and also promotes the effective use of land through its 'Good Growth' policies which seek to optimise the redevelopment and re-use of brownfield land. Whilst retrofit and the re-use of buildings can contribute to carbon reduction, and both the Mayor's WLC Assessment LPG and Circular Economy LPG advise that priority should be given to the re-use/retrofitting of buildings, neither policies SI2 or SI7 of the London Plan prohibit demolition (albeit that the policies do require development proposals referable to the Mayor to undertake a WLC Assessment and demonstrate the actions take to reduce life-cycle carbon emissions as well as to produce a Circular Economy Statement).
71. The adopted CoLC Local Plan states in Policy CS15 that demolition should be avoided through the re-use of existing buildings and the CoLC Carbon Options Guidance PAN provides the most recent intermediate position on how this will be considered by the CoLC as LPA. The CoLC emerging policy in City Plan 2040 also favours an embedded strategy of retrofit and the re-use of existing buildings.
72. As set out earlier in this statement, an interim WLC Assessment report (May 2022) was undertaken at pre-application stage to assess the existing buildings on the LWW Site. This WLC Assessment stated that a high-level engineering review of the existing buildings had been undertaken and highlighted there are three key challenges that would need to be addressed in any retention proposals. This includes material design life, fire integrity and design for disproportionate collapse. This WLC Assessment was undertaken based on two design options, subsequently eliminating any further discussions regarding the re-use of existing buildings despite the results indicating that the absolute Whole Life-Cycle Carbon emissions for the re-use of the existing buildings are approximately 20 million kilograms' lower when compared to a redeveloped LWW Site. The WLC Assessment dismissed the option of retrofitting the existing buildings based on viability and feasibility.



73. The BQA instructed Simon Sturgis of Targeting Zero LLP to undertake a review of the LWW Proposals in relation to matters pertaining to the circular economy, the reduction of carbon and meeting net zero. Their full review is at Appendix B to this statement and their main conclusions are summarised below, as follows:

- The proposals are not optimising the carbon emissions impacts and as a result are in direct opposition to UK National policies, GLA policies and the City's policies. These include the City's new sustainable guidance for developers dated 12 December 2023, covering retrofit and reuse, energy and whole life carbon and the circular economy. Their conclusion is that the planning application proposals ignore this new guidance.
- There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to six options selected for detailed examination. These six options excluded 'option two' for a 'Major Refurbishment', which is the option that is most consistent with the approach favoured by the commercial bids in this City's market testing exercise.
- The conclusion of the planning application submission reports is exactly the same as previous reports in May 2022, namely that a 'Major Refurbishment' approach is to be rejected in favour of 'new build'. This appears to demonstrate that the latest optioneering exercise is purely 'window dressing' to prove a pre-ordained choice 'new build', and that a 'major refurbishment' option has not been seriously investigated by the design team in detail as 'new build' was always the intended outcome.

74. Notwithstanding the conclusions above, Targeting Zero also comment that in the event of the LWW Proposals being approved, unless the levels of carbon emissions achieved are 'locked into' the scheme and become secured by way of legal agreement or planning condition, they are likely to be abandoned by any future purchaser, meaning that the figures achieved are effectively meaningless.

75. As a result, it is reasonable to conclude that there are failings in the approach to the Whole Life Cycle Carbon Assessment of the LWW Proposals. The CoLC Whole Life-Cycle Carbon Options PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emissions. It states that optioneering is required for all major schemes before the application is submitted and furthermore advises *"If substantial demolition is proposed, applicant will need to demonstrate that benefits of the demolition would clearly outweigh the benefits of retaining the existing building or part of the structure."* This approach reinforces the Mayor's WLC Assessment LPG by requiring developers to consider alternatives to demolition at the earliest stages of planning and in this regard, the BQA consider the failings highlighted by the group to the CoLC at pre-application stage relating to the option of retrofit and reuse of the buildings on the LWW Site have equally been dismissed in the appraisal of options assessed at planning application stage.



Design, Public Realm and Landscaping

76. Chapter 12 of the NPPF focuses on achieving well designed places and recognises that good design is a key aspect of sustainable development and creates better places in which to live and work and helps make development acceptable to communities. Paragraph 135 emphasises that planning policies and decisions should ensure that developments:
- *“Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - *Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - *Establish or maintain a strong sense place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - *Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - *Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*
77. Furthermore paragraph 137 states: *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*
78. A review of the submitted Design and Access Statement (DAS) has been undertaken by Jan-Marc Petroschka ARB, a resident of the Barbican Estate and member of the BQA. A schedule of his comments is attached to this statement at Appendix C. Mr Petroschka’s evaluation shows that numerous statements, assumptions, assessments, and conclusions drawn in the DAS are misleading, flawed, and/or factually incorrect. He also comments that option appraisals have been inadequate, and that important and relevant design considerations, such as the local character, history and other site-specific qualities were wholly ignored. As a result, it can only be concluded that the basis for the design of the proposals is unsound.



Townscape and Views

79. Mr Petroschka has also reviewed the submitted TVBHIA and his conclusions are attached to this statement at Appendix D. Again, Mr Petroschka concludes that a number of statements and conclusions in the assessment are incorrect, flawed, misleading and are strongly contested.
80. In particular, Mr Petroschka states that while many of the post-war office blocks on London Wall have been replaced and the density of the urban fabric increased, all new office blocks strictly follow the perpendicular grid of the post-war plan, continue to contain and define the urban street space and public realm, break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context and their immediate neighbours, including the Barbican Estate. All developments place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks.
81. None of the above prevailing qualities were applied to the two proposed development blocks. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining Conservation Areas, but also to the setting of the immediate and wider neighbourhood.
82. The BQA further highlight that the CoLC adopted Local Plan does not place the LWW Site in an area deemed to be inappropriate for tall buildings and as such Policy CS14 advises that within such areas, proposals for tall buildings will be considered suitable having regard to a variety of design considerations. The London Plan Policy D9 provides the more recent policy position in relation to tall buildings and sets out a much wider assessment of the impacts to be considered where development proposals include tall buildings. Policy D9 also requires development plans to identify the locations and building heights considered appropriate for tall buildings and states that tall buildings should only be developed in such suitable locations. The BQA are aware that Draft Strategic Policy S12 in City Plan 2040 defines a tall building as being over 75m AOD (therefore applicable to two of the buildings included in the LWW Proposals) but does not identify the LWW Site as being one of the tall building areas that are proposed to be identified as suitable for tall buildings. The BQA do not consider that the LWW Proposals respond to the LWW Site's existing character, or respect and enhance identified heritage assets and architectural features. Further commentary on heritage matters is provided below.

Heritage

83. The BQA instructed Alec Forshaw a highly experienced specialist heritage consultant to assess the heritage impacts of the LWW Proposals. He has considered the impacts within the local and immediate area, and left the potential impacts on long-distance views of St Paul's Cathedral or the riverside to Historic England and the GLA, who have particular remit and expertise in this field. Mr Forshaw's full report is at Appendix E to this statement.



84. Mr Forshaw questions the reliability of the submission material: Architect's sketches and artistic illustrations give inaccurate impressions of the proposals with stretched and distorted perspectives; and photographs use wide angle-lenses, a technique used by estate agents in sales brochures to make internal rooms seem bigger than they are.
85. He strongly opposes the applicant's consistent claims that the proposals, by virtue of their size, contrasting design and materials will enhance local views and settings.
86. Mr Forshaw concludes that the proposals cause widespread harm to a large number of heritage assets. This includes the complete loss of two undesignated heritage assets, and less than substantial harm, but nevertheless considerable harm to and erosion of significance of several Grade I, Grade II, Grade II* scheduled monuments, some directly abutting, and the setting of three Conservation Areas. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm, requiring the balance of harm against public benefits in line with Paragraph 202 of NPPF. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere, nor other public benefits which would offset the great weight that must be given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

Biodiversity and Ecology

87. The BQA note that a Biodiversity Net Gain assessment has been undertaken and is submitted alongside the planning application. There appear however to be discrepancies in the reported net gain in biodiversity units as reported in the submitted Planning Statement compared to those reported in chapter 10 of the Environmental Statement submitted with the application. Furthermore, given the habitat survey of the LWW Site was updated in May 2023, it is queried why Biodiversity Net Gain Metric 3.0 is used to assess the LWW Proposals rather than Biodiversity Net Gain Metric 4.0 which was published in March 2023.

Transport, Access, and Servicing

88. The LWW Site is highly accessible by public transport. However, issues relating to vehicle access, highway safety, highway and public transport capacity, design of the public realm, and pedestrian connectivity and permeability are key considerations for the BQA.
89. The planning application is supported by the following documents which relate to the consideration of transport, access and servicing matters; Environmental Statement Chapter 6 'Traffic and Movement' along with Appendices 6A 'Transport Assessment' and 6B 'Travel Plan & Cycle Promotion Plan'; Draft Construction Environmental Management Plan; Delivery and Servicing Management Plan. Having reviewed each of these documents, the BQA wish to highlight three significant areas of concern:



- a. The operational impact of the LWW Proposals with three new buildings and a changed Ironmonger's Hall.
 - b. The impact of Phase 2 works relating to the removal of the St. Paul's Gyrotory system.
 - c. The impacts relating to the demolition of the existing buildings and the construction of the LWW Proposals on residents and other sensitive receptors (schools, businesses, Barbican Centre, St Giles Church and public and private gardens) within close vicinity to the LWW Site.
90. A fundamental concern relates to the proposed access and egress arrangements for vehicles to the redeveloped LWW Site. At present, access to service the buildings on the site is via a one-way system with access from London Wall and egress via the Aldersgate Street ramp. The latter is used primarily by residents accessing the TMH car park along with service and delivery vehicles supporting the residential community. The proposed development will abandon this 'through route' with all vehicles entering and exiting via the Aldersgate Street ramp.

Operational impacts

91. The Delivery and Service Plan (DSP) submitted with the application sets out the proposal that, on completion of the proposed development, all service vehicles as well as Barbican residents will use the Aldersgate Street ramp. The service vehicles will be held at a barrier on the ramp with an intercom to await instructions. Traffic will include vehicles accessing Bastion and Rotunda Yards at 10-11 servicing vehicles per hour, Barbican traffic at 10 - 15 vehicles per hour, with the addition of further servicing vehicles to the new North Office building and Ironmongers Hall. The ramp will thus need to provide for:
- All deliveries and services to and from the three new buildings.
 - All deliveries and services to and from Ironmongers' Hall.
 - All deliveries and services to and from the Barbican residents' car park (affecting Seddon, Thomas More, Lauderdale, Mountjoy and Lambert Jones Mews).
 - Emergency fire and ambulance access to and from Barbican residents' car park (there is no alternative access proposed in the scheme from the south of the site).
 - Barbican residents entering and exiting the car park.
 - Contractors, postal services, grocery deliveries and taxis entering and exiting the car park.
 - Pedestrians and cyclists (residents and deliveries) entering and exiting the residents' car park.
92. The DSP also provides a number of diagrams showing that there is inadequate width for two-way traffic at several points and thus proposes a traffic light control system for all servicing vehicles. It also proposes use of the TMH Service Yard as part of the route without any explanation of where the current activities at the Service Yard will be relocated.
93. The BQA consider this to be a significant design weakness for the following reasons:
- Residents' use of the Thomas More car park will be severely impacted from the outset and for the indefinite future once the buildings are completed.



- There is significant likelihood of congestion on the ramp, in the single-lane sections of the proposed route and in the underground service yards.
 - The large increase in traffic on the ramp and lower levels resulting from this design proposal will have a significant adverse effect on noise and air pollution for residents in nearby residential blocks and on the CLSG sports field.
 - There will be frequent occasions when vehicles entering the ramp will be queued at the intercom barrier and backing onto Aldersgate Street, thus jeopardising safety for all road users at the top of the ramp onto Aldersgate Street.
 - It will create delay for emergency vehicles entering via ramp and exiting onto Aldersgate Street.
94. The BQA therefore considers that this 'single entry/exit route' is a fatal design flaw and should be withdrawn and replaced with a 'through route' which reduces the risks and serious adverse impact on a major residential community.

Impact of Phase 2 of the St Pauls Gyratory works

95. The Transport Assessment (TA) makes clear that demolition and construction on the LWW site and the highway scheme are interdependent - see paragraphs 6.4.49 and 6.4.50. Phase 2 of the Gyratory works is intended to happen when construction commences at the rotunda. The demolition of the rotunda and construction of the new highway layout cannot begin before 2028 in order to allow time for the many governance and consent processes that will need take place both within the CoLC and by TfL to have been completed - see paragraph 6.4.50 of the TA. The implication is also that the sale of the LWW Site must be completed by this time in order that the applicant can enter into the required section 278 agreement with the highway authority for the necessary highway works.
96. Earlier traffic modelling in connection with the St Paul's Gyratory proposals indicated that this change could result in a significant increase in delays to bus journeys as well as cars, taxis and other vehicles. In paragraph 6.4.32 of the TA it states *that "The junction modelling for the St Paul's Gyratory Transformation Project (Phases 1 and 2) is being undertaken by Norman Rourke Pryne and it is envisaged that TfL's Model Auditing Process (MAP) process for Phase 2 would be concluded after the planning application is submitted for the proposed development, as part of the s278 process"*.
97. The BQA raise concern that there is no up-to-date modelling of the likely traffic flows, travel times, congestion etc when the LWW Proposals are complete. This is particularly important given the removal of the Rotunda roundabout and its conversion to a signal-controlled junction with two-way traffic lanes. The BQA contend that the data underlying the traffic forecasts is disparate and out of date, and that more traffic modelling will be required in connection with obtaining TfL's consent to the removal of the rotunda roundabout. The BQA position on the impact of this removal is therefore reserved until this new traffic modelling has been undertaken and public consultation has taken place.



Impacts during construction on residents and adjoining residential properties

98. An initial review of the Draft Construction Environmental Management Plan (CEMP) has been undertaken by the BQA and the following comments are made. The BQA raise concern that almost no discussion or consultation with the local community has been undertaken in relation to the management and mitigation of construction impacts taking place over the course of a five-year period. The single exception to this was the opportunity to meet members of the LWW project team on 11 January 2024 at the London Centre. On raising concerns with the project team manager about the CEMP, the BQA were advised that *“it has been prepared by Multiplex who are unlikely to work on the construction project, and everything in it can be changed”*. BQA would like to express major concern at this apparent cavalier and dismissive approach on a matter that will affect the lives of many hundreds of residents over a period of at least five years.
99. A fundamental point of concern is the proposal that - from the commencement of development onwards - vehicles requiring direct access to the LWW Site will enter and exit via the existing ramp on Aldersgate Street. Furthermore, on page 36 of the CEMP, 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 [it] should only be utilised when absolutely necessary”*.
100. 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, it has several hairpin bends and would become seriously congested.
101. The BQA consider this proposed re-routing to be impractical and unacceptable and that it should be prohibited.
102. Further concerns during the construction phase are the suspension of bus stops and cycle bays where these are heavily used by residents and those attending/working at St. Bart’s Hospital. Furthermore, it is considered that the impact of suspending public transport facilities for a 5+ year period on people with disabilities has not been assessed and is likely to be significant. Whilst commitment is made to contractors being part of the nationwide Considerate Contractors Scheme, the CoLC has its own Code of Practice for Deconstruction and Construction Sites (Ninth Edition) – January 2019 which should equally be met.
103. A further concern raised by the CEMP relates to the proposals for staff welfare facilities. in section 3.2.4 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”*.



104. 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. The BQA considers this to be totally unacceptable and that it should be prohibited by means of an appropriate planning condition.

Daylight, Sunlight and Overshadowing and Solar Glare

105. Anstey Horne were instructed by the BQA to review the submitted assessment in relation to daylight, sunlight, overshadowing, solar glare and light spillage within the Environmental Statement. Anstey Horne's report is at Appendix F to this statement. Their main conclusions are that there will be significant impact in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight. They further conclude there will be significant VSC daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant NSL daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight. Additionally, they conclude that there will be major adverse and significant incidences of solar glare to residents within Monkwell Square.

106. They also consider that further information is required to be submitted, as follows:

- VSC daylight results on a room by room basis;
- VSC daylight results on a room by room basis without balconies;
- NSL contour plots to establish the layout used within the analysis;
- 'A clear sky' solar glare analysis to fully understand the potential for solar reduction at key road junctions;
- An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP '2011' Guidance Notes; and
- Confirmation of the location of the areas of additional light spill on the façade of Mountjoy House and that they do not coincide with the location of windows serving habitable rooms.

107. In addition Anstey Horne request that the following points be clarified:

- To verify the accuracy of the 3D modelling and analysis, confirm which properties are modelled from measured survey and which are modelled from photogrammetric survey;
- Confirm how the windows and their locations have been modelled where photogrammetric survey has been used; and
- Confirm the solar glare results within Appendix 13-F, including the angles on the field of vision on the solar glare result drawings.



108. Once the above information has been submitted, and made public, Anstey Horne will review and provide further conclusions to the BQA which may then be the subject of further submissions to the City of London Corporation as local planning authority.

Archaeology

109. The BQA are aware that the LWW Site is within an archaeologically sensitive area. The Planning application is supported by Environmental Statement Chapter 10 ‘Archaeology’ which assesses the likely environmental effects of the LWW Proposals with respect to archaeology. A review of this chapter of the Environmental Statement has been undertaken by Cathy Ross, an Honorary Research Fellow at the Museum of London, a resident of the Barbican Estate and member of the BQA. Having reviewed the chapter, her comments are as follows:

110. The archaeology scoping document and desk-based assessment (on which the chapter is based) both fail to consider the heritage assets of the Aldersgate side of the LWW Site, particularly any potential remains of Thanet House, one of the City’s grand Stuart mansions and a key site of interest for Britain’s political history. The evidential and historical potential of a site should be taken into account when considering the value of a heritage asset, and in this respect the documents are lacking. Thanet House and its gardens / environs have significant historical, political and architectural interest but are here ignored. More specifically:

111. At paragraph 15.2.2 and with reference to the remains of a Jewish Cemetery within the LWW Site - Nowhere is it made clear who actually owns the land between the Museum and the remains of the City wall. The BQA understand that the CoLC do have title to this piece of land. The report seems to assume that this land forms part of the Barbican’s group of gardens but this is clearly not the case (there are locked gates preventing public access to the Barbican’s territory).

112. At paragraph 15.2.4 – the BQA understand that any EIA has to evaluate ‘... *the significance of buried heritage assets, based on existing designations and professional judgment where such resources have no formal designation, and considering evidential, historical, aesthetic and communal value.*’ This is not considered to be the case here: the focus is entirely on the Roman remains and the much rebuilt City Wall. Other areas threatened with disturbance by this proposal have not been considered.

113. At paragraph 15.4.3 - as per paragraph 15.2.2, this implies the land is part of the Barbican estate and under City ownership. The BQA consider this point should be clarified.

114. At paragraph 15.4.20 – the BQA consider this section of the report to be completely inadequate as a summary of the whole site’s post-medieval significance. As mentioned above, Thanet House and the Aldersgate frontage must be included in any detailed consideration of the LWW Site’s ‘archaeological and historical context’, particularly given that the sites of these politically-charged 17th century buildings lie directly beneath the development. Nor is there any mention of the



Victorian development of the site (most of the standing remains of the City Wall are in fact Victorian or later). No mention either of the site's interest to Wesleyan Methodists.

115. At paragraphs 15.4.27 to 15.4.29 - the inference in these sections is that the access roads have *'heavily truncated if not removed completely'* archaeological remains. The BQA consider this to be very disputable. It is more likely that, as it says in paragraph 15.4.30 *'Archaeological remains (primarily the City ditch) have been shown to survive beneath and possibly between this localised truncation.'*
116. At paragraphs 15.4.32 to 15.4.33 – the BQA consider that these sections do at least acknowledge that there were post-medieval buildings on the LWW Site, but – again - without proper consideration of the actual buildings on this particular site. The text here is considered to be generic and based on assumptions.
117. At paragraphs 15.4.34 to 5.4.38 – the BQA consider these statements of significance points relate entirely to the Roman remains and ignore any heritage assets, actual or potential, relating to other periods of the past – Tudor and Stuart in particular.
118. Paragraph 15.4.39 – the BQA contend that surely the area of the Jewish cemetery extends beyond the footprint of Bastion House. In which case the potential for the survival of remains is higher than suggested here.

GLA Referral

119. The Town and Country Planning (Mayor of London) Order 2008 states that applications of potential strategic importance ('PSI applications') need to be referred to the London Mayor for his/her consideration. The definition of a PSI application is set out in a Schedule attached to this legislation. Part 3 of the Schedule deals with development which may affect strategic policies and Category 3E states that PSI applications include those for development:
- (a) Which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and
 - (b) Comprises or includes the provision of more than 2,500 square metres of floor space for a use falling within any of the following classes in the Use Classes Order [these uses include Class B1 Business, which has now been included within the new Class E of the Use Classes Order.
120. In this statement, we conclude that the redevelopment proposals for London Wall West do not accord with one more provisions of the relevant development plan and thus the planning application is required to be referred to the London Mayor under the Town and Country Planning (Mayor of London) Order 2008. To not do so will mean that the application has not been subject to the correct legal procedures.



Public Benefits

121. The Planning Statement submitted with the application sets out the range of purported public benefits that are considered to be provided by the LWW Proposals as they relate to Economic, Social and Environmental matters. The BQA has considered each of these as listed in the submitted Planning Statement and comment specifically on those below.

Economic Benefits

122. **Creating a catalyst for change and wider regeneration of the Barbican and Smithfield as one of the seven key areas of change, by investing significantly to unlock this key Site within the heart of the Culture Mile:** The seven ‘key areas of change’ is a reference to the strategic policy direction proposed by the CoLC in the emerging City Plan 2040. This is subject to further public consultation and scrutiny as the draft local plan progresses through to adoption and therefore the status of this policy direction should not be accorded the same weight as the adopted local plan. The LWW Site is currently located in the ‘North of the City’ area as defined in the adopted local plan. Whilst the principle of this benefit is accepted, it could equally be true of any other reuse the LWW Site.

123. **Delivery of approximately 56,000sqm GIA of new high quality, sustainable office workspace to meet a range of business needs across the Square Mile to enrich the City of London as a primary business centre of national and international importance:** Given the spatial strategy for the ‘North of the City’ area, the BQA disagree that the LWW Site should be promoted for significant office growth. The detrimental impacts in terms of heritage, design and townscape that result from the LWW Proposals as identified by the BQA are set out in this statement.

124. **Optimising the use of this underdeveloped site to a commercially led development with significant cultural uses within the buildings and the public realm:** The BQA consider that the LWW proposals comprise overdevelopment (not optimisation) with resultant heritage, design, townscape and other impacts as identified by the BQA in this statement.

125. **The demolition and construction phase of the development is anticipated to provide a significant amount of jobs targeted at local people:** Whilst the principle of this benefit is accepted, the BQA consider this could equally be true of any other reuse or redevelopment of the LWW Site. Whilst the BQA do not contest the number of jobs to be created during the construction phase, this ‘benefit’ is not specific to this development in particular; a significant number of construction jobs would be created by another form of redevelopment or as a result of the retrofit and adaptation of the existing buildings on the LWW Site. Also, these jobs are only temporary.

126. **The employment density will increase as a result of the Proposed Development through more efficient floorplates:** Whilst the principle of this benefit is accepted, it could equally be true of any other redevelopment or reuse/adaptation of the existing buildings on the LWW Site.

127. **Provision of Section 106 and Community Infrastructure Levy contributions to support the City’s infrastructure:** The NPPG advises that planning obligations are entered into to mitigate the impacts of a proposal whilst Community Infrastructure Levy (“CIL”) is a charge which can be levied on new



development by local authorities to help them deliver the infrastructure needed to support development in their area. The BQA therefore consider these are ‘requirements’ resulting from the LWW Proposals rather than ‘benefits’. The BQA consider the detrimental impacts of the LWW Proposals as set out in this statement are of greater significance.

Social Benefits

128. **Creation of a range of cultural uses (c. 8,000 sqm GIA) to activate the streetscape, facilitating the City’s strategic objective to implement Destination City:** The LWW Proposals do not deliver a like for like replacement of cultural floorspace on the LWW Site. The BQA highlight in this statement that Destination City is currently under review.
129. **The overall quality of the development and proposals offer would attract visitors, increase tourism, support and improve worker productivity and enhance the image of the area.** The BQA query how this statement can be qualified/evidenced by the CoLC. This statement could equally be true of any other reuse or redevelopment of the LWW Site.

Environmental Benefits

130. **Delivery of world class public realm and new open spaces:** The BQA do not consider the public realm and new open spaces to be provided by the LWW Proposals to be ‘world class’. The BQA note that no environmental benefits are promoted in relation to the design of the new buildings within the LWW Proposals. The BQA consider that the design is not beautiful or attractive as sought by the NPPF and indeed the design is flawed as set out in this statement.
131. **Deliver highly sustainable development targeting BREEAM “Outstanding”, delivering significant carbon dioxide reductions through implementing new efficient all electric plant and renewable technologies to improve energy efficiency and reduce greenhouse gas emissions:** The BQA consider this to be a planning policy requirement. Reduced impacts on the environment could similarly be achieved through the retrofit and reuse of the existing buildings or through reduced development of the LWW Site.
132. **Helping to facilitate the implementation of the fifth generation Citigen Network by providing space at basement level for new equipment to unlock the upgraded heating network:** The BQA query why this could not be delivered now, given that the CoLC are landowner.
133. **Implementation of Air Quality Positive measures within the scheme design in order to maximise benefits to local air quality in and around the site whilst also minimising exposure to existing sources of poor air quality:** The BQA consider this to be a planning policy requirement. Detrimental impacts of the development relating to air quality must be mitigated.



134. **Implementing a net waste positive approach to demolition of the buildings to support the circular economy:** The BQA consider this to be a planning policy requirement. A greater net waste positive approach would be to retrofit and reuse the existing buildings on the LWW Site.
135. **Delivering substantial new areas of public realm within the masterplan, including the landscaped Glade, including soft landscaping (including 98 trees, a net uplift of 71) and green open spaces; and as a result significantly increasing biodiversity and ecology across the site:** The quality of the open areas and landscaping proposals is not agreed by the BQA.
136. **Delivering significant urban greening measures on the buildings themselves.** The BQA consider the requirement to achieve urban greening improvements a planning policy requirement. Whilst the principle of this benefit is accepted, there is no assessment of the UGF score for the LWW Site as it exists compared to the UGF score of 0.41 for the LWW Proposals.
137. **Provision of alterations to the roadway to create a better experience for pedestrians and cyclists and provision of a short stay cycle hub. It would deliver growth in a highly sustainable location which will assist in the delivery of the City of London’s Transport Strategy, assisting in creating sustainable patterns of transport:** The BQA have identified significant concerns with the proposed transport proposals.
138. **Delivering a sustainable servicing strategy which includes off site consolidation:** The BQA raise significant concern in relation to the servicing strategy for the LWW Proposals and consider the use of the Aldersgate Street ramp as a single entry/exit route to be a design flaw that will have serious detrimental impact on the local residential community as users of this access.

Planning Balance

139. The NPPF (December 2023) states (at paragraph 11):
“Plans and decisions should apply a presumption in favour of sustainable development..... for decision-taking this means:
- c) *Approving development proposals that accord with an up to date development plan without delay; or*
 - d) *Where there are no relevant development plan policies or the policies which are important for determining the application or are out of date, granting permission unless:*
 - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrable outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*
140. At paragraph 20.13 of the Planning Statement submitted with the planning application for London Wall West, Gerald Eve comment:



“It is considered that the Proposed Development complies with the Development Plan when considered as a whole and that other material considerations weigh in favour of the scheme. Any perceived harm arising from the Proposed Development is greatly outweighed by the public benefits. Accordingly, it is considered that the planning permission and listed building consent should be granted for the Proposed Development.”

141. It is our view that this is not a full and considered planning balance assessment and as such cannot be relied upon. A full and proper planning balance assessment would thoroughly consider the following six questions:

- Do the proposals comply with the Development Plan?
- Do the proposals give rise to any harm to heritage assets, having applied a heritage balance?
- Do the proposals give rise to any other harm?
- Are there material considerations which should be weighed in the balance?
- Do the benefits of the proposals outweigh any harm that has been identified?
- Considering the Development Plan and the NPPF as a whole, are there factors to bring about a different conclusion?

142. Appendix G to this statement sets out the relevant planning policies of the Development Plan which are not referenced at all within the submitted Planning Statement and so have not been considered. This statement has already set out that the LWW Proposals do not comply with the Development Plan in a significant number of areas.

143. Mr Forshaw has concluded that the proposals cause widespread harm to a large number of heritage assets, including the complete loss of two undesignated heritage assets. He explains that harm to these assets, whilst less than substantial, is to such a degree that it will considerably erode and harm their significance. It is his conclusion that this harm is not outweighed by heritage benefits elsewhere.

144. This statement has also identified a number of other harms as follows:

- Impacts to the daylight levels received by neighbouring buildings;
- Harm to the area’s prevailing character and setting;
- The loss of cultural facilities;
- Significant and avoidable increases in carbon emissions;
- Impacts on townscape;
- Impacts on local amenities by way of transport movements;
- Overshadowing of public realm.

145. Other material considerations that we have identified to be weighed in the balance are as follows:

- There is no adopted vision to promote significant office growth within this part of the City.
- The emerging City Local Plan is at an early stage and therefore its policies only have limited weight at this stage.



- There is a housing crisis and the opportunity to deliver much needed housing in this part of the City has been lost. This area is considered compliant with Policy DM21.2 of the adopted Local Plan which states that new housing will be provided in the City in or adjacent to identified residential areas, such as the Barbican, provided that this does not prejudice the business function of the City.
- Market testing has identified other options for the LWW Site which would avoid the need for demolition, the identified harms and the increase in carbon emissions which the planning application proposals would create.

146. In the section above, we have commented on the public benefits, as identified in the submitted Planning Statement. In short, we do not agree with many of the asserted benefits.

147. Overall, we do not consider that the public benefits outweigh the harm that the proposals would bring to heritage assets and in relation to other matters, the failure to comply with a number of policies of the adopted Development Plan and the clear guidance in the NPPF as a whole to deliver beautiful and attractive development, in accordance with the prevailing character of an area.

148. As a result, it is our overall conclusion that planning permission should be refused for this proposed development.

Conclusions

149. In light of the comments set out above, the BQA object to the planning applications and consider the applications should be refused.

150. As referred to above, this statement (and appendices) set out BQA's concerns and objections to these planning applications to date. The planning application documentation is extensive and detailed and so BQA may submit further comments. They will, however, not procrastinate in this regard, and will ensure that any follow-up comment is submitted as soon as they are able. In addition and notwithstanding, the comments below refer to the inadequacy of some of the planning application documentation, and so BQA will wish to review and potentially comment on any further amended documentation submitted to rectify these inadequacies.

Appendix A: BQA letters submitted to the CoLC at pre-application stage

Appendix B: Embodied Carbon Review by Targeting Zero

Appendix C: BQA review of DAS by Jan-Marc Petroschka

Appendix D: BQA review of TVBHIA by Jan-Marc Petroschka

Appendix E: Heritage Assessment on behalf of BQA by Alec Forshaw

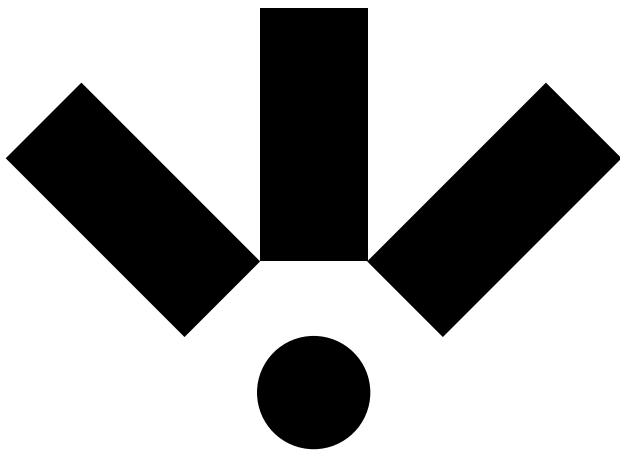
Appendix F: Assessment of Daylight, Sunlight, Solar Glare and Light Spillage by Anstey Home

Appendix G: Planning Policy Review table by CarneySweeney



APPENDIX A





BARBICAN QUARTER ACTION

On 24th October a letter was sent to many residents from Christopher Hayward, Chair of the Policy and Resources Committee of the City of London. In this letter, he maintains that the decision to marginally reduce the size of the London Wall West development is a response to 'consultation'.

Barbican Quarter Action (BQA) is publishing this open letter as a response and rebuttal of most of the content of Mr Hayward's missive. Please take a moment to read this and also to visit www.londonstartshere.co.uk where you can sign up to the campaign and see Mr Hayward's letter.

If you have skills and time to offer, especially in web updating (Square Space), social media, planning and architecture, the time to deliver messages like this through letter boxes, please get in touch via the website. We welcome your support.

OPEN LETTER FROM BQA TO POLICY CHAIR, CHRISTOPHER HAYWARD

Dear Mr Hayward,

We refer to your letter to residents dated 24th October 2022. In line with previous communications from your office, there are a number of issues in this letter which are misleading or misguided. In the interests of clarity, we have highlighted below claims made by you and/or your advisors which simply do not stand up to scrutiny.

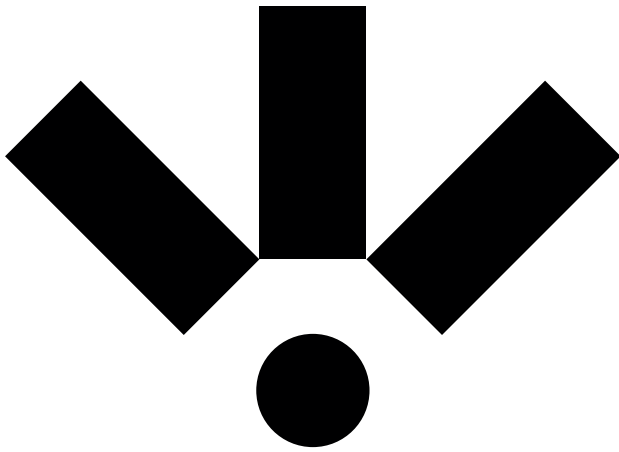
CONSULTATION AND CONCERNS

You write that following consultations, the width of the proposed buildings has been reduced by two and three metres respectively. By omission you imply that mass and scale are the sole grounds for the hundreds of objections you received. However, many of the comments submitted were copied to our campaign email address. Those comments focus, amongst others, on the environmental impact, on damage to town and streetscape and adjacent listed heritage assets, and on lack of a cultural strategy. The barely perceptible reduction in girth does nothing to reduce the actual impact of the scheme and nor will it address real concerns raised in consultation.

SUSTAINABILITY

Furthermore, it is perplexing that you would describe the new office space as sustainable. The 40,000kts of CO₂ undermine the accuracy of that claim. The 'demolition first' approach adopted by your office is, however, unsustainable and will contribute to global heating. Your officers and engineering advisors, Buro Happold, have accepted that your Whole Life Carbon Assessment Report (May 2022) which set out to justify the decision to demolish, is misleading and should be rewritten. The faulty report should be withdrawn.





STOP. RETHINK. RESET.

THE CITY'S EXPLORATION OF RETENTION OF EXISTING BUILDINGS

The City has not considered retention and retrofitting of all buildings. This was confirmed in the Stagg/Sturgis reports and by your advisors. All buildings at some point require work to bring them up to modern standards and these fine buildings, designed by world leading architects, will respond very successfully to retrofit as Bob Stagg confirmed in his report. Therefore, it is clear from independent experts that the buildings on the site could be retrofitted and repurposed.

FEASIBILITY OF THE SCHEME AND FINANCIAL PLANNING

Given that no economic appraisals for any of the City's major projects have been carried out, it is difficult to claim that unless the building is of a minimum size that it is not feasible. The £50m sum raised will have little impact on the black hole in the City's finances and its attempt to fund its current projects. That £50m fails to take into account the demolition costs. Apparently reckless financial planning and over-committing to projects have resulted in claims at the Court of Common Council on 13th October 2022 that the City is at risk of going bankrupt. This is an unprecedented situation, the responsibility for which lies squarely with those continuing to promote these schemes without a comprehensive business plan or risk assessment. The waste of funds in pursuing these schemes suggests that the decision-making process in the Guildhall is contributing to the gaping hole in the City's coffers.

A VIABLE FUTURE AND A CULTURAL STRATEGY

On 21st July 2022, you confirmed that no other cultural option for the site had been considered since the Centre for Music. What was to be a world class concert hall became overnight an office development. The element that you claim will be dedicated cultural space is not guaranteed. The City requires footfall seven days a week. Office workers have not returned to pre-Covid levels. However, small and medium-sized enterprises will not survive if footfall does not return. The LWW site seems an obvious site for a major cultural anchor that will see visitors from far and wide, generation after generation making multiple visits. Whatever the future of this strategic site, it must play a key role in any cultural strategy for the City. The City is falling behind its global competitors. This City needs a visionary cultural strategy now.

Again we ask the City to stop, rethink and reset plans for London Wall West. Do not demolish - retrofit and repurpose based on expert advice. This makes sense financially and environmentally and can make the City more competitive.

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

<https://www.londonstartshere.co.uk>

TWITTER
@barbicanquarter

INSTAGRAM
@barbicanquarteraction



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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BARBICAN QUARTER ACTION

- 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

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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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To Policy Chairman
Chris Hayward

Wednesday, 12 April 2023

Dear Chris,

EXPLORING THE POTENTIAL TO REFURBISH THE LONDON WALL WEST SITE

Thank you for your letter of 3 April stating that the City Corporation will explore the potential to refurbish the London Wall West (LWW) site. We very much welcome this move.

As you know we object to the demolition of the former Museum of London and Bastion House on a number of grounds. Foremost amongst these is climate change. The demolition of the existing buildings and consequent redevelopment of the site would result in more carbon emissions than other options. Exploring alternatives is not only in line with your new guidance to developers, but essential in our view.

We also object to demolition because these are fine buildings, of pioneering design and high quality, capable of being successfully adapted and retrofitted. You refer in your letter to “ a real desire locally for these buildings to be retained” but of course objection is not confined to the locality. Significantly, the Twentieth Century Society has included these buildings in its list of the *2023 top ten most threatened buildings across the UK*. It calls for them to be retained, refurbished and adapted.

We question, however, whether by seeking interest in LWW on its own, an opportunity to maximise interest and value might be lost. The New Museum, The Arts Centre renewal, and the potential afforded by Smithfield East and LWW, provide the City with an opportunity to create a world-leading centre for the creative industries. Seeking interest to develop Smithfield East and LWW, with clarity on dates for vacant possession, might have greater appeal to prospective developers.

Finally, there is the time-scale. Seven weeks which include four Bank Holidays seems a short period in which to ask for expressions of interest. This is a site with complex buildings in a difficult urban setting. Retention of buildings may require significant adaption, and targeted demolition and extension. We have never argued that narrow refurbishment is the only solution. More time and encouragement to develop alternative creative options for the buildings, the site and its surroundings might be desirable.

Thank you for the invitation to meet. Averil and I welcome the opportunity to discuss in detail the points raised above. Can you offer us a some dates in the near future?

Yours sincerely,

Averil Baldwin, Adam Hogg
Co-Chairs Barbican Quarter Action

15 June 2023

To Chris Hayward, Policy Chairman City of London
CC Paul Wilkinson, City Surveyor; Andrien Meyers, Chairman Investment Committee

LONDON WALL WEST

We are writing to congratulate you, and the officers involved, on the recent soft market test to establish the level of interest in repurposing the former Museum of London and Bastion House buildings for new uses. As you know we have long campaigned for the City Corporation to rethink its plans for this site and seriously consider retention and reuse options, not least in response to the City's bold net-zero commitments.

We celebrate the market testing and wholeheartedly endorse any responses to the redevelopment of this site that clearly demonstrate:

- a true sense of vision and imagination for this outstanding historic and cultural site,
- that the current buildings at London Wall West are adaptable to many uses,
- a track record in creative, sustainable and viable refurbishment.

While we celebrate the City's actions in creating the soft market testing, we believe the process to have been seriously constrained, not least in providing just 31 working days to meet an extremely demanding brief and submit proposals. So, we are delighted to learn that developers have enthusiastically seized the opportunity and created proposals despite these constraints. This surely demonstrates that there is an appetite for retaining, repurposing and refurbishing these fine buildings; now included in the Twentieth Century Society's 2023 Risk List of the top ten most threatened in the UK. Moreover, it also demonstrates that fuller and more proactive marketing should generate valuable interest.

We hope the City's Investment Committee will now give these proposals the due attention they deserve and acknowledge that there are viable alternatives for the development of this exceptional site. Proposals that:

- are fit for the future of an ambitious, vibrant and diverse Destination City,
- reflect the potential and opportunities for cultural, creative and learning use of the site,
- demonstrate commitment to climate action and publicly underline the City's own innovative environmental planning policies should be prioritised.

We believe that retention and reuse options can represent best value for the City and enhance its reputation on the national and world stage.

We also hope that the next stage of decision making for options for the site will meaningfully involve the local community, in establishing any developer brief as well as the process for development. This would greatly enhance the intentions of the Residential Reset that you have championed. As you know, we have repeatedly said this campaign is not anti-development and is keen to offer our skills, insights and experience to work with you and your colleagues to create a valuable and truly future facing possibility for the site.

Adam Hogg
Co-Chair, Barbican Quarter Action

7 November 2023

Chris Hayward
Policy Chairman
City of London Corporation.

Dear Chris,

OPEN REPLY TO YOUR LETTER OF 29 SEPTEMBER 2023

We refer to your letter dated 29 September 2023 which you sent by email to us on 4 October 2023. There are substantive issues raised in your letter which merit further clarification. We make the following observations on the statements in your letter, with references being to paragraphs therein:

1. We note your intention to submit a planning application for the redevelopment of London Wall West and associated listed building consent (paragraph 1).
2. You claim that the decisions of the Policy and Resources Committee on 21 September 2023 and the Investment Committee meeting on 22 September 2023 to proceed with a planning application are in keeping with your *"duty to achieve best consideration"* (paragraph 2). Please provide without delay a copy of the background papers which informed those decisions. Given that the papers relate to the development of land owned by the Corporation we are advised that the Corporation is not entitled to withhold disclosure of the background papers on the grounds that they contain commercially sensitive information.
3. At the City-wide residents' meeting on 15 June 2023, you publicly stated that when assessing best value for the site a range of factors in addition to financial would be taken into account, including sustainability and the quality of the buildings. Please set out how you have taken these factors into account in your decision to proceed with the scheme.
4. You claim that the City Corporation is under a legal obligation to extract *"the maximum financial return"* for the site and that this equates to the *"best consideration"* (paragraph 3). Please explain how the City Corporation has on this occasion reduced the definition of best consideration to just the financial return. We note that this narrow interpretation was not applied in 2015 when the City Corporation agreed in principle to make the site available for a new Centre for Music, at the same time commenting on the site's strong cultural potential. Similarly, the vast sums spent on the development of the Justice Quarter were committed without an economic appraisal.
5. We note that while you rely on legislation in relation to your *"best consideration"* argument, that you fail to address the other element which the legislation imposes on local authorities, namely *"the best use of the land"*. The legislation does not allow local authorities to cherry-pick its provisions to promote its own schemes. We note that you do not mention that environmental issues have been considered at this or at any stage of the decision-making process. We challenge your contention that building more massive glass office blocks is the best use of the land. Working habits including working from home mean that office workers no longer come into the City five days a week. This does little to regenerate areas and promote footfall 5-7 days a week. The absence of a coherent current culture strategy for the City means that the use of the site as a cultural hub is not being considered as an alternative to a space that is office-led.
6. We note it is your intention to obtain planning permission from your own Planning & Transportation Committee before selling the site on for development by a third party (paragraph 4).

7. You claim to have listened to concerns about your proposal to demolish the buildings (paragraph 5) and that you have reduced the scale of the scheme accordingly. Your scheme is supported by a report by Buro Happold (and others) that claims that the buildings are at risk of disproportionate collapse. We note that you have not withdrawn that report despite its findings being discredited by BQA expert, Bob Stagg. We also note that the carbon emissions calculations set out in that same report were also discredited by BQA's carbon expert, Simon Sturgis. We note that no independent third-party review of the Buro Happold report has yet been published in line with the City's much hyped Carbon Options Guidance Advice Note.
8. We note that you confirm that the soft market test carried out this year proved successful. The credible responses (your words) were submitted despite the mere 31 working days available to applicants to complete a detailed proposal (paragraph 5). We note that you have decided not to pursue these credible responses and let the market decide the future of the site (paragraph 5). We remind you that earlier this year you wrote to residents, acknowledging a real desire locally for the former Museum of London and Bastion House to be retained. You said that you had listened to them and wanted to explore the possibility of a viable alternative to demolition. Having explored this possibility and, despite credible responses, you have decided once again to not seriously consider full retention options.
9. In explaining your decision to proceed, you make no reference to the recent shifts in planning policy at both national and local level prioritising retention of buildings for re-use and retrofit above demolition. For example, the Corporation's own Whole Life-Cycle Carbon Optioneering Planning Advice Note, and its draft City Plan 2040, which states (paragraph 12.1.15) *"As new developments are large consumers of resources and materials the possibility of sensitively refurbishing or retrofitting buildings should be considered in preference to demolition..."*.
10. Similarly, your explanation fails to take into account the decision by the Secretary of State, Michael Gove, on 20 July 2023 to refuse planning permission for the demolition of 456-472 Oxford Street. There are many parallels with London Wall West (environmental and heritage impact). A key consideration in his decision is whether retention options had been fully explored. We note that in the case of London Wall West full retention options have not and are not being actively considered.
11. Your explanation fails to take into account the heritage value of the two non-designated assets on the site. The inclusion of both buildings by Powell & Moya on the Twentieth Century Society's (the statutory consultee) 2023 buildings at risk register on account of the quality of their design and construction is significant. We note that at no point do you address the impact of demolition on these heritage assets.
12. You state that all options remain on the table and that ultimately it will be the market that will decide the optimum use of the buildings and occupancy mix. For the reasons set out above, we question the decision to proceed with a planning application allowing demolition. There already appears to be sufficient market interest to retain and retrofit these buildings in a manner reflecting the location and history of the site, at the same time securing a decent financial return for the City.

We therefore look forward to learning more about the rationale behind a decision which appears to contradict earlier commitments, disregards current planning policy and precedent, and ignores evidence of an appetite to retain and adapt the former Museum of London building and Bastion House.

Best wishes,

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

22 November 2023

Christopher Hayward
Policy Chairman
City of London Corporation

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

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**².

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.

APPENDIX B



London Wall West – Museum of London and Bastion House

Planning Submission Ref: 23/01304/FULEIA

Embodied Carbon Review

on behalf of

Barbican Quarter Action

17 January 2024

Contents:

- 1. Executive Summary and Key Findings**
- 2. UK National, GLA, and City of London Planning Policies**
- 3. Conclusions on Planning Issues**
- 4. Options Appraisal**
- 5. Conclusions on Optioneering**

1. Executive Summary and Key Findings:

- 1.1. This report examines the City of London Corporation's (CoLC) planning submission for London Wall West, the Museum of London and Bastion House (23/01304/FULEIA) examining in particular at the carbon/net zero and circular economy issues. The submission proposals follow the initial CoLC London Wall West Whole Life Carbon Assessment of May 2022. The submission represents a modification of the May 2022 proposals.
- 1.2. In April/May 2023, the CoLC undertook a Soft Market Test, inviting developers to put forward detailed proposals that would retain and adapt the existing buildings on the London Wall West, the Museum of London and Bastion House site. The CoLC received a number of credible and viable proposals for a '**major refurbishment**' of the existing buildings. These proposals not only met the CoLC's commercial requirements, but also met a whole range of UK, GLA and CoLC net zero, retrofit, and carbon policies for this site. (see section 2 below).
- 1.3. This report looks at the policy environment in which the submission has been made in respect of the UK's commitments to achieve net zero by 2050, 78% reductions (compared to 1990 levels) by 2035, and 68% reductions (compared to 1990 levels) by 2030.
- 1.4. **Key Finding:** There are significant and growing policy requirements at UK National, GLA and CoLC levels to assist the UK meet its net zero carbon targets and move towards a circular economy. The submitted proposal is not optimising the carbon emissions impacts of developing this site, and as a result is in direct opposition to UK National, GLA policies, as well as the CoLC's own policies. (see sections 2.1-2.7 below)
- 1.5. **Key Finding:** As recently as 12th December 2023 the CoLC approved new sustainability guidance for developers in a 'huge step' towards net zero, covering retrofit and reuse, energy and whole life carbon, the circular economy. This proposal effectively ignores this new guidance (see section 2.7 below)
- 1.6. **Key Finding:** There are fundamental flaws in the Optioneering Assessment which narrowed down from 11 outline options to 6 options selected for detailed examination. These 6 options excluded 'Option 2', for a 'Major Refurbishment'. This is 'Option 2 is the option that is most consistent with the approach favoured by the commercial bids in the City's market testing exercise. **Why was this then excluded?**
- 1.7. **Key Finding:** The conclusion of the current 2023 submission and the associated optioneering studies is exactly the same as the May 2022 proposal, i.e. that a 'major refurbishment' approach is to be rejected in favour of 'new build'. This demonstrates that the latest optioneering exercise is purely 'window dressing' to prove a pre-

ordained choice (new build), and that a 'major refurbishment' option has not been seriously investigated by the design team in detail as 'new build' was always the intended outcome.

- 1.8. **Key Finding:** If the CoLC proceeds with this new build development proposal, at the expense of the refurbishment route for which they have received viable commercial proposals, then the CoLC will be in direct conflict with their own latest guidance and policies. (see sections: 2.4.4 - 2.4.8, 2.6, below).
- 1.9. **Key Finding:** By ignoring their own policies and guidance with respect to net zero, the CoLC is demonstrating to the global commercial property and investment market that they do not consider these issues to be important which puts the CoL at a commercial disadvantage to European competitors who take carbon reduction more seriously.
- 1.10. **Key Finding:** Unless the levels of carbon emissions achieved and reported in the submission's GLA reporting template are 'locked into' the scheme and become legally binding they are likely to be abandoned by any site purchaser, which means that the figures achieved by the proposal are effectively meaningless.

2. UK National, GLA, and City of London Planning Policies

This section identifies those key policies at National, GLA and City of London level that prioritise retention and reuse, i.e. resource efficiency, circular economy and retrofit vs demolition, disposal as waste, and new build. It is important to note that at all these levels of national and local government, change is happening fast to ensure legislation and regulation adapt to meet the overarching requirements of a net zero and circular economy.

The proposed scheme has a current completion date of 2033 which is 9 -10 years away, and we can expect that the level of regulation in relation to the Government's legally binding commitments on climate change will only increase.

Government Trajectory to Net Zero

- 2.1.1. The UK Government is legally committed to achieving Net Zero by 2050, 78% reductions by 2035, and 68% reductions by 2030, both compared to 1990 levels. These are already demanding with the completion date well after the first

milestone. **Already the pressure to retrofit rather than to build new is increasing and this is likely to accelerate, e.g. Secretary of State decision on M&S, Oxford Street.**

2.1.2. In support of the UK's downward carbon emissions trajectory, the 'Industrial Decarbonisation Strategy 2021', Action 5.5: Page 64, States the following:
"Increasing resource and material efficiency in practice means keeping products and materials in circulation for longer through circular economy approaches such as reuse, repair, recycling and reducing the quantity of materials used within manufacturing. This transformative approach, tackling both consumption and production related efficiency, reduces emissions at all stages of a product's lifetime."

2.1.3. The UK Government's 'Net Zero Strategy: Build Back Greener', Department for Business, Energy and Industrial Strategy (BEIS) 2021 states the following:

- Technical Annex, Item 81 states: *"Resource efficiency policies will have a net benefit to pressures on raw material availability, reducing raw material demand and consumption. Moving towards a circular economy, where priority is placed on extending the lifetime and lifecycle of a product through sharing, reusing, repairing, redesign and recycling, is likely to have a positive impact"*.
- Resources and Waste, Item 47 p180. states: *"Government is committed to moving to a more circular economy. This means keeping built assets, products, and materials in use for longer, including through repair and reuse, and making greater use of secondary materials, thus reducing waste arising."*
- Resource Efficiency, Item 47 p130. states: *"Resource efficiency measures reduce emissions from industrial processes by keeping products and materials in circulation for longer by way of reuse, repair, remanufacture and recycling as well as reducing material usage. These activities enable the retention of value, and in some cases the creation of new value for both the producer and customer, at a much-reduced environmental impact."*
- Resource Efficiency Item 53 states p130: *"To realise the wider emissions saving potential of resource efficiency measures will require establishing frameworks which minimise virgin resource use and maximise recycled, reused, or remanufactured content."*
- **All of the above four extracts are clear about: "minimise virgin resource use" "extending the lifetime of a product" through "reusing, repairing" and keeping "materials in use for longer". This is a clear and unambiguous call for a change in direction where existing buildings are involved.**

2.2. National Planning Policy Framework

- 2.2.1. Chapter 2 of the NPPF advises that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 2.2.2. Paragraph 8 of the NPPF confirms that there are three dimensions to sustainable development – economic (building a strong, responsive and competitive economy); social (providing a sufficient number and range of homes to meet the needs of present and future generations and fostering well-designed, beautiful and safe places); and environmental (**protect and enhance our natural, built and historic environment**).
- 2.2.3. Paragraph 157 states that the planning system should support the move to a low carbon future in a changing climate and that: *“It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; **encouraging the reuse of existing resources, including the conversion of existing buildings**”*.

2.3. GLA London Plan and Policies SI2; Whole Life Carbon, and SI7 Circular Economy (CE):

- 2.3.1. GLA Policy SI2, Principle No.1 p4: ***“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”***.
- 2.3.2. The submission quotes GLA Policy SI7, for example: *“Resource conservation, waste reduction, increases in material reuse and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration”*,
- 2.3.3. But the submission, unsurprisingly, does NOT quote GLA Policy SI7 para 1.1.3: ***“prioritising the reuse and retrofit of existing structures, can promote CE outcomes.”***
- 2.3.4. The submission also quotes the following from GLA Policy SI7: *“Meet or exceed the targets for each of the following waste and material streams:*
- *Construction and demolition – 95% reuse, recycling or recovery*
 - *Excavation – 95% beneficial use”*.
- It should be noted that these commitments are routine from most contractors and do not therefore represent anything additionally beneficial.**

2.3.5. The submission states the following (Circular Economy Statement, p18):
“Overall, there are strong aspirations to adopt circular economy principles in development projects including its operations, therefore the Applicant is committed to circular economy principles within the Site and to lead by example”.

This is ironic as the most ‘circular’ activity possible on this site is to reuse and refurbish the existing buildings, so the ‘Applicant’ i.e. the CoLC, is NOT meeting these requirements nor can it be said to be ‘committed to circular economy principles or leading by example’.

2.3.6. GLA Policy SI2, 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)”.* *This has not been done, see section 4 below.*

2.3.7. GLA Policy SI2 Item 3.2.2.: Box 4, item 5: *“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.”* *This has not been done, see section 4 below.*

2.4. Emerging Local Plan City Plan 2040

- 2.4.1. As set out earlier in this report the City of London Corporation (CoLC) is currently in the process of producing a new Local Plan covering the period to 2040, setting out what type of development the CoLC expects to take place and where. Once adopted, it will replace the current adopted local plan.
- 2.4.2. Paragraph 48 of the NPPF advises that *‘local planning authorities may give weight to relevant policies in emerging local plans’.*

2.4.3. In terms of strategic priorities, the plan sets out overarching economic, social and environmental objectives. Those that are of key importance to the LWW Site and LWW. Proposals include:

- The 'Environmental Section' includes the statement: *"The need to shift the culture away from 'demolition first' to 'retrofit first'". Not achieved, see section 4 below.*
- And also that *"Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development". Not achieved, see section 4 below.*

2.4.4. In terms of the economic objectives of City Plan 2040, draft Strategic Policy S4: Offices, updates adopted Policy CS1 Offices, notably through the policy, promotes the retrofitting of existing office buildings for office use as well as upgrades to their environmental performance and quality of accommodation. This is expanded upon by draft Policy OF1: Office Development which states that office development should prioritise the retrofitting of existing buildings. **Not achieved, see section 4 below.**

2.4.5. The retrofit first approach is further embedded in draft Strategic Policy S8: Design, with the aim of prioritising the retention of and retrofit of existing buildings which should be informed by an appraisal of the development options. (NB See Section 4 below). Such refurbishments should improve the environmental performance of existing buildings and minimise whole lifecycle carbon emissions. **Not achieved, see section 4 below.**

2.4.6. Further detail is then set out in draft Policy DE1: Sustainable Design, which requires a retrofit first approach and that all major development should undertake an assessment of options for the site in line with the CoLC Carbon Options Guidance PAN. **Not achieved, see section 4 below.**

2.4.7. Also referenced is Policy CE1 where the submission quotes as follows: *"This policy states that developments should be designed to promote circular economy principles throughout the life-cycle of the building, as established in the GLA's CES guidance. Examples include re-use and refurbishment of existing buildings, structures, and materials to reduce reliance on virgin resources". Not achieved.*

2.4.8. The submission also references policy CE1 as follows: *"Figure 2-4 which shows the circular economy hierarchy for building developments with retaining existing buildings as the preferred option. Retention serves as the starting point*

in redevelopment schemes and should be maximised before considering refurbishment and reuse through to the least preferable option of recycling materials from demolition works”.

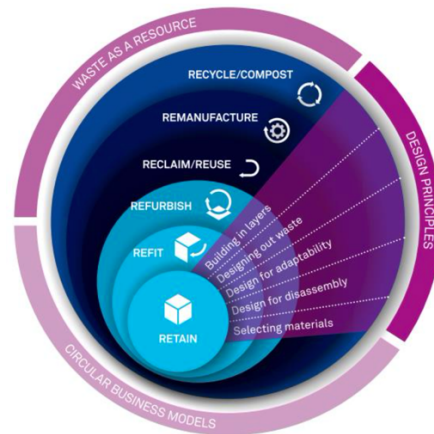


Figure 2-4 Circular economy hierarchy for building approaches as shown in Policy D3 of the London Plan. References Building Revolutions (2016), David Cheshire, RIBA Publishing.

Although referenced, this policy has not been followed.

2.4.9. Optioneering has NOT been correctly examined as ‘Option 2’ (see ‘Carbon Optioneering Study, including Dashboard 1 and Dashboard 2’), which aligns with the CoLC’s ‘Soft Market Test’ was rejected without being examined in detail. Not achieved, see section 4 below.

2.5. Planning Policy – Principles of Redevelopment

2.5.1. As noted, the NPPF states in paragraph 157 that the planning system should support a transition to a low carbon future in by ‘encouraging the reuse of existing resources, including the conversion of existing buildings’. Not achieved, see section 4 below.

2.5.2. The adopted CoLC Local Plan supports this and states in Policy CS15 that demolition should be avoided through the re-use of existing buildings and the CoLC Carbon Options Guidance PAN provides the most recent intermediate position on how this will be considered by the CoLC as LPA. It is clear, however, that the CoLC emerging policy in City Plan 2040 favours an embedded strategy of retrofit and the re-use of existing buildings. Whilst these policies do not yet have significant weight given the status of the emerging local plan, given that CoLC are also applicant it would seem inappropriate for this

emerging policy approach to not be adhered to without clear explanation and justification. **Not achieved, see section 4 below.**

2.5.3. The CoLC Whole Life-Cycle Carbon Options PAN provides the recommended methodology to compare a number of development options in order to find the best balance in carbon emissions. It states that optioneering is required for all major schemes before the application is submitted and furthermore advises “If substantial demolition is proposed, applicant will need to demonstrate that benefits of the demolition would clearly outweigh the benefits of retaining the existing building or part of the structure.” This approach reinforces the Mayor’s WLC Assessment LPG by requiring developers to consider alternatives to demolition at the earliest stages of planning and in this regard, the current interim WLC Assessment undertaken for the LWW Proposals will need to be reviewed and reconsidered (including options for part retention). **Not achieved, see section 4 below.**

2.5.4. As Section 4 below demonstrates the submitted Optioneering Appraisal is fundamentally flawed as it does not include a basic ‘Major Refurbishment’ as outlined in ‘Option 2’ which has been disregarded in the detailed optioneering process.

2.6. **The City of London on the 12th December 2023 approved new sustainability guidance for developers in a ‘huge step’ towards net zero.** Five key considerations are identified in the guidance for developers, in order to set exemplary standards for sustainability, without undermining the economic viability of planning applications. These include the following three relevant to this proposal:

2.6.1. **Retrofit and reuse** - Outlining the ‘retrofit first’ approach, promoting the reuse of existing buildings where this is the most sustainable and suitable approach for a site, in line with the City Corporation’s adopted Carbon Options Guidance. **Not achieved, see section 4 below.**

2.6.2. **Energy use and ‘Whole Life-Cycle’ carbon emissions** - Providing guidance on reducing and mitigating emissions from construction and the use of a building over its entire life, including demolition and disposal. **Not achieved, see section 4 below.**

2.6.3. **Circular Economy in Construction and Operation** - Demonstrating how developers should shift from a linear to a more circular construction model, where a long-life, loose-fit, low-energy approach is taken to all new and existing

buildings and materials, with focus then switching to reducing and treating waste produced by occupants. **Not achieved, see section 4 below.**












3. Conclusions on Planning issues:

- 3.1. The above Section 2 shows that at UK national level, GLA level and at City of London level there is ample policy that specifically prioritises the reuse of resources, circularity and retrofit over demolition and new build. **By proceeding with this submission, the CoLC is in direct conflict with their own current policies and guidance, as well as GLA policies and guidance and the UK national trajectory to net zero.**
- 3.2. That such demolition is against the UK national interest with respect to moving towards Net Zero by 2050, as well as to a Circular economy.
- 3.3. The submitted proposals have included optioneering, but as shown in Section 4 below, the most realistic refurbishment option, and the approach favoured by the commercial bids to refurbish with minimum new construction (called 'Option 2' in the submission) has been effectively ignored.
- 3.4. **Unless the carbon emissions levels proposed by the new scheme are effectively 'locked in' in any consent, in a similar way to GIA, massing etc, then the WLC levels achieved in the submission and reported in the GLA Spreadsheet showing the meeting or exceeding of GLA carbon targets will in effect be meaningless.**
- 3.5. By ignoring their own policies and guidance with respect to net zero, the CoLC is demonstrating to the global commercial property and investment market that they do not consider these issues as important. This puts the CoLC at a commercial disadvantage to European competitors who take this more seriously.

4. Options Appraisal

- 4.1. As part of the submission an 'Options Appraisal' or 'Evaluation of the Design Scenarios' was done within the 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2'. This shows that 11 options for the site were initially considered from Option 0, 'Do Nothing' to Option 9, a full redevelopment. Of these initial 11 Options the analysis focuses on 6 Options, Options 1, 3a, 3b, 5, 6, and 9, (numbers shown in green on diagram below).

4.2. Option 2: 'Major Refurbishment' is notably missing from this more detailed investigation, the reason given being that it is essentially an extension of a minor refurbishment (see diagram below, red box)

Scenario	Do Nothing	Minor Refurbishment	Major Refurbishment	Major Refurbishment with Extensions						Redevelopment	
	0	1	2	3a	3b	4	5	6	7	8	9
											
Selection of scenarios to be quantitatively assessed and main reasons for discounting	Considered not feasible due to current low energy performance, challenges with thermal comfort, low ceiling heights. Investment needed for carbonation, repair, fire risk, and structural robustness. Public realm redevelopment limited.	To be further analysed qualitatively and quantitatively	This scenario has been integrated to option 1 as a major refurbishment is considered necessary to be done to option 1 after 15 years of further operation.	To be further analysed qualitatively and quantitatively	To be further analysed qualitatively and quantitatively	Peninsula change limited by the areas of the Museum of London Building retained. Public realm redevelopment limited. Investment needed for carbonation, repair, fire risk, and structural robustness.	To be further analysed qualitatively and quantitatively	To be further analysed qualitatively and quantitatively	Peninsula change limited by the areas of the Museum of London Building retained. Public realm redevelopment limited. Challenges with the integration of new buildings into existing substructure of the Museum of London Building.	Size of the new buildings limited by the existing substructure or extensive reinforcement needed to increase it. Public realm redevelopment limited. Investment needed for carbonation, repair, fire risk, and structural robustness.	To be further analysed qualitatively and quantitatively

After the qualitative assessment of the 10 scenarios, and the "Do Nothing" baseline required by the Carbon Options Guidance document, cases 1, 3a, 3b, 5, 6 and 9 were selected for further qualitative and quantitative assessment. The extent of intervention per scenario has been defined in detail.

Diagram from page 17: 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2'.

- 4.3. This omission is significant as a 'Major Refurbishment' is the most plausible alternative low impact approach to the site in order to achieve a scheme that is also commercially viable. This has been proven by the City's decision to offer the site to potential bidders for 'major refurbishment' proposals by way of market testing.
- 4.4. The fact that a number of developers submitted design and commercial proposals that can be described as 'major refurbishment' demonstrates that this approach has both practical and commercial merit, yet it was specifically excluded from the detailed options appraisal.
- 4.5. The Submission's Options Appraisal or 'Evaluation of the Design Scenarios' is therefore fundamentally flawed and cannot be seen as a reliable examination of the options for the site.
- 4.6. The diagrams below (Figure 10-2 and 10-3), 'Carbon Optioneering Study, including Dashboard 1 and Dashboard 2', p35, show respectively for the 6 Options selected for detailed study; the carbon intensity (kgCO₂e/m² GIA), and the total whole life carbon emissions (tCO₂e) for each option.

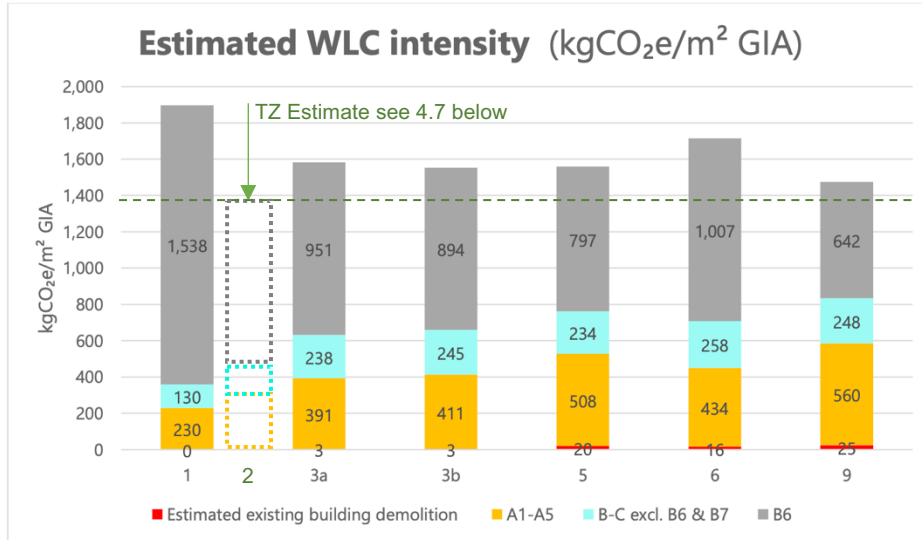


Figure 10—2 Estimated WLC Intensity Per Scenario Analysed

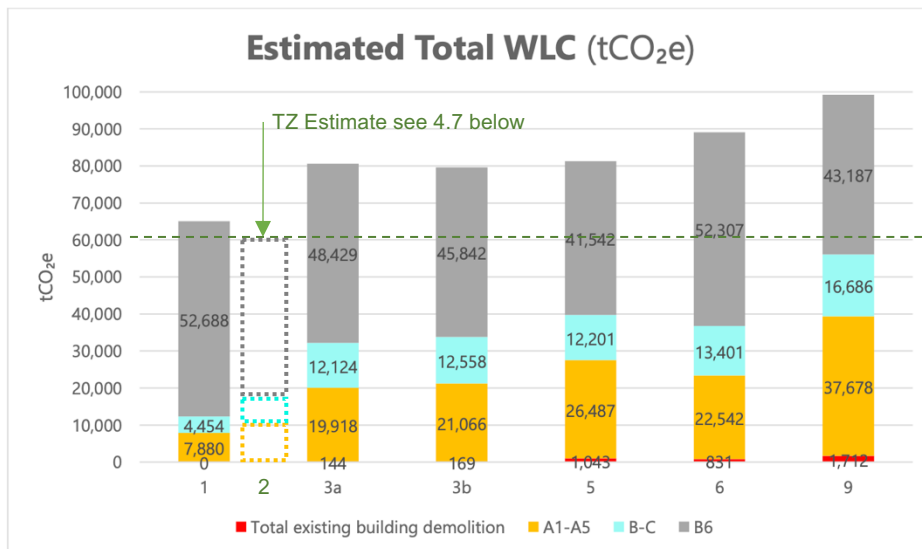


Figure 10—3 Whole Life Carbon Scenarios Comparison in Total Tonnes of CO₂ Per Scenario Analysed

4.7. Shown, dotted, is an estimate by the author of this report of what ‘Option 2’ might look like in comparison. This is based on the following assumptions:

- That A1-A5 (yellow box) will be slightly more than Option 1, but less than Option 3A. This is reasonable as Option 1, described as a ‘minor refurbishment’ involves very little new work, whereas Option 3A ‘major work with extensions’ involves significant new construction not included in the ‘major refurbishment’ for ‘Option 2’.
- The same logic applies to B-C excl. B6, B7 (blue box).
- B6, Operational energy use (grey box) should, within a ‘major refurbishment’ be to current environmental standards, and therefore at least as good on a m2 basis

as Option 3b, even if possibly not quite as good as a new build Option 9. On a total basis operational energy use would be less than the other major works options due to the smaller area, GIA.

- These assumptions would have to be verified through actual analysis of the major refurbishment proposals, but nevertheless represent a reasonable estimate of carbon emissions on a comparative basis.

4.8. The TZ additions to the submission diagrams 10-2 and 10-3 (Carbon Optioneering Study p35) show that on a carbon intensity basis ($\text{kgCO}_2\text{e}/\text{m}^2$ GIA) a major refurbishment is the best option, and better than the new build. This is because the embodied emissions for refurbishment would be significantly lower than for new build, and even if the operational emissions were to be slightly higher on a m^2 basis, the combination would be lower.

4.9. On a total carbon emissions basis (tCO_2e), the major refurbishment would be the best overall, better even than a 'minor refurbishment'. This is because although the embodied carbon expenditure is more than a minor refurbishment, the improvement in operational performance would more than outweigh this.

4.10. The diagram below from the submission (Carbon Optioneering Study p34) compares the 6 options selected for more detailed analysis over a 60 year period. It should be noted that these trajectories (from the submission) should be treated with caution as they are only very indicative of what is likely to happen in reality. Nevertheless onto this diagram TZ has overlaid a yellow dotted line showing what an 'Option 2' might look like by way of comparison.

10.1.1 Cumulative Carbon Emissions Graph

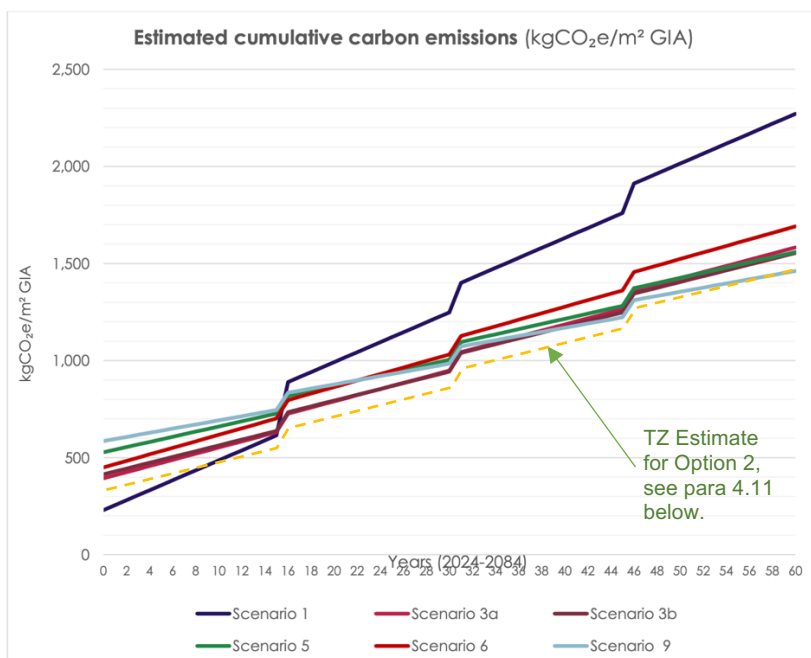
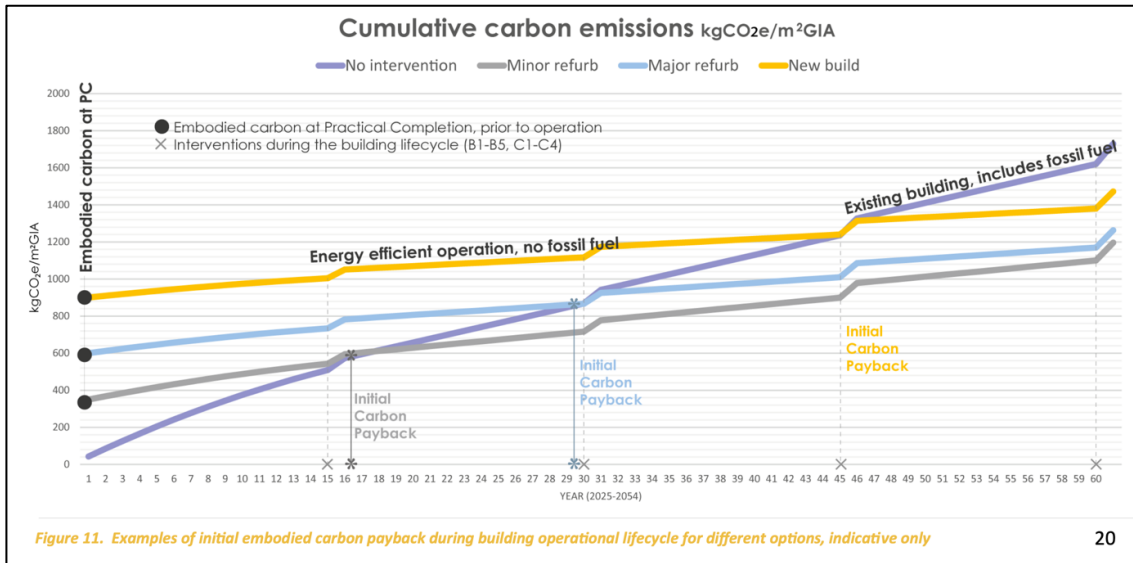


Figure 10—1 Estimated Cumulative Carbon Emissions (kgCO₂e/m² GIA) Over A 60-Year Period, Including Whole Life-Cycle Carbon (Embodied and Operational) Emissions

4.11. The yellow dotted line, the assumed Option 2, starts above Option 1, but below the other options as per Figure 10.2 above. The trajectory is assumed to be similar to options 3a and 3b. This is because the Option 2 ‘major refurbishment’ would bring the buildings up to a good standard equivalent to Options 3a and 3b. As noted above in 3.10 this diagram should be treated with caution. However what is shown, is that the resulting trajectory over 60 years is better than the other refurbishment options, and about the same as the new build.

4.12. It should be noted that in the May 2022, ‘*Planning Advice Note; Whole Life Cycle Carbon Optioneering*’ by Hilson Moran for the City of London the following diagram ‘*Figure 11*’, shows the typical relative trajectories for various options see in particular ‘major refurb (blue line)’ vs ‘new build (yellow line)’. This shows that typically major refurbishment has a lower WLC life cycle over 60 years than new build. This is of significance as it clearly supports GLA ‘Policy Principle No 1’ (see section 2.3.1 above) to prioritise retrofit and illustrates that to achieve its net zero objectives, the City of London should be following this route.



5. Conclusions on Optioneering

- 5.1. The Optioneering study is fundamentally flawed as it does not include 'Option 2' 'Major Refurbishment' which is essentially what the City's market testing exercise covered. The study is not therefore a reliable source of information on optioneering.
- 5.2. The proposals therefore do not comply with draft Strategic Policy S8 and other relevant policies.

APPENDIX C



11	<i>The CoL highways team identified the LWW site as providing the potential opportunity to transform the existing roundabout arrangement to create a consolidated peninsular site and improved public realm at the north end of the gyratory project.</i>	It does not seem logical that the peninsular scheme diverting the traffic around the proposed building is driven by highways when a simple intersection with clear views and overview from all streets would be the safest option – for motorists, cyclists and pedestrians. The traffic scheme seems to be driven by the desire to maximise the footprint of buildings and therefore includes the area of the roundabout, including street and sidewalks within the site boundary.
24 ff	2.6 Site Historic Context	The historic context analysis fails or omits to mention the Roman and later Saxon gate (Aldersgate) in the City Wall to the south of the site and the importance of the historic route Aldersgate Street as the beginning of the A1, longest numbered road in the UK, connecting London towards Edinburgh.
32 6 th ¶	<i>The Museum of London and Bastion House were a separate project from the Barbican development, however the intention was to connect into the pedway network of the Barbican, which was realised to one location to the north, and to the highwalk adjacent to London Wall, but not to the full extent that was originally planned.</i>	Reductive presentation: the link between the Barbican Estate and the MoL/Bastion House goes far beyond the pedway system. The Museum of London and Bastion House were part of commercial Barbican South, the Barbican Estate formed residential Centre Barbican. The whole area, subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards, was laid out on an orthogonal grid. The areas were planned in response to each other, with open spaces contained in between the two developments and building volumes aligned, in proportion to each other, and all linked by an extensive network of pedways.
33 2 nd ¶	<i>The majority of the Museum building is clad in a white rectangular tile in a simple stacked pattern. The massing of the buildings is monumental with exposed concrete columns, exposed concrete soffits and ribbon windows in the modernist style. A dark brick tiled flooring unifies the floorscape.</i>	The description of the museum's massing as monumental is emotive and is contested. The Museum is a four-storey block of similar height as the historic buildings that survived the blitz (now mostly demolished and replaced by much taller buildings).
34 1 st ¶	Bastion House <i>Bastion House was developed as part of the masterplan for the extension of London Wall, and was originally one of six similar office blocks that lined the new road. Bastion House is the only remaining building standing of this original context, which has all been lost.</i>	Factually incorrect. While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived. City Tower on the south side of London Wall, designed by Sir John Burnet, Tait & Partners, built 1962-4, was first reclad by GMW Partnership in 1985, and comprehensively refurbished by ORMS in 2013. Another important building of the commercial South Barbican plan is Britannic Tower, former headquarters of BP. Designed by F. Milton Cashmore and H. N. W. Grosvenor, and built 1964-7, the building was successfully refurbished by Sheppard Robson and renamed Citypoint in 2000.
34 3 rd ¶	<i>The floor to ceiling heights are 2.5m, which is low by modern office standards.</i>	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 is 11 feet - 3.35 metres - with a floor-to-ceiling height of 10 feet 2 inch – 3.10 metres – and a floor to false ceiling height of 9 feet – 2.74 metres. The floor to false ceiling height may be significantly increased with the use – as many modern office blocks do – of exposed services.
42, 43	Artifacts of interest on the site	Print mistake, pages double printed and not intelligible
60	Scenarios selected/not selected for whole life cycle carbon analysis.	Option 1, minor refurbishment, replacement of some of the MEP items, minor upgrade to the façade, is taken forward in the WLC assessment. This, however, is the most unlikely scenario.

		<p>Option 2, major refurbishment of the existing building is excluded from the evaluation. However, any repurposing of the former museum and Bastion House will most likely involve a change of use and require substantial works to adapt the buildings, including changes to the interior and exterior.</p> <p>Option 2 would have been the route progressed by the developers of the soft market test in May/June 23, all of which have proposed the conversion of Bastion House from office use to hotel use.</p> <p>The options seem to be chosen to lead to the foregone conclusion and selection of option 9, demolition and new build.</p>
66	<p>4.2 Urban Strategy - Urban and Cultural Axes</p> <p><i>Furthermore, the site lies on a North-South axis which connects the South Bank and Tate Modern to St. Paul's Cathedral, and the Barbican Centre and London Symphony Orchestra St. Luke's Venue to the North.</i></p>	<p>The diagram of connecting urban and cultural routes is a misinterpretation of factual movement through the area. The Barbican Highwalks are labyrinth-like and difficult to navigate. With only few access points they do not work as thoroughfare for the wider public.</p> <p>Moreover, this is deliberate – like all housing estates the internal routes are largely for access for residents and their visitors – they are not to provide major thoroughfares for through pedestrians – in order to maintain the residential nature of the estate.</p> <p>The main routes are at street level. The vast majority of visitors of the Barbican Centre use Beech Street as thoroughfare and not the Barbican podium. Aldersgate Street is the main route north from St Paul's. On the diagram the route from St Paul's terminates at the site. However, it continues past the site to the east-west axis of the new London Museum and Barbican Centre (Long Lane and Beech Street), past Barbican tube station and far beyond.</p> <p>A baseline study (by e.g. Spacy Syntax) looking at spatial accessibility, local route hierarchy, from high, medium to low would have shown how people move through the area.</p>
76 2 nd ¶	<p>Alternative Massing Strategies</p> <p><i>After finalising the site brief and laying out the road junction, key townscape guidelines were implemented to shape the size and placement of the buildings. A primary consideration was ensuring that the buildings would not obstruct the view of St. Paul's Cathedral from Millennium Bridge. Initially, there was an assumption that taller buildings could work if not directly behind the cathedral. With this in mind, various massing options were explored based on typical floor plate depth constraints, and their pros and cons were assessed.</i></p>	<p>While it is commendable that long distance views were considered, this should not absolve the design team from paying regard to medium-distance and close-up views of the development, nor other site constraints and urban design considerations.</p> <p>A carefully developed response would have analysed, understood and addressed the rich history of the site and area, pre- and post-war, the current specific urban context, its character, scale and grain, vistas, desire lines, and specifically the sensitivity of listed buildings and CAs. For example: the obvious alternative of turning the Rotunda into a public square and placing the building mass along the perimeter, similar to 200 Aldersgate and One London Wall, has not been assessed. Sketch 3 leaves a gaping hole in the middle where space defining building mass should be.</p> <p>For a strategic site of this importance this restricted options appraisal without a detailed townscape analysis but with a foregone conclusion in mind falls far short of the requirement to seriously evaluate alternative development options.</p> <p>Not mentioned is the fact that the proposed massing actually obscures access to one of the area's cultural icons. At present one of the Barbican towers is visible to anyone approaching from the south up St Martin Le Grand. The proposed Rotunda building blocks that view (impeding access to the iconic estate and replacing a</p>

		recognisable architectural landmark with a building of questionable design quality.
77 2 nd ¶	<i>The building element on the Rotunda site creates a terminus of the Aldersgate Street Axis. The floor plates of the individual towers are appropriate for an efficient core and depth for daylighting.</i>	As above, Aldersgate Street is an over 1600-year-old historic Roman route in and out of London. There is neither a historic nor an urban justification nor any benefit in creating a terminus in the middle of this important north-south axis and at the junction with London Wall.
77 3 rd ¶	<i>This is also a significant benefit of the revised roadway configuration. The low podium also maximizes the openness and porosity of the site providing the potential to connect the North-South axis of movement in a clear intuitive manner.</i>	To the contrary: The north-south axis is Aldersgate Street and not the meandering Barbican highwalks. Blocking Aldersgate Road with a terminus building is counterintuitive. This physically and visually splits and disconnects the north-south axis and represents a fundamental urban design flaw. The terminus building, blocking the junction, will be disorientating for pedestrian and vehicular movement along Aldersgate Street, St. Martin's Le Grand and London Wall.
77 4 th ¶	<i>Lastly, Ironmongers' Hall is not cut off from the street, and has an improved relationship to the street from its current situation.</i>	Historically the building sat on the inside of an urban block, within dense urban fabric, therefore only partially visible. Access was from Aldersgate Street via a small archway within the row of buildings along the street. Ironmongers Hall will now stick out like a sore thumb, like a relic, similar to the ruins of London Wall. This looks like disneyfication of urban planning. Alec Forshaw will be a better judge. Please refer to image: <i>Fig. 4.12: Superimposed sketch design for Ironmongers' Hall in the TVBHIA, page 21</i>
78 1 st ¶	<i>Having established the initial block massing part, the proposed building massing was refined through a series of operations responsive to micro-climate within the public spaces - by opening up the central public spaces, along with further considerations of the strategic views of the development with the townscape context, and residential amenity considerations.</i>	This is urban planning by deduction. The sole ambition of the massing exercise seems is to push the quantum of developable area to legally unchallengeable limits. The scheme represents a total disregard for the historic and urban context, the scale and grain of the area, and the visual and physical impact on its immediate surrounding, listed buildings and CAs. It is a self-serving development which looks at optimising the semi-public realm at its heart while turning its back onto its neighbours and public street space, specifically the main north-south route Aldersgate Street.
82	<i>Design Sketch Studies: Public Realm A series of design sketches and studies helped evolve the public realm design into the final proposals as shown later in this document. A selection of these sketches focused on the different aspects of the public realm are included here.</i>	No consideration has been given to the quality of Aldersgate Street; it is treated as the back of the development. Instead of reinforcing and improving the historic north-south axis of, the diagram omits this main and direct route. The movement from Aldersgate Street south, up onto and across the glade and then back onto Aldersgate Steet north is a diversion and does not follow a natural desire line.
85	Feedback Summary	To be addressed by AB's SCI review.
86	<i>Across the course of the evolution of the Proposed Development, feedback on the height and massing proposed was received from both the consultation process and pre-application meetings with planning officers. Multiple approaches to reducing the building massing were studied and implemented.</i>	No other points raised at the public consultations were addressed.
94 4 th ¶	<i>The overall curved forms of the buildings help reconcile the multiple site orientations and geometries between the City urban grid, the Barbican urban grid, and the Rotunda which is angled at odds relative to the rest of the context.</i>	The only reference is to opposite equally curved One London Wall. The curved forms are at odds and do not relate to the strictly orthogonal grid of Centre Barbican (Barbican Estate) and South Barbican (London Wall). They stand in

		stark contrast and opposition and therefore do not reconcile.
95 1 st ¶	<i>The pair of buildings seen as forming a gateway in the City - recalling the historic function of this location as a gate in the City Wall - is again apparent from the North, with a greatly increased public realm connectivity and porosity to view at the pedestrian levels.</i>	The semi-public glade is not a gateway. The proposed scheme does exactly the opposite of a gateway: it blocks the public realm and views by placing a terminus building in the middle of Aldersgate Street. A gate places a marker on both sides of a road, not in the middle.
95 3 rd ¶	<i>The solar shading screen of the outer facades wraps onto the North facades as well to perform a different function: to create the sense of the buildings closing their facades in the direction of adjacent residential buildings.</i>	This gesture does not prevent direct overlooking of the bedrooms of Montjoy House, nor the only external amenity the City of London School of Girls.
108	Public spaces. The Glade Garden is located at the Highwalk level, projecting over the Central Plaza. It creates a surreal garden environment that is detached from the lively activity of the streets below, a green space for contemplation at the heart of the development, surrounded by banks of lush planting that also extend up the planted terraced facades of the buildings that flank it.	The current highwalks and the Rotunda, roads and sidewalks are public thoroughfares. In contrast, who will own, control and maintain the glade? Since the site will be disposed of, it seems that the buyer and developer would own this area. This would turn currently public space into semi-public /semi-private space. As this space is little overlooked at night, will it be closed after office hours? Will there be private security?
		The quality of the central garden space as outdoor amenity will be limited due to the tall buildings surrounding it. During spring, summer and autumn the glade will only receive around two hours/day of sunshine, and none during winter. Please refer to Environmental Statement Volume III: Technical Appendices, APPENDIX 13-D, Transient Shadow Results
110	Culture Space	As the CoL will not develop the scheme but sell it to the highest bidders who will likely redesign the scheme to suit their needs, this part is aspirational only.
121	West Side Elevation	The uniformity of the outer façade, its lack of detail, its scale and grain bear no relation to the listed Barbican Estate.
122	East Side Elevation	The uniformity of the outer façade, its lack of detail, its scale and grain bear no relation to the listed Barbican Estate. The east elevation makes opposite 1 London Wall look small in comparison. This view demonstrates how the Rotunda building terminates the view of this important junction.

APPENDIX D



20 (4.17)	<p><i>The Barbican Estate was of importance to the redevelopment of the site: the highwalk, or pedway as it was known at the time, was a crucial element of the site's design. However, the buildings on site – the Museum of London and Bastion House – were not designed in conjunction with the Barbican Estate. The only requirement for development on the site was that the buildings should connect into the Barbican Estate and City wide network of pedestrian highwalks. The Museum of London was conceived as a sprawling, low-lying mass, predominantly clad in white tiles, and with a dark brick rotunda at its southwestern tip.</i></p>	<p>Reductive presentation: the link between the Barbican Estate and the MoL/Bastion House goes far beyond the pedway system: The entire Barbican area, devastated by heavy bombing during WWII, was subject to compulsory purchase orders and grand post-war planning from the late 1940s onwards. "A powerful motivation in the preparation of the various post-war reconstruction plans was a desire to prevent uncontrolled piecemeal development with no aesthetic coherence." (Barbican Penthouse over the City, David Heathcote, page 72.) The Museum of London and Bastion House were part of commercial Barbican South, the Barbican Estate formed residential Centre Barbican. The whole area was laid out on an orthogonal grid. As condition for the Centre Barbican development the architects Chamberlain, Powell & Bon had to integrate the LCC and Planning Committee's Commercial Barbican plan. The two areas were planned on the same perpendicular grid and in response to each other, with streets and open spaces contained in between the two developments and building volumes aligned, in proportion to each other, and all linked by an extensive network of pedways.</p>
20 (4.17)		<p>Philip Powell and Geoffrey Powell were firm friends and knew each other well from university days, even sharing the same house. The choice of the same materials of the two cultural buildings, the Barbican Centre and the Museum of London is not by coincidence: The galleries at the later Barbican Centre were clad in white rectangular tiles just as the earlier Museum of London. Similar to the residential buildings of the Barbican Estate, the museum itself is supported by pick-hammered concrete columns, as is Bastion House, while the office block's façade followed the planning authority's strict design brief for the six London Wall towers for uniform appearance and inspired by latest office blocks in New York.</p>
20 (4.17)	<p><i>Bastion House was one of a number of commercial slab blocks which were designed to line the main route of London Wall, the rest of which have since been redeveloped. The 1970s OS map shows the site boundary empty (with the exception of the fragments of historic City wall), awaiting development to the south of the part completed Barbican Estate (Fig. 4.9).</i></p>	<p>Factually incorrect: While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived. City Tower on the south side of London Wall, designed by Sir John Burnet, Tait & Partners, built 1962-4, was first reclad by GMW Partnership in 1985, and comprehensively refurbished by ORMS in 2013. Another important building of the commercial South Barbican South is Britannic Tower, former headquarters of BP. Designed by F. Milton Cashmore and H. N. W. Grosvenor, and built 1964-7, the building was successfully refurbished by Sheppard Robson and renamed Citypoint in 2000.</p>
23 (4.22)	<p><i>Bastion House is the only remaining office block associated with the post-war masterplan for London Wall, which envisaged the construction of six curtain-walled office blocks, arranged equidistantly to either side of the widened road.</i></p>	<p>Factually incorrect: While four of the original towers have since been replaced, one tower at eastern end, City Tower, and one at western end, Bastion House, have survived.</p>
23 (4.22)	<p><i>Whilst there is some historic interest associated with Bastion House for these reasons, little else of the masterplan remains today beyond the broad roadway and hard edges of Route XI. The walkway has been fragmented and bypassed by further</i></p>	<p>It is misleading and factually incorrect to claim walkways being <i>fragmented</i> and <i>bypassed by further development</i>, <i>diluting of the aspirations of the plan</i>, when the opposite is the case:</p>

	<i>development of London Wall, diluting the aspirations of the plan.</i>	Along the north side of London Wall, the replacement schemes Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE, and Foster's Moor House on More Lane Ave have adhered to the principles of the original masterplan. All schemes have maintained, continued and celebrated the highwalk connections, while bringing the buildings down to street level. Buildings follow the perpendicular grid of the original plan, and continue to frame existing streets, external spaces and gardens. The highwalks continue to be highly popular and their extend, with smaller and larger circuits, serve many as a measure of daily exercise, especially for joggers, the older generation.
23 (4.24)	<i>The 2019 HE COI report notes the mundane appearance of Bastion House and its lack of architectural quality when compared to other commercial buildings of a contemporary date, several of which are listed in recognition of their innovation and design quality.</i>	In contrast, the 20 th Century Society has added the building to their 2023 Risk List: <i>"The first post-war museum to be built in London and the largest urban history museum in the world, the Museum of London was designed when architects Powell & Moya were at the height of their reputation and prestige. Best known for the Skylon at the Festival of Britain they were one of the most significant practices in post-war Britain. Housed within an angular and robust white-tiled concrete structure, the museum is skilfully placed on a considerably constrained site. Its solidity protects the interiors from the traffic noise outside and shelters a quiet courtyard garden, while a great dark brick-clad rotunda – referencing the nearby Roman city walls – rises from the centre of a busy roundabout, acting as an arrival point to the complex. To the east is Bastion House, also by P&M, built as a speculative office development above the podium, as part of the new museum scheme. Standing on piers of biscuit-coloured concrete with Miesian bronzed curtain walling, it is now a rare survivor of a hugely important part of the City of London's post-war planning history."</i>
		The COI was granted on the back of the proposals for the Centre of Music to replace the buildings. The public benefit of a grand concert hall for the LSO would have outweighed the loss of the MoL and Bastion House. The only person ever consulted on the special interest of the MoL and Bastion house is Kenneth Powell, who wrote the Powell and Moya article in Architects' Journal in 1996, and book in 2009. His negative views of the buildings are widely known. Another and younger architectural historian might take a different view.
23 (4.29)	<i>It has been established that the Museum of London does not possess the special interest required for statutory listing. The reasonings for which are fully outlined in the Historic England COI advice reports in 2015 and 2019 respectively (Ref. 1-19 and Ref. 1-20).</i>	See response to 4.24 above.
24 (4.32)	<i>Just beyond Alban Gate, MAKE's London Wall Place scheme (2016) refurbished a section of highwalk and introduced landscaped public space at street level around remnants of the City wall (St Alphage Gardens). Generally, recent development along London Wall has entailed the removal of remnants of the pedway and the reintroduction of pedestrian routes and entrances at street level.</i>	Claiming that generally recent development has entailed the removal of remnants of the pedway system is therefore factually incorrect, the opposite is the case: The latest scheme, Deutsche Bank, located between Moor Lane and Moorfields, continues the old highway link from the Barbican Estate to Moorgate Station. The large office block, owing to the tube station entrance at ground, has its main at highwalk level. MAKE's London Wall Place, one of the most recent schemes, replaced the original St Alphage House and surrounding podia. The buildings successfully celebrate

		<p>the highwalk theme with new sculptural bridges retracing all original links, including the pedestrian bridge across London Wall.</p> <p>Foster's More House replaced the most eastern tower and is linked at high level to Deutsche Bank and London Wall Place.</p> <p>The highwalk from 1 London Wall Place across London Wall is temporarily closed due to the demolition and redevelopment of the opposite office block City Place on Basinghall Street. Once completed, the highwalk, which connects the ground floor of City Tower to the Guildhall and the Barbican, will be reinstated.</p> <p>As not all highways are visible on Google, it may have helped the assessor to go beyond a simple desk top study and pay the area a visit.</p>
24 (4.34)	<p><i>When assessed for statutory listing, Bastion House was acknowledged as the first commercial work undertaken by Powell and Moya, and the only remaining, largely externally unaltered, commercial office associated with the post-war masterplan for London Wall. There is some historic interest associated with Bastion House for these reasons, but the fragmentation of the walkway and redevelopment on London Wall has largely eroded the aspirations of the masterplan, therefore limiting the historic interest of Bastion House.</i></p>	<p>It is therefore incorrect to talk about <i>fragmentation</i> and <i>erosion of the aspirations of the masterplan</i>, therefore <i>limiting the historic interest of Bastion House</i>:</p> <p>Four of the original London Wall towers stood on the north side of the street. Three of these have been replaced, Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE and Moor House by Foster and Partners. All of these replacement schemes have continued and celebrated the highwalk connections, while bringing the buildings down to street level – one does not preclude the other.</p>
24 (4.35)	<p><i>Whilst there is a Miesian quality to Bastion House, it was described in the Architects Journal of 1996 as 'in anonymous Miesian mode', and when compared to listed post-war office buildings it appears mundane and somewhat old-fashioned in its treatment, lacking in architectural quality and innovation.</i></p>	<p>The article in the Architect's Journal from 4 July 1996, <i>An architecture of continuity, We celebrate the first 50 year of Powell Moya Partnership – a practice whose work represents the best social values of post-war Britain</i>, is again written Kenneth Powell. He seems to be the only authority ever written, or ever to be quoted or consulted on the scheme. His negative views of the buildings are widely known but may not be representative.</p> <p>The C20 board is meeting this week to consider their view.</p>
25	Townscape Character Area Diagram	<p>The London Wall TCA should include the area in between Moore Land, Moorfields and Ropemaker Street. This area forms part of the original Barbican South area and masterplan.</p>
30 (5.5)	<p><i>New Bastion House ... the proposed building has a slightly larger footprint, which would result in a slight increase of visibility in views from the south bank ...</i></p>	<p>Misleading.</p> <p>The footprint of the proposed building measures between two and a half times and three times that of the original Bastion House</p>
30 (5.5)	<p><i>While the tonality and opacity of the outer elevations will embed the building into the architecture of the Barbican Estate, the fin vertical expression of the outer 'husk' will have a much lighter visual character than the over-scaled, concrete expression of the Barbican, legibly placing these new buildings within an existing urban backdrop in views from within the Estate.</i></p>	<p>The exact opposite is the case:</p> <p>The description suggests that the proposed Bastion House, due to its detailing, will appear lighter than its neighbour, the over-scaled Barbican.</p> <p>A view of the east elevation (DAS, page 122, 5.11 Site East Elevation) demonstrates that the vast volume of the proposed tower will appear oversized and, in such close proximity, dwarf the adjacent Mountjoy House.</p> <p>Instead of forming a backdrop the proposed buildings will visually encroach and dominate the southern perimeter of the conservation area.</p>
31 (5.12)	<p><i>... the pedestrian experience along Aldersgate Street and London Wall significantly enhanced.</i></p>	<p>The enhancement of the street environment would be welcomed. However:</p> <p>The tall Rotunda building and 200 Aldersgate will create a tight, lightless and canyon-like street environment.</p> <p>The placing of a terminus building at this important road junction, blocking views and diverting the street, will be disorientating for pedestrians and motorists alike.</p>

31 (6.12)	<p><i>The scale and design character of the proposed buildings would complement the existing townscape character of the site. The high-quality of the architectural treatment and the enhancement to the quality of the public realm on site would result in an enhancement to townscape character and quality. This will result in beneficial effects to TCA 1, TCA 3, TCA 4 and TCA 6 and neutral effects to TCA 2 and TCA 5, where the effects are negligible in scale. There would be no adverse effects on TCAs.</i></p>	<p>Exactly the opposite: The development is out of scale, lacks grain. The overly large and amorphous volumes bear little to no relation to the post-war masterplan with its perpendicular grid and synergy between Barbican South and Centre Barbican area. By placing a large terminus building on top of the road junction, the proposed scheme does not respect the historic route and important axis of north-south vehicular and pedestrian movement. What is interpreted as neutral and beneficial is in fact harmful to a large number of heritage assets, CAs and to the townscape in general.</p>
89	<p>View 12, St Martin's Le Grand, outside entrance to no.16. <i>The glimpsed view of the distant Lauderdale Tower and opaque presence of the existing Rotunda (former Museum of London) would be replaced with a building of an appropriate scale and high design quality, providing an interesting and complementary focal point to the view.</i> <i>Sensitivity: medium</i> <i>Scale and Nature of Effect: moderate, beneficial</i></p>	<p>This is contested: St Martin's Le Grand and Aldersgate Street (south) are framed by a mix of four to nine-storey high buildings of various styles and eras, however, consistent in their materiality (largely Portland Stone). The large and prominent neo-classical No.1 St Martin's Le Grand (Nomura House) covers the entire block along Angel Street. Together with the adjacent Grade I listed St. Botolph's church it forms the eastern perimeter of the Postman's Park Conservation Area. View 12 clearly demonstrates that the proposed Rotunda building, due to its encroaching position, its height, grain and materiality will dominate the street scene, appear overpowering and dwarf the buildings along the street, specifically the Grade I listed church and even the substantial Nomura House of the CA. This view is too far away to show the impact of the proposed development on much smaller St. Botolph's without Aldersgate. Note: the two tall buildings at the street junction, 200 Aldersgate Street and One London Wall, both step down to the prevailing height of their neighbours. One of the stated aims of this development is to enable access to the City's cultural facilities. But by obscuring an existing view of the Barbican's Lauderdale Tower from the south (one of the few remaining medium-distance views of the estate from the south), this proposal reduces access to a longstanding cultural asset in the City (the listed Barbican estate, an internationally renowned icon of 20th century urban planning) in favour of an office block with an uncertain cultural offering.</p>
107	<p>View 17, Aldersgate: west pavement. <i>This will be an exceptionally high-quality development, with coherent and visually engaging buildings and spaces at this important and historic City gateway location.</i> <i>Magnitude of Impact: high</i> <i>Scale and Nature of Effect: moderate, beneficial</i></p>	<p>The placing of this tall terminus building in the middle of Aldersgate Street, blocking views and circulation, just meters away from the historic location of the former Roman and later Saxon city gate and the beginning of the A1 route to Edinburgh, will cause substantial harm to the existing and historic townscape.</p>
132	<p>View 24, Barbican Estate: St Giles Terrace <i>New Bastion House and Rotunda building would have a light appearance, clearly positioned in the background of the view. The proposed development would be a high-quality secondary background element in the view, with the foreground forming the principal focus. The proposed development would not detract from the townscape and visual qualities of the foreground, and would form a sensitive, high-quality, and well-considered addition to the</i></p>	<p>This view is considered harmful to the Barbican Estate, the setting and character of the CA: As the Centre Barbican plan had to incorporate the South Barbican plan, the buildings were designed in proportion and aligned with each other. The current Bastion House has the same depth as Mountjoy House, the buildings were initially planned aligned but were later staggered along the same axis. The footprint of New Bastion House will increase by two and a half to three-fold. This vast volumetric increment and swelling across the axis, coupled with the reduction</p>

	<p><i>setting of the Estate which, as seen in this view, is already characterised by tall modern buildings.</i></p> <p>Magnitude of Impact: high</p> <p>Scale and Nature of Effect: major, beneficial</p>	<p>of distance from approximately 30 to 20 metres to Montjoy House will appear overly close, imposing and disproportionate.</p>
137	<p>View 26, Barbican Estate: Thomas More Highwalk terrace, west end, overlooking tennis courts.</p> <p>Magnitude of Impact: high</p> <p>Scale and Nature of Effect: major, beneficial</p>	<p>This view is considered harmful to the amenity of the school, the Barbican Estate, the setting and character of the CA:</p> <p>Comments as above.</p> <p>In addition, there will be considerable overlooking of Mountjoy House, and of City of London School of Girls' external amenity and sports ground.</p> <p>Coupled with the North Building and the Rotunda building, there is a significant loss of sky and sense of enclosure.</p>
161 (12.2)	<p><i>Neither the former Museum of London or Bastion House, nor any other buildings on the site, have been identified by CoLC officers as non-designated heritage assets (NDHAs).</i></p>	<p>Who gets to decide what a NDHA is? There is no Local List.</p>
161 (12.3)	<p><i>Externally, the former Museum forms somewhat of a barrier within the local townscape, particularly the vast blank frontage of the rotunda which forms a harsh environment which is not pedestrian-friendly.</i></p>	<p>Correct.</p> <p>The Rotunda is the result of a much too small site for the MoL, and the post-war concept of separation of vehicular traffic at street level and pedestrian movement on pedways above. The Rotunda is a public space and garden with views in all directions, it was once to become the heart of the pedway system.</p> <p>From today's perspective, the Rotunda is certainly a mistake: It blocks views and movement along Aldersgate Street.</p> <p>As the applicant is proposing complete redevelopment, why not mend, but reinforce the blockage of this important street with a 14-storey tower?</p> <p>The proposed development exasperates the blockage of the historic route and will create a canyon-like street environment between the tall Rotunda building and 200 Aldersgate Street.</p> <p>Apart from the sheer mass created, there is no benefit and only harm to the immediate and wider urban setting.</p>
161 (12.3)	<p><i>In regard to Bastion House, it is acknowledged that it is the only commercial building designed by Powell and Moya and externally is largely unaltered which gives the building a degree of interest, however, the building has a restrained form and treatment lacking the innovation and quality of listed examples of its type and date.</i></p>	<p>Together with the St Helen's (previously known as the Aviva Tower or the Commercial Union building) at 1.Undershaft, soon to be demolished to make place for a taller tower, Bastion House is the City's only remaining and unaltered Miesian tower of that era.</p>
161 (12.3)	<p><i>Bastion House has some historic interest for its part in London's post-war masterplan, but this is overshadowed by the redevelopment of London Wall which has eroded the town-planning aspirations of the plan.</i></p>	<p>Emotive language. Neither Bastion House nor its historic interest are overshadowed by recent redevelopment.</p> <p>Four of the original London Wall towers stood on the north side of the street. Three of these have been replaced, Alban Gate by Terry Farrell, 1 and 2 London Wall Place by MAKE and Moor House by Foster and Partners.</p> <p>The airiness of initial concept of six towers on two-storey podia has been lost. However, all replacement schemes follow the orthogonal grid of the original plan, and together with the Barbican Estate continue to frame existing streets, external spaces and gardens, and retain the highwalk connections around and across the site.</p>

167 (12.56)	<i>A key characteristic of the Barbican Estate is that the residential accommodation is privately owned, as originally intended.</i>	The Barbican Estate was originally built for rent for middle to high income earners. Most flats and houses have been sold following the introduction of RTB with the 1980 Housing Act.
167 (12.60)	<i>The Estate has predominantly flat roofs of asphalt.</i>	Wrong. All lower blocks of the Barbican have barrel vaulted roofs throughout, which are a striking and instantly recognisable motif of the estate. It appears that the author has never been to site.
167/8 (12.66)	<i>There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. That includes the slab block Bastion House, on the site, which was conceived as part of a separate masterplan for commercial development along London Wall, rather than in conjunction with the Barbican Estate.</i>	As explained under above point 20 (4.17), the Museum of London, Bastion House, the Barbican Estate and the Barbican Centre share the same palette of materials and repeat architectural elements and language.
167/8 (12.66)	<i>As such, tall and large modern commercial buildings form a well-established part of the Barbican Estate's setting. Their scale and proximity further contribute towards a sense of enclosure and segregation which is characteristic of the Barbican Estate and forms part of its significance. The Barbican Estate buildings are appreciable against this background of tall buildings within its close setting, and, despite the proximity of the modern commercial buildings, there remains a clear sense of separation between the heritage asset and its urban surroundings.</i>	This approach and justification are highly contested. This is key to this highly subjective interpretation of the TVBHIA. New building on the perimeter of the site contribute to the setting of the Barbican by virtue of their contrasting large scale and proximity leading to a high degree of enclosure?
		Over the past 30 years, four of the six original 1960s London Wall office blocks have been replaced. The density of the urban fabric has significantly increased, with height and volume extending into the area of the former two-storey podia. These tall and large modern office blocks, however, have a few things in common. They all: <ul style="list-style-type: none"> • Strictly follow the perpendicular grid of the post-war South and Centre Barbican plan. • Continue to contain, define and reinforce the urban street space and public realm. • Break down their mass into smaller segments, which relate to the smaller scale and finer grain and proportions of the urban context, their immediate neighbours, including the Barbican Estate. • Place height away from the Barbican Estate, e.g. tall elements are aligned with the far edge of housing blocks. None of the above prevailing qualities were applied to the two proposed development. In contrast, the proposed amorphous blocks, due to their position, proximity and imposing size, are not only harmful to the Grade II listed Barbican Estate, the two adjoining CAs, but also to the setting of the immediate and wider neighbourhood.
		On the east side of the Barbican area, replacement blocks of the post-war development along Moor Lane generally follow the shoulder height of the Barbican Estate. From here the height and massing increases, away from the Estate and towards Moorfields. What were once two point-blocks, Britannic Tower and More House, with lower blocks in between, is de facto

		<p>morphing into an approximate 20-storey continuous high wall.</p> <p>The result represents the piecemeal approach the original masterplan sought to avoid. The haphazard and jugged wall of buildings is not a redeeming quality. On the contrary, it is judged to be harmful to the setting of the Barbican, the CA, and the residential amenities, specifically of listed Willoughby House.</p>
174 (14.15)	<p><i>Due to the scale and type of the existing commercial blocks to the south of the Conservation Area, including the existing Bastion House, the proposed development would be in keeping with the character of this part of the setting of the Conservation Area. New Bastion House broadly the same height as the existing Bastion House and is visible to a similar degree but would bring a noticeable improvement to that part of the site in terms of its design and materials. The proposed Rotunda Building would be noticeably taller than the existing buildings on that part of the site, however it would be lower than Bastion House, with more limited visibility in the Conservation Area and, when seen, it would complement New Bastion House in terms of its design, and it would be seen and understood within the existing large scale commercial development which already characterises the southern setting of the Conservation Area.</i></p>	<p>In contrast to the proposed buildings other developments adjacent to the Postman's Park, and Barbican Estate and Golden Lane CAs with their listed buildings, attempt to respond to its specific urban context of their immediate neighbours:</p> <ul style="list-style-type: none"> • 200 Aldersgate steps down to adjacent London House and Little Brittain, where the building is successively broken down in scale. • One London Wall steps down to 10 Aldersgate Street, aligning it with the roofline of its neighbours along Aldersgate Street. • 88 Wood Street is in height aligned with its smaller scale neighbours along Wood Street. • London Wall Place breaks down its mass into proportionate sections and places height in a careful composition and in response to the buildings of the Barbican Estate, allowing for sufficient breathing space. • Developments along Moor Lane reduce the height along the street to that of the Barbican Estate. <p>The proposed development consists of two massive volumes that are alien to the grain established by neighbouring buildings, dwarfing even the large structures of Alban Gate and One London Wall. They proposed development, due to its proximity encroaches on the CA.</p> <p>The <i>enormous</i> (Pevsner) Alban Gate is one of the least successful buildings along London Wall, specifically its London Wall bridging half creating a dark, windy and hostile street environment. It should not serve as precedent.</p>
175 (14.19)	<p><i>The slight erosion to the backdrop of the bell tower of St Botolph's in some views from within the Park (View 14B) would be balanced by the high quality design and materials of the proposals and the scale, type and location of the proposed buildings, which would be in keeping with that part of the setting of the Conservation Area, and the substantial improvement to the quality of the setting of the Conservation Area and the Church at the north end of Aldersgate Street (View 13).</i></p>	<p>This interpretation is challenged.</p> <p>The view of St Bride's spire shall be protected, however, not the bell tower of Grade I listed St Botolph's? The encroachment of the Rotunda building on Postman's Park and the loss of sky will be harmful to the setting of the church, the park and the conservation area.</p>
176 (14.31)	<p><i>The Barbican Lauderdale tower would be obscured by the proposed Rotunda Building in views north along St Martin's Le Grand (View 12), however this view is incidental and not part of the heritage significance of the Barbican Estate; the visibility and prominence of the Barbican towers in other views will remain.</i></p>	<p>Lauderdale Tower represents an important view for wayfinding from Tate to St Paul's to Barbican Centre.</p>
176 (14.33)	<p><i>The proposed development, in its scale and design, would be in accordance with the established character of the south part of the setting of the</i></p>	<p>This is contested.</p> <p>With 60- to 70-meter-long elevations of monotonous fins, the proposed development consists of two massive</p>

	<i>Estate and would enhance the skyline through high-quality architectural design.</i>	volumes that are alien to the grain established by neighbouring buildings, dwarfing even the large structures of Alban Gate and One London Wall. Please refer to drawings: <ul style="list-style-type: none">• DAS, page 121, 5.11 Site West Elevation• DAS, page 122, 5.11 Site East Elevation
199	A5, Bridge above Aldersgate from Barbican Station	This is one of the harmful views of the proposed development. The proposed Rotunda building will close the gap between the east and west sides of Aldersgate Street, creating one continuous wall of development, and visually turning the street towards St Paul's into a dead-end road. Not mounting the actual building into the photomontage by solely a blue dotted outline seems intentionally deceptive.

APPENDIX E



**MUSEUM OF LONDON AND BASTION HOUSE
140 & 150 LONDON WALL EC2Y 5DN & EC2Y 5HN**

LONDON WALL WEST REDEVELOPMENT

**PLANNING APPLICATION 23/01304/FULEIA
LBC APPLICATIONS 23/01276/LBC & 23/01277/LBC**

**HERITAGE ASSESSMENT ON BEHALF OF BARBICAN
QUARTER ACTION**

SCOPE OF REPORT

1. This report, prepared on behalf of Barbican Quarter Action, focusses on the heritage impacts of the proposals within the local and immediate area. It does not consider the potential impacts on long-distance views of St Paul's Cathedral or the riverside. These matters are left to Historic England and the Greater London Authority who have a particular remit and expertise in this field, or to other London boroughs such as Lambeth and Islington whose own protected local views may potentially be affected.

DESCRIPTION OF PROPOSALS

2. Planning permission is sought for:

“Demolition of 140 & 150 London Wall to provide a phased development comprising: the construction of new buildings for a mix of office, cultural uses, food and beverage/café, access, car parking, cycle parking and highway work; part demolition of reconfiguring of the Ironmongers' Hall, creation of new Ancient Monument viewing area, public realm alterations to Plaisterer's Highwalk, John Wesley Highway, Bastion Highwalk and Mountjoy Close; removal of two highwalks known as Falcon Highwalk and Nettleton Court; alterations to the voids, lifts and stairs at 200 Aldersgate Street and One London Wall, introduction of the new City Walkway and hard and soft landscaping; and associated and ancillary works, structures and highway works.”

3. Listed Building Consent is sought for:

“External alterations to existing highwalks at the Barbican Estate including to the John Wesley Highwalk and Mountjoy Close to allow for the integration of the new highwalks, hard and soft landscaping, and works associated with the

construction of new buildings with the development proposed at London Wall West (140 & 150 London Wall), Shaftesbury Place, and London Wall car park”.

“Demolition of Ferroners’ House alongside external alterations to the façade and roof level of Ironmongers’s Hall, internal reconfiguring to cores and back of house areas and works associated with the development proposed at London Wall West, Shaftesbury Place and London Wall car park”.

GENERAL COMMENTS ON PRESENTATION MATERIALS

4. The architect’s sketches and artistic illustrations contained within the applicant’s Design & Access Statement, and displayed for public view in the London Centre, generally give an unreliable impression of the proposals with stretched and distorted perspectives. A simple examination of the model shows, for example, that Approach View 1 is not correct in terms of showing the true height of the Rotunda Building, the ‘Glade’ in View 4 appears far larger than it will actually be in reality, and View 6 of the ‘Aldersgate Plaza’ has a similarly enlarged perspective.

5. The applicant’s Townscape, Visual and Built Heritage Impact Assessment (TVBHIA) is more rigorously prepared. However, while the ‘existing’ and ‘proposed’ comparative images may be accurate in their own right, according to the methodology set out, the photographs generally use a wide-angle lens which does not always reflect what is seen or sensed by the human eye. In the photographic images middle-distance objects appear to be farther away, and hence smaller and diminished in context. It is similar to the technique often used by estate agents in sales brochures to make internal rooms seem bigger than they are.

POLICIES TO PROTECT THE HISTORIC ENVIRONMENT

6. The National Planning Policy Framework, the London Plan (2021), the City of London Plan (2015) and the emerging City Plan 2040 all contain numerous policies for the preservation and enhancement of the historic environment. These are set out in the applicant’s submissions and do not need to be repeated here. While they provide a framework for decision-making, they also rely on an understanding of the significance of the assets which are affected and how the proposals potentially impact on that significance.

IMPACT ON HERITAGE ASSETS

Existing buildings on the site

7. The existing buildings proposed for demolition are not designated heritage assets. However, they directly abut a Scheduled Ancient Monument, Ironmongers' Hall (Grade II Listed), the Barbican (Grade II Listed), and the Barbican Park and Garden (Grade II* Listed). The site also directly abuts the Barbican and Golden Lane Conservation Area and lies close to Postman's Park Conservation Area and Foster Lane Conservation Area, all of which contain Grade I Listed Buildings.
8. A Certificate of Immunity from Listing was issued in 2015 and renewed in 2019 for both the existing Museum of London building and Bastion House. This COIL expires in August 2024.
9. The City Corporation does not have a register of locally listed buildings or non-designated heritage assets.
10. The Museum and Bastion House were designed as one scheme by the highly respected architectural practice of Powell and Moya. Historic England's assessment as part of its consideration of the application for a Certificate of Immunity from Listing in 2014 and its renewal in 2019 stated the following: "Whether considered individual buildings or as two elements of one entity, it is acknowledged that both buildings have a degree of architectural and historic interest, but they do not meet the very high bar set for buildings of their date and type and should not be added to the statutory list".
11. The Principles of Selection for Listed Buildings (March 2010) states that "particularly careful selection is required for buildings from the period after 1945".

The Museum of London

12. According to Historic England's assessment, the stellar reputation of Powell and Moya confers some significance of the Museum of London building, although it falls short of the required architectural interest and is too altered to meet the criteria for listing. Historically, it has interest as the first post-war museum to be built in London and, at the time, the largest urban history museum in the world. On these grounds it should therefore be classified as a non-designated heritage asset.
13. Powell and Moya's design for the Museum has always attracted interest as an example of non-grandiose modernism. The building's thoughtful reticence was noted on its opening. In 1982 the architectural critic Bryan Appleyard

praised the new Museum building as ‘brilliant’; its ‘beautiful variations and careful detailing are demonstrations of late modernism at its cool and satisfying best’ (*The Times*, 26 November 1982, see Appendix 1). The contrast with the more robust style of the Barbican Estate was seen as rewarding. While the 1982 article was written before the new entrance was built in 2010 this too was designed by Wilkinson Eyre in a ‘cool’ and undemonstrative manner that complimented Powell and Moya’s original plans and the Barbican Estate beyond.

14. The original Rotunda of the Museum of London was placed in the middle of Aldersgate Street, which marks the start of the ancient Roman Road to the north, now known as the A1 and the longest numbered road in the UK. While the Rotunda blocks the road, this was done at a time when there were extensive plans to separate pedestrians from vehicular circulation, intended to cross the whole of the City of London. The Rotunda was envisioned as a central hub of the proposed pedway system from where the pedestrian had an elevated vantage point with views in all directions, including south towards St Paul’s. These features also arguably contribute towards its significance as a heritage asset.

15. While the Museum and its Rotunda are not actually part of the Barbican Estate they were intended to integrate and connect into the Barbican’s network of public pedways and highways, and designed with a high degree of architectural sympathy and synergy with the Barbican.

16. The proposal involves the total loss of the Museum and its Rotunda. Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of the harm and the significance of the heritage asset. The replacement of the existing Rotunda with a commercial building will cement the blocking of this vital and historic artery of Aldersgate Street, and furthermore demolish and privatise these important existing public views.

Bastion House

17. Bastion House forms part of the post-war masterplan for the Barbican South Development, as shown in Figure 1. The six office blocks along London Wall, four on the north side and two on the south, plus the development to the east of the Barbican, including Britannic House, were all based on the same orthogonal grid of the Barbican Estate. This grid was set up to be parallel with Moorgate to the east, and then rigorously applied up to Beech Street/Chiswell Street in the

north, to Aldersgate Street in the west, and straddling both sides of the new dual-carriageway section of London Wall (Route XI). Historic England's assessment notes that Bastion House possesses particular historic interest for its part in this post-war masterplan.

18. The 1959 plan (Figure 1) predates the Museum and shows the potential position of Bastion House as a direct continuation of Mountjoy House. In the event, to accommodate the Museum, Bastion House was constructed marginally to the east, but still on the same orientation. It is consciously set at an angle to London Wall so that it aligns precisely with the grid of the Barbican blocks to the north. It is also a very similar width to Mountjoy House.

19. Designed in a strongly Miesian form sitting above its plinth it is carefully proportioned and detailed. It is the only unaltered (externally) survival of the six similar office blocks that flanked the northern vehicular bypass for the City. Together with the Commercial Union Building (the Aviva Tower), soon to be demolished for the development of No.1 Undershaft, it is the last surviving example of its type in the City of London.

20. It has been suggested by the applicant that Bastion House suffers from structural defects that constrain its retention and reuse, but these have been strongly rebutted by independent experts. It does not reduce its heritage significance.

21. As with the Museum the proposal involves total demolition, and Paragraph 203 of NPPF must be therefore considered and give due weight to the total loss of the non-designated heritage.

22. The applicant's claim (for example in the analysis of View 15 in the applicant's TVBHIA,) that the demolition of Bastion House is a heritage benefit and that new Bastion House is a 'major beneficial' townscape enhancement compared to the existing is strongly challenged. Many of the THBVIA views show how much more prominent and dominant the new buildings will be, with no regard whatsoever for their context.

23. It is important to note that when four of the original six towers to the east of Bastion House fronting London Wall were subsequently demolished, all the replacement development schemes followed the same perpendicular grid, as can be clearly seen in Terry Farrell's Alban Gate and MAKE's London Wall Place.

Setting of the Barbican Grade II Listed (Ref. 1352667)

Setting of the Barbican Park and Garden Grade II * Listed (Ref. 10001668)

Setting of the Barbican and Golden Lane Conservation Area

24. These separately designated heritage assets overlap considerably in terms of their heritage significance, and the impact of the proposals is therefore assessed together.

25. Bastion House was designed with clear reference to and continuation of the strictly orthogonal grid layout of the Barbican. Powell and Moya were completely aware of the design rationale of Chamberlain Powell and Bon in their layout of the Barbican complex. Bastion House aligns precisely with the adjacent Mountjoy House, and indeed picks up on the rhythm of its fenestration. The external plain white tiling of the Museum complex has close synergy with that in the contemporary Barbican Arts Centre.

26. The western edge of the Barbican estate, fronting onto Aldersgate Street and continued by the Golden Lane Estate fronting Goswell Road, is low-rise, providing a human scale to the eastern side of this important north-south thoroughfare. The towers of the Barbican are set back from the edges of the podium deck. The existing Museum of London complex respects and continues this modest scale to the junction with London Wall and incorporates the low-level rotunda in the centre of the vehicular roundabout.

27. The demolition of the Museum and Bastion House will erode and isolate the historic contextual setting of the Barbican complex. The scale, mass and form of the proposed Rotunda Building and New Bastion House will radically change the setting of the Barbican on its southern and western side. The applicant's TVBHIA consistently and wrongly claims that the proposals will enhance the setting of the Barbican, based on the premise that, despite being bigger, the contrasting design and materials will be less intrusive. The opposite will be the case. The amorphous, bloated shape of the new buildings proposed, combined with their scale, footprint and materials, will jar with the orthogonal nature of the Barbican to its north.

28. The Barbican Estate Listed Buildings Management Guidelines Volume II SPD (October 2012) notes in Paragraph 2.2.7 that controlling and limiting alterations to the exterior spaces within the Barbican is of the utmost importance to preserving the special architectural and historic character of the Barbican Estate as a whole. Its setting, and the impact of changes to views into and out of the Barbican, are of great importance.

29. The proposed 14 storey height and mass of the proposed Rotunda Building radically alters the established townscape and introduces an entirely inappropriate scale on the east side of Aldersgate Street. Together with the highest part of the 200 Aldersgate Street (built in 1991) which lies directly opposite, the combination will create a canyon-like constriction in Aldersgate Street, clearly apparent on examination of the model. View 13 in the TVBHIA is very misleading as it neither includes the full height of the new buildings nor the relationship with 200 Aldersgate Street. The Rotunda Building will block views of the Barbican from the further south, notably the fine view from St Martin Le Grand of the pencil-thin Lauderdale Tower. It will radically alter and harm the setting of the Barbican from the south.

30. Similarly, the setting of the western side of the Barbican will be harmed in views from the north, particularly as illustrated in View A5 on the TVBHIA, taken from the public bridge to Barbican Station. View 17, taken from the western pavement of Aldersgate Street, similarly shows how the increased bulk of New Bastion house and the Rotunda Building will loom over the southernmost frontage of the Barbican to Aldersgate Street. The impact will be equally harmed in views from further north, near the junction with Long Lane, and from the eastern pavement.

31. The existing landscape of the Barbican has very high heritage significance, recognised through Grade II* listing, and the existing Museum building and Bastion House contribute positively to its setting. Policy CS12.4 of the City of London Local Plan 2015 specifically seeks to safeguard the character and setting of the City's gardens of special historic interest.

32. The Barbican Listed Buildings Management Guidelines Volume IV SPD (2015) focusses on the listed landscape and notes in paragraph 1.4.11 that the podium and highwalks offer a continuous range of viewpoints from which to survey the surrounding city. The map of important views and vistas in the Appendix to Volume IV of the SPD identifies the view south from the Lakeside Terrace as the most important public panoramic view within the whole of the Barbican complex.

33. Similarly, the Barbican and Golden Lane Conservation Area SPD, adopted on 1st February 2022, describes the character of the south Barbican sub-area on page 27. "At the southernmost end of the estate are the 'foothills' of the Barbican, where the scale is lowest and closest to more traditional forms of building, which are illustrated by the remnants of the Roman and medieval City wall and the church of St Giles Cripplegate. The street level podium, the park and the raised walkways all offer a multitude of important views across and

beyond the Barbican. The SPD selects several views of particular importance on pages 31 and 32, notably Nos. 12, 16, 21 and 26 which all comprise views to the south with Bastion House in the background.

34. The applicant's TVBHIA illustrates some of these views. From the Lakeside Terrace Views 19, 20 and 21 all show that the wider massing of New Bastion House will be a larger incursion into the backdrop view than the existing. From the western end of St Giles' Terrace, View 24 shows that the Rotunda Building impinges on the existing clean outline of Mountjoy House. The view out of the Barbican to the south from the Wallside Highwalk will be fundamentally changed for the worse, as shown in View 27. View A7 further illustrates how the existing clean gap between the slim orthogonal mass of Bastion House and Mountjoy House will be eroded by the proposals.

35. From a continuum of publicly accessible areas the two new tall buildings will become very prominent background features, filling areas of existing sky, and providing a muddled silhouette to the Barbican buildings. This will harm the existing character and appearance of the Barbican and Golden Lane Conservation Area and the setting of the Barbican complex as a listed building.

Setting of St Giles Cripplegate Grade I Listed (Ref. 1359183)

36. This is a building of the highest heritage significance and its retention and repair after war damage was a key element incorporated into Chamberlin Powell and Bon's design for the Barbican. Its setting comprises a major part of its heritage significance.

37. There are fine existing views of the church from the public podium areas immediately adjacent to the north side of the church, from the extensive terrace on the north side of the lake and from the entire length of Gilbert Bridge. In this continuum of views the slim and restrained outline of Bastion House is often visible, but the majority of the silhouette of the church, its tower and crenelated nave parapet is seen against clear sky. This will be greatly changed by the two tall buildings proposed. The impact will harm the setting of the church and hence its significance.

38. In the 'as existing' View 21 of the TVBHIA the right-hand side of the tower of St Giles is clearly defined against sky; in the proposal the rotunda will fill in and spoil that clean outline. The applicant's claim that the impact is beneficial is strongly challenged. Similarly in View 22 from Andrewes Highwalk the gap between the tower of St Giles and the existing Bastion House is effectively filled in by the new development. It should be noted that there is a continuum of views along this highwalk beneath Gilbert House in which 200 Aldersgate is

often completely masked by the church. The new Rotunda Building, owing to its width and height, will be continually visible.

39. From St Giles Terrace, which is effectively the modern ‘churtyard’ and integral to the significance of the church, View 23 in the TVBHIA takes just one position in this important public space but it illustrates how the wider massing of New Bastion House and its fussy architectural treatment will impact negatively on the backdrop of the church and harm its setting.

Setting of Ironmongers’ Hall Grade II Listed (Ref. 145812)

40. Ironmongers’ Hall (excluding Ferroners’ House) was statutorily listed on 20th April 2023. This is an important change to its heritage status and its heritage significance since pre-application discussions and public consultation for the redevelopment proposals. Dating from 1923-25 (with a 1975 extension by Fitzroy Robinson that is not included in the listing), it is one of the few buildings in the area that survived wartime destruction and post-war clearance. It has been listed because of its distinctive Tudor/Jacobean Revival architecture, its historic interest as the purpose-built home of the Worshipful Company of Ironmongers and the only livery company hall built between the wars, and for its group value lying next to the Grade II listed Barbican.

41. Historic England’s very thorough listing description notes that “the hall is reached via Shaftesbury Place, off Aldersgate Street. Always hemmed in by surrounding buildings, it now occupies a tight site enclosed by the Museum of London and the Barbican”.

42. Powell and Moya were deeply aware of the constraints placed by the existence of the Ironmongers’ Hall on their designs for the Museum of London. While they and the City Corporation might have preferred at the time for it to be demolished and relocated, Powell and Moya accepted its retention and skilfully designed a setting that respected its scale and historic setting.

43. Shaftesbury Place is an ancient alley off Aldersgate Street, as shown on historic maps (Figure 2), and was one of several on both sides of the street, some associated with old coaching inns. Shaftesbury Place, however, was associated with Shaftesbury House, a mansion attributed to Inigo Jones in Chapter XXVI of Walter Thornbury’s *Old and New London* (1878), and lived in by Anthony Ashley Cooper, Earl of Shaftesbury. Although the mansion had long disappeared, Shaftesbury Place was a long-established constraint when Ironmongers’ Hall was built in the early 20th century. Together with the Hall and frontage buildings to Aldersgate Street, Shaftesbury Place survived the war, as shown on the 1945 map (see Figure 3).

44. Powell and Moya retained the ancient configuration of Shaftesbury Place and recreated the historic arched entrance off Aldersgate Street and secluded forecourt. They respected and paid homage to the network of passageways, alleys and courtyards that had characterised the area before the war and which survives in some other historic parts of the City.

45. The City Corporation have policies to retain, and reinstate where possible, its historic street pattern of lanes, alleys and courtyards. Paragraph 3.12.6 of the Local Plan states that “the pattern of streets, lanes, alleyways and other open spaces such as squares and courts is a distinctive element of the City’s townscape and is of historic significance. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings”. The eradication of Shaftesbury Place would conflict with this policy.

46. Shaftesbury Place was paved in brick in order to be similar to the Barbican podium and pedways. The archway gives shelter and respite from the noise and pollution of the busy traffic on Aldersgate Street, and the yard provides a semi-private space which is well suited to wedding parties and other such functions which hire the Livery Hall.

47. Historically Ironmongers’ Hall was always approached through an archway beneath a continuous run of buildings along the east side of Aldersgate Street. The proposals will radically change the setting of the Ironmongers’ Hall by exposing it to much greater public view and activity. This is heralded by the applicant as a major heritage benefit, but this is considered highly debatable. This existing and historic intimacy and secluded nature of its setting is part of its significance, and its radical alteration will be harmful. The proposed ‘Aldersgate Plaza’ bears little resemblance to the historic form of Shaftesbury Place. Moreover, the exposure of Ironmongers’ Hall will be compounded by the overwhelming scale of the north end and street frontage of the Rotunda Building, which presents a cliff onto Aldersgate Street. View 18 of the applicant’s TVHBIA is telling. The frame of the ‘existing’ photograph contains the whole of the existing frontage buildings to Aldersgate Street while the ‘proposed’ image omits the vast scale of the new buildings, so huge that they cannot be fitted into the frame.

48. Some of the best existing views of Ironmongers’ Hall are from the high walks of the Barbican. View 26 is from the Thomas More Highwalk in which the slim lines and simple geometry of the existing Bastion House provide a dignified background to the hipped roofs, gables and chimneys of Ironmongers’

Hall, together with ample areas of sky. Much of this sky will be filled in by the new Bastion House and Rotunda Building which will provide a high wall of development behind. View A8 shows the impact even more alarmingly; the cantilevered form of the new Bastion House ‘leans’ over the roofs of Ironmongers’ Hall while the Rotunda Building looms behind the chimneys and blocks the existing view of the top of the dome of St Paul’s Cathedral. View A9, taken from the Thomas More Highwalk near Mountjoy House shows how the wider footprint of new Bastion House and the massing of the Rotunda Building, together with their uncontextual architectural treatment, will radically alter what at present is a very fine and unspoilt view of Ironmongers’ Hall.

Setting of Roman and Medieval Wall and Bastions, west and north of Monkswell Square Scheduled Ancient Monument (Ref. 1018888)
Setting of Barber-Surgeon’s Hall and Physic Garden

49. The existing podium element of Bastion House and the flank wall of the Museum form the western edge and immediate setting for the remarkable surviving above-ground sections of Roman and Medieval wall and bastions which run from London Wall to the Barbican lake. These are set in public gardens which contain mature planting. This Scheduled Ancient Monument is of the highest heritage significance. The greatly increased bulk of the proposed development in terms of its footprint and solidity will have an overwhelming and harmful impact on the setting of the Ancient Monument and the amenity of the public open space. The curving bulbous design is a marked contrast to the restraint and discipline that characterised Bastion House and the Museum and the southern edge of the Barbican.

50. View 27 in the TVBHIA taken from the Wallside Highwalk indicates a massive and deleterious change in the existing townscape and setting for the Ancient Monument and public gardens which will be overwhelmed by the scale and form of the new development.

51. To the east the neo-Georgian post-war Barber-Surgeon’s Hall (built in 1969) is a non-designated heritage asset, together with its Physic Garden, one of ten livery company gardens surviving in the City, which is also of historic interest in its own right. The greatly increased massing of the proposal will harm the setting of these non-designated heritage assets.

52. View 28 in the TVHBIA shows the increased impact of the greater bulk of New Bastion House on the setting of Barber-Surgeon’s Hall as seen from Monkswell Square to the east.

Setting of St Botolph Aldersgate Grade I Listed (Ref. 1064732)

Setting of Postman's Park Conservation Area

53. St Botolph's Aldersgate Church is a building of the highest heritage significance, Grade I listed. It sits within its former churchyard, now known as Postman's Park. At the western end of the church the low square tower, built of brick, with a lead dome and a small bellcote is a distinctive feature. There is a continuum of fine views of the church from the middle and southern side of Postman's Park. The low massing of the existing buildings on the north side of Little Britain and the south-east part of 200 Aldersgate results in existing views of the tower bellcote silhouetted against open sky. The proposed development will fill this existing area of sky and will alter and harm the setting of St Botolph Aldersgate.

54. The proposal will also harm the character and appearance of Postman's Park. Already enclosed by substantial buildings on its southern flank (Namura House) and the block of flats comprising 75 Little Britain (built 1996), the existing view of sky to the north above the range of buildings on the north side of Britain Street is extremely important to the character and appearance of Postman's Park. It contributes to its sense of 'openness' which is noted as being an integral component of its character in the Conservation Area Character Appraisal and Management Guidelines (SPD). The proposal will seriously curtail these sky views to the detriment of its character and its amenity. The proposal will loom above the terrace of buildings on the north side of Little Britain. It will reduce the amount of natural light to the Watts Memorial plaques. The view of St Botolph's Church is specifically identified (3B) in the Conservation Area Management Guidelines.

55. Views 14A, 14B and A4 provided in the applicant's TVHBIA show some of the impact of the Rotunda Building. However, no view is provided from the pathway along the south side of Postman's Park which provides a continuum of views to the north.

56. The Rotunda Building will also appear above 75 Little Britain in views from King Edward Street. View B17 in the TVHBIA is not taken from the best position. Examination of the model shows that the impact on the skyline looking east from the west side of King Edward Street will be considerable, including views down Little Britain itself.

57. It should be noted that the Draft City Local Plan 2040 does not identify London Wall West as an area that is appropriate for tall buildings. While it will no doubt be argued by the applicant that the northern section of 200 Aldersgate

Street already sets a precedent for tall buildings, there is no doubt that its height detracts from the character and appearance of Postman's Park. An additional tall building, closer and with a bigger footprint than the tall section of 200 Aldersgate Street, will exacerbate this harm. Two 'wrongs' will not make a 'right' in this situation. It is frankly extraordinary that the applicant's assessment of the impact of the Rotunda Building is 'moderately beneficial'.

58. There will also be a harmful impact on the southern section of Aldersgate Street. The existing Museum Rotunda provides a low-rise termination to the view north along St Martin Le Grand and the southern section of Aldersgate Street. The 1990s development immediately north of Little Britain was carefully restricted to six storeys in height in order to protect the setting of the east end elevation and nave of St Botolph's Church, and the backdrop of views of the western spire and south elevation from Postman's Park. The proposed 14 storey tower of the new Rotunda Building will radically alter this view and the harm setting of the church and the eastern edge of the Postman's Park Conservation Area.

Setting of St Anne and St Agnes Church Grade I listed Ref. 1286384 Setting of Foster Lane Conservation Area

59. The Church of St Anne and St Agnes on the north side of Gresham Street is a building of the highest heritage significance. There are important views of the church from the south and east. In these views the charming and diminutive belfry is visible against sky, and it is notable that the scale of modern development to the north has been restrained in order not to overpower the setting of the church. The new Rotunda Building will be clearly visible rising above these buildings, particularly from the north-eastern end of Foster Lane, which is arguably the best view of the church. The view of the tower and belfry will be harmed by this intrusive backdrop. View B18 in the applicant's TVHBIA fails to encompass this view, and is oriented to look down Noble Street, conveniently excluding the church.

60. The western boundary of the Foster Lane Conservation Area directly abuts the Postman's Park Conservation Area at St Martin Le Grand. Immediately to the north of the Conservation Area, Castle House, 4-6 Aldersgate Street (built in 1999) and the corner of Aldersgate Street and London Wall, part of Foster's One London Wall (completed in 2005), respect the prevailing townscape context with five/six storey scale, and the setting of St Botolph's Church opposite, and St Anne and St Agnes to its south. The low scale of the existing Museum

Rotunda provides a very modest and unassuming background. This view and the wider townscape context will be significantly altered by the scale of the new Rotunda Building. Its scale will become a very prominent and obtrusive feature which will harm the setting of the Foster Lane Conservation Area.

61. The Foster Lane Conservation Area Character Summary and Management Strategy SPD 2015 identifies important views of the 19th century townscape at the corner of Gresham Street and Aldersgate Street. The applicant's TVHBIA fails to include this view of the corner of Gresham Street. View 13 is too close, taken from the south side of the existing roundabout, albeit the scale of the new Rotunda Building will be overwhelming. View 12 taken towards the southern end of St Martin Le Grand is too far south.

Wider Impacts on other Heritage Assets

62. The applicant's TVHBIA includes dozens of 'before' and 'after' images from distant viewpoints. It will be for others to comment on these impacts, such as the incursion into the existing backdrop views of the tiered spire of St Bride's Church, Fleet Street, evident in Views 1 and 2 of the TVHBIA, or potential views from parts of Charterhouse Square or The Charterhouse itself, not considered in View B23.

OVERALL ASSESSMENT OF HARM

63. The proposal involves the complete loss of two non-designated heritage assets, namely the former Museum of London building and Bastion House. There is substantial harm to these heritage assets.

64. The proposal involves less than substantial harm to the setting of several listed buildings, a Registered Park and Garden, a Scheduled Ancient Monument, and the setting of three conservation areas.

65. The most damaging impacts on designated heritage assets are the background views of the church of St Giles Cripplegate from within the Barbican, and the views of the spires of St Botolph Aldersgate from Postman's Park and St Anne and St Agnes from Gresham Street, both currently silhouetted against sky. While this is less-than-substantial harm, as defined in National Planning Policy Framework and Guidance, it lies potentially at the middle-to-upper range of less-than-substantial harm, given that the heritage assets are Grade I buildings of the highest significance of which their setting is a major contributor.

66. There is also less-than-substantial harm to the setting of Ironmongers' Hall and the Barbican, to the setting of the London Wall Scheduled Ancient Monument and to the character and appearance of the Postman's Park and Foster Lane Conservation Areas. These come at the lower-to mid-range of the scale.

67. Cumulatively the harm to designated heritage assets lies at the upper-middle range of the scale of less-than-substantial harm. Paragraph 202 of NPPF is thus relevant, requiring the balance of harm against public benefits.

HERITAGE BENEFITS

68. The applicant's claim that the proposals contain considerable heritage benefits is strongly challenged and disputed. The opening up of the setting of Ironmongers' Hall to wider public view and exposure, as explained above, is not considered to be a benefit. The claim made by the applicant throughout the TVBHIA that the new development will have only beneficial impacts on the historic environment is strongly refuted.

BALANCING HARM AGAINST PUBLIC BENEFITS

69. Paragraph 202 of NPPF states that "where a development proposal will lead to less than substantial harm to the significance of the heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

70. Paragraph 203 of NPPF requires that "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

71. Paragraph 199 of NPPF requires that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance." Given the considerable degree of less-than-substantial harm that is caused to designated assets of very high heritage significance, this must be given great weight.

72. Paragraph 200 of NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification”. It is not at all clear from the current proposals that such justification exists.

73. During the developer’s application for a Certificate of Immunity from Listing in 2014 and 2019 considerable emphasis was placed on proposals at the time to develop the site for a new concert hall and music centre, as a key component in the aim to create a Cultural Mile along the northern edge of the City. It was suggested that it would be impossible to adapt the existing structures of the Museum to create the large concert hall then envisaged, and that the large public benefit from the new concert hall would therefore justify comprehensive demolition. The COIL would ensure that the balance of heritage harm against public benefit would not be altered by the increased heritage significance that statutory listing would confer. However, the concert hall and music centre have now been abandoned and replaced by a commercial scheme with less definite cultural public benefit. Indeed, one of the benefits now muted by the applicant is that profits from the development will help to pay for the relocation of the Museum to Smithfield, which is happening in any event.

74. The proposals, promoted by the owner of the land, are speculative, with no pre-let or funding provision, likely intended to maximise the value of the site with a view to disposal to a developer. It seems probable that there are alternative options which could retain at least some of the existing fabric of both the Museum and Bastion House. Such alternatives would likely cause less heritage harm and might also provide a variety of uses, some of which could construe public benefit, whilst also achieving a positive value for the owner. The optimum viable use for the site might not be that which achieves the highest value in purely monetary terms.

CONCLUSION

75. The proposals cause widespread harm to a large number of heritage assets, including the complete loss of two undesignated heritage assets. Harm to designated heritage assets is less than substantial, but nevertheless of such degree that will considerably erode and harm their significance. This harm is not outweighed by heritage benefits elsewhere, nor do there appear to be other outstanding public benefits which would offset the great weight that must be

given to heritage harm. Alternative solutions which could re-use and enhance the existing heritage assets, including their setting, should be explored.

Barbican Quarter Action

December 2023

Author of this report

Alec Forshaw worked for 35 years as a conservation and urban design officer in local government. As a specialist heritage and planning consultant he has presented evidence at major Public Inquiries including Smithfield (2014), Liverpool Welsh Streets (2014), New River Head (2017), Norwich Anglia Square (2020), Custom House (2021), and M&S Oxford Street (2022). He contributed to the designation of the Barbican and Golden Lane Conservation Area, and has been heavily involved in the very recent designation of the Creechurch/Bevis Marks Conservation Area. He is the co-author of *The Barbican: Architecture and Light* (2015) and *New City: Contemporary Architecture in the City of London* (2013).

APPENDIX

From God's house to Bauhaus and back again Bryan Appleyard, published in *The Times* 26 November 1982

LIST OF FIGURES

Figure 1 Map of South Barbican Development Masterplan 1959

Figure 2 Alleys off Aldersgate c.1840

Figure 3 Ordnance Survey Map 1945

20-26 November 1982

Bryan Appleyard, complete with Pevsner's writings and architect Will Alsop, appraises a selection of modern buildings From God's house to Bauhaus and back again

Should the appreciation of post-war architecture be left to the experts or can the public at large raise their eyes skyward in admiration rather than conventional condemnation? A leisurely weekend walk through the City of London can confound the sceptics and provide a real insight into the best of modern buildings

Modern architecture requires some explanation. Its post-war reputation in this country has been appalling and the buildings of the seventies, designed in reaction to the public's disgust, have done little to restore the popular standing of the art. It is not enough to complain, as architects persistently do, about cowardly clients, inept planners and mindlessly difficult local protest groups. That is merely to correct incomprehension. It would be far better for architects to own up to the immensity of the mistakes and to the relentless mediocrity of most modern developments; then to spend the rest of the time drawing attention to the best that has been achieved.

Post-war British architecture has thrown up a number of fine buildings, some with the confident air of near-masterpieces. But the strength of the reaction against the failures has meant that most people no longer bother to look.

They are there, however, and the City of London is as good a place as any to walk and look for them. But first it is necessary to understand a few of the reasons for the peculiar nature of modern architecture. Of all the arts, architecture is the one in which the artist aspires most literally to the condition of the deity. Sir John Soane's Bank of England presupposes a God as surely as any artist's King's Cross presupposes a train.

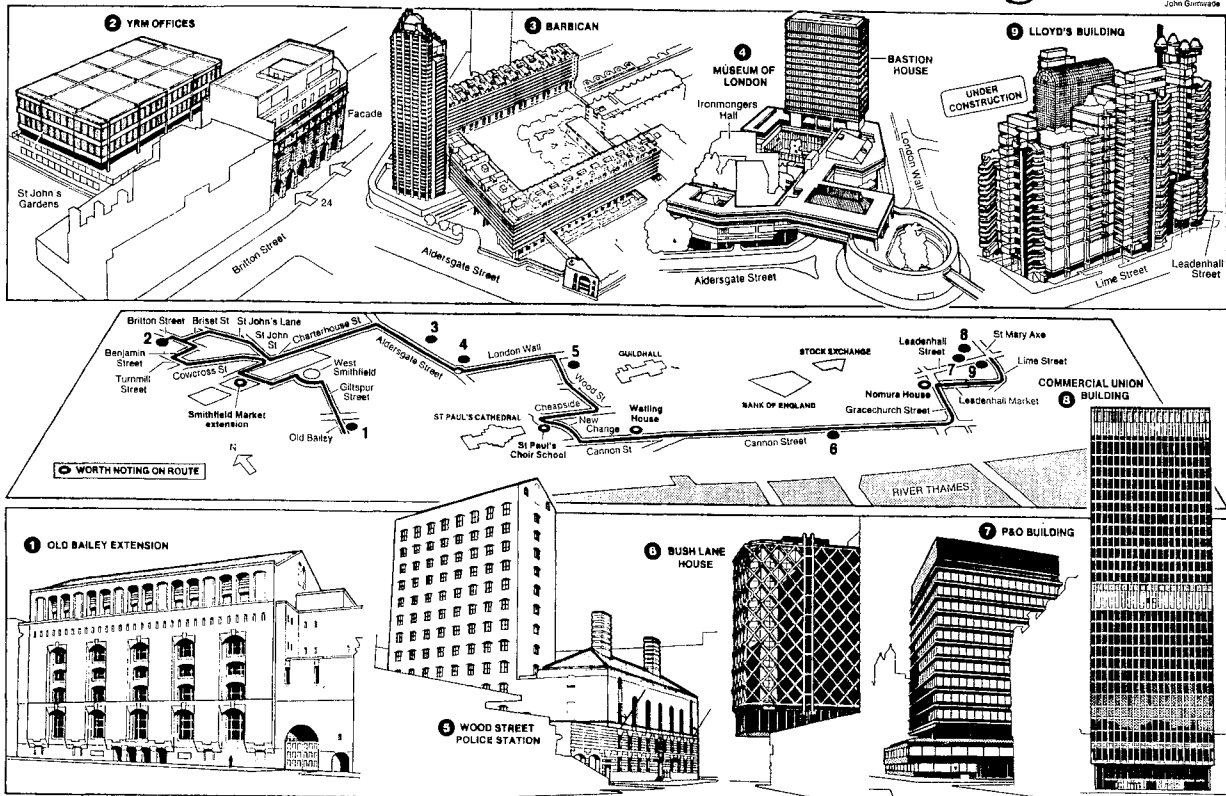
A building is centred on its formal function or functions, the rain out and providing decent plumbing, the architect, however, requires it to be beautiful, in a theoretical sense, he is simply playing at God's creation is supremely functional and yet it is also beautiful. The element of beauty is provided as a beneficent embellishment by the "decor." Decoration in architecture is no more than such an embellishment; indeed, it was essential if the architect was to fulfil his god-like function.

The Victorians' profound belief in that view led to such extravagant masterpieces as St Francis Station. Form and applied decoration were part of the transcendental and moral significance attached to commerce. Even the simplest Victorian house would be endowed with decorative mouldings.

At the height of this decorative extravagance, though, a few people decided that God had had. The carnival continued into this century as last decorative gasp being art nouveau - but then the crisis came. Vulgarity, it was felt, had been caused by the First World War, in reality that was only a symptom, and the trend was discernible long before.

In the godless post-war world a generation of prodigiously-gifted architects went back to basics. In the minds of Walter Gropius at the Bauhaus or of Le Corbusier or Mies van der Rohe, a profound disgust with the idea of decoration was conceived. A new conceptual centre had to be found for their art to replace the decayed metaphysics. For Mies this new centre was an ethereal perfection of abstract form, for Le Corbusier it was a visionary determination to transform the world - "architecture or revolution".

It is easy now to mock the idealism which characterized these visionary. With hindsight we can blame them for the horror executed by lesser talents Tom Wolfe in his book From Bauhaus to our House (Cape) does just that but, in doing so, he fails to grasp the creative power they possessed. Without that, modern architects can be portrayed all too simply as slavish acolytes of a gang of



anti-human fanaticism whose artists are laughing when they are not destroying our cities. But Mies' buildings are beautiful and Le Corbusier did possess an astonishingly fertile and varied visual imagination. Wolfe's verbal acrobatics at the expense of an aesthetic he perceives as anti-life are less impressive if reduced to their essence - a banal, noisy exercise in philistinism.

British building in the fifties and sixties was conceived under the modernist spell. The steel and glass towers that began to appear in the sixties were "expressed structure" or "form-following function" whether we liked it or not. Gradually it began to emerge that we did not. The anti-property developer fury of the sixties spilled over

rather at its modern extension southwards down Old Bailey. This is the first of two buildings by the firm of McMorran & Whitley on our route and both can fairly claim to be among the best.

Built in 1967-69, the Old Bailey extension was well ahead of its time in the abandonment of modernist conventions, not for the new vernacular, but for a far more coherent and radical style. The frontage on to Old Bailey itself is brilliant with its massive sheet of Portland stone interrupted by recessed windows with flat arches and by vertical projections which sweep smoothly back into the wall just above street level. At the top there is a haunting row of arches, some blanked off, while the entrance is an understated and surprisingly small doorway after the drama of the rest of the frontage.

The architects wisely decided to attempt to blend with the neo-baroque extravagance of Mountford's original building. Indeed the clear line of their shallow-pitched roof looks suspiciously like an ironic comment on its somewhat empty rhetoric.

But the overall effect is breathtaking in the way the avoidance of any grand entrance permits it to be human as well.

Heading northwards through Smithfield and a maze of streets we arrive at 24 Britton Street - the first truly classic piece of modern architecture on the walk. These are the offices of the architects York, Rosenthal, Marshall. They are behind the Victorian street frontage which the firm has restored and converted into shops and flats. The arch in the centre leads into a brick courtyard in which rests with perfect simplicity a three-storey steel and glass structure exuding an almost oriental, meditative calm.

The effect of such stunning simplicity is not easily achieved. Note specifically the carefully conceived relationship of the block as a whole to its surrounding space. But note especially the figure of the detailing: the revolving door entrance, for example, is prevented from creating a nasty bulge by being set slightly behind the usual. The doors thus provide a satisfying v-shape into the facade. Note also the tone of the red steel facings - a heightened version of the usual colour of the treated steel used in the building.

It is a building which challenges our anger at the relentless simplifying tendency of modernism. It reveals that the complication can attain harmony rather than monotony. Mies sired much that is bad but here at least his purism and

rigour found sufficiently careful disciples. Returning to Charterhouse Street we head east towards the unavoidable Barbican. Like the West End Centre Point this is a development which is likely to drive people to nail their colours to the mast on the subject of modern architecture. For a start it is intended to be lived rather than worked in and for people living reluctantly in tower blocks is the popular image of everything that is vile about architecture.

However, people do choose to live in the Barbican and ironically they rise higher rents the higher up the towers they go. Alsop's main criticism is the lack of colour though he defends vigorously the care which has gone into the shaping of the towers. But he admits that the development as a whole suffers from being too large for one firm of architects - Chamberlin, Powell & Bon had their scheme accepted in 1959 but the present centre was only finished last year.

The date of the scheme's acceptance is important because it means that the Barbican concept began to age dangerously in the midst of the realization that a raised podium and apparently endless dripping concrete corridors may be intimidating rather than welcoming slowly began to dawn on people as crime and vandalism bred in the building program. The one council block after another, ironic comparisons with Le Corbusier's "Ville Radieuse" - never actually built - are inevitable when confronted with such strict anti-individual idealism.

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

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

"Expressed structure" is even handled with unusual sensitivity in the rough concrete pillars which rise through the facade of the building, cutting through tiles and even through windows. The effect is complex and yet clean and the rhythm of the movement across the road

building completely lack the oppressive quality of the borrowings of the "new vernacular".

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

most uncompromising application of Mies' idealism in London. The delicacy of its construction is stunning and the way the piazza in front dips down from street level has the effect of presenting the entire stylistic cacophony which surrounds it.

It is a worthwhile shock but it would be inhuman to attempt to suppress that plurality in favour of a modernist singularity. It was Le Corbusier who wanted to do in Paris and it is what the Brazilians have done - disastrously - in Brasilia. Happily Alsop and his contemporaries have emerged from such Utopian dreams. They may not have reinstated God in the process but at least they have restored mass, unpredictable, unplannable man.

The effect from a distance is of a somewhat crude outcrop but at street level the empty space left by the raised first floor creates a surprisingly attractive effect. The block is raised with sufficient care and to a sufficient height to prevent any oppressive effect for the pedestrian. Its clumsiness prevents this being even the most interesting building but it is worth noting as yet another example of the simple modernist theme.

Through to Gracechurch Street where number 3 - Nomura House - has an elegant Italian feel with its angled windows, and then through the superb Victorian Leadenhall Market opposite. With its magnificent ironwork beloved of young architects today - this is an appropriate way to reach the climax of the walk: the junction of Leadenhall Street, St Mary Axe and Lime Street.

That promise to be an intersection which will stand as a monument to the achievements of modernism. On one side Richard Rogers' now Lloyd's building is slowly rising to its climax in a 290 foot glass-roofed atrium. In spite of the current vogue for Rogers' work largely based on the popular success of his Centre Pompidou in Paris, it is important to remember that he is in effect no more than a late modernist. He is still in the business of "expressed structure" even if he has added a somewhat baroque twist to the ideology. In the wake of Rogers' failure to make the shortlist for the National Gallery extension, it is some consolation and Lloyd's had already given him this opportunity for another major London building.

Opposite is the Commercial Union building, built in 1964-69 by Gola, Melvin, Ward & Partners. This is perhaps the

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2 Travel: Guide to the best of shopping in Hongkong

3 On the road, The Times Cook, In the garden and Eating Out

4 Values: How to personalize your presents at Christmas

5 Review: Video Preview: Theatre, Festivals and Galleries

7 Preview: Music, Dance, London films and films on TV

8 Calendar, Drink, Bridge, Chess, Collecting and Family events

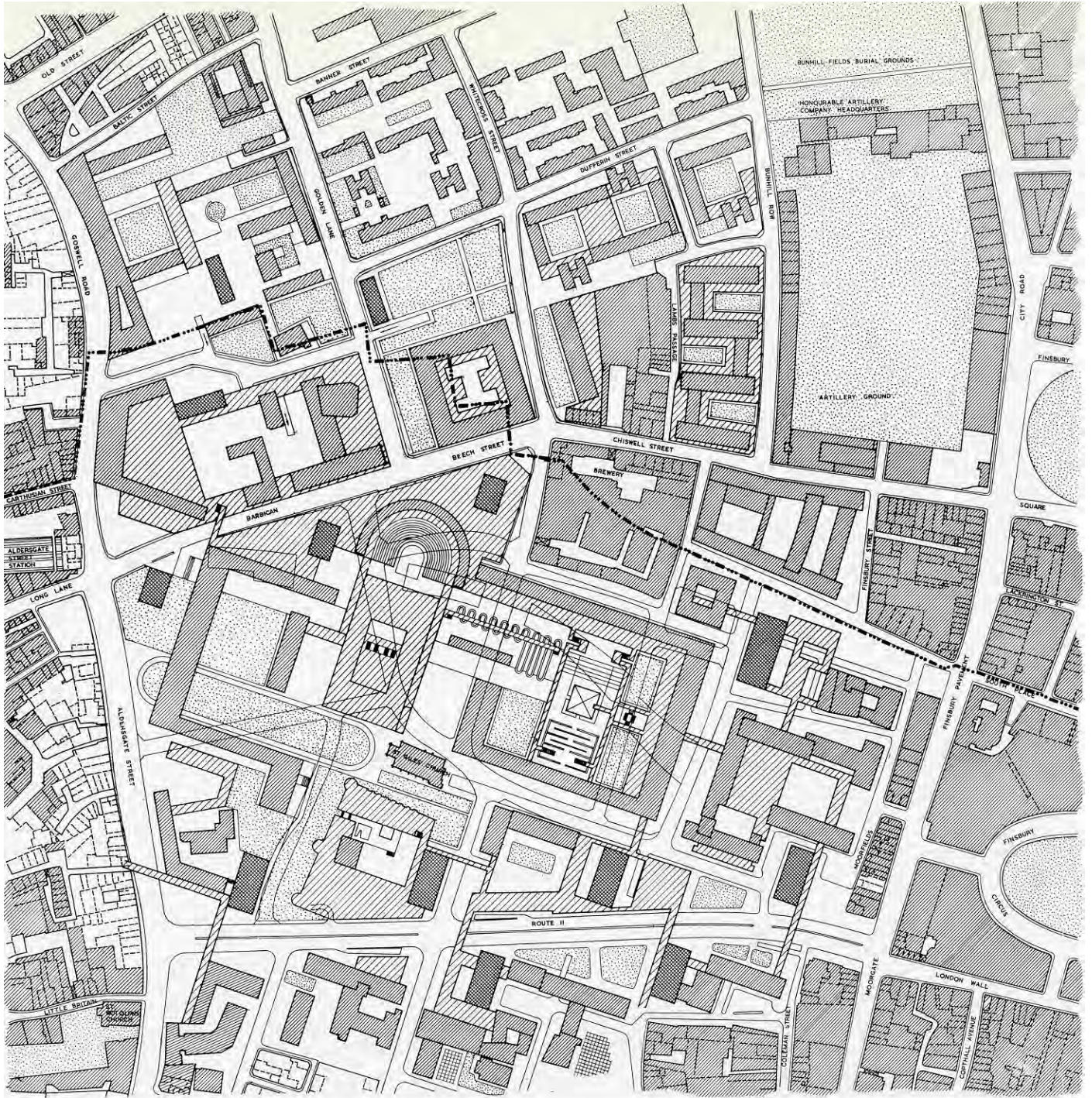


FIGURE 1 MASTERPLAN 1959

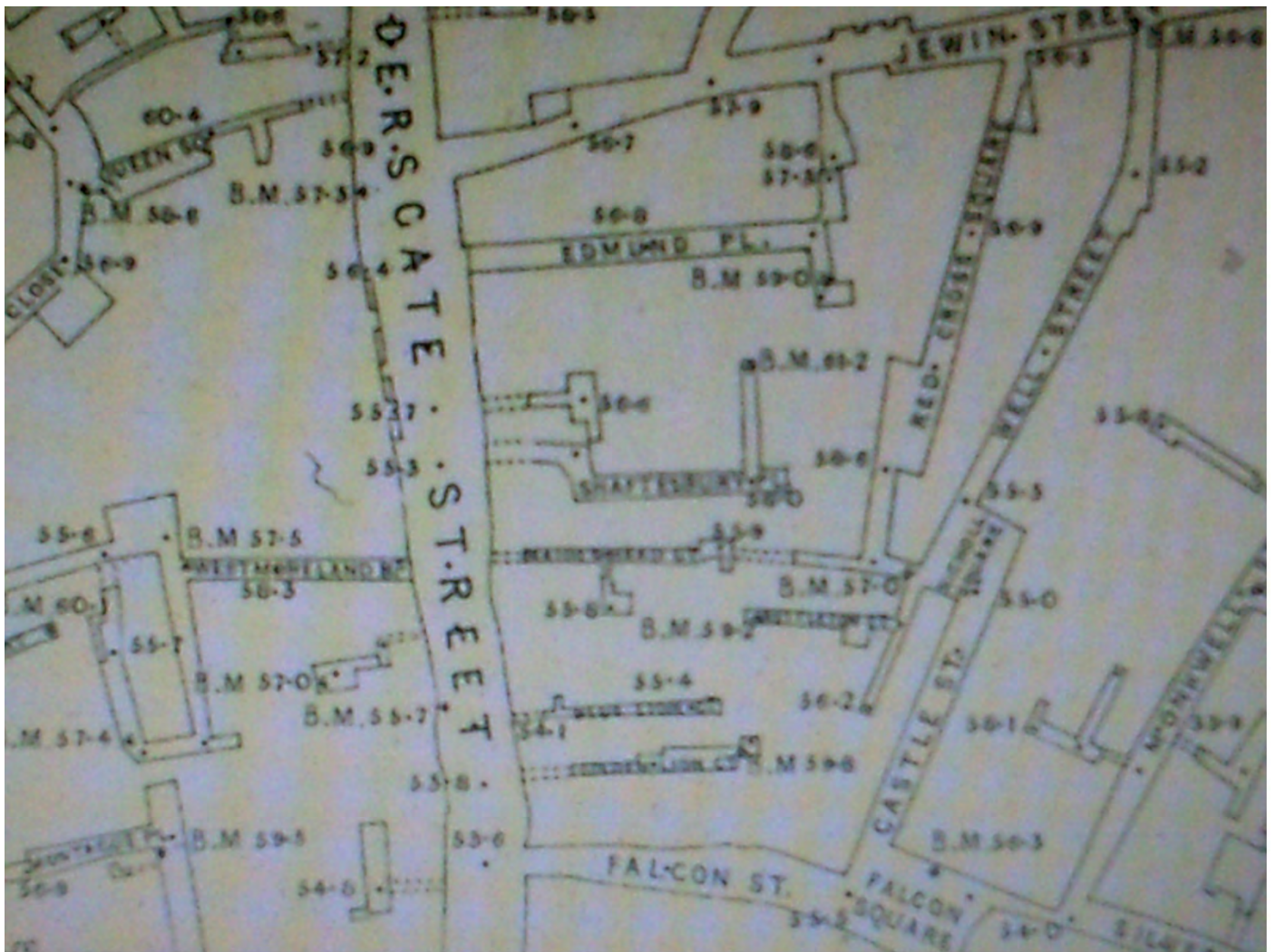


FIGURE 2 ALLEYS OFF ALDRSGATE c.1840



FIGURE 3 1945 OS MAP

APPENDIX F



29 January 2024

By Email only: action@londonstartshere.co.uk

Dear Brenda,

RE: (ROL01285) Redevelopment of 140 & 150 London Wall and its effect upon the Barbican Estate residents Monkwell Square and London House – Daylight and sunlight

Anstey Horne has been instructed by the Barbican Quarter Action group to review the ES chapter report on Daylight, Sunlight, Overshadowing, Solar Glare and Light Spillage that accompanies the planning application for 140 & 150 London Wall (planning application 23/01304/FULEIA).

As part of the review, we have been asked to comment upon the methodology adopted for the various assessments and upon the overall impact that the proposed scheme will have upon the residents of the Barbican, Monkwell Square and London House. This letter sets out our observations.

Review of methodology

3D Contextual Model

The 3D computer model of the existing site and surrounding context upon which the assessments are based, has been constructed using “*photogrammetric survey, site photography and OS information*” and has subsequently “*been updated using measured survey of the adjacent properties to the site*” (paragraph 13.2.7).

Photogrammetric survey does not establish the location of windows on a façade and has a built-in tolerance of up to 300mm. Measured survey provides greater accuracy of modelling and results.

The City of London as the Local Planning Authority should request confirmation as to which properties are modelled from measured survey and which are modelled from photogrammetric survey. In addition, confirmation as to how the windows and their locations have been modelled where photogrammetric survey has been used.

Until it is confirmed which properties are modelled from measured survey and which are modelled from photogrammetric survey, the overall accuracy of the modelling and analysis results cannot be commented upon.

Daylight and Sunlight Assessment (Impact upon neighbours)

The BRE guidance sets out the tests that should be adopted when assessing the impact upon existing neighbours under section 2.2 of the document. The guidance states that the vertical sky component (VSC), no sky line (NSL) and annual probable sunlight hours (APSH) tests should be used.

Comparative daylight illuminance analysis ('illuminance method') has been undertaken for the surrounding properties (paragraph 3.2.17). Daylight illuminance is an absolute assessment of the daylight performance within a proposed scheme as set out within section 2.1 of the BRE guidance.

The appendices do not include any NSL contour plots. Therefore, it is not possible to see what layouts Waldrams' have used for each of the neighbouring properties. It would be helpful to review these to establish how the internal configurations of neighbours have been modelled, particularly where assumed layouts have been applied, as this can heavily influence the findings of the NSL test.

Solar Glare Assessment

The solar glare analysis has been undertaken using climate based data (paragraph 13.2.44). We request that a supplementary assessment of solar glare on a 'clear sky' basis be provided to fully understand the potential for solar reflection at key road junctions.

The report states that "*incidence of proposed glare arising from the proposed development.....is likely to be major adverse and significant*" for the residents of Monkwell Square (paragraph 13.6.180). It would therefore be helpful for the number of tested viewpoints to be expanded to also include windows to the north and south ends of the elevation (either side of the currently tested viewpoints).

It would also be helpful to see the angles on the field of vision illustrations on the appendix 13-F solar glare results drawings. It is assumed that the angles are 3°, 10°, 20°, 30°, 40° etc.

Light Spillage Assessment

The report states that "*there are only small areas of low additional light spill, the impact at Mountjoy House is therefore negligible and the effect not significant, particularly as any of these small areas do not appear to coincide with windows serving habitable space*" (paragraph 13.6.125)

No clear indication of where the additional light spill occurs to the facade of Mountjoy House has been provided. A drawing should be provided which overlays the light spill analysis and the facade of Mountjoy House to confirm the areas of additional light spill do not coincide with windows serving habitable rooms.

In addition, the City of London as the Local Planning Authority should request that the analysis for the site be rerun without the light spill from the existing neighbouring buildings being considered in the baseline scenario.

This will determine the effect of the proposed scheme in isolation and whether the proposed scheme meets the pre and post curfew targets of 25 and 5 Lux as set out within the ILP (2011) Guidance Notes.

Review of results for Impact Upon Neighbours

The VSC daylight results have been run on a room-by-room basis as well as a window-by-window basis (Table 13-22 and paragraph 13.6.40). The room-by-room results do not appear to be appended to the report. It is therefore not possible to comment upon this assessment.

Reference is made to a without balconies assessment as justification for the impact upon Mountjoy House (paragraph 13.6.40). These results do not appear to be appended to the report. It is therefore not possible to comment upon this assessment.

The results for Mountjoy House, show that there will be significant (moderate or major) VSC daylight impacts to 12 bedrooms on the 1st to 6th floors. Nine of these bedrooms will also experience a significant reduction in annual sunlight. The remaining three bedrooms will experience a minor reduction in annual sunlight outside of the BRE guidance target.

The results for London House (172 Aldersgate Street), show that seven windows will experience significant (moderate) VSC daylight impacts. Five of these windows serve living/dining rooms or living/kitchen/dining rooms. A further eight rooms will experience significant (moderate or major) NSL daylight impacts. Two of these rooms are living/dining rooms.

With regard sunlight for London House, paragraph 13.6.64 states that *“in sunlight terms, 46 of 47 living rooms with windows that face within 90° of due south meet the target value for APSH with the proposal in place. The impact to these windows is therefore considered negligible”*. The results in the appendices appear to list seven living rooms with windows that face within 90° of due south (pages 44 to 47). Three of the windows serving these living rooms experience significant (major) impacts in both annual and winter sunlight, two of which are left with no winter sunlight (R1 on the eighth and ninth floors). A further three windows experience significant (major) impacts in winter sunlight.

We have reviewed the sun-on-ground overshadowing analysis and while there is a reduction in sunlight, these are within the BRE guidelines. We therefore have no further comment.

With regard solar glare, paragraph 13.6.180 states that there will be major adverse and significant incidence of solar glare to Monkwell Square, and that *“mitigation measures including the use of non-reflective glass coatings or fritting will be required”*. Such measures need to be specified by the architect at the design stage to avoid *“major adverse and significant”* and therefore unacceptable levels of solar glare.

Review of results for Internal Daylight Assessment

The report concludes that the scheme will not achieve the BREEAM daylighting credits. The report goes further to state that achieving BREEAM daylight credits is difficult in urban locations and lists the competing requirements of the design scheme. We therefore have no further comment.

Conclusion and Recommendations

There will be significant impacts in both daylight and sunlight to nine bedrooms within Mountjoy House, with a further three bedrooms experiencing a significant impact in daylight and a minor impact in sunlight.

There will be significant VSC daylight impacts to seven windows within London House, five of which serve rooms with a living room element. A further eight rooms will experience significant NSL daylight impacts, two of which serve rooms with a living room element. In addition, three windows serving living rooms experience significant impacts in both annual and winter sunlight (two of which are left with no winter sunlight), and a further three windows experience significant impacts in winter sunlight.

There will be major adverse and significant incidences of solar glare to residents within Monkwell Square.

The City of London as the Local Planning Authority should request that the following points be clarified:

- To verify the accuracy of the 3D modelling and analysis, confirmation of which properties are modelled from measured survey, and which are modelled from photogrammetric survey should be requested;
- Confirm how the windows and their locations have been modelled where photogrammetric survey has been used; and,
- To confirm the solar glare results within appendix 13-F, include the angles on the field of vision on the solar glare results drawings.

In addition, the following information and assessments should be provided:

- VSC daylight results on a room-by-room basis;
- VSC daylight results on a room-by-room basis without balconies;
- NSL contour plots to establish the layout used within the analysis;
- A 'clear sky' solar glare analysis to fully understand the potential for solar reflection at the points assessed;
- Expanded the number of tested viewpoints for solar glare for Monkwell Square;
- An isolated light spill analysis without consideration of the existing neighbouring buildings to establish whether the proposed scheme meets the pre and post curfew targets as set out within the ILP (2011) Guidance Note; and



- Confirm the location of the areas of additional light spill on the façade of Mountjoy House to show that they do not coincide with the location of windows serving habitable rooms.

Kind regards

A handwritten signature in black ink that reads "Anstey Horne".

Anstey Horne

APPENDIX G



London Wall West (ref: 23/01304/FULEIA)
 Planning Policy Review – 31/01/2024

The London Plan 2021	
POLICY	Referenced in Planning Statement?
Policy GG1 Building Strong and Inclusive Communities	Y
Policy GG2 Making the Best Use of Land	Y
Policy GG5 Making the Best Use of Land	Y
Policy GG6 Increasing Efficiency and Resilience	Y
Policy SD4 The Central Activities Zone	Y
Policy SD5 Offices, other Strategic Functions and Residential Development in the CAZ	Y
Policy D2 Infrastructure requirements for sustainable densities	Y
Policy D3 Optimising site Capacity through the Design-led Approach	Y
Policy D4 Delivering Good Design	Y
Policy D5 Inclusive Design	Y
Policy D6 Housing quality and standards	Y
Policy D8 Public Realm	Y
Policy D9 Tall Buildings	Y
Policy D11 Safety, Security and Resilience to Emergency	N
Policy D12 Fire Safety	Y
Policy E1 Offices	Y
Policy E2 Providing Suitable Business Space	N
Policy E3 Affordable Workspace	N
Policy E10 Visitor infrastructure	N
Policy HC1 Heritage conservation and growth	Y
Policy HC3 Strategic and Local Views	Y
HC4 London View Management Framework	Y
Policy H5 Supporting London’s culture and creative industries	N
Policy G1 Green Infrastructure	Y
Policy G4 Open Space	Y
Policy G5 Urban greening	Y
Policy G6 Biodiversity and Access to Nature	Y
Policy G7 Trees and Woodlands	Y
Policy SI 1 Improving Air Quality	Y
Policy SI 2 Minimising Greenhouse Gas Emissions	Y
Policy SI 7 Reducing Waste and Supporting the Circular Economy	N
Policy SI 12 Flood Risk Management	Y
Policy SI 13 Sustainable Drainage	Y
Policy T1 Strategic Approach to Transport	Y
Policy T2 Healthy Streets	Y
Policy T4 Assessing and Mitigating Transport Impacts	Y
Policy T5 Cycling	Y
Policy T6 Car parking	Y
Policy T7 Protecting and enhancing London’s Waterways	Y

London Wall West (ref: 23/01304/FULEIA)
 Planning Policy Review – 31/01/2024

The City of London Local Plan 2015	
POLICY	Referenced in Planning Statement?
Policy CS1 Offices	Y
Policy DM 1.1 Protection of office accommodation	
Policy DM 1.2 Assembly and protection of large office development sites	Y
Policy DM 1.3 Small and medium sized business units	Y
Policy DM 1.5 Mixed uses in commercial areas	Y
Policy CS3 Security and Safety	
Policy DM 3.1 Self-containment in mixed use developments	
Policy DM 3.2 Security measures in new developments around existing buildings	
Policy DM 3.3 Crowded places	
Policy DM 3.4 Traffic management	
Policy CS5 The North of the City	
Policy CS10 Design	Y
Policy DM 10.1 New development	Y
Policy DM 10.4 Environmental Enhancement	Y
Policy DM 10.7 Daylight and sunlight	Y
Policy DM 10.8 Access and inclusive design	Y
Policy CS11 Visitors, Arts and Culture	
Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities	
Policy DM 11.3 Hotels	
Policy CS12 Historic Environment	Y
Policy DM 12.1 Managing change affecting all heritage assets and spaces	
Policy DM 12.3 Listed buildings	
Policy DM 12.4 Ancient monuments and archaeology	Y
Policy DM 12.5 Historic parks and gardens	
Policy CS13 Protected views	Y
Policy CS14 Tall Buildings	
Policy CS15 Sustainable Development and Climate Change	Y
Policy DM15.1 Sustainability requirements	
Policy DM 15.2 Energy and CO2 emissions assessments	Y
Policy DM 15.3 Low and zero carbon technologies	
Policy DM 15.4 Offsetting of carbon emissions	Y
Policy DM 15.5 Climate change resilience and adaptation	
Policy DM 15.6 Air quality	Y
Policy DM15.7 Noise and light pollution	Y
Policy DM15.8 Contaminated land and water quality	
Policy CS16 Public Transport Streets and Walkways	Y
Policy DM 16.1 Transport impacts of development	
Policy DM 16.2 Pedestrian movement	
Policies DM 16.3 Cycle parking	
DM 16.4 Facilities to encourage active travel	
DM 16.5 Parking and servicing standards	Y
Policy CS17 Waste	
Policy DM 17.2 Designing out construction waste	Y

London Wall West (ref: 23/01304/FULEIA)
 Planning Policy Review – 31/01/2024

Policy CS19 Open Spaces and Recreation	N
Policy DM 19.1 Additional open space	N
Policy DM 19.2 Biodiversity and urban greening	Y
Policy DM 21.3 Residential environment	N
Policy CS22 Social Infrastructure and Opportunities	N

Emerging Local Plan City Plan 2040	
POLICY	Referenced in Planning Statement?
Draft Strategic Policy S1: Health and Inclusive City	Y
Draft Policy HL1: Inclusive buildings and spaces	N
Draft Policy HL2: Air quality	N
Draft Policy HL3: Noise	N
Draft Policy HL5: Contaminated land and water quality	N
Draft Policy HL6: Location and protection of social and community facilities	N
Draft Policy HL9: Play areas and facilities	N
Draft Policy HL10: Health Impact Assessments (HIA)	N
Draft Strategic Policy S2: Safe and Secure City	N
Draft Policy SA1: Crowded Places Publicly accessible locations	N
Draft Policy SA3: Designing in Security	N
Draft Strategic Policy S4: Offices	Y
Draft Policy OF1: Office Development	Y
Draft Policy OF2: Protection of Existing Office Floorspace	N
Draft Strategic Policy S6: Culture and Visitors	Y
Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities	N
Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities	Y
Draft Policy CV3: Provision of Visitor Facilities	N
Draft Strategic Policy S7: Infrastructure and Utilities	N
Draft Policy IN2: Infrastructure Capacity	N
Draft Strategic Policy S8: Design	Y
Draft Policy DE1: Sustainable Design	Y
Draft Policy DE2: Design Quality	Y
Draft Policy DE3: Public Realm	Y
Draft Policy DE5: Terraces and Elevated Public Spaces	Y
Draft Policy DE8: Daylight and Sunlight	N
Draft Policy DE9: Lighting	N
Draft Strategic Policy S9: Transport and Servicing	N
Draft Policy VT1: The impacts of development on transport	N
Draft Policy VT3: Vehicle Parking	N
Draft Strategic Policy S10: Active Travel and Healthy Streets	N
Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding	N
Draft Policy AT2: Active Travel including Cycling	N
Draft Policy AT3: Cycle Parking	N
Draft Strategic Policy S11: Historic Environment	Y
Draft Policy HE1: Managing Change to Historic Environment Development	Y

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Draft Policy HE2: Ancient Monuments and Archaeology	N
Draft Strategic Policy S12: Tall Buildings	N
Draft Strategic Policy S13: Protected Views	N
Draft Strategic Policy S14: Open Spaces and Green Infrastructure	Y
Draft Policy OS2: City Urban Greening	N
Draft Policy OS4: Biodiversity Net Gain	N
Draft Strategic Policy S15: Climate Resilience and Flood Risk	N
Draft Policy CR1: Overheating and Urban Heat Island Effect	N
Draft Strategic Policy S16: Circular Economy and Waste	N
Draft Strategic Policy S23: Smithfield and Barbican Key Area of Change	Y

City of London SPD/PAN	
POLICY	Referenced in Planning Statement?
Air Quality SPD, July 2017	Y
Archaeology and Development Guidance SPD, July 2017	Y
Barbican and Golden Lane Conservation Area SPD, February 2022	Y
Lighting SPD, October 2023	Y
Office Use SPD, January 2022	Y
Open Space Strategy SPD, January 2015	Y
Planning Obligations SPD, July 2014	Y
Protected Views SPD, January 2012	Y
Barbican Listed Building Management Guidelines, Volumes I, II and IV (2012-2015)	N
Archaeology in the City PAN,	N
Carbon Options Guidance PAN, March 2023	N
Developer Engagement Guidance PAN, May 2023	N
Preventing suicides in high rise buildings and structures PAN, November 2022	N
Solar Convergence PAN, July 2017	Y
Solar Glare PAN, July 2017	N
Sunlight PAN, July 2017	N
Wind Microclimate PAN, August 2019	Y

London Plan Guidance	
POLICY	Referenced in Planning Statement?
Planning for Equality and Diversity in London SPG, October 2007	N
All London Green Grid SPG, March 2012	N
London View Management Framework SPG, March 2012	Y
Play and Informal Recreation SPG, September 2012	N
The Control of Dust and Emissions during Construction and Demolition SPG, July 2014	N
Accessible London: Achieving an Inclusive Environment SPG, October 2014	Y
Social Infrastructure SPG, May 2015	N
Public London Charter LPG, October 2021	N
Circular Economy Statements LPG, March 2022	Y

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Whole Life-Cycle Carbon Assessments LPG, March 2022	Y
Fire Safety LPG, draft June 2022	N
Sustainable transport, Walking and Cycling LPG, December 2022	N
Air Quality Positive LPG, February 2023	N
Air Quality Neutral LPG, February 2023	N
Urban Greening Factor LPG, February 2023	Y
Optimising Site Capacity: A Design-Led Approach LPG, June 2023	N