



Planning and Transportation Committee

Annex Pack – Background Papers

Date: TUESDAY, 10 JULY 2018
Time: 10.00 am
Venue: LIVERY HALL - GUILDHALL

8. **100, 106 AND 107 LEADENHALL STREET**
Report of the Chief Planning Officer and Development Director

(Pages 1 - 222)

9. **ILLUMINATED RIVER PROJECT**
Report of the Chief Planning Officer and Development Director

(Pages 223 - 240)

John Barradell
Town Clerk and Chief Executive

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Background Papers

External

Online	Mr Peter Kelly	19 March 2018
Online	Mr Kieran Wardle	19 March 2018
Email	Nick Pope	19 March 2018
Online	Mr Yarema Ronish	20 March 2018
Online	Mr Eitan Goury	27 March 2018
Online	Mr Xavier Tzinmann	27 March 2018
Online	Mr Xavier Maer	27 March 2018
Online	Mrs Rachel Levy	27 March 2018
Online	Miss Karla Macias	27 March 2018
Online	Mr Darren Hill	27 March 2018
Online	Mr Steven Wolfinger	27 March 2018
Online	Mrs Sara Jackson	28 March 2018
Online	Mrs Melody Salem	28 March 2018
Online	Mr David Ereira	28 March 2018
Online	Mrs Joyce Misraho	29 March 2018
Online	Dr Richard Dawood	28 March 2018
Online	Mr Robert Yentob	27 March 2018
Online	Mr Howard Martin	27 March 2018
Online	Ms Anna Albright	27 March 2018
Online	Mrs Anna Sanders	27 March 2018
Online	Mr Richard Sopher	27 March 2018
Online	Mr Michael Brandon	27 March 2018
Online	Mr Freddy Salem	27 March 2018
Online	Mr Maurice Martin	27 March 2018
Online	Mr Allan Howard	27 March 2018
Online	Dr Stuart Morganstein	27 March 2018
Letter	Mrs Gillian Beauchamp	28 March 2018
Online	Mr Caline Chazan	17 April 2018
Online	Mr Marcos Chazan	17 April 2018
Online	Mr Albert Hay	17 April 2018
Online	Mr Ezra Aghai	17 April 2018
Online	Mr Brian Duffus	17 April 2018
Online	Mrs Patty Ladow	17 April 2018
Online	Mr Norman Dawood	17 April 2018
Online	Mrs Jewel Scott	17 April 2018
Online	Mrs Jill Ruddock	17 April 2018
Online	Mrs Ayelet Elstein	17 April 2018
Online	Mr Michael Webber	17 April 2018
Online	Mr Lee Whitbread	17 April 2018
Online	Mr Harry Handelsman	17 April 2018
Online	Miss Olivia Horton	17 April 2018
Online	Mr Laurent Zmiron	17 April 2018
Online	Ms Sandra Shashoua	17 April 2018
Online	Mrs Lina Ofer	17 April 2018
Online	Mr Charles Jacob	17 April 2018

Online	Miss Nina Appleby	09 April 2018
Online	Mrs Lesley Arkin	09 April 2018
Online	Dr Simon Gabbay	28 March 2018
Online	Mr Loïuse Obadia	28 March 2018
Online	Ms Vicky Album	30 March 2018
Online	Mr Lawrence Salem	03 April 2018
Online	Mr Solly Levy	03 April 2018
Online	Mrs Hazel Collins	03 April 2018
Online	Mrs Muriel Salem	03 April 2018
Online	Mr Ilan Kreiger	04 April 2018
Online	Mr Charles Teacher	04 April 2018
Online	Ms Rebecca Krechman	04 April 2018
Online	Me Daniel Zubaida	04 April 2018
Online	Mr Nick Balcombe	05 April 2018
Online	Mr Michael Keats	05 April 2018
Online	Ms Hilary Blume	05 April 2018
Online	Mrs Jessica Tricot	06 April 2018
Online	Mr David Hoffman	06 April 2018
Online	Mr Anthony Tricot	06 April 2018
Online	Ms Cathy Wills	23 April 2018
Online	Mr Jack Bekhor	22 April 2018
Online	Mr Charles Shamash	18 April 2018
Online	Mr Lloyd Hunt	18 April 2018
Email	Malena Schmool	03 April 2018
Online	Mr Darren Smith	18 April 2018
Online	Mr Jack Basrawy	04 April 2018
Online	Mr Alex Gruca	03 April 2018
Online	Mr Jonathan Whitbr	04 April 2018
Online	Mr Frank Martin	27 April 2018

Letter The S&P Sephardi Community dated 27 March 2018

Letter J Watson Consulting Ltd (on behalf of Tavor Holdings Ltd (Valiant House, 4 Heneage Lane) dated 4 April 2018

Letter Eversheds Sutherland (on behalf of The Wardens and Society of the Mystery or Art of the Leathersellers) dated 26 March 2018

Letter Environment Agency dated 27 March 2018

Email Port of London Authority dated 26 March 2018

Email Natural England dated 26 March 2018

Email Thames Water dated 16 March 2018

Email Heathrow Airport dated 26 March 2018

Email London City Airport dated 20 March 2018

Email National Air Traffic Services (Technical and Operations Assessment (TOPA)) dated 16 March 2018

Letter London Borough of Hackney dated 09 March 2018

Letter Royal Borough of Greenwich dated 21 March 2018

Letter London Borough of Lambeth dated 03 April 2018

Letter London Borough of Tower Hamlets dated 12 April 2018

Letter Transport for London dated 04 April 2018

Email City of London and GLA/TfL Transport Responses from DP9 dated 18 May 2018

Letter Historic England dated 27 March 2018
Letter Great London Authority dated 16 April 2018
Letter Historic Royal Palaces dated 22 May 2018
Letter Surveyor to the Fabric of St Paul's Cathedral dated 25 May 2018
Letter J Watson Consulting Ltd (on behalf of Meron Holdings Ltd 18 Bevis Marks) dated 4 April 2018
Letter St Helens Bishopsgate dated 14 June 2018
Letter J Watson Consulting Ltd (Further representation on behalf of London Sephardi Trust including Letter from Caroe Architecture re Heritage Impact of Proposed Development at 100 Leadenhall dated 8 June 2018) dated 12 June 2018
Letter DP9 in response to objection raised by Surveyor to the Fabric of St Paul's Cathedral dated 13 June 2018
Letter DP9 in response to objection raised by Historic Royal Palaces dated 13 June 2018
Email Zachary Osbourne - The Georgian Group dated 15 June 2018
Email DP9 in response to objection raised by Leathersellers dated 19 June 2018
Email Lance Harris (Anstey Horne) on Behalf of Residents at 4-8 Creechurch Lane dated 16 May 2018

From: PlnComments@cityoflondon.gov.uk
Sent: 19 March 2018 10:42
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:38 AM on 19 Mar 2018 from Mr Peter Kelly.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and Improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ|cr|

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Peter Kelly

Email:

Address: River Lea London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: Reason for comment: Conservation and design

I object to the current scheme on the grounds of conservation and design.

The site layout and overall massing looks well-suited to this site. However the loss of the two westernmost and oldest buildings (particularly their street frontages) closest to the church, should not be acceptable. Given that the application proposes replacing these buildings with another of a similar scale suggests that there is no

good reason not to attempt to keep them, or their facades at least, on site.

These older buildings (even if not in a conservation area or protected in any way) are still valuable. They give interest to the street; they protect from down draughts from tall buildings; they create a heritage character context for the listed church; they represent embodied energy; they represent embodied information about the history of the street; they represent continuity which is as important as change in the City of London. They would give the site depth and gravitas. A good precedent could be seen up against the Lloyds of London building a few doors away - this approach is a characteristic of Leadenhall Street

London is full of contrasts between old and new, but these contrasts are made when old buildings are retained alongside new and in a balance. If more old buildings are lost than new ones built that special character disappears and the city will gradually lose its genius loci that makes the City such a special place to work.

Retaining these two buildings or their facades would require minimal changes to the proposal. It may require some ingenious approach which would challenge the builders and architects, but this will only improve their capability to deal with similar challenges in future.

I would be happy to write a strongly supportive letter in support of a proposal which retained these heritage / character assets. But until then I object to this scheme as an urban designer and as a resident of London.

From: PlnComments@cityoflondon.gov.uk
Sent: 19 March 2018 11:18
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:14 AM on 19 Mar 2018 from Mr Kieran Wardle.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ|cr|

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Kieran Wardle
Email:
Address: 30 Elam Close London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: It seems from the plans that there is no material need to demolish a building of relative historic merit in an area of London that is being radically changed by new large scale developments. Although I am generally very supportive of new architecture, it seems that to approve the unnecessary demolition of a building of some merit due to laziness of design or a wish for a clean slate on site would be harmful to the local area and the City's urban fabric

From: Contact Centre
To: [Pin - CC - Development Dc](#)
Subject: FW: PRO - FW: Objection to 18/00152/FULEIA COL:05095855
Date: 19 March 2018 15:34:25
Attachments: [Image001.png](#)

Dear Team,
Please see email below.
Kind Regards
David Parvin
Contact Centre Agent
Town Clerks Department
City of London Corporation
T: 020 7606 3030

From: Nick Pope [REDACTED]
Sent: 19 March 2018 13:20
To: PRO Queue
Subject: Objection to 18/00152/FULEIA

Dear Sir/Madam

I am writing to strongly object to the demolition of the historic stone buildings as part of this development as part of this scheme REF: 18/00152/FULEIA at 100 Leadenhall Street London EC3A 3BP.

Continued demolition of historic buildings completely erodes the character of London and the setting of other important heritage assets locally, such as Leadenhall Market.

I have no objection to the glass tower but it's clear with this development that the new glass tower could still be built whilst incorporating and reusing the existing heritage buildings that offer much more visually and to a personal scale that the new building does. It would be more ambitious for the city to be developed with consideration of its built heritage rather than by throwing up yet another glass tower that has a rather poor relationship with the ground level and public realm.

I hope you can work with the developer to find a scheme that reuses the historic buildings that are on the site.

Regards
Nick

Nick Pope
35A Kenworthy Road
London
E9 5RB



From: PlnComments@cityoflondon.gov.uk
Sent: 20 March 2018 21:31
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:27 PM on 20 Mar 2018 from Mr Yarema Ronish.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Yarema Ronish
Email:
Address: Flat 5 4-8 Creechurch Lane London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: This planning application proposes to replace a 10 storey building with a 56 storey building. It is abundantly clear that the proposed building is simply too big, for a number of reasons:

HERITAGE
The proposed building sticks out like a sore thumb in proposed views 8, 18, 19, 20, 28, 29 and 33. These views are highly significant because the building is seen next to the Tower of London. In the cumulative versions of these views, the proposed building is an abrupt

cliff edge to the Eastern Cluster next to the Tower of London. There are few if any tall building sites available east of the proposal site, as the neighbouring land is occupied by St Katherine Cree church, the residential flats on Creechurch Lane and Mitre Street, the recently completed Mitre Square development and Sir John Cass school. Therefore for all intents and purposes 100 Leadenhall Street will form the edge of the Eastern Cluster when seen in these views. It is therefore essential that 100 Leadenhall Street be reduced and reshaped to form a gentler transition to surrounding urban form.

In cumulative view 45 from Cornhill, Leadenhall Street becomes a canyon due to the quantity and proximity of tall buildings. The presence of looming towers in the mid- and background of this view has a detrimental effect on the Bank Conservation Area.

In proposed view 63, the proposed building competes for prominence with the spire of St Botolph Aldgate, detracting from the setting of this Grade I listed building. In view 71 the proposed building, with its huge scale and faceted cladding, creates a garbled backdrop to St Andrew Undershaft, again detracting from the setting of a Grade I listed building.

In proposed view 66, the proposed tower looms over fine historic buildings, wrecking the coherent character of the Lloyds Avenue conservation area.

PUBLIC AMENITY

The proposed tower obscures views from public viewing galleries in recently constructed tall buildings. In proposed view A14 from 120 Fenchurch Street, the proposed tower fills a quarter of the view. Instead of seeing the whole of the Gherkin as an object in the middle ground, the view is enclosed by the wide and tall south elevation of the proposed tower. In proposed view A15 from 22 Bishopsgate, the proposed tower appears as a distracting object in the foreground, spoiling what would have been a fine view of the Tower of London. These public viewing galleries were created as a public amenity to mitigate the impact of 120 Fenchurch Street and 22 Bishopsgate. If the views are obscured by following developments, this undermines the case for granting planning permission to the existing towers, increases their impact and degrades public amenity.

DAYLIGHT

The proposed development has too many detrimental effects on the daylighting of adjoining flats. The existing vertical sky component of most of the windows to the flats at 4-8 Creechurch Lane is already well below 20% and in some cases below 10%. The proposed losses of up to 20% of vertical sky component breach the BRE guidance, even for a densely built up urban site. In the case of the flats at 14-16 and 18-20 Creechurch Lane the existing VSC's are even lower and the proposed loss of VSC is even more severe (over 30% in some cases). This leads to cumulative loss of VSC of nearly 50% in the

case of 14-16 and 18-20 Creechurch Lane.

Existing and proposed Average Daylight Factor, which forms part of BRE guidance, has not been calculated, presumably because the results are even worse. The applicants clearly know the existing room dimensions, since they are able to calculate the No Sky Line and identify kitchens smaller than 13sqm. Therefore they have the data they need to calculate the ADF.

LIGHT POLLUTION

The applicant's light pollution drawings indicate an illumination of 25 lux or more to the west facing windows of 18-20 Creechurch Lane (Appendix 14.6, figure 6), and an illumination of 20 lux to the west facing top floor windows of 4-8 Creechurch Lane (Appendix 14.6, figure 8). For comparison, 20 lux is equivalent to the light of 20 candles illuminating one square metre, so this is a significant amount of light pollution to rooms which include bedrooms.

CONCLUSION

This proposal has severely detrimental effects on heritage (including the Tower of London, Grade I listed buildings and conservation areas), public amenity (recently constructed viewing platforms), daylight and light pollution. Therefore the planning committee should refuse this application.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:03 PM on 27 Mar 2018 from Mr eitan goury.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr eitan goury

Email:

Address: Flat F Blenheim Court 108 lancaster gate london

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: THE TOWER BLOCK PLANNED HAS NOT STUDIED CORRECTLY THE IMPACT OF SUNLIGHT ON A MUCH USED COURTYARD AND HAS A DETRIMENTAL EFFECT ON THE SURROUNDINGS OF AN HERITAGE SITE

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:49 PM on 27 Mar 2018 from Mr Xavier Tzinmann.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
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Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Xavier Tzinmann

Email:

Address: 20 elnathan Mews London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: I strongly object as the project at hand give no consideration to the particular nature of the listed building. There is enough space and demand in canary wharf for a project of this kind. England must be proud of its history and symbols so must nurture its historical places rather than allow financial investors make short term profits.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FUL/EA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:15 PM on 27 Mar 2018 from Mr Xavier Maer.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
[cr]This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Xavier Maer

Email:

Address: 2 Clifton Villas London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity

Comments: This will alter significantly the landscaping of the neighbourhood.

From: PlnComments@cityoflondon.gov.uk
Sent: 27 March 2018 17:41
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 5:37 PM on 27 Mar 2018 from Mrs Rachel Levy.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
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Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Rachel Levy

Email:

Address: 25 Harley House 28-32 Marylebone Road London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: Would you allow a commercial development to overshadow Westminster Abbey. Bevis Marks is a Grade 1 listed House of Worship it is already surrounded by monstrous Commercial Developments. It is a regular house of religious attendance. Jews in the city and from abroad attend services at Bevis Marks. Through world War 2 it was the only synagogue in Europe holding daily services. It is not a dead monument like statues that surround LONDON. It's courtyard is used for religious celebrations and social gatherings. The decision to support a commercial office is a

disgrace. Two generations of my family were married at Bevis Marks. I have a vested interest in maintaining its place in the History of Jews in London. The planning authorities should hang their heads in collective shame if they allow this monstrous proposal to advance. They are busy maintaining burnt out churches in the city but impotent to maintain a house of Regular Jewish Worship. It is not a dead building but one holding religious services every day through the year.

RECONSIDER.

From: PlnComments@cityoflondon.gov.uk
Sent: 27 March 2018 18:52
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 6:48 PM on 27 Mar 2018 from Miss Karla Macias .

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

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Customer Details

Name: Miss Karla Macias

Email:

Address: 779 Finchley Road Flat 1 London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I totally want the Synagogue to stay as it is; is part of our history as Jews

From: PinComments@cityoflondon.gov.uk
Sent: 27 March 2018 20:57
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 8:53 PM on 27 Mar 2018 from Mr Darren Hill.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Darren Hill

Email:

Address: 115 Glengall Road London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: Natural light into the historic Synagogue has been preserved since 1701 when the building was constructed. The EIA concerning light has been improperly undertaken by the developer as they have assessed the impact on light to the small Heneage Lane entrance. An appropriate assessment must be undertaken focusing on natural light to the courtyard, the results of which must be considered by the Synagogue and its members.
The building is of historical importance given its Grade I Listed status and has been a focal point for the local

Jewish community for many generations. Therefore, a correct EIA is the very least that can be expected in order to preserve the Synagogue.

From: PlnComments@cityoflondon.gov.uk
Sent: 27 March 2018 21:23
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:19 PM on 27 Mar 2018 from Mr steven wolfinger.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr steven wolfinger

Email:

Address: 19 Tavastock House ROSEBURY sQUIRE London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments:

Obscures the view of the historic Bevis Marks Synagogue.

From: PlnComments@cityoflondon.gov.uk
Sent: 28 March 2018 07:14
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 7:10 AM on 28 Mar 2018 from Mrs Sara Jackson.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Sara Jackson
Email:
Address: 16 Park Crescent London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: This is an ill advised and horrifying suggestion that will have a detrimental effect on a building incredibly important to the congregation and Jews from all over who visit Bevis Marks Synagogue. The 300 year old Synagogue is a Grade I listed building and as such is of 'exceptional historic interest'. The courtyard, which has remained unchanged in layout since the Synagogue's construction in 1701, is where the Synagogue building has been appreciated for over 300 years against backdrops of open sky and generally lower scale nearby buildings.

· As well as being a place for general socialising and meeting, the Courtyard is used for many daytime events and celebrations throughout the year. Part of its charm is that it enjoys natural light and is a relatively secluded private space.

The application failed to assess impact from the front and only did so from the back.

The council must help us to protect this building and our usage against this commercial property giant.

My husband's family are founder members of this community all the way back to 1700's. The impact on the community and in these difficult times for Jews in the UK would be enormous

· The Synagogue is used every day of the year including for prayers three times per day, Saturday services, weddings, celebrations, and educational visits.

From: PlnComments@cityoflondon.gov.uk
Sent: 28 March 2018 08:51
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 8:46 AM on 28 Mar 2018 from Mrs Melody Salem.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Melody Salem

Email:

Address: 70 Regents Park Road London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: I object to this building as it might block the light into Bevis Marks Synagogue.

From: PlnComments@cityoflondon.gov.uk
Sent: 28 March 2018 16:12
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 4:08 PM on 28 Mar 2018 from Mr David Ereira.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr David Ereira

Email:

Address: 47b Welbeck Street London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I strongly believe this planning application will have a negative effect on the heritage of Bevis Marks synagogue and also the position will dramatically overshadow this historical premises.

From: PlnComments@cityoflondon.gov.uk
Sent: 29 March 2018 07:24
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 7:20 AM on 29 Mar 2018 from Mrs joyce misrahi.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs joyce misrahi

Email:

Address: 98 Hamilton Terrace London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Residential Amenity

Comments: It will overshadow Bevis Marks synagogue and cut out natural light.

From: PlnComments@cityoflondon.gov.uk
Sent: 28 March 2018 23:46
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:42 PM on 28 Mar 2018 from Dr Richard Dawood.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Dr Richard Dawood

Email:

Address: Fleet Street Clinic 29 Fleet Street London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: There can be no doubt that this project will have a highly detrimental impact on a Grade 1 Listed Building, literally overshadowing the neighbouring Bevis Marks Synagogue, a building of tremendous importance to the history of London and the London Jewish community as a whole. It is very clear that a full and adequate heritage impact assessment is urgently needed. I fully understand the powerful commercial motives that drive such a proposed development, but It is no less Important to preserve the heritage and amenity of such a unique and

precious building as Bevis Marks, which is like no other in the UK.

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:03 PM on 27 Mar 2018 from Mr Robert Yentob.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Robert Yentob

Email:

Address: 18 Cumberland Terrace London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: Bevis Marks Synagogue is the oldest in the UK and this building could not only help overpower it but most important reduce the light in the courtyard and the building.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULETA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:53 PM on 27 Mar 2018 from Mr Howard Martin.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Howard Martin

Email:

Address: 21 Tretawn Park Mill Hill London

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: My family has been worshipping at the Bevis Marks Synagogue since it opened in 1701. The building is a grade 1 listed building and is deemed so significant to the heritage of the City of London and the UK that it recently received approval for major works from the HLF. The beauty of the building and of the courtyard would be seriously damaged by the proposed development. The natural light is both a feature but also an essential ingredient for our prayers and community activities - services are held daily and in order to preserve the ambience and authenticity of the building only limited electric lighting has been added. We rely on the natural light for our prayers and to hold our events and

activities. The proposal would seriously damage a historic building and space, ruin the atmosphere for religious services that has been in place for 317 years and adversely impact the many cross communal events. I urge you to consult with the HLF themselves for further information on the significance of Bevis Marks Synagogue and the need to avoid this kind of development.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:43 PM on 27 Mar 2018 from Ms Anna Albright.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Ms Anna Albright

Email:

Address: 17 Nottingham Street London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: I strongly object to the plans. This is a historic site and Bevis Marks is a historic building. Please don't take away another part of London's character in favour of another office building that could be built in an area of London that does not offer the historical, social and pleasurable importance that this area has.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:47 PM on 27 Mar 2018 from Mrs Anna Sanders.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and Improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Anna Sanders

Email:

Address: 7 Denning Close LONDON

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: It is important that more detailed analysis of the overshadowing effect of the proposed building on the Bevis Marks synagogue and exterior courtyard is carried out. This is a historic building that is a key part of the London Jewish community's heritage as well as being a much loved and used community centre. The building and its enjoyment, of which natural light is an important part, must be protected for future generations.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:53 PM on 27 Mar 2018 from Mr richard sopher.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further Information](#)

Customer Details

Name: Mr richard sopher

Email:

Address: 3 upper belgrave street london

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: Please review the Impact of the proposed scheme on the light at nearby Bevis Marks Synagogue, including on its courtyard. It is the oldest synagogue in the UK I believe.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FUL/EA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:09 PM on 27 Mar 2018 from Mr Michael Brandon.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
[cr]This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Michael Brandon

Email:

Address: 46 Cumberland Drive Hinchley Wood Esher, Surrey

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: No assessment has been made of the impact of this building on the natural daylight currently enjoyed at the Main Entrance and Courtyard at the front of the Synagogue building and also on the quality of the daylight at the windows at the front and sides of the building.

The Courtyard, deprived of natural daylight, will have an intimidating aspect of darkness and imprisonment imposed by the new building.

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FUL/EA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:20 PM on 27 Mar 2018 from Mr Freddy Salem.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Freddy Salem
Email:
Address: 29 Eccleston street London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: The new development at 100 Leadenhall will over shadow this 300 years old historically Important grade one listed building and will cast a shadow over its main entrance.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application TB/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:22 PM on 27 Mar 2018 from Mr Maurice Martin.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and Improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Maurice Martin

Email:

Address: 16 Paragon Court 129 Holders Hill Road Hendon

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: As a regular attender at Bevis Marks Synagogue , as my family has been since it was opened in 1701, I strongly object to the new building proposal as it would interfere with the running of our synagogue and services, which are unique as the oldest synagogue in the uk open for regular daily services.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:42 PM on 27 Mar 2018 from Mr Allan Howard.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Allan Howard

Email:

Address: 1 Townsend Lane London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: This will destroy the outlook from the courtyard and over shadow the synagogue even more.

Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:53 PM on 27 Mar 2018 from Dr Stuart Morganstein.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further Information](#)

Customer Details

Name: Dr Stuart Morganstein
Email:
Address: 5 Defoe House Barbican London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Traffic or Highways

Comments: I have been a member of the Synagogue for 40 years and I have three main objections to the proposed building.
Firstly the proposed building will completely remove daylight from the Synagogue and the courtyard which is the main entrance to the synagogue and plays a vital part in the functioning of the synagogue and is also the location for some of the religious activity. The 'assessment of impact' was aimed at the rear door which is NOT the entrance but the fire escape!
Secondly, there are very real security implications to the synagogue and its worshipers in having the entrance, courtyard and building overlooked from an easy target.

Thirdly the Building and courtyard are both well over 300 years old and Grade 1 listed. The potential disturbance to the synagogues property from the excavations, building and traffic noises poises a potential disturbance to the services in the synagogue which take place every day of the year. There have been previous occasions when religious services have had to be temporarily suspended because the traffic and building noise has been such that congregants have not been able to hear to pray.

Please reject this proposal as it will have such a large impact on the life of a synagogue that has had continuous services for in excess of 320 years which is unique in the world.

PL
29 MAR 2018

Mrs Gillian Beauchamp
21 Seymour Avenue
E. Ewell Epsom Surrey KT17 2RP

Annie Hampson
Chief Planning Officer
and Development Director:

28th March 2018.

Your ref: PT-BXD/18/00152/FULLE1A

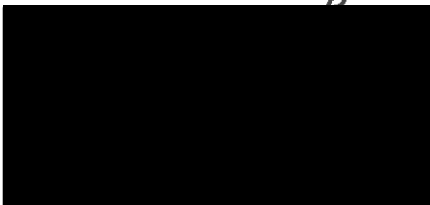
Cunard Place, 100 headenhall Street, EC3A 3BP

Dear Madam

Re: Your planning application for this site. I wish the existing alley way / right of way for pedestrians to remain. This is used constantly as a shortcut throughout the day and the rush hour, by not only commuters, but persons going about their day-to-day business appointments.

I have not viewed the plans for this redevelopment as I have just seen your notice, and do not own a computer; but wish this right of way / alleyway to be preserved.

Yours faithfully



attached my card.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 22:16
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:11 PM on 17 Apr 2018 from Mr Caline Chazan.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
[cr]This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Caline Chazan

Email:

Address: Flat 80 Harley House Marylebone Road London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: This development would deprive of daylight and overshadow our synagogue Bevis Marks which has existed for more than three hundred years.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 22:14
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:09 PM on 17 Apr 2018 from Mr Marcos Chazan.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
[This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.]

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Marcos Chazan
Email:
Address: Flat 80 Harley House Marylebone Road London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
Comments: This development would deprive of daylight and overshadow our synagogue Bevis Marks which has existed for more three hundred years

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 17:43
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 5:39 PM on 17 Apr 2018 from Mr Albert Hay.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sul Generis) and after hours Restaurant/Bar (Sul Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Albert Hay
Email:
Address: 25 Hampstead Grove London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Traffic or Highways

Comments: I AM CONCERNED THE PROPOSED DEVELOPMENT WILL PREJUDICE THE DAYLIGHT AND AMENITIES OF BEVIS MARKS SYNAGOGUE AND COMMUNITY CENTRE, A HISTORIC LANDMARK LISTED PROPERTY. THE COUNCIL SHOULD BE DOING EVERYTHING IN ITS POWER TO PRESERVE THE INTEGRITY OF THIS BUILDING.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 15:24
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:20 PM on 17 Apr 2018 from Mr EZra Aghai.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr EZra Aghai
Email:
Address: 8 Allandale Avenue london

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
Comments: Bevis Marsk is a historical building which has deep root to English heritage, once this building is overshadowed by high tower block Bevis Marsk might fall to the ground, we should not forget history which is our presence.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 15:18
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:13 PM on 17 Apr 2018 from Mr Brian Duffus.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Brian Duffus

Email:

Address: 17 Woodbine Place Wanstead London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: This new building is adding too the already oppressive high rise office provision in the immediate area around a 300 year old religious building which is used each day by many people who also work in the surrounding offices .
There are many empty offices in a short walking distance from this applicants site which could be used instead of adding another tower to the skyline surrounding this 300 year old synagogue.
I wish to object to the proposal as it stands , the proposed building is too high, and a submission to the

small religious building when it should complement the historic synagogue not cause a blight upon it. I ask the planning committee to reject the current proposed tower and refuse planning approval.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 12:52
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:48 PM on 17 Apr 2018 from Mrs Patty Ladow.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Patty Ladow
Email:
Address: 1 Thornwood Gardens London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: I strongly disagree

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 12:38
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:33 PM on 17 Apr 2018 from Mr Norman Dawood.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Norman Dawood
Email:
Address: 132 Cleveland St London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity

Comments: This construction will have a catastrophic effect on the neighbouring buildings which will be impacted by a severe loss of light and will literally live in its shadow. In particular, the ancient synagogue, one of the last buildings of that age will be completely overshadowed.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 12:13
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:08 PM on 17 Apr 2018 from Mrs Jewel Scott.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Jewel Scott
Email:
Address: 2A Lauderdale 2A Lauderdale London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments:

- Some key points about the Bevis Marks Synagogue:
 - The 300 year old Synagogue is a Grade I listed building and as such is of 'exceptional historic interest'
 - The courtyard, which has remained unchanged in layout since the Synagogue's construction in 1701, is where the Synagogue building has been appreciated for over 300 years against backdrops of open sky and generally lower scale nearby buildings.

- As well as being a place for general socialising and meeting, the Courtyard is used for many daytime events and celebrations throughout the year. Part of its charm is that it enjoys natural light and is a relatively secluded private space.
- The Synagogue is used every day of the year including for prayers three times per day, Saturday services, weddings, celebrations, and educational visits.

From: PinComments@cityoflondon.gov.uk
Sent: 17 April 2018 11:53
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:48 AM on 17 Apr 2018 from Mrs Jill Ruddock.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Jill Ruddock
Email:
Address: 7 Lansdowne Walk London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
Comments:

Our synagogue Bevis Marks has existed for three hundred years , was built in the times of Thomas Cromwell when he welcomed the immigrant Jews to England.

It has functioned as such and still do nowadays.
The explosion of development in the city is

about
to deprive it of daylight and overshadow it.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 11:51
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:46 AM on 17 Apr 2018 from Mrs Ayelet Elstein.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Ayelet Elstein
Email:
Address: Patlo Flat 94 Carlton Hill London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: The construction of this 56 storey building will demonstrate lack of respect to a historic building which is symbolic to an entire community that has been rooted in the City for centuries and has contributed immensely to its cultural prosperity and further.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 11:22
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:17 AM on 17 Apr 2018 from Mr Michael Webber.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Michael Webber
Email:
Address: 9 Chester Terrace London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity

Comments: The proposed building will create an overbearing negative presence in the historic setting of the 300+ year old Grade I listed Bevis Marks Synagogue and will cut out the natural light both through the south facing windows and to the historic courtyard.

Understand the developers have improperly assessed the Impact on the historic setting of the Bevis Marks Synagogue from the rear entrance on the narrow Heneage Lane

Surely a proper assessment & report should be undertaken from the much-used courtyard where the Synagogue can actually be seen. This proposed report will be very negative for the developers !!

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 11:04
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:00 AM on 17 Apr 2018 from Mr Lee Whitbread.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Lee Whitbread
Email:
Address: 36 Metcalf Road Ashford

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: Support for Bevis Marks Synagogue

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 11:01
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:57 AM on 17 Apr 2018 from Mr Harry Handelsman .

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Harry Handelsman
Email:
Address: Flat 1 2 Hyde Park Gardens London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: The Bevis Marks synagogue has existed for three hundred years and has welcomed the immigrant Jews to England. The proposed development will deprive it of daylight and overshadow this important building. Its integral to the community.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 11:00
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:56 AM on 17 Apr 2018 from Miss Olivia Horton.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Miss Olivia Horton

Email:

Address: 39b Garner Road London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: The Bevis Marks synagogue has existed for three hundred years and has welcomed the immigrant Jews to England. The proposed development will deprive it of daylight and overshadow this important building. Its integral to the community.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 10:57
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:53 AM on 17 Apr 2018 from Mr Laurent Zmiro.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Laurent Zmiro
Email:
Address: 8 Clifton House Hollywood Road London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
Comments: Protect the surroundings of the 300 years old Bevis Marks synagogue

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 09:35
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:31 AM on 17 Apr 2018 from Ms Sandra Shashou .

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Ms Sandra Shashou
Email:
Address: Flat 1 33 Elsworthy Road London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: Pls preserve the synagogue

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 08:53
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 8:48 AM on 17 Apr 2018 from Mrs Lina Ofer.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Lina Ofer
Email:
Address: 27 The Little Boltons London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: Object based on the deprivation of daylight that will be caused to Bevus Marks synagogue.

From: PlnComments@cityoflondon.gov.uk
Sent: 17 April 2018 10:30
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:25 AM on 17 Apr 2018 from Mr Charles Jacob.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Charles Jacob
Email:
Address: 16 Elmcroft Crescent London

Comments Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Reasons for comment:
- Noise
- Residential Amenity
Comments: there are enough office buildings in the area- don't spoil the character of the city anymore

From: PlnComments@cityoflondon.gov.uk
Sent: 09 April 2018 11:05
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:01 AM on 09 Apr 2018 from Miss Nina Appleby.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Miss Nina Appleby

Email: _____

Address: 94 Lavender Hill Enfield

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I am extremely concerned that this proposed office tower will have a detrimental effect on Britain's oldest synagogue, its unique historic setting, and on the diverse Bevis community - including those who pray there, those who come along on educational visits, and those who gather for socials, weddings and other celebrations.

In particular, I am worried that the proposed tower will overshadow the synagogue, cutting out the natural light both through the south facing windows of the synagogue

and to the historic courtyard, where I have enjoyed numerous events.

I understand that the courtyard has remained unchanged in layout since the synagogue's construction in 1701 - It is where the exterior of the synagogue building has been appreciated for over three centuries. The courtyard's special ambience is largely down to that fact that it enjoys natural light and is a relatively secluded private space.

The Grade I listed status of the 300-year-old Synagogue underlines the building's national importance. As I understand it, 'listing marks and celebrates a building's special architectural and historic interest, and also brings it under the consideration of the planning system, so that it can be protected for future generations.' (Historic England).

From: PlnComments@cityoflondon.gov.uk
Sent: 09 April 2018 13:37
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:33 PM on 09 Apr 2018 from Mrs Lesley Arkin.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mrs Lesley Arkin
Email:
Address: 10 Whetstone Close Heelands Milton Keynes

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: The blocking of the light especially the courtyard of this 300+ year old synagogue, which is still used everyday, and has one of the best synagogue architectures in Europe.

This building is visited regularly by tourists as well as the congregation and it is expected that the Council should wish to protect such a historic site.

From: PlnComments@cityoflondon.gov.uk
Sent: 28 March 2018 14:30
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:25 PM on 28 Mar 2018 from Dr SIMON GABBAY.

Application Summary

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Dr SIMON GABBAY

Email:

Address: 26 Manor Hall Avenue LONDON

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:
- Noise
- Traffic or Highways

Comments: PRESERVE the tranquility and respect for listed places of worship with consequent adverse effects the proposed planned high rise 56 storey building will bring around the surrounding existing buildings.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Louise Obadia

Address: 1 Cotman Close London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I feel that it would be a total injustice to build this 56 storey building and risk overshadowing or damaging the beautiful 300 year old plus Bevis Marks Synagogue. We fear this will present a huge overbearing presence in the historic setting of the Synagogue and will cut out the natural light both through the south facing windows and to the historic courtyard where we welcome the public and hold so many events. I doubt very much that there would be any assurances you could offer that would ensure its protection in any way.

A 56 storey building that has retail complexes in it too - will threaten the building too in terms of security, due to the increased number of people in the area. This is especially pertinent now given the rising number of antisemitic incidents in London.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Vicky Album

Address: 47 Lyndale Avenue London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am objecting to this development on the grounds that it will overshadow Bevis Marks Synagogue which is a Grade 1 listed building as well as a working synagogue of which I have been a member all of my life. In particular, I believe this development would overshadow our courtyard.

The courtyard is central to synagogue life and overshadowing or darkening it would have a serious detrimental effect on the character of the building and on our community. We gather in the courtyard after services, and both my parents and brother's wedding photos were taken in that courtyard. The courtyard is the heart of the synagogue.

Whilst the surrounding area is built up, we currently enjoy good light there. We are an old established part of the City community and our synagogue should be valued and protected for its historic and cultural significance as well as the role it should rightly play in the lives of generations of Londoners to come.

Many thanks

Vicky Album

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Lawrence Salem

Address: 9 Holyrood Court 3-5 Gloucester Avenue LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: My fear is that the new building is of such substantial nature that it will overwhelm the setting of the existing synagogue and cut out the majority of the natural light that it benefits from, which is one of its key definitive features.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Solly Levy

Address: 59 Highfield Avenue London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Kindly help preserve the integrity of this great listed building of historical interest



Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mrs hazel Collins

Address: 1 Old Court House North End Way NW3 7ER London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: A 56 storey 100 Leadenhall Street tower will stand some 260m high and be just a street block away to the south-west of Bevis Marks Synagogue which is 300 years old and of historic significance.

I fear it will present a huge overbearing presence in the historic setting of the Synagogue and will cut out the natural light both through the south facing windows and to the historic courtyard where the public are welcomed and many events are held.

I feel it is essential to preserve the integrity of this grade 1 listed building of historical interest.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Muriel Salem

Address: 29 Eccleston street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Bevis Marks synagogue is 300 years old and still functioning as such .

The new planned building will deprive it of daylight and overshadow it .

It will be a great shame to disrespect and ruin this beautiful and historical building of worship.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ilan Krieger

Address: 68, Cornhill London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I fear this will present a huge overbearing presence in the historic setting of the Bevis Marks Synagogue and will cut out the natural light both through the south facing windows and to the historic courtyard

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Charles Teacher

Address: 40 Titan Ct 1 Flower Lane London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The development will obscure light to courtyard which house many events

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Rebecca Krechman

Address: 71 Fitzjohns Ave London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: Significant detriment from light implications on historically important Bevis Marks synagogue

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniel Zubaida

Address: 71 Fitzjohn's Avenue LONDON

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: Natural light implications for Bevis Marks synagogue in the courtyard and windows will significantly impact the functioning of the synagogue

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr nick balcombe

Address: 8 Springfield road london

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: removing light from one of the oldest synagogues in the UK

this synagogue is used continually and " light " is very much a part of our daily activities and prayers

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Keats

Address: 5 Wadham Gardens London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am objecting to this development on the grounds that it will overshadow Bevis Marks Synagogue which is a Grade 1 listed building as well as London's oldest working synagogue. In particular, this development would overshadow the courtyard.

The courtyard is central to synagogue life and overshadowing or darkening it would have a serious detrimental affect on the character of the building and on the way it is used. For generations members have gathered in the courtyard after services and on festivals. The courtyard is the heart of the synagogue.

Whilst the surrounding area is built up, the building currently enjoy good sunlights. We are an old established part of the City community and our synagogue should be valued and protected for its historic and cultural significance as well as the role it should rightly play in the lives of generations of Londoners to come.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Hilary Blume

Address: 9 Mansfield Place London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: the proposed development will tower over Bevis Marks Synagogue, literally. It will cut out light to the actual synagogue and the courtyard, which is historically important as a gathering place.

You list only 3 possible grounds for objection - traffic residential amenity or noise. What about preserving historic buildings?

(Your form does not allow for accurate comment.

I am not a resident but am a member of the Spanish and Portuguese synagogue, of which Bevis Marks is the historic synagogue.

Why does your drop down menu have Lord but not Lady or Baroness or Sir or Dame and insists on a title being entered

Comments for Planning Application 18/00152/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Jessica Tricot

Address: 35c Belsize Avenue London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: This development will have a material and adverse implication on the light at Bevis Marks, which as a 300 year old synagogue and a Grade I listed building of "exceptional historic interest".

I and other members of this historic community fear this will present a huge overbearing presence in the historic setting of the Synagogue and will cut out the natural light both through the south facing windows and to the historic courtyard, which is a key focal point for many of the events held at the synagogue.

I understand that the developers have assessed the impact on the historic setting of the Synagogue from the rear entrance on the narrow Heneage Lane and concluded there would be negligible effect. A proper assessment must be made from the much-used courtyard where the Synagogue can actually be seen.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr David Hoffman

Address: Flat 5 28 Belsize Park London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: This development will have a material and adverse implication on the light at Bevis Marks, which as a 300 year old synagogue and a Grade I listed building of "exceptional historic interest".

I and other members of this historic community fear this will present a huge overbearing presence in the historic setting of the Synagogue and will cut out the natural light both through the south-facing windows and to the historic courtyard, which is a key focal point for many of the events held at the synagogue.

I understand that the developers have assessed the impact on the historic setting of the Synagogue from the rear entrance on the narrow Heneage Lane and concluded there would be negligible effect. A proper assessment must be made from the much-used courtyard where the Synagogue can actually be seen.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Anthony Tricot

Address: 35c Belsize Avenue London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: This development will have a material and adverse implication on the light at Bevis Marks, which as a 300 year old synagogue and a Grade I listed building of "exceptional historic interest".

I and other members of this historic community fear this will present a huge overbearing presence in the historic setting of the Synagogue and will cut out the natural light both through the south facing windows and to the historic courtyard, which is a key focal point for many of the events held at the synagogue.

I understand that the developers have assessed the impact on the historic setting of the Synagogue from the rear entrance on the narrow Heneage Lane and concluded there would be negligible effect. A proper assessment must be made from the much-used courtyard where the Synagogue can actually be seen.

From: PlnComments@cityoflondon.gov.uk
Sent: 23 April 2018 14:31
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 2:26 PM on 23 Apr 2018 from Ms cathy wills.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Ms cathy wills

Email:

Address: 10 eton road london

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: This old synagogue has existed In the City of London for over 300 years - and is still used and loved by its community and the greater community world wide. If you build a hge overwhelming building it will destroy its light, nature of the building and also destroy this important city heritage.

From: PinComments@cityoflondon.gov.uk
Sent: 22 April 2018 09:38
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 9:33 AM on 22 Apr 2018 from Mr Jack Bekhor.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Jack Bekhor

Address: 8 Lexham Gardens London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I object in the strongest terms. The proposed development as stands will only serve to the detriment of the local community as our 300 year old Grade I listed Synagogue, which serves as a place of worship and community gathering for Jews from all over London, where we also celebrate our life events (weddings / bar mitzvahs etc..) is deprived of natural light especially over the courtyard where we regularly hold our functions which will be completely overshadowed by the proposed tall construction.

From: PlnComments@cityoflondon.gov.uk
Sent: 18 April 2018 15:07
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 3:02 PM on 18 Apr 2018 from Mr Charles Shamash .

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Charles Shamash

Email:

Address: 3 Hillside Close London

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment:

- Noise
- Residential Amenity
- Traffic or Highways

Comments: It would be a great shame to have such a beautiful buildings as Bevis Marks Synagogue shadowed by a huge monster that is proposed to be built.

From: PlnComments@cityoflondon.gov.uk
Sent: 18 April 2018 11:03
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:58 AM on 18 Apr 2018 from Mr Lloyd Hunt.

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Lloyd Hunt

Email:

Address: 39 Victoria Avenue Grays

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: I strongly object based on the deprivation of daylight that will be caused to Bevis Marks synagogue.

From: [Depala, Bhakti](#)
To: [PLN - Comments](#)
Subject: FW: Threat to light of Beis Marks Synagogue
Date: 03 April 2018 14:01:36

-----Original Message-----

From: [REDACTED]
Sent: 03 April 2018 13:46
To: Depala, Bhakti <Bhakti.Depala@cityoflondon.gov.uk>
Subject: Threat to light of Beis Marks Synagogue

As from:

11 Defoe House,
Barbican,
London EC2Y 8DN.

Dear Bhakti Depala,

I write as a regular attender at Bevis Marks Synagogue.

I am most disturbed to read of the building proposed at 100 Leadenhall Street. It will certainly affect the light that comes into the synagogue.

I find it strange that the developers have looked at the impact of their 56 stories from the Heneage Lane side of the synagogue rather than from Bevis Marks. Is that maybe because there are no windows there? Light comes into the courtyard and the main synagogue prayer area from windows on the other sides of the building. Any very high building towering over the synagogue will cut the light for the congregation.

The whole character of the synagogue and its courtyard will be spoiled by such an intrusive building.

Will you please pass my comments to the appropriate committee. I most strongly oppose the plan.

Thank you,
Yours sincerely,
Marlena Schmool.

From: PlnComments@cityoflondon.gov.uk
Sent: 18 April 2018 10:50
To: PLN - Comments
Subject: Comments for Planning Application 18/00152/FULEIA

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 10:46 AM on 18 Apr 2018 from Mr Darren Smith .

Application Summary

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

[Click for further information](#)

Customer Details

Name: Mr Darren Smith

Email:

Address: 117 Tyrrell Avenue Welling Kent

Comments Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Reasons for comment: - Residential Amenity

Comments: I object to these works as It is a blight on an already overpopulated area

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Jack Basrawy

Address: 13-14 Hanover st London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: Totally disproportionate in size, and will affect the enjoyment of neighbouring buildings

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]|cr|This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Alex Gruca

Address: 59 Queen Anne Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity
- Traffic or Highways

Comment: The noise pollution is going to go through the roof. We don't want that.

London is already one of the most polluted places in Europe, don't add to it. We don't want that.

Why build one more tower in a city that is going to suffer a significant exodus of businesses and people due to Brexit (don't you see that there is already a significant fall in residential prices and that there is a residential over capacity. The same is starting to happen in commercial). There is no need to build more landscape damaging buildings.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Jonathan Whitbr

Address: 1 The Creechurch 4-8 Creechurch Lane London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Residential Amenity

Comment: This planning application proposes to replace a 10 storey building with a 56 storey building. It is abundantly clear that the proposed building is simply too big, for a number of reasons:

ACCESS

The proposed service access via Creechurch Lane is simply not sufficient to service a 56 story building without a significant and detrimental impact on existing residents and businesses in terms of noise / pollution / additional traffic. The proposed restaurant and bar will especially for private functions increase the number of taxi's / Ubers etc parked up around and in Creechurch Lane creating considerable disturbance to existing businesses and residents

HERITAGE

The proposed building sticks out like a sore thumb in proposed views 8, 18, 19, 20, 28, 29 and 33. These views are highly significant because the building is seen next to the Tower of London. In the

cumulative versions of these views, the proposed building forms an abrupt cliff edge to the Eastern Cluster next to the Tower of London. There are few if any tall building sites available east of the proposal site, as the neighbouring land is occupied by St Katherine Cree church, the residential flats on Creechurch Lane and Mitre Street, the recently completed Mitre Square development and Sir John Cass school. Therefore for all intents and purposes 100 Leadenhall Street will form the edge of the Eastern Cluster when seen in these views. It is therefore essential that 100 Leadenhall Street be reduced and reshaped to form a gentler transition to surrounding urban form.

In proposed view 66, the proposed tower looms over fine historic buildings, wrecking the coherent character of the Lloyds Avenue conservation area.

PUBLIC AMENITY

The proposed tower obscures views from public viewing galleries in recently constructed tall buildings. In proposed view A14 from 120 Fenchurch Street, the proposed tower fills a quarter of the view. Instead of seeing the whole of the Gherkin as an object in the middle ground, the view is enclosed by the wide and tall south elevation of the proposed tower. In proposed view A15 from 22 Bishopsgate, the proposed tower appears as a distracting object in the foreground, spoiling what would have been a fine view of the Tower of London. These public viewing galleries are were created as a public amenity to mitigate the impact of 120 Fenchurch Street and 22 Bishopsgate. If the views are obscured by following developments, this undermines the case for granting planning permission to the existing towers, increases their impact and degrades public amenity. The proposed viewing gallery here is one more example of planning being granted 'with public access' but this is at a cost which a lot of the public cannot afford to enjoy.

DAYLIGHT

The proposed development has too many detrimental effects on the daylighting of adjoining flats. The existing vertical sky component of most of the windows to the flats at 4-8 Creechurch Lane is already well below 20% and in some cases below 10%. The proposed losses of up to 20% of vertical sky component breach the BRE guidance, even for a densely built up urban site. In the case of the flats at 14-16 and 18-20 Creechurch Lane the existing VSC's are even lower and the proposed loss of VSC is even more severe (over 30% in some cases). This leads to cumulative loss of VSC of nearly 50% in the case of 14-16 and 18-20 Creechurch Lane.

Existing and proposed Average Daylight Factor, which forms part of BRE guidance, has not been calculated, presumably because the results are even worse. The applicants clearly know the existing room dimensions, since they are able to calculate the No Sky Line and identify kitchens smaller than 13sqm. Therefore they have the data they need to calculate the ADF.

LIGHT POLLUTION

The applicant's light pollution drawings indicate an illumination of 25 lux or more to the west facing windows of 18-20 Creechurch Lane (Appendix 14.6, figure 6), and an illumination of 20 lux to the west facing top floor windows of 4-8 Creechurch Lane (Appendix 14.6, figure 8). For comparison,

20 lux is equivalent to the light of 20 candles illuminating one square metre, so this is a significant amount of light pollution to rooms which include bedrooms.

CONCLUSION

This proposal has severely detrimental effects on heritage (including the Tower of London, Grade I listed buildings and conservation areas), public amenity (recently constructed viewing platforms), daylight and light pollution. Therefore the planning committee should refuse this application.

Comments for Planning Application 18/00152/FULEIA

Application Summary

Application Number: 18/00152/FULEIA

Address: 100, 106 & 107 Leadenhall Street London EC3A 3BP

Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA]

This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ.

Case Officer: Bhakti Depala

Customer Details

Name: Mr Frank Martin

Address: 21 Crothall Close London

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My family have been members of this Synagogue since it opened in 1701. Every generation, including myself and my daughter, has been married in Bevis Marks Synagogue. If this development takes place I fear that the loss of light in the Synagogue will be catastrophic. Weddings, which should be bright and joyous, and indeed all religious services and functions, will be substantially impacted by the loss of light that will ensue, and the gloom that such a development will bring. Other factors that should also be considered are the considerable noise impact that there will be during construction; when services are held at the Synagogue, particularly on Saturdays. There may also be damage to the structure of the Synagogue because of the substantial excavations and piling that will be required by the proposed new structure. Finally, and not least, there may be serious security implications with regard to the proposed new building and its overview of the Synagogue.

27th March 2018

Mrs Annie Hampson
 Chief Planning Officer and Development Director
 Department of the Built Environment
 City of London
 Guildhall
 PO Box 270
 London EC2P 2EJ

Dear Mrs Hampson

OBJECTION to 100 Leadenhall Street planning application ref 18/00152/FULEIA

Please accept this letter as the London Sephardi Trust's objections to planning application 18/00152/EIA for the proposed development at 100 Leadenhall Street.

The Trust is concerned that the development will have unacceptable impacts on the setting of the Grade I listed Bevis Marks Synagogue and the adjoining courtyard.

As you may be aware, the 300-year-old Synagogue is a Grade I listed building and as such is of 'exceptional historic interest'. It is used every day of the year including for prayers three times per day, Saturday services, weddings, celebrations, educational visits and general access for visiting members of the public.

The Synagogue courtyard, which has remained unchanged in layout since the Synagogue's construction in 1701, is where the Synagogue building has been appreciated for over 300 years against backdrops of open sky and generally lower scale nearby buildings. It is where we welcome visiting members of the public and hold many daytime events and celebrations throughout the year. Part of its charm is that it enjoys natural light and is a relatively secluded private space.

Our objections to the proposed 100 Leadenhall Street development are on the following grounds.

Heritage impact

As far as we can glean from the planning application documentation, the only assessment of impact on the heritage significance of the Synagogue is based on View A12¹ from the rear entrance to the Synagogue on Heneage Lane. This view is referenced on page 49 of the *Environmental Statement*² which says:

¹ View A12 as shown on page 288 of *100 Leadenhall Street Environmental Statement, Volume 3, Townscape and Visual and Built Heritage Assessment (Feb 2018)*

² Table on page 49 of *100 Leadenhall Street Environmental Statement, Volume 3, Townscape and Visual and Built Heritage Assessment (Feb 2018)*

Page 95

all adjoining the site or in its immediate proximity present an obligation to both developer and design team. These important artefacts of the development of the City provide an opportunity for consideration of the proposed built form to enhance and protect their setting by providing improved light and air. Equally, opportunities to establish new public realm to preserve or enhance their setting should be maximised."

We see no evidence that the applicant is meeting its own stated obligations to enhance and protect the setting of the Synagogue by providing improved light and air. The contrary appears to be the case.

I hope these objections are clear but please let me know if you need anything further or have any queries at this stage.

We would also be very pleased to show you and/or your officers around the Synagogue and its courtyard if this would help you gain a better understanding of our concerns. Please just let me know and we will make arrangements.

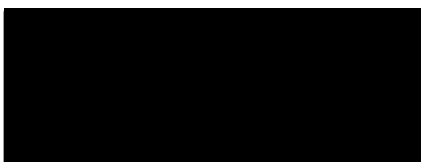
Yours sincerely,



fl **David Ereira**

Vice President S&P Sephardi Community and Director London Sephardi Trust

Cc Kathryn Stubbs - Assistant Director Historic Environment, City of London
Bhakti Depala – Senior Planning Officer, Dept of the Built Environment, City of London





J Watson Consulting Ltd
71-75 Shelton Street
Covent Garden
London WC2H 9JQ

04 April 2018

Bhakti Depala
Department of the Built Environment
City of London
Guildhall
PO Box 270
London EC2P 2EJ

Dear Bhakti

Objection by Tavor Holdings Ltd to Planning application 18/00152/FULEIA - 100 Leadenhall Street London EC3A 3BP

Please accept this letter on behalf of my client Tavor Holdings Ltd as their objection to planning application 18/00152/EIA for the proposed development at 100 Leadenhall Street.

Tavor Holdings Ltd is the long leaseholder for Valiant House, 4 Heneage Lane, EC3 which is located to the north of the application site.

Tavor Holdings Ltd is concerned about the potentially adverse impacts of the proposed development on the light levels and associated amenity currently enjoyed in Valiant House.

Of particular concern are the results of the Overshadowing Assessment¹ which accompanies the planning application. This shows that in spring, summer and autumn, the proposed building would cast a shadow over all or part of Valiant House between 2pm and 4pm.

This is a significant part of the working afternoon when people working in the Valiant House offices are currently able to enjoy some natural light. Tavor Holdings Ltd objects to the adverse effects and harm caused to the amenity of Valiant House and its occupiers by this overshadowing which would be contrary to policies 7.6Bd and 7.7Da of the London Plan (2016):

"Policy 7.6 ARCHITECTURE

B Buildings and structures should:

d) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, **overshadowing**, wind and microclimate. This is particularly important for tall buildings"

"Policy 7.7 LOCATION AND DESIGN OF TALL AND LARGE BUILDINGS

D Tall buildings:

a) should not affect their surroundings adversely in terms of microclimate, wind turbulence, **overshadowing**, noise, reflected glare, aviation, navigation and telecommunication interference"

¹ GIA Overshadowing Assessments (Dec 2017) in Appendix 14.4 of 100 Leadenhall Street Environmental Statement, Volume 2, (Feb 2018)

Tavor Holdings Ltd is also concerned that proposals for tall buildings on other sites nearby could result in a 'building canyon' and further overshadowing of Valiant House. In accordance with para 3.14.4 of the City of London Local Plan (2015), the cumulative impact of any such proposals along with those for 100 Leadenhall Street and existing tall buildings should be taken into account in the assessment of all the schemes. Tavor Holdings Ltd may submit further representations regarding such cumulative impacts should other relevant planning applications be submitted.

I hope these representations are clear but please let me know if you have any queries or require further information.

Yours sincerely,



John Watson MRTPI
Director

Bhakti Depala
Development Division
Department of the Built Environment
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Date: 26 March 2018
Your ref: 18/00152/FULEIA
Our ref: 303118.NEW
Direct: [REDACTED]
Email: [REDACTED]

By email to PLNComments@cityoflondon.gov.uk and by special delivery

Dear Sirs

Planning Application 18/00152/FULEIA – 100 Leadenhall Street, London EC3A 3BP

1. Introduction

- 1.1 We have been instructed by The Wardens and Society of the Mystery or Art of the Leathersellers of the City of London to advise them in relation to the above named planning application.
- 1.2 Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the application site:
 - (a) 3, 5, 6, 7, 15, 16 and 17 St Helen's Place;
 - (b) 33 Great St Helens;
 - (c) 52-68 and 88 Bishopsgate;
 - (d) 12/20 Camomile Street; and
 - (e) 25-51 and 61 St Mary Axe.
- 1.3 We have undertaken a review of the available information relating to the above planning application and our client has concerns above the potentially adverse effect the proposed development could have on the light levels in its properties. It has concerns that the amenity and light at these properties will be prejudiced. Our client has yet to conclude its impact assessment of the scheme and reserves its position in relation to these issues.
- 1.4 Our client also has concerns regarding the planning merits of the proposed development and the potentially adverse impact it could have on surrounding built environment and public services. These concerns are set out below.
- 2. Impact on the St Helen's Place Conservation Area and the setting of nearby heritage sites and listed buildings**
- 2.1 The proposed building has the potential to cause significant harm to the character of the St Helen's Conservation Area by virtue of its height and form and the increasing

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perception of the conservation area being hemmed in by tall buildings. Whilst changes to the scale, composition and urban form of the Eastern Cluster is not in itself contrary to local policy, it is evident that the cumulative effects of proposed development, along with the existing tall buildings, and those recently granted planning permission, will threaten the character and appearance of the conservation area.

2.2 Volume 3 of the Environmental Statement (Townscape and Visual and Built Heritage Assessment) identifies the heritage value of the St Helen's Place Conservation Area as high and relies on its immediate setting being already characterised by modern tall and very tall buildings to conclude that the significance of the likely effect on it by the proposed development is *"negligible to major, neutral"*.

2.3 As the Townscape and Visual and Built Heritage Assessment notes, the St Helen's Conservation Area largely comprises those buildings that make up St Helen's Place and buildings that contribute to the setting of the Parish Church of St Helen Bishopsgate. The impact on the Church of St Helen is described in the Townscape and Visual and Built Heritage Assessment as *"relatively minor"* due to the existing established tall setting of the listed building. It proceeds to validate the impact in the following terms:

"Although the Proposed Development would be visible within the close setting of the listed building, the tall modern character of its setting overall would not be altered and the elements of setting which contribute to the church's heritage significance would not be altered. The effect on heritage significance would be negligible and not harmful."

2.4 'Setting' is defined in the National Planning Policy 2012 ("NPPF") as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral." (NPPF, Annex 2: Glossary)

2.5 We do not agree that the existing prevalence of tall buildings in the immediate vicinity of the St Helen's Conservation Area has the effect that the proposed development avoids impacting the setting of the heritage asset. Rather, the proposed additional tall building has the potential to cause harm to the character of the St Helen's Place Conservation Area as it will affect the surroundings in which the heritage asset is experienced, particularly in terms of exacerbating the overall impact of tall buildings in the area.

2.6 Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 (the "Act") is of major importance to consideration of this application. This provision requires that, in considering whether to grant planning permission for a development which affects a listed building or its setting, decision-makers must have 'special regard' to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.

2.7 Paragraphs 128 to 134 of the NPPF explain how Section 66 of the Act is expected to work in practice, and further guidance is set out in Planning Practice Guidance, in addition to Historic England publication: "The Setting of heritage Assets (Historic Environment Good Practice Advice in Planning: 3)" Recent case law in connection with the statutory test has reinforced the need for decision makers to consciously acknowledge any harm to heritage assets and then apply 'considerable weight' to their preservation. Only then can an assessment be made as to whether there are circumstances that outweigh the harm identified that would allow the grant of planning permission.

- 2.8 In the decision of *Steer v Secretary of State for Communities and Local Government [2017]* (appeal outstanding) it was held that the term 'setting' is not defined in purely visual terms in the NPPF which refers to the "surroundings in which a heritage asset is experienced". The word "experienced" has a broad meaning, which is capable of extending beyond the purely visual.
- 2.9 The applicant's attempt to justify its proposals by stating that the height of the proposed development building would match the adjacent buildings, in effect applying a favourable comparison on height, demonstrates an artificially narrow and oversimplified concept of the setting of the heritage asset. The proposed building has the potential to cause significant harm to the character of the St Helen's Conservation Area by virtue of its height and form and the increasing perception of the conservation area being hemmed in by tall buildings, particularly when the cumulative impact with 100 Bishopsgate, 1 Undershaft and 22 Bishopsgate is considered.
- 2.10 In addition to the impact on the St Helen's Conservation Area and the Church of St Helen, the Townscape Heritage and Visual Impact Assessment appears to underplay the impact of the proposed development on the setting of the following important heritage assets, particularly when considered cumulatively with other proposed tall buildings in the Eastern Cluster:
- The setting of the Tower of London World Heritage Site;
 - The setting of St. Paul's Cathedral;
 - The setting of Tower Bridge;
 - The setting of St Andrew Undershaft, St. Mary Axe;
 - The setting of the Leadenhall Conservation Area;
 - The setting of Leadenhall Market.
- 2.11 Policy DM 10.1 of the City of London Local Plan requires all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that:
- "the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways".*
- 2.12 Whilst the applicant makes reference to massing in the Townscape Heritage and Visual Impact Assessment it fails to grapple with the policy and does not pay due regard to the character or historic interest and significance of having a diverse and distinctive city-scape.
- 2.13 Our client is concerned that the proposed development risks diluting the special architectural qualities and distinctiveness of the City's characteristic network of streets and alleyways which includes buildings of differing heights, scale, age and architecture. The appraisal in the Townscape and Visual and Built Heritage Assessment of heritage value of the three buildings on the site identifies only one of them as a non-designated heritage asset. The other two are considered to be of negligible heritage value. This however does not in itself justify the loss of three buildings of differing styles and forms which contribute to the diversity of the city-scape.
- 2.14 Whilst the clash of large scale, modern development with the historic built environment is a classic feature of the Eastern Cluster, there is now a real risk of 'tipping the balance'; this area of the City can only accommodate a finite number of tall buildings before irreversible harm will be caused to important surrounding historic receptors.

- 2.15 Our client fully understands the growth agenda in the City. This is crucial to ensuring that London maintains its prized position as the world's foremost financial centre. However this should not displace the requirement to preserve heritage assets. Whilst changes to the scale, composition and urban form of the Eastern Cluster is not in itself contrary to local policy, our client is concerned that the construction of tall buildings must not be to the detriment of the current variations in the architectural landscape of the City.

3. Daylight and Sunlight Impacts

- 3.1 Our client's property at 33 Great St Helens has been identified as a sensitive receptor in Chapter 14 (Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution) of the Environmental Statement submitted with the application.

- 3.2 The Environmental Statement reports that, at 33 Great St Helens, one window (which equates to over 5% of all the windows) is not expected to meet BRE Guidelines on daylight following the construction of the proposed development. The Environmental Statement also notes that this window has a "*low existing level of VSC in the baseline whereby any alteration could result in a disproportionate percentage change.*" The assessment in the Environmental Statement concludes that this reduction in the amount of daylight is nonetheless "*considered appropriate*".

- 3.3 The ES concludes that the daylight impact on our client's property at 33 Great St Helen's is assessed as "*minor adverse*", and the sunlight impact is assessed as of "*negligible significance*". In both cases, the impact is therefore considered to be 'not significant' in EIA terms. Our client is concerned that this understates the likely impact that the proposed development would have in reality given the cumulative impact expected from the number of other consented and proposed tall buildings in the area.

- 3.4 In particular, our client has major concerns about the cumulative effects of the proposed development and the scheme for 1 Undershaft on 33 Great St Helens. The assessment in the Environmental Statement for the proposed development reports that the cumulative impact of the proposed development when considered with other committed developments, including 1 Undershaft, is of "*major significance*".

- 3.5 When considered cumulatively, at 33 Great St Helen's, 74% of the windows are not expected to meet BRE Guidelines on daylight following the construction of the proposed development. Specifically in relation to the rooms, these parts of the property are expected to experience alterations beyond 40% of current daylight levels. In terms of sunlight impacts, two windows would experience reductions in light in excess of 40% for both total and winter annual probable sunlight hours.

- 3.6 Our client has yet to conclude its impact assessment of the proposed development and reserves its position in relation to these issues. It does, however, have serious concerns that 33 Great St Helens will experience a significant adverse impact as a result of the construction of another tall building in this area. The findings in the Environmental Statement show a clear risk that our client's enjoyment of their property will be materially affected.

4. Public Transport

- 4.1 Chapter 7 (Transportation and Access) of the Environmental Statement states that planned improvements to the local public transport network are expected to increase capacity and relieve congestion. However there is no consideration about the impact of the proposed development on the local transport network. There is concern that the Environmental Statement fails to consider the potentially significant impacts on the transport network that a development of this scale is likely to cause.

- 4.2 The occupation of the proposed development, with the increase in office floorspace that it proposes, will result in a major uplift in trips across London Underground services, in particular the Central, Northern and Waterloo and City lines. In addition, an emerging area of concern is the growing reliance amongst developers in the Eastern Cluster as to the capacity of Crossrail to accommodate cumulative transport pressures. Our client has concerns about this reliance on Crossrail given that, as the City of London's research briefing paper on the Impact of Crossrail notes, there is some suggestion that it might be immediately at capacity on opening.
- 4.3 The pedestrian and road network in the vicinity of the proposed development is also heavily congested during peak times, carrying very high volumes of people and traffic. The proposed development will put an additional burden on this infrastructure and further details as to how the applicant will fully address the increasing pressures on local highways, walkways and cycleways must be provided.
- 4.4 Our client also has concerns that the Environmental Statement understates the significant impacts on traffic levels which the construction of the proposed development will have, particular when considered in combination with the number of other consented schemes in the vicinity of the site. The Environmental Statement reports that 33 committed developments are considered within the future baseline scenario of this assessment and therefore, committed developments surrounding the site have been accounted for. This assertion and any analysis with current traffic levels seems to be unsubstantiated and must be considered with a marked degree of scepticism.
5. **Waste**
- 5.1 The Environmental Statement does not consider the impacts of the proposed development on waste and recycling facilities despite its size and the proposed increase in floorspace. Inadequate waste management arrangements risk blighting our client's substantial property holdings within the vicinity of the proposed development, potentially causing amenity issues and affecting their enjoyment of their property. At present our client considers there is insufficient information provided in the application to allow for due consideration of the potential effects of the proposed development. Further details as to how this matter will be resolved should be provided before the determination of the planning application.

For the reasons set out above, our client objects to the planning application.

EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP

Bhakti Depala
PLNComments@cityoflondon.gov.uk

Our ref: NE/2018/128285/01-L01
Your ref: 18/00152/FULEIA

Date: 27 March 2018

Dear Bhakti

Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m aod) for office use (class B1) [102,043sq.m gea], retail use (class A1/A3/A4) [882sq.m gea] at lower levels, a publicly accessible viewing gallery with controlled restaurant bar use (sui generis) [1,934sq.m gea] at levels 55 and 56, as well as new and improved public realm, ancillary basement cycle parking, servicing and plant. [total scheme area: 122,091sq.m gea] this application is accompanied by an environmental statement which is available for inspection with the planning application.

100 Leadenhall Street, London, EC3A 3BP.

Thank you for consulting us on the above proposal. We have reviewed the application and have no comments to make as there are no environmental constraints that fall under our remit.

If you have any questions please contact me on 02077140578 or email me at HNLsustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely

Demitry Lyons
Sustainable Places Planning Advisor

Direct dial: 02077140578

Direct e-mail: HNLsustainablePlaces@environment-agency.gov.uk

From: Helena Payne
To: [PLN - Comments](#)
Cc: [Lucy Owen](#)
Subject: 18/00152/FULEIA - 100 Leadenhall Street - PLA Ref DC 806
Date: 26 March 2018 09:04:33
Attachments: [image002.png](#)
[image003.png](#)

FAO: Bhakti Depala

Dear Bhakti

The PLA previously provided representation in response to the scoping opinion for the proposed development at the above site, and advised that due to the distance of the site from the River Thames, the PLA did not need to be consulted on any subsequent planning applications.

The PLA has no comment to make in response to this submission.

Regards

Helena

Helena Payne
Senior Planner
Port of London Authority

London River House, Royal Pier Road
Gravesend, Kent, DA12 2BG
01474 562385
WWW.PLA.CO.UK



Find out about the Cleaner Thames campaign:

- Website: www.pla.co.uk/Cleaner-Thames
- Film: <https://youtu.be/9bsImgzpHQE>
- Twitter: @LondonPortAuth #cleanerthames



Almost half of all incidents on the tidal Thames are caused by **Human factors**. Maintain a positive **Safety Culture** by:

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- Not being distracted

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website: www.pla.co.uk

From: Consultations (NE)
To: [PLN - Comments](#)
Subject: FAO Bhakti Depala REF: 18/00152/FULEIA
Date: 23 March 2018 09:47:08

Dear Sir or Madam

Application ref: 18/00152/FULEIA
Our ref: 241272

Natural England has **no comments** to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Kind regards,

Victoria Kirkham

Technical Support Adviser

Consultations Team

Natural England

County Hall

Spetchley Road

Worcester.

WR5 2NP

Tel: 0300 060 3900

Fax: 0300 060 1544

www.gov.uk/natural-england

<mailto:consultations@naturalengland.org.uk>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

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From: Contact Centre
To: [Pin - CC - Development Dc](#)
Subject: FW: PLANNING : 3rd Party Planning Application - 18/00152/FULEIA COL:05095777
Date: 15 March 2018 10:35:49

Dear Team,
Please see email below.
Kind Regards
David Parvin
Contact Centre Agent
Town Clerks Department
City of London Corporation
T: 020 7606 3030

-----Original Message-----

From: BCTAdmin@thameswater.co.uk [mailto:BCTAdmin@thameswater.co.uk]
Sent: 14 March 2018 16:23
To: Planning Queue
Subject: 3rd Party Planning Application - 18/00152/FULEIA

Corporation of London
DTS Ref: 56142
Department of Planning & Transportation
Ref: 18/00152/FULEIA
PO Box 270
Guildhall
London
EC2P 2EJ

Our

Your

14 March 2018

Dear Sir/Madam

Re: 100, 106-107, LEADENHALL STREET, LONDON, EC3A 3BP

Waste Comments

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

A Trade Effluent Consent will be required for any Effluent Discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at <https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply

infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

Thames Water recommend the following informative be attached to any planning permission: There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

Thames Water recommend the following informative be attached to any planning permission: There are large water mains adjacent to the proposed development. Thames Water will not allow any building within 5 metres of them and will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Supplementary Comments

Surface Water should be addressed in accordance with the London Plan and we expect a significant reduction from current peak discharge rates.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel: 020 3577 9598
Email: devcon.team@thameswater.co.uk

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From: Connor Gladwin
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 18/00152/FULEIA
Date: 26 March 2018 10:02:43
Attachments: [image003.png](#)

FAO Bhakti Depala

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to make the following observation:

Cranes

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at <http://www.aopa.org.uk/policy-campaigns/operations-safety/>)

Kind regards,

Connor Gladwin BA (Hons)
Aerodrome Compliance Support Manager
Airside Operations

Heathrow
Making every journey better

Airside Operations Facility, Building 16887
Heathrow Airport
Hounslow, Middlesex, TW6 2GW

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i: [instagram.com/heathrow_airport](https://www.instagram.com/heathrow_airport) | l: [linkedin.com/company/heathrow-airport](https://www.linkedin.com/company/heathrow-airport)

-----Original Message-----

From: PLNComments@cityoflondon.gov.uk [mailto:PLNComments@cityoflondon.gov.uk]
Sent: 07 March 2018 15:04
To: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 18/00152/FULEIA

Dear Sir/Madam

Please see attached consultation for 100 Leadenhall Street London EC3A 3BP
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Bhakti Depala
Department of the Built Environment
City of London

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From: Jack Berends
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 18/00152/FULEIA
Date: 20 March 2018 11:06:53

Dear Bhakti Depala

Thank you for consulting London City Airport regarding 100 Leadenhall Street. Based on the information provided, London City Airport has no safeguarding objection to the building's completed structure. London City Airport requests to be consulted and allowed to comment on the construction methodology and crane plan when this information has been provided to the City of London.

Kind regards,

Jack Berends
Technical Operations Coordinator

Phone: 020 3203 2523

Mobile: 07590880745

Email: Jack.Berends@londoncityairport.com

Website: www.londoncityairport.com


London City Airport
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-----Original Message-----

From: PLNComments@cityoflondon.gov.uk

[<mailto:PLNComments@cityoflondon.gov.uk>]

Sent: 07 March 2018 15:04

To: Safeguarding

Subject: Planning Application Consultation: 18/00152/FULEIA

Dear Sir/Madam

Please see attached consultation for 100 Leadenhall Street London EC3A

3BP.

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

Kind Regards

Planning Administration

On behalf of

Bhakti Depala
Department of the Built Environment
City of London

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Technical & Operational Assessment (TOPA)

NATS Ref: SG25365

LPA Ref: 18/00152/FULEIA

100 Leadenhall Street

Issue 2

Contents

Publication history	3
Document Use	3
Referenced documents	3
1 Background	4
2 Scope	4
3 Application Details	5
4 Impact Assessment	9
4.1 Assessments Undertaken	9
4.2 En-route Radar Assessment	10
4.2.1 Heathrow H10 Radar	10
4.3 Navigation Aids Assessment	10
4.4 Air-ground-air radio sites Assessment	10
4.5 Air Traffic Control Assessment of radar Impact	11
4.5.1 Degradation of radar cover	11
4.5.2 False SSR targets	11
4.6 Cranes	11
4.6.1 Impact of cranes on H10 radar	11
5 Conclusions	12
5.1 Loss of PSR/SSR Cover	12
5.1.1 Mitigation	12
5.2 Duplicate SSR plots	12
5.2.1 Mitigation	12
5.3 Cranes	12
Appendix A – Principles of Radar	13
Loss of Cover	13
Basic SSR Theory	13
Plots and Tracking	13
Reflected Energy - Definition	14
Characteristics of Reflections	14
Case Study 1 – The Euston Tower – Heathrow Radar	15
Case Study 2 – Vertical Component– Pease Pottage	18

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Publication history

Issue	Month/Year	Change Requests and summary
Issue 1	26 January 2018	First Version – <i>Pre-planning Application</i>
Issue 2	15 March 2018	Second Version – <i>City of London Planning Consultation</i>

Document Use

External use: Yes

Referenced documents

1. DP9 submissions accompanying the planning application.
2. Material on the City of London Planning portal:
<http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=P472KKFHI5400>
 - i. 171206_CURRENT DEVELOPMENT.jpg
 - ii. 171206_FUTURE DEVELOPMENT.jpg
 - iii. A-012.pdf
 - iv. 2604_Project_Dragon_Position_Signoff_Markup_011217.pdf
 - v. 171130mv_100 LEADENHALL STREET_EXISTING ELEVATION_SOUTH-Model.pdf
 - vi. 171130mv_100 LEADENHALL STREET_PROPOSED ELEVATION_SOUTH-Model.pdf

1 Background

Under the licence granted to it through the Transport Act 2000, NATS (En-Route plc) "NERL" is a provider of Air Traffic Services and has the duty to ensure the safe and expeditious flow of traffic in the en-route phase of flight, for aircraft operating in controlled airspace in the UK. In order to provide its service, it operates a comprehensive infrastructure of radars, communication systems and navigational aids throughout the UK.

The operation of this infrastructure can be compromised by the construction and development of structures which can cause an obstruction or affect it in other ways.

NERL's licence requires it to ensure the integrity and safe operation of its infrastructure and to discharge this duty NATS is a statutory consultee for all wind turbine applications as well as other types of developments that are in proximity to its installations. NERL receives relevant consultations from Planning Authorities and assesses the potential impact of these across the UK.

NERL's role as a statutory consultee is defined within the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Safeguarding Direction 2002.

2 Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS radar used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS's statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

3 Application Details

A planning consultation was received by NATS in March 2018 for development of a site located at 100 Leadenhall Street, City of London. The plot is adjacent to 30 St. Mary's Axe (known as The Gherkin) and a plot away from the site of 1 Undershaft and The Leadenhall Building.

The application details for the consultation from the planning portal are as detailed below:

18/00152/FULEIA | Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery (Sui Generis) and after hours Restaurant/Bar (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, new and improved Public Realm, ancillary basement cycle parking, servicing area and plant. [Total Scheme Area: 122,091sq.m GEA] This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ | 100 Leadenhall Street London EC3A 3BP

The site location can be seen in Figure 1. The maximum elevation is 263m AOD.

The proposed building is shown in Figure 2 below, Figure 3 shows the proposal development site (pink) in the context of the City cluster. Figure 4 shows the constructed building in the context of neighbouring schemes.

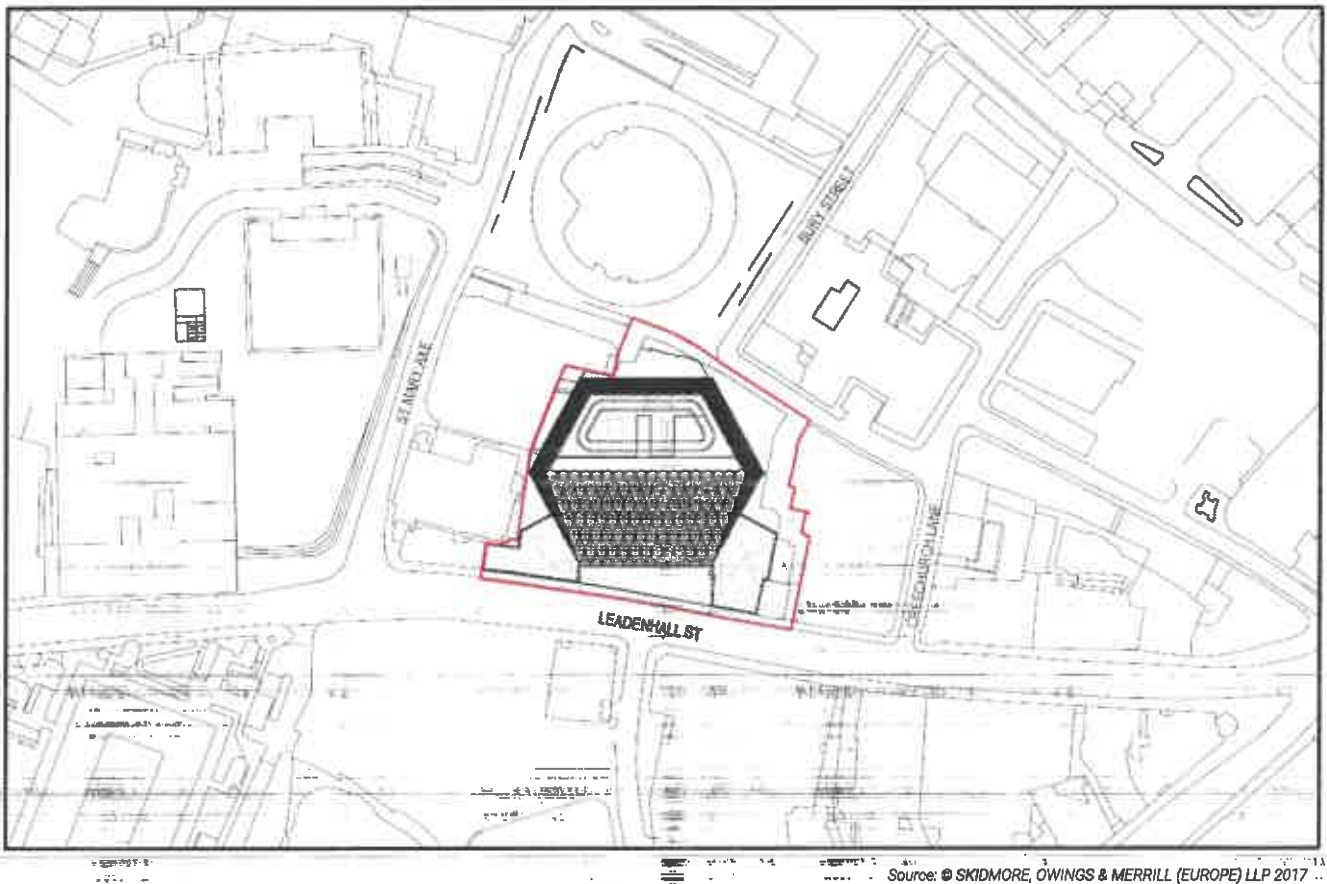


Figure 1 – Site of the proposed development

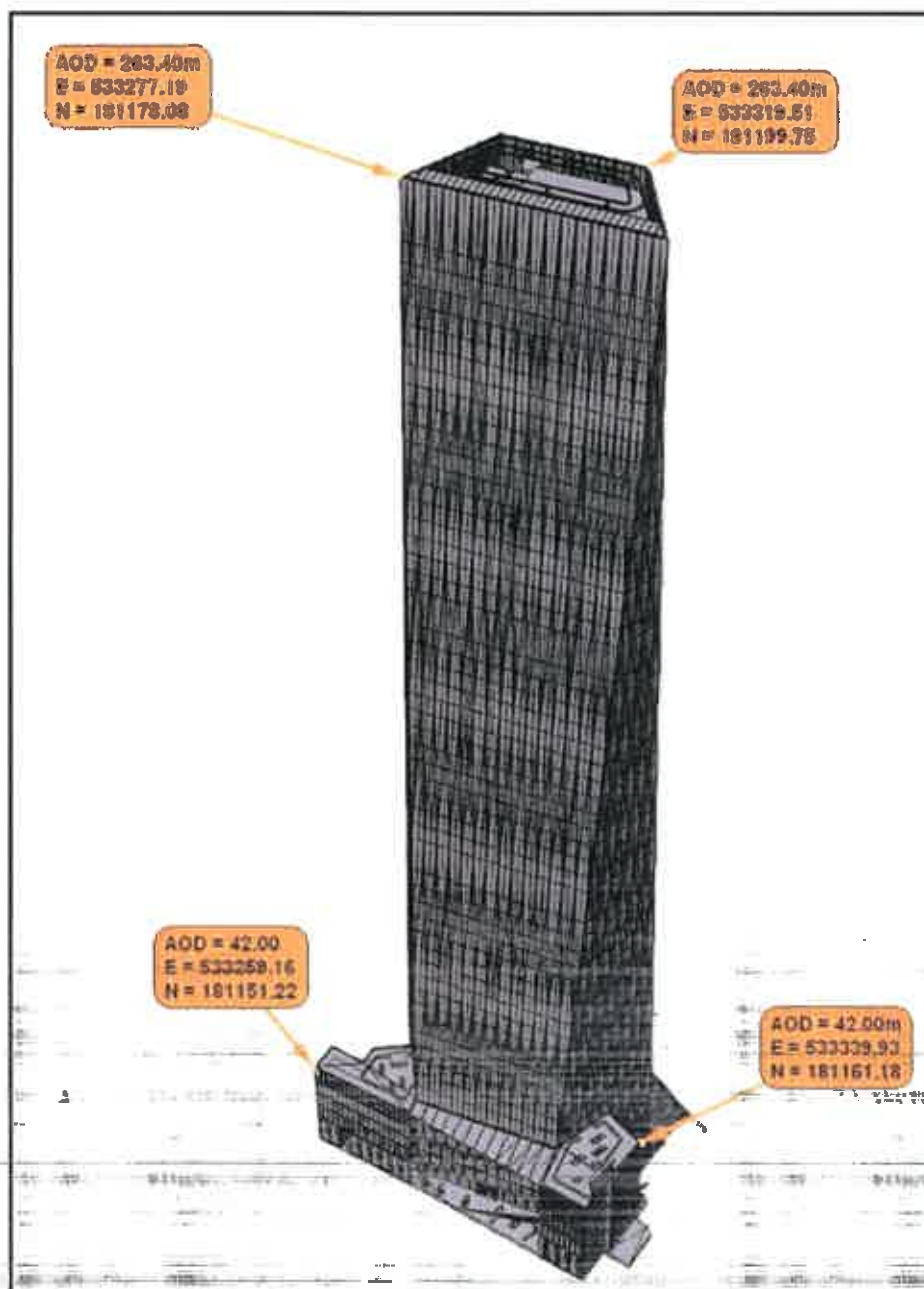
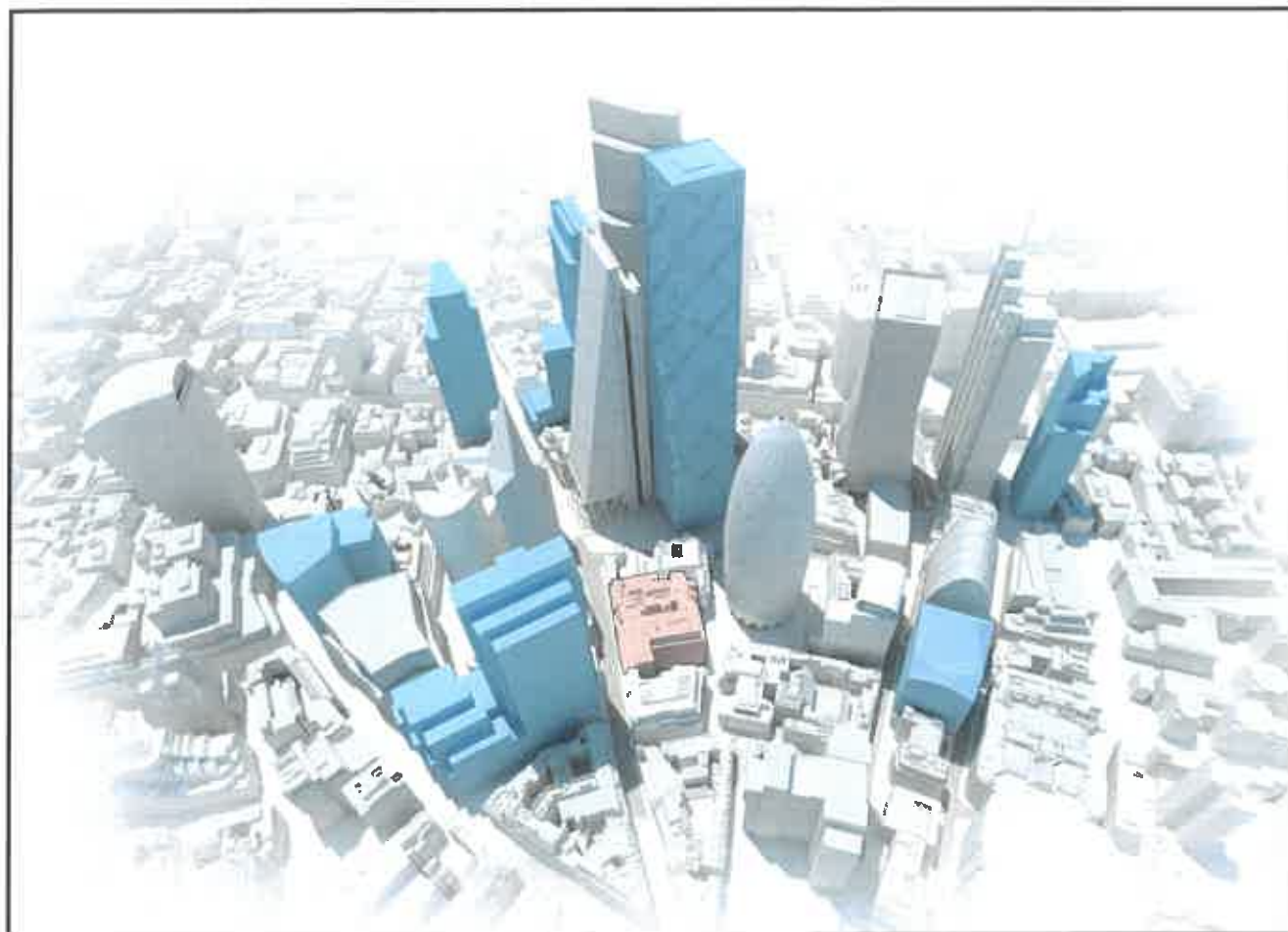


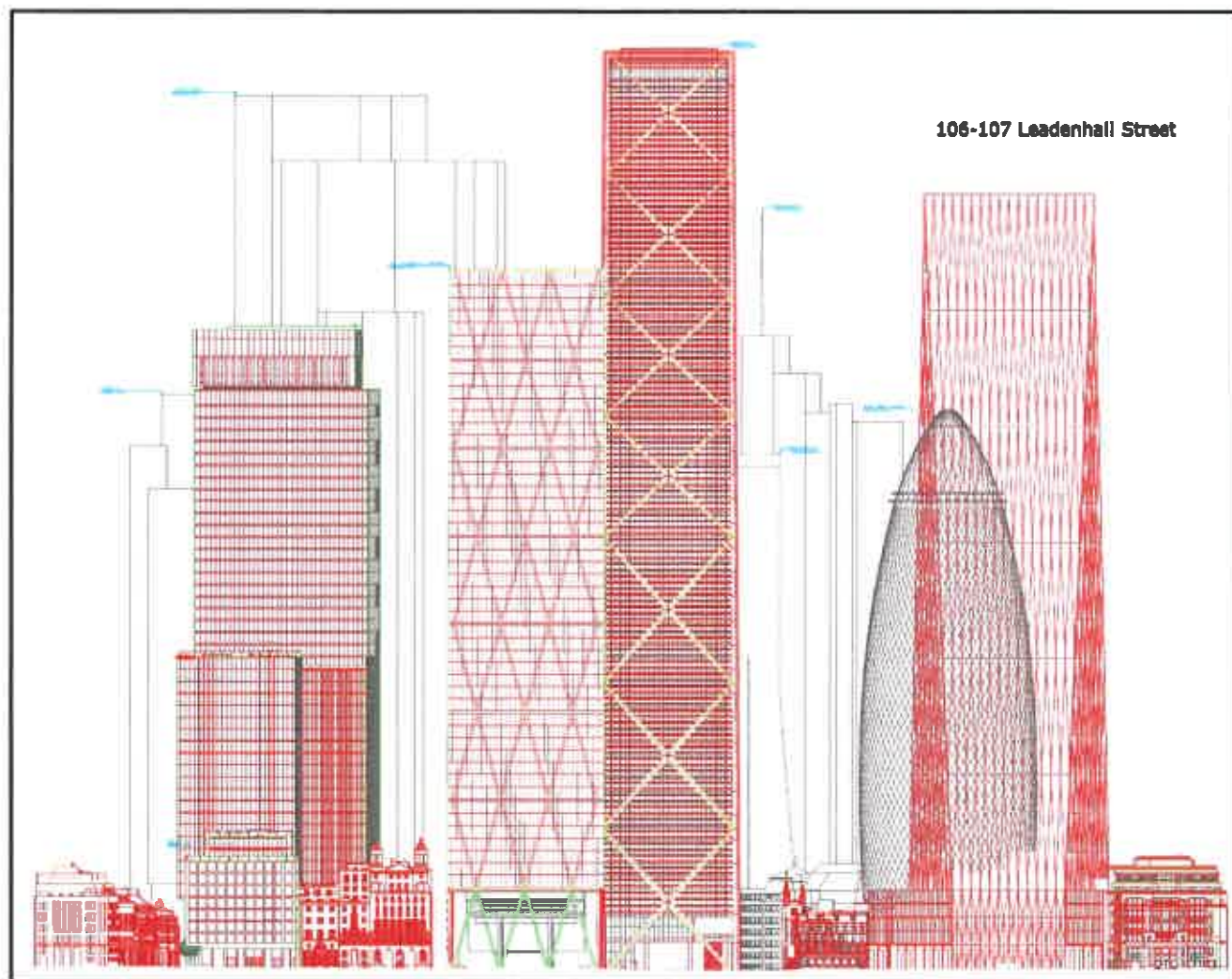
Figure 2 – Proposed Elevation

Source: © Cityscape Digital



Source: DP9

Figure 3 – Proposed development site in context



Source: 171130mv_100 LEADENHALL STREET_PROPOSED ELEVATION_SOUTH-Model

Figure 4 – Proposed Elevation in context

4 Impact Assessment

4.1 Assessments Undertaken

The proposed development was assessed against the following NATS infrastructure:

- 1) *En-route Radar,*
- 2) *Navigation Aids,*
- 3) *Air-ground-air radio sites*

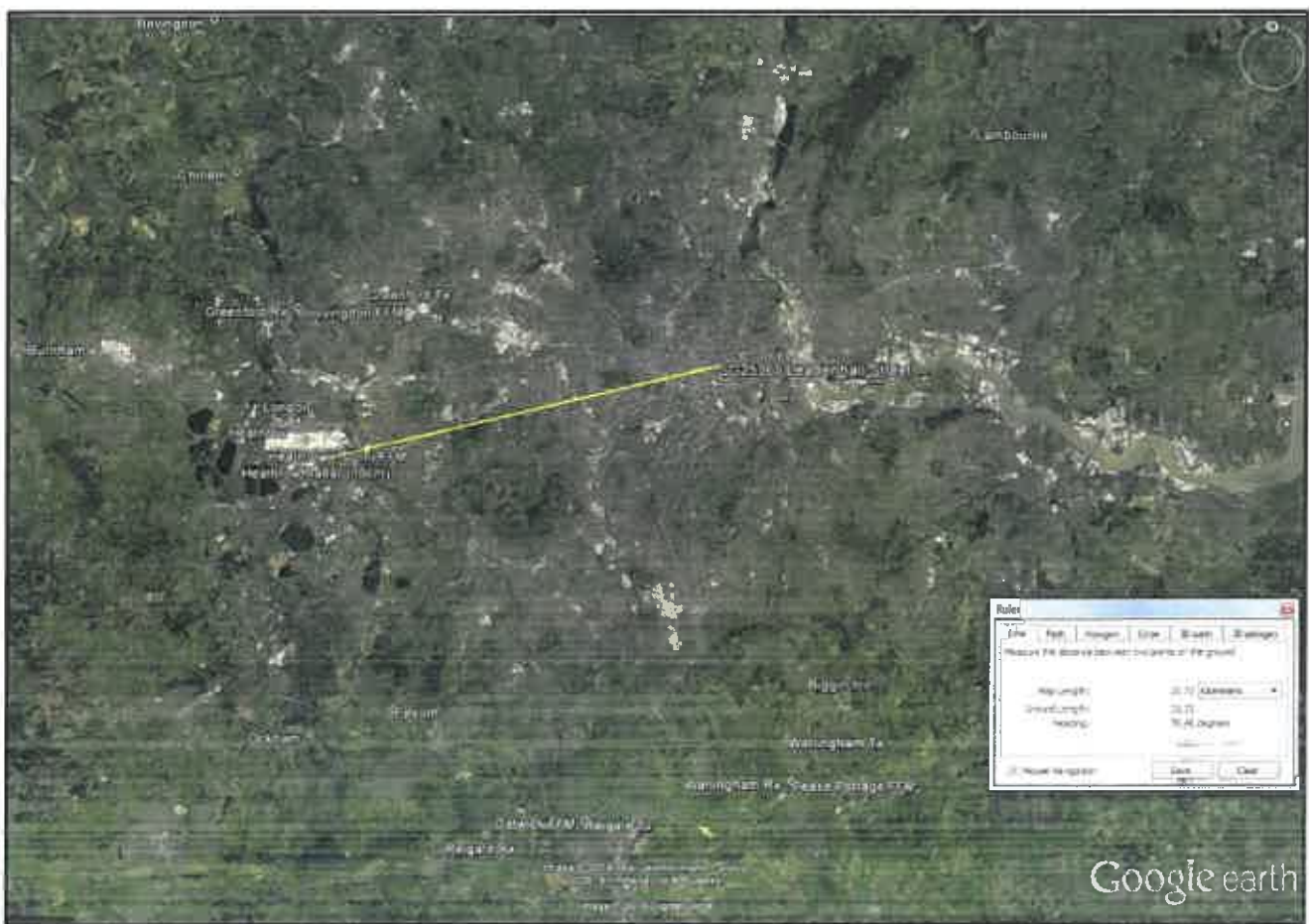


Figure 5 – The site in relation to NATS's infrastructure

4.2 En-route Radar Assessment

The presence of a large obstruction in the radar beam has the potential to impair the performance of the radar.

The impairment can have two effects; the first can be in the form of a loss of cover. This can cause targets at a low elevation angle to be in an area where there is a lower probability of detection (the radar detection is degraded); the second effect is where the obstruction reflects the radiated energy, which in turn can give rise to the generation of false aircraft targets. For an explanation of the two issues, refer to Appendix A.

4.2.1 Heathrow H10 Radar

The proposed development was assessed against the NATS 10cm En-route radar located at Heathrow airport, referred to as H10, this is a combined Primary and Secondary Surveillance radar (PSR/SSR).

The proposal is at a range of 13.85 nm (25.66) away on an azimuth (bearing) of 76.5° from the radar (Figure 5).

4.2.1.1 Loss of PSR/SSR cover

A radar propagation assessment was carried out to ascertain whether any loss of cover could be expected due to the development.

While the terrain in the area is relatively flat out to about 30nm, as the area in question is over a densely built up region, including multiple high rise buildings in and around the City of London, the theoretical cover is not an overly accurate representation on this azimuth. The base of cover was assessed using existing radar performance and the existing urban development. The assessment has shown that low level radar cover in this area is already eroded by existing development.

The proposed development was determined as not worsening the cumulative impact of the existing City cluster and has deemed to be acceptable.

4.2.1.2 SSR reflections and false plots

The proposed development is in close proximity and of similar scale to a number of existing Central London buildings which are adapted into the radar processing as they are known to cause reflections on H10 radar.

The size, proximity and orientation of the proposed development is such that in theory, the transmitted power from the SSR transmitter can be reflected and remain sufficiently strong to trigger an aircraft transponder to respond. The proximity is also such that the response from an aircraft transponder is deemed to be sufficiently strong to be detected by the SSR receiver despite the reflection. This would create a valid plot which the radar system will process as a real target.

This would cause an aircraft to be displayed in an additional (and false) position as well as being displayed in the true position, i.e. a duplicate aircraft would be created.

However, through an analysis of the radar performance, coupled with assessment of neighbouring buildings it has been deemed that the bulk of the surface area of the proposal will be shielded. Furthermore, the tapering design of the scheme is anticipated to reduce the likelihood of sufficient radar energy being reflected skywards and back towards the radar.

As such, an impact is deemed to be unlikely.

4.3 Navigation Aids Assessment

No impact on NATS En route navigation aids.

4.4 Air-ground-air radio sites Assessment

No impact on NATS En route aeronautical radio sites.

4.5 Air Traffic Control Assessment of radar impact

The predicted impact of the proposal's effect on the H10 radar low level cover was deemed not to worsen the existing developments' impact. As such an Air Traffic Control assessment was not required.

4.5.1 Degradation of radar cover

No impact.

4.5.2 False SSR targets

No impact.

4.6 Cranes

4.6.1 Impact of cranes on H10 radar

Cranes can also cause reflections due their physical structure or the material/shapes being lifted, their impact as with buildings can also be a degradation in cover.

At this range, the risk of an impact on radar is not considered to be an issue.

Note: Advice should be sought from London City airport in respect of other crane concerns (obstacle safeguarding).

5 Conclusions

5.1 Loss of PSR/SSR Cover

The impact of the proposal has been deemed to be acceptable.

5.1.1 Mitigation

Not required.

5.2 Duplicate SSR plots

The impact of the proposal has been deemed to be acceptable.

5.2.1 Mitigation

Not required.

5.3 Cranes

NATS has no concerns around the impact of cranes on its infrastructure. However it recommends engagement with London City airport and advises that an impact on airspace may exist for cranes above 300m AOD, in which case liaison with the Civil Aviation Authority may also be advisable.

Appendix A – Principles of Radar

Loss of Cover

Figure 6 shows radar targets behind the proposed development will not be detected by radar. The effect is the same as shining torchlight on an object – anything in the shadow behind the object will not be seen. The air traffic control service for any flight in the lost volume of radar cover will be degraded.

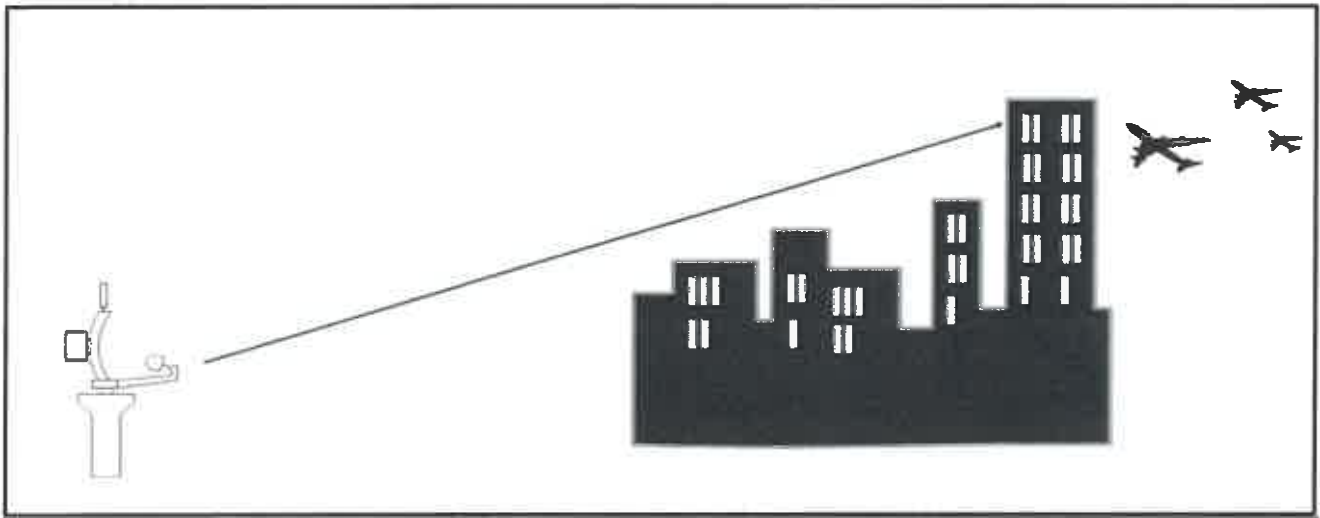


Figure 6: Loss of low radar cover due to the proposed development (not to scale)

Basic SSR Theory

Secondary Surveillance Radars (SSR) transmit Radio Frequency (RF) Interrogations from a rotating antenna at the radar site, on reception of these interrogations by a transponder, RF replies are transmitted.

For NERL SSR, these replies primarily originate from airborne targets and are received at the radar using the same antenna.

A radar antenna is designed to focus RF energy to create the required beam pattern. The RF energy consists of alternating Electrical and Magnetic fields which interact close to the antenna. At a distance from the antenna the fields come together to form a stable wave front which creates the radar beam. A radar beam therefore requires a clear or 'sterile' area in which to form correctly, if there are obstructions within this area, the beam will not be the required shape.

A radar beam that is interrupted in the 'sterile' area and therefore is not the required shape can lead to the generation of false targets, inaccuracies in the reporting of real target positions or non detection of real targets. All of these lead to a reduction in the quality of the air situation picture presented to air traffic controllers making the job of safely and efficiently controlling aircraft more difficult.

Plots and Tracking

For the purposes of accurate detection of valid targets, the radar system processes all transponder replies to decipher the real returns from false ones.

Verification of the presence of a target is made once per antenna revolution, even if several discrete detections are made during that scan. On the first antenna revolution that an apparently valid reply is received an initial plot is formed. This initial plot is then stored and the system estimates a realistic zone from which the next reply should originate.

If a second valid reply is received from within the anticipated region on the subsequent revolution of the antenna, the location of this plot is also stored by the system. These two plots and their associated characteristics are now used by the system to predict the region from which the third reply should originate. On verification of this third reply, a radar track is established.

Every subsequent reply should then track directly because the chain of replies has already been verified to be real according to the predefined system parameters. It is radar tracks that are output to Air Traffic Control and appear on the radar displays.

Reflected Energy - Definition

A secondary radar reflection manifests as a second track report for the same aircraft. A radar reflection is caused when the interrogation is directed to an azimuth that is not the intended azimuth; the result is that an unintended interrogation occurs to an aircraft than is not in the direction the antenna is facing at that instant.

This is caused by large reflecting surfaces that direct the beam away from the azimuth of the antenna main beam. See Figure 7 for a pictorial representation of this situation.

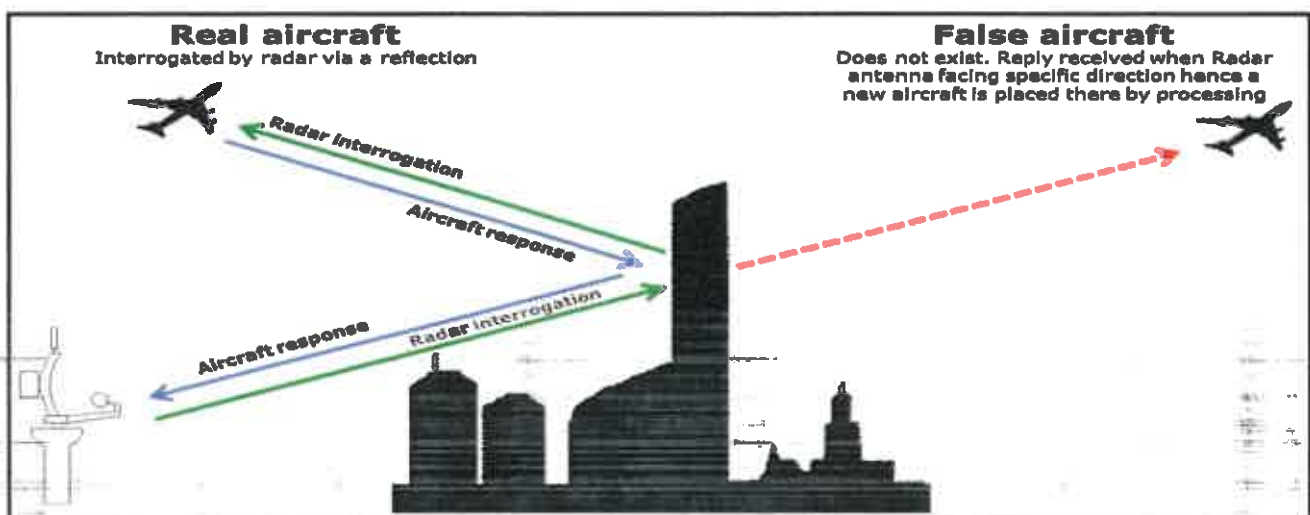


Figure 7: Simplified SSR Reflection Geometry

Characteristics of Reflections

Reflections are typically characterised by "ghost" targets that appear in a geographic location for a period of time and then vanish without trace, creating a very unstable and inconsistent air situation picture.

Reflections, although false, have all the characteristics of real replies, and so they will form plots and will track in the same manner.

Verification of the integrity of a reply is a fundamental part of the operation of the radar system. If there is any doubt surrounding the validity of a reply, the unverified target will be output on the ATC radar display, increasing workload as controllers see and react to false targets that may be in close proximity to real targets.

Case Study 1 – The Euston Tower – Heathrow Radar

The Euston Tower was chosen for investigation as maintenance logs show it to be heavily used to suppress false targets and as a 124m tower at 11.9nm from the radar it is similar in many ways to the developments being proposed in central Heathrow.

The Euston Tower was not adapted into the Heathrow radar as a known building, false plots identified during initial system optimisation were calculated as being generated by a surface at 11.9nm with a central azimuth of 70.7° and an orientation of 341.5° , it was only later that this was identified as aligning with the Tower.

For the purposes of this analysis the Tower has been estimated at 124m tall on a ground level of 25m and that the widest flat portion of the tower facing the radar has a width of 25m.

When a NERL radar suppresses a target it believes to be false the details are recorded locally, this information is not retrieved routinely but has on occasion been extracted during specific investigations and a limited archive is available. Half an hour of such an archive was examined for this case study.

Within the half hour examined 14 suppressed plots were traced back to the Euston Tower and the real aircraft that led to their generation were determined. For this limited-data set the real aircraft were all tightly grouped around a point 2nm from approach on Heathrow's northern runway.

By using relative power levels corrected for the known signal path lengths many of the assumptions in the reflection analysis can be cancelled out in an attempt to isolate the magnitude of the reflected component, i.e. the magnitude of σ . The largest remaining unknown is probably the antenna pattern, G_{rw} , of the aircraft transponder and given that the geometry remains relatively constant across the 14 instances this may lead to a systemic bias. The full track length for each of the real aircraft was examined and by eye the aircraft heading did not appear to be correlated with any deviation in real/expected signal strength leading to the conclusion that this is not a significant factor.

Using the parameters estimated from the direct interrogations the indirect power levels were used to estimate the radar cross section, σ , of the Euston tower and the results averaged 87dBsm with a standard deviation of 3.2dBsm.

Using the formula for a perfectly conducting flat plate equivalent to the full height of the building and 25m wide gives a radar cross section of 92dBsm, reducing the height of the building by 21m to take into account the shielding from adjacent 7 storey Santander building yields 90dBsm.

The above analysis suggests that although, as expected, the perfectly conducting flat plate assumption leads to an overestimate of the radar cross section this may be by as little as 3dB.

The relationship between the real aircraft position and the tower can also be used to examine the assumption of specular reflections in the horizontal plane in determining the volume of airspace within which real aircraft would potentially generate false plots as shown below (in all plots the scale is nm with the origin at the radar).

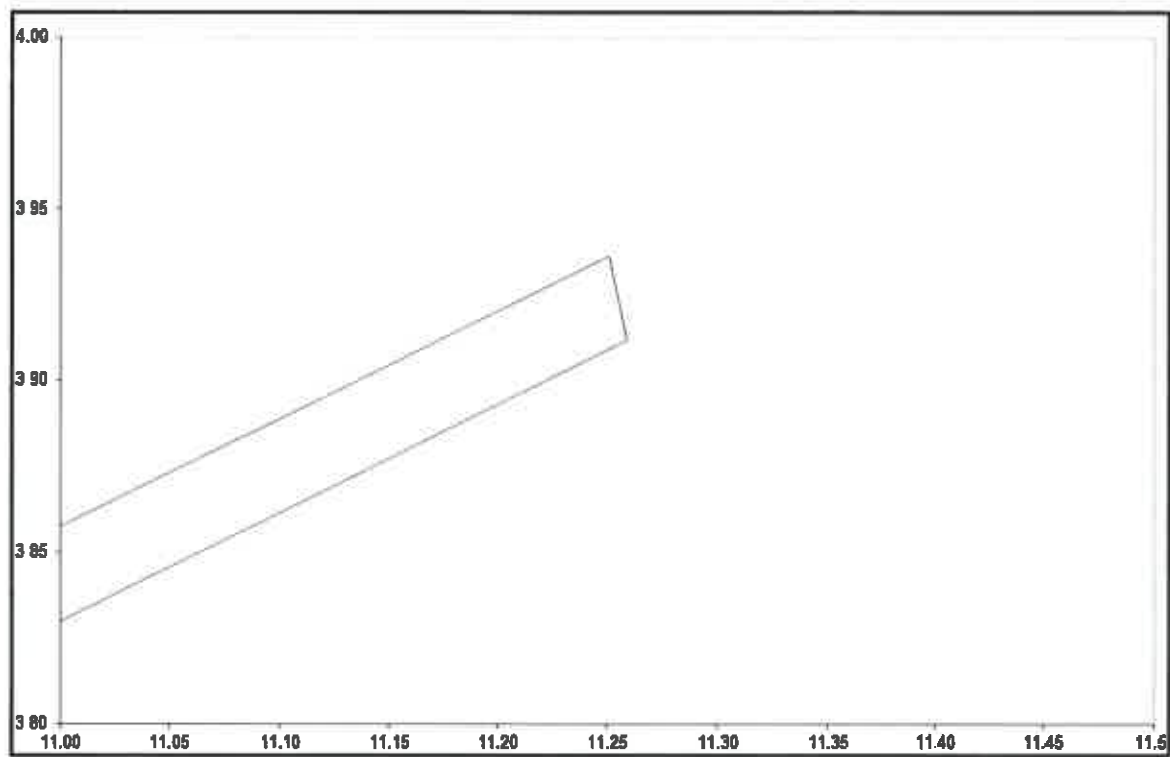


Fig CS1.1 Estimated zone of Impact in the horizontal plane assuming specular reflections

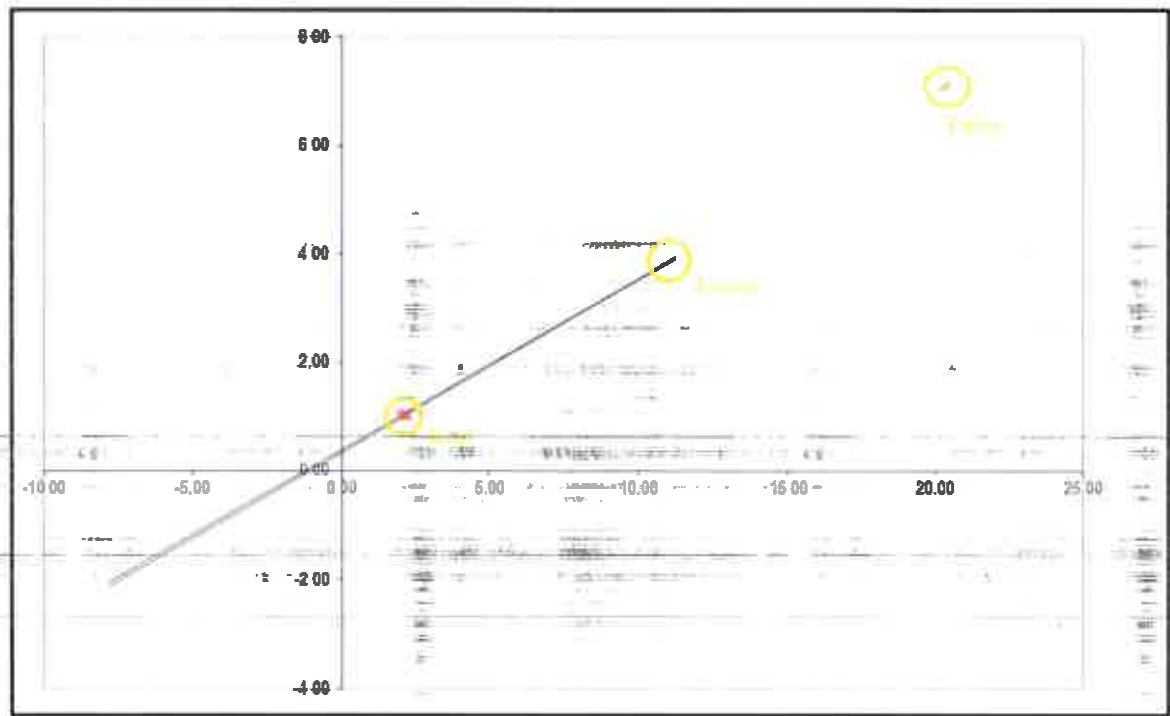


Fig CS1.2 Estimated zone of Impact alongside real and false plots

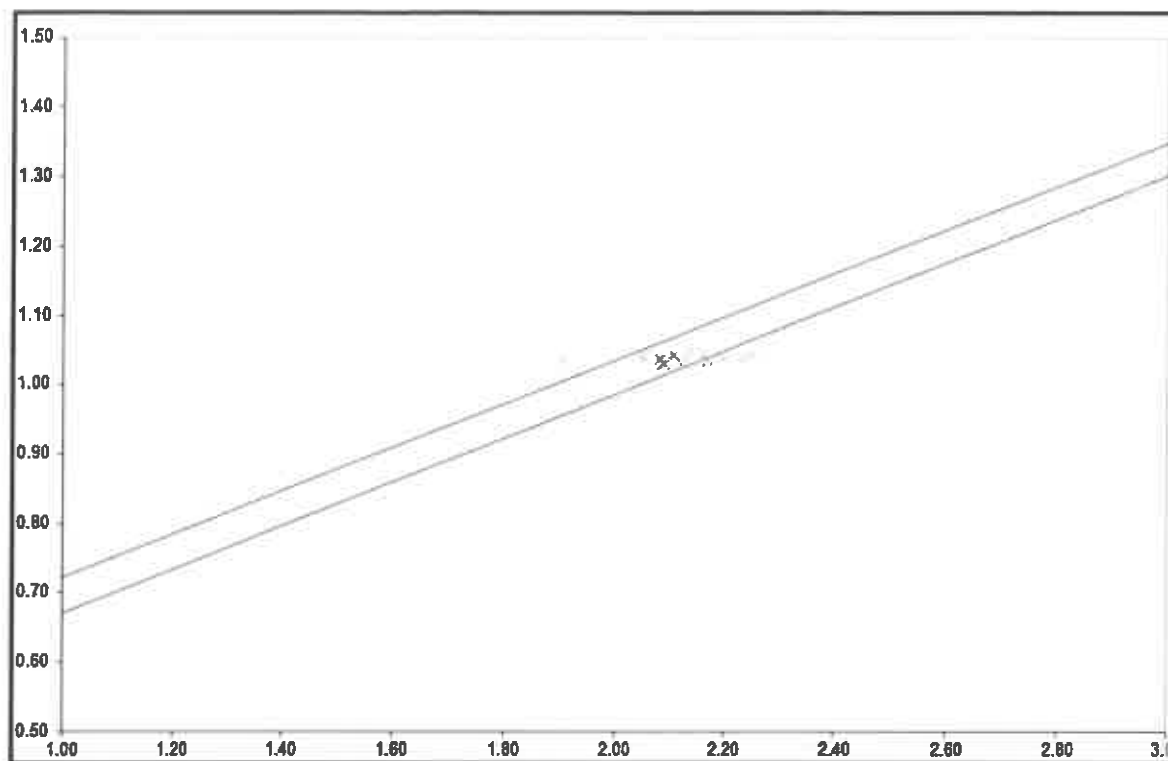


Fig CS1.3 Estimated zone of Impact alongside real plots

Given that there were a large number of real plots close the estimated zone of impact that did not give rise to false plots it can be assumed that although the assumption of specular reflection leads to an underestimation this is not a large effect.

Case Study 2 – Vertical Component– Pease Pottage

Pease Pottage was chosen to investigate the vertical component of the reflection as it combines a hill-top site with close proximity to a built up area.

The maintenance logs were examined and, excluding Gatwick Airport, the 3 reflectors used to suppress the most false targets were chosen for further investigation these were

1. A 6 storey Hotel on Southgate Ave, Crawley
2. A 4 storey office building at Pegusus Place Crawley
3. Farm buildings on Parish Lane

The geometric relationship between the radar and each of the buildings are shown in the following diagrams with the New Buildings Farm examined in more depth as it was by far the most heavily used reflector leading to the suppression of 2,400 false plots on one recent log file.

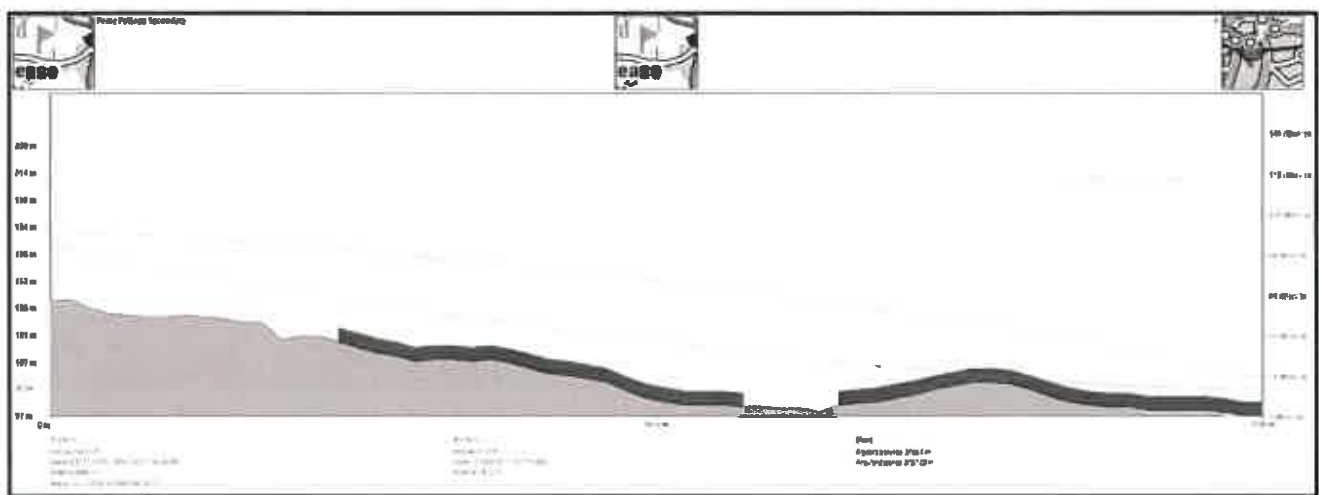


Fig CS2.1 Path from Pease to the Hotel

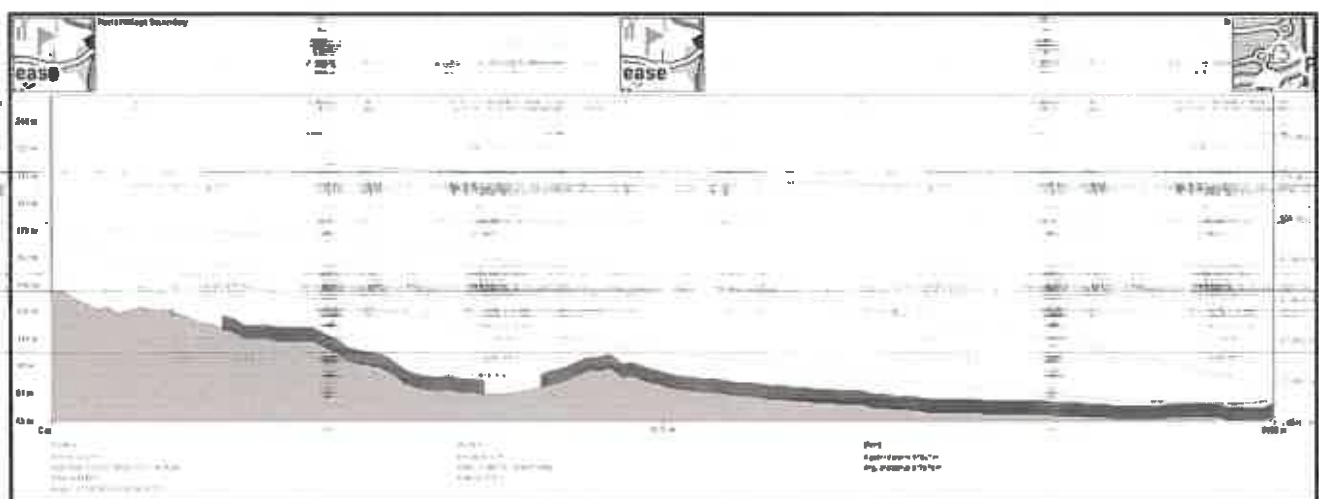


Fig CS2.2 Path from Pease to the office building

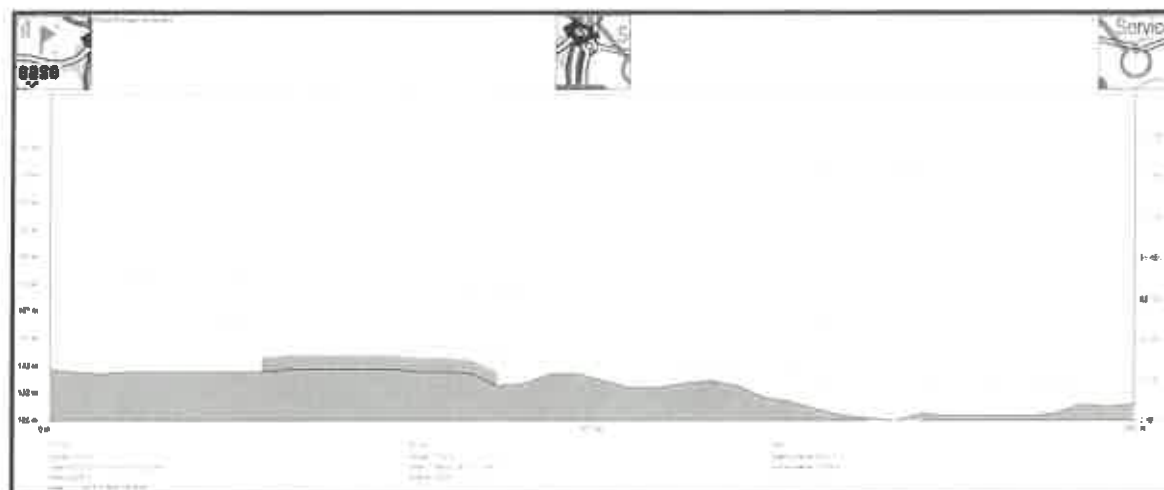


Fig CS2.3 Path from Pease to the Farm Buildings



Fig CS2.4 The Farm Buildings

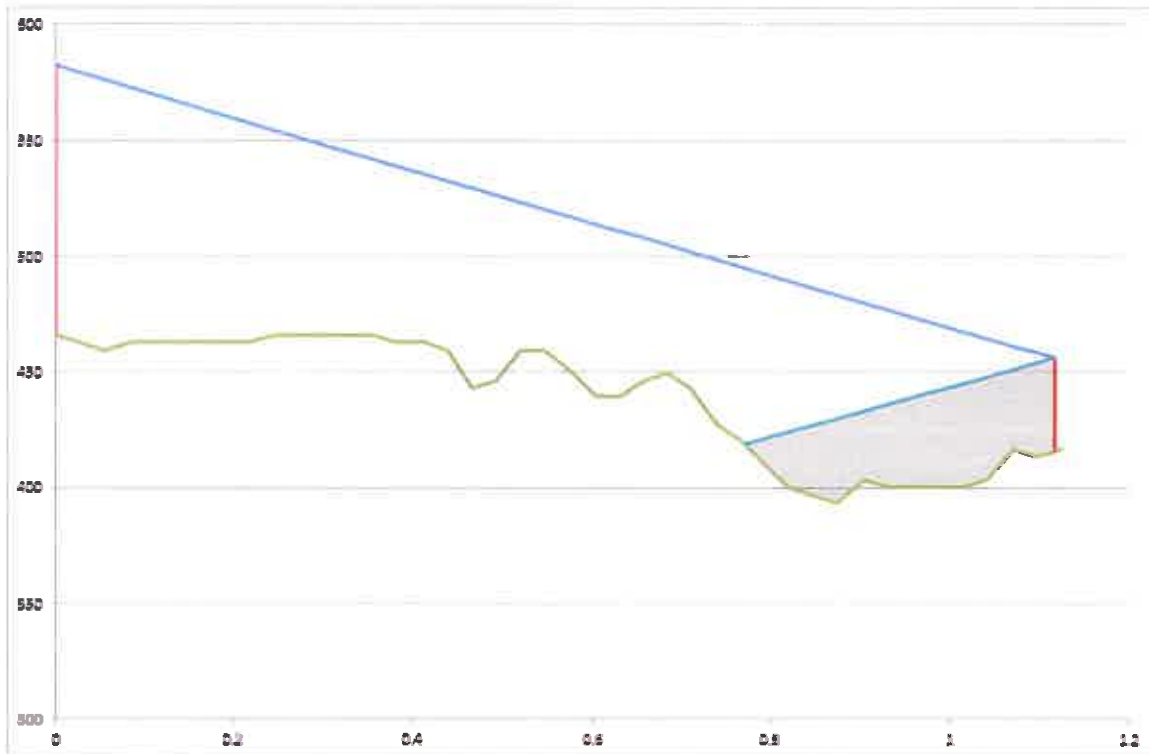


Fig CS2.5 Theoretical zone of impact using specular reflection assumptions

Due to the large negative angles in all three cases the theoretical zone of impact using specular reflection assumptions will be a negligibly small volume of airspace where it is very unlikely that any aircraft would transit.

The fact that these are heavily used reflectors suggests that specular reflection assumptions are not valid in the vertical plane and if thousands of false plots are to be generated by a surface such as the Farm Buildings then the assumption is not simply a slight underestimate but is actually of little use.

Until further work can ascertain limits to the vertical extent of SSR reflections the assumption is that aircraft at all altitudes could be interrogated via a reflecting surface.



City of London

PO BOX 270
Guildhall
London
EC2P 2EJ

London Borough of Hackney
Planning and Regulatory
Services
2 Hillman Street
London E8 1FB
www.hackney.gov.uk
Hackney Reference:
2018/0917

09 March 2018

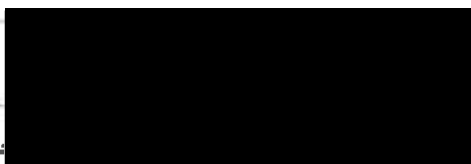
**Town and Country Planning (Development Management Procedure)
Order 2015**

Application Number: 2018/0917
Site Address: 100 Leadenhall Street London EC3A 3BP

Thank you for your recent application for the above address on which a decision has now been made. The decision on your application is attached. Please carefully read all of the information contained in these documents.

Please quote your application reference number in any correspondence with the Council, either by post to the Hackney Planning Service, 2 Hillman Street, London, E8 1FB, by email to planning@hackney.gov.uk, or by phone to 020 8356 8062.

Yours faithfully



Ian Rae
Head of Planning
Planning Service
Neighbourhoods and Housing

PLANNING DECISION NOTICE

Town and Country Planning (Development Management Procedure) (England) Order 2015

Agent: City of London
PO BOX 270
Guildhall
London
EC2P 2EJ

Applicant:

**Part 1- Particulars
of the Application**

Application No: 2018/0917

Date of Application: 07/03/2018

Date Validated: 09/03/2018

Application Type: Adjoining Borough Observations

Proposal: Notification from City of London of proposed development of 57 storey building to accommodate offices.

Location: 100 Leadenhall Street London EC3A 3BP

Part 2 – Particulars of Decision: NO OBJECTIONS

Informative: The proposed building would obscure the silhouette of 30 St Mary Axe when viewed from the London Borough of Hackney. Whilst this is regrettable it is accepted that this is not a material planning reason to object to the proposed development.

Date of Decision: 09 March 2018

Yours faithfully


Ian Rae
Head of Planning
Planning Service
Neighbourhoods and Housing

Tel: 020 8921 5222



Bhakti Depala
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

**Directorate of Regeneration,
Enterprise & Skills**
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

I8/0830/K
Your Ref: I8/00152/FULEIA
21 March 2018

DECISION NOTICE – RAISE NO OBJECTION

Dear Sir/Madam,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site: 100 Leadenhall Street, London, EC3A 3BP
Applicant: Frontier Dragon Ltd
Proposal: Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery with controlled restaurant bar use (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, as well as new and improved Public Realm, ancillary basement cycle parking, servicing and plant. [Total Scheme Area: 122,091sq.m GEA].
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ
Drawings Covering Letter dated 7 March 2018.

I refer to your letter dated 07 March 2018 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director

18/00152/fulGA

Your Ref:
Our Ref: 18/01070/OBS



P11492152/000010

City Of London
Bhakti Depala
PO Box 270
London
EC2P 2EJ

3rd April 2018

RE: REQUEST FOR OBSERVATIONS

Dear City Of London

**DECISION NOTICE
TOWN AND COUNTRY PLANNING ACT 1990.**

REQUEST FOR OBSERVATIONS

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 18/01070/OBS Date of Application: 07.03.2018 Date of Decision 03.04.2018



Proposed Development At:
Adjoining Borough Observations Within The Corporation Of London

For: Observations on a proposed development within the adjoining Borough of City of London with respect to Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1)(102,043sq.m GEA), retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery with controlled restaurant bar use (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, as well as new and improved Public Realm, ancillary basement cycle parking, servicing and plant. [Total Scheme Area: 122,091sq.m GEA] At: 100 Leadenhall Street London EC3A 3BP

Approved Plans

Conditions

Lambeth Planning
PO Box 734
Winchester
SO23 5DG

Telephone 020 7926 1180
Facsimile 020 7926 1171
www.lambeth.gov.uk
planning@lambeth.gov.uk

Notes to Applicant

Yours sincerely



ROD BRISTOW

**Assistant Director Planning, Transport & Development
Growth, Planning and Employment Directorate**

Date printed: 3rd April 2018

Bhakti Depala
City of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Place Directorate
Development Management
Town Hall, Mulberry Place
5 Clove Crescent
London
E14 2BG
www.towerhamlets.gov.uk

Application Number: PA/18/00780
Your ref: 18/00152/FULEIA

Enquiries to: Rikki Weir
Tel: 0207 364 1954
Email: Rikki.Weir@towerhamlets.gov.uk

12 April, 2018

Dear Bhakti Depala,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	100 Leadenhall Street London EC3A 3BP
Proposal	Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use (Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery with controlled restaurant bar use (Sui Generis) [1,934sq.m GEA] at levels 55 and 56, as well as new and improved Public Realm, ancillary basement cycle parking, servicing and plant. [Total Scheme Area: 122,091sq.m GEA] This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from DP9, 100 Pall Mall, London, SW1Y 5NQ

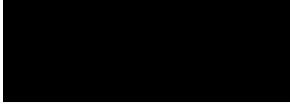
Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out about into consideration:-

1. The Local Planning Authority of the London Borough of Tower Hamlets do not wish to comment further on this planning application.



If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Owen Whalley, Divisional Director - Planning and Building Control



Your ref: 18/00152/FULEIA
Our ref: 18/1150

Bhakti Depala

Via email only
Bhakti.Depala@cityoflondon.gov.uk

4th April 2018

Dear Bhakti,

100 and 106-107 Leadenhall Street EC3A 3BP

Demolition of the existing buildings and construction of a ground plus 56 storey building (263.4m AOD) for office use Class B1) [102,043sq.m GEA], retail use (Class A1/A3/A4) [882sq.m GEA] at lower levels, a publicly accessible viewing gallery with controlled restaurant bar use (Sul Generis) [1,934sq.m GEA] at levels 55 and 56, as well as new and improved Public Realm, ancillary basement cycle parking, servicing and plant. [Total Scheme Area: 122,091sq.m GEA]

This letter follows the recent submission of the above planning application. The following comments are on a 'without prejudice' basis only and are intended to ensure that this development is successful in transport terms and in line with relevant London Plan policies. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority. The Mayor of London will consider these proposals shortly and a formal Mayoral response will also be made.

Site context

The site of the proposed development is at 100 and 106-107 Leadenhall Street, which forms part of the Strategic Road Network (SRN). TfL have a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The closest parts of the Transport for London Road Network (TLRN) are Whitechapel High Street A11 approximately 600m east of the site directly along Leadenhall Street and Aldgate High Street, and Bishopsgate A10 approximately 250m west.

The site has a public transport accessibility level (PTAL) of 6b on a scale of 1-6b where 1 is the least and 6b is the most accessible. There are 7 bus stops within walking distance of the site giving access to the 35, 47, 344, 149, 48, 133, 43, 141, 21, 23, 11, 388, 26, 242, 8, 15, 40, 25, 254, 115, 67, 205, 100, 135, 42 and 78 bus services. Bank, Aldgate East, Fenchurch Street, Canon Street, Liverpool Street and Tower Hill stations are all also within walking distance, giving access to a wide range of National Rail, TfL Rail services, DLR services and London Underground (LU) services on the Central, Circle, Hammersmith & City, District and Metropolitan lines.

TfL Rail has been running the Liverpool Street to Shenfield route using Crossrail trains since May 2017 and will takeover running the Paddington to Heathrow service in May this year. The Crossrail central section is expected to become operational between Paddington and Abbey Wood in December 2018 at which point this and the two existing TfL Rail services will be known as the Elizabeth Line. The whole line between Reading and Heathrow in the west and Abbey Wood and Shenfield in the east is due to open by the end of 2019.

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

Cycle Superhighway 2 (CS2) from Aldgate to Stratford is approximately 600m east of the site. Cycle Superhighway 1 (CS1) from the City to Tottenham can be joined approximately 1.5km north west. North-South Cycle Superhighway 7 (CS7) crosses Southwark Bridge approximately 800m west. The East-West Cycle Superhighway from Tower Hill to Lancaster Gate is approximately 2km west.

The closest Cycle Hire docking stations are at 30 St. Mary Axe (the Gherkin) and Jewry Street, 160m north and 260m east respectively.

Key TfL considerations

Public transport services, assets and infrastructure owned and managed by TfL are crucial to the accessibility of the site. It should also be noted that pedestrian comfort levels in the vicinity are currently poor, especially during peak hours. Pedestrian comfort, despite planned improvements, is unfortunately expected to worsen considerably in the coming years due to a large increase in Elizabeth Line passengers and ongoing progress of the City Corporation's Eastern Cluster tall buildings planning strategy.

The Site falls within the Central Activities Zone (CAZ). Current London Plan policies 2.10-2.12 emphasise enhancement and promotion of the unique international, national and London-wide roles of the CAZ (2.10Aa), including through provision of appropriate supporting infrastructure (2.10Ab), and protection of the CAZ's strategic functions (2.11). Around 90% of trips under 1 mile originating in the CAZ are conducted on foot.

The current London Plan CAZ SPG notes walking and cycling are essential to the mix of modes if the CAZ is to sustain its essential strategic functions and accommodate further growth (para 5.1.2).

The current London Plan (para 2.43) also notes that parts of Inner London "suffer from a legacy of ill-conceived and sometimes poorly managed development which has received inadequate subsequent investment, especially in the public realm."

Draft London Plan

We remind the Council that the draft new London Plan was launched for consultation on 1st December 2017. This document is now a material consideration in determining applications and in assessing general conformity of emerging local policy. As such, TfL now has regard to this Plan, inter alia, when assessing and responding to relevant consultations.

Mayor's Transport Strategy (MTS)

The Mayor's Transport Strategy, now published, sets out the Mayor's policies and proposals to reshape transport in London over the next two decades.

Healthy Streets

TfL published Healthy Streets for London in February 2017. Healthy Streets features heavily in both the draft London Plan and the published MTS. Improving the health of Londoners through transport planning and urban design is now a key priority for the Mayor and TfL.

This includes being able to enjoy clean air and an environment that feels safe, relaxed, easy to move through and not too noisy. Developers, local planning authorities and other relevant stakeholders should therefore prioritise active travel and public transport use and deprioritise travel by private vehicles including taxis and coaches. Public realm proposals should create inclusive environments that can be accessed and enjoyed by all, especially those visiting and stopping to relax on foot or by bike.

Access and Site Layout

The Transport Assessment (TA) shows there will be two entrance doors for pedestrians; one fronting directly to Leadenhall Street at the south end of the main tower, and one at the northern edge fronting towards 30 St Mary Axe (the Gherkin).

Cyclists will access the new development at the northeast corner of the main tower, via Bury Street,

where existing on-street servicing bays will be removed and replaced with a shared space. Pedestrians will be guided away from the cycle parking and servicing access by planting and hard landscaping.

Vehicles will also access a new basement servicing consolidation area from Bury Street, adjacent to the cycling entrance. However entry will be restricted by retractable bollards and a logistics management office immediately adjacent to the vehicle access and lifts will manage these arrangements. All vehicles would be able to enter and exit the development in forward gear, as sufficient space to turn around would be provided within basement level -2. Two vehicle lifts are proposed to avoid vehicles waiting on street or in the basement if the only one is occupied.

Due to the close proximity of the proposed cycling and servicing accesses, and the what are expected to be busy areas of new public realm to be created as part of the development, time restrictions on deliveries and servicing trips to and from the site will be essential. All deliveries and servicing trips should be limited to outside cycling network peaks.

Access to the cycle parking at basement level -1 will be via a 3m wide cycle ramp from the entrance on Bury Street and a lift sized for bicycles will also be provided. TfL Spatial Planning requests clarification of the exact gradient and total length of the cycle ramp, and also the exact capacity of the lift in terms of cycles which can fit within it at one time and how many cyclists it can transfer safely and conveniently per hour to the basement level cycle parking area. The capacity of the lift for larger bikes should also be confirmed.

Public Realm

The Public Realm at the site will increase by approximately 1000 sq m and permeability and pedestrian connectivity will improve both in and around the site and within the wider Eastern Cluster. TfL Spatial Planning supports this in line with draft London Plan Policies T2 (Healthy Streets) and D7 (Public Realm).

In addition to the new north-south route east of the main tower already mentioned, a small new public space will be created at the rear of St Andrew Undershaft church, with active retail uses and a seating area. This will be served by two pedestrian routes from Leadenhall Street, also lined with active retail uses.

All these routes and the public realm should be generally open to the public 24/7.

Legible London & Cycle Hire Section 106 (S106)

It will be necessary to make the permeability of routes through the site understandable and clear to pedestrians coming from Leadenhall Street to the south and Bury Street or 30 St Mary Axe to the north.

Legible London signage should therefore be secured in line with draft London Plan Policies T2, T4 and T5 and London Plan Policies 6.3 and 6.9 (Paras 56-64). TfL Spatial Planning can advise on the exact cost between Stages 1 and 2 of the GLA planning process and should include updates of existing signs as well as new ones...

A large uplift in office and retail space is forthcoming in the local area due to the Eastern Cluster tall buildings strategy which will inevitably add to the already high demand in the City of London for Cycle Hire. .

The proposed development will contribute to significant stress on the capacity and operations of our Cycle Hire network. The popularity of cycling is increasing rapidly in both the City of London and London more widely. Furthermore, the creation of new destination retail and related uses within the development is clearly likely to attract large numbers of Cycle Hire users in addition to those working or visiting the significant amount of new office floorspace which is proposed. .

TfL Spatial Planning therefore requests a contribution of up to £200,000 to fund extensions of the 2 closest Cycle Hire docking stations at 30 St Mary Axe and Jewry Street. The feasibility, exact cost

and increase in points at each docking station for these extensions should be clarified by the applicant in conjunction with TfL Cycle Hire and TfL Spatial Planning and relevant City Corporation officers prior to determination. Legible London signage in and around the development will also need to indicate the availability of Cycle Hire nearby to promote sustainable and active travel in line with draft London Plan Policies T2, T4 and T5 and London Plan Policies 6.3 and 6.9.

Section 278 (S278) agreement

A S278 agreement will be required between the applicant and the City Corporation as the highway authority for the surrounding SRN road network. Locations for new Legible London signage will need to be taken into account in all S278 designs. TfL Spatial Planning can advise on appropriate locations for the signage between Stages 1 and 2 of the GLA planning process.

TfL Spatial Planning requests formal consultation with TfL on the detailed design which would be subject to the S278 agreement for this development to be secured in the S106 agreement. This is essential given that the local context is in a complicated state of flux with a number of significant changes to the strategic highway and public transport networks taking place soon or currently being trialled, namely:

- Joint temporary (during construction) and permanent S278 agreements for 6-8 Bishopsgate and 1 Leadenhall, including major junction works
- S278 for 22 Bishopsgate (currently under construction)
- S278 for 135 Bishopsgate, including major streetscape & utilities works
- Bank on Safety experimental safety scheme
- Emerging proposals for Monument junction
- The new Liverpool Street Crossrail station with new exits out onto City Plaza on Ropemaker Street near Moorgate and within British Land's Broadgate estate outside 100 Liverpool Street.

Car and Cycle Parking

Only 2 disabled car parking spaces are proposed within the development, at basement level -2. Due to the excellent provision of wheelchair accessible public transport services in the local area and the wide range of local facilities, this is acceptable to TfL Spatial Planning. However our support for such a low disabled parking provision is contingent on the spaces being made available to Blue Badge holders 24 hours a day with no blocking in by servicing vehicles at any time, and all new public realm created at the development as part of the S278 should be step-free. The parking spaces must also be conveniently located, close to wheelchair accessible lifts and should be managed such that they are available to any Blue Badge holder and not each allocated to a single user.

The Proposed Development would meet the minimum long-stay cycle parking quantum requirements from current London Plan Policy 6.9 and Table 6.3. Long-stay cycle parking would be provided at basement level -1. The TA (para 5.4.6) specifies that most of the spaces would be two-tier and 5% would be usable by larger bicycles in which accords with the TfL London Cycling Design Standards (LCDS) and therefore acceptable. Provision of at least 1,345 long-stay cycle parking spaces should be secured by condition.

However, the proposal for 10-15% of the long-stay cycle parking provision to be foldable bicycle lockers is not acceptable to TfL Spatial Planning and should be changed. In the circumstances, a maximum of 5% foldable bicycle lockers could be provided and, taking into account 5% will need to be Sheffield stands for larger cycles, at least 90% of the required total long-stay provision should then be provided in complete compliance with LCDS.

The current London Plan requirement for short-stay cycle parking is 69 spaces. However the TA (para 5.4.8) states that 25% of the short-stay cycle parking spaces would be located in the basement. Whilst TfL Spatial Planning would prefer for all short-stay cycle parking spaces to be at ground level and does not support any of them being provided at basement level, we understand from City Corporation planning colleagues that some flexibility has been applied to increase space for pedestrian circulation, which is acceptable due to the unique characteristics of the local context.

Provision of at least 69 short -stay cycle parking spaces should nonetheless be secured by condition and the condition wording should specify that at least 75% must be provided at ground level in permanently publicly accessible areas. TfL Spatial Planning will be happy to discuss this matter further prior to determination.

135 cyclist showers are proposed within the basement along with one locker for each long-stay cycle parking space. TfL strongly supports this in line with current London Plan policy 6.9B. Provision of at least these numbers of cyclist showers and cyclist lockers should be secured by condition.

Trip Generation

Trip generation analysis has been supplied in the TA and is satisfactory despite use of an alternative methodology to the TfL-endorsed TRICS database. The mode share used for cycling, of 12%, is satisfactory, as is the trip assignment across local rail, LU and bus services. A large net increase in bus trips is predicted compared to the existing site use, of 188 inward journeys during the AM peak and 163 outward journeys during the PM peak. However, TfL Buses have advised that existing services and planned service enhancements in the City of London will be able to accommodate the increased demand.

The City Corporation should secure funding for TRICS compliant trip generation monitoring of the building once it is occupied as part of the S106 agreement. TRICS offer a Standard Assessment Methodology service and template S106 obligation which can be used (see http://www.trics.org/sam_process.aspx). Given the current lack of relevant trip generation comparison sites within the TRICS database, as highlighted in the TA (para 6.3.1), it is essential that the S106 obligation for post-occupation trip monitoring at the development includes specific wording obliging the applicant to share the results with TRICS or have TRICS themselves complete the survey.

Overall TfL Spatial Planning is satisfied that London's strategic walking, cycling, public transport and highway networks are likely to be able to cope with new demand generated by the proposed development. Furthermore, the scheme will be car free except for disabled parking and servicing and new trips on the rail network will be mitigated by a large S106 contribution to Crossrail in accordance with London Plan policy 6.5. The generation and on-site management of servicing trips by the proposed development are dealt with in a later section of this letter.

Walking

The local neighbourhood site suffers from walking congestion and crowding on adjacent footways during peak hours, especially the AM peak. This problematic issue of pedestrian comfort in the local area has been emphasised in many recent GLA and local policy documents and projects, for example:

- City of London Liverpool Street Area Enhancement Strategy (Publica Associates, June 2013)
- London Plan: Central Activities Zone (CAZ) SPG (March 2016)
- City of London Public Realm SPD & Technical Manual (July 2016)

For pedestrians, the new building proposed would be stepped back compared to the current structure occupying the site, which is up against the street line. This will increase the width and space of the footway along Leadenhall Street which TfL Spatial Planning strongly supports.

A new north-south pedestrian route will also be created on the east side of the tower, from Leadenhall Street to Bury Street, improving pedestrian circulation in the local area and taking pressure off St Mary Axe to the west, which TfL Spatial Planning also strongly supports.

The Pedestrian Comfort Level (PCL) analysis supplied in the TA shows that compared to both baseline levels of local pedestrian congestion, and to a future baseline taking into account cumulative growth in foot traffic due to Crossrail and consented local developments, increasing the

permeable public realm around the new tower would result in minimum score of B- on all adjacent footways. This is acceptable to TfL Spatial Planning.

The Pedestrian Environment Review Survey (PERS) conducted in the TA is also satisfactory. However the pedestrian crossing at Leadenhall St/Billiter St (west arm) scores -79 (red, negative), indicating that this requires urgent improvement. However it is a temporary crossing which has been created to facilitate the north-south movement of pedestrians in response to the temporary closure of the southern footway of Leadenhall Street. The footway closure is due to construction works at 52 Lime Street site. Notwithstanding the temporary nature of this issue, the score is extremely low and as a result the City Corporation may wish to consider revising the crossing arrangement prior to completion of 52 Lime Street.

Cycling

As earlier noted, the application site is well connected for cycling to nearby parts of the strategic cycling network. However cycling routes in the City of London and the CAZ more generally are poor in places as well as the availability of public cycle parking. Both therefore need improvement, as noted in:

- City of London Cycle Parking Strategy (July 2011)
- TfL International International Cycling Infrastructure Best Practice Study (December 2014)
- TfL Central London Grid project (see www.tfl.gov.uk/travel-information/improvements-and-projects/central-london-cycling-grid)
- TfL Strategic Cycling Analysis (June 2017)
- TfL Analysis of Cycling Potential 2016 policy analysis report (March 2017)

The main route to the development for cyclists would be along Bury Street which is a one-way westbound for vehicles with a contraflow for cyclists. The City Corporation may wish to ask the applicant to fund and design cycling improvements to Bury Street as part of their S278, in particular the potential for widening and even segregating the contraflow lane. TfL Spatial Planning would suggest a Stage 1 Safety Audit should be carried out for the proposed Bury Street access prior to determination, to enable a robust assessment of potential vehicle/cyclist conflicts and identify potential improvements to the safety of the highway design.

Servicing and Freight

A Delivery & Servicing Plan (DSP) has been submitted which proposes use of off-site delivery consolidation to minimise impacts on the transport network. This strategy is expected to achieve a 50% reduction in trips compared to traditional servicing and all servicing trips will be managed and co-ordinated through a delivery management system. The outline proposal is acceptable to TfL Spatial Planning in principle and we understand the City Corporation will secure a full DSP, including these consolidation arrangements, by condition, which would be supported.

The TA states (para 7.7.3) that the development is expected to generate 16 servicing or disabled parking vehicle trips in the AM peak hour and 15 in the PM peak hour, which would have a negligible impact.

However the TA states earlier (para 5.2.8) that 'No vehicle deliveries during busiest pedestrian and cyclist times.' This should be secured in the S106 agreement and more specifically there should be no vehicle deliveries to or from the site between both 7.30 and 9.30 am and 4.30 to 6.30pm. Therefore only disabled people who hold Blue Badges should be permitted to access the development by a vehicle during these periods and the trip generation should be significantly lower than 15 or 16 vehicle trips at the site.

TfL Spatial Planning therefore seeks confirmation from the applicant and the City Corporation that all vehicle movements except for disabled parking will be restricted to outside 7.30-9.30 am and 4.30-6.30pm on all weekdays by an appropriate planning obligation. This would go further than the planning obligation anticipated in the TA (at para 8.4.2) to place a cap on the daily number of servicing vehicles permitted to arrive at the development.

Construction

A framework Construction Logistics Plan (CLP) has been supplied as part of the application TA which is acceptable in principle. A full CLP should be secured by condition and discharged in consultation with TfL. TfL Spatial Planning would prefer if the full CLP is produced using our own recommended template (available from <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>).

Travel Plan

A framework Travel Plan has been provided for the application which is satisfactory, especially the target to increase cycling mode share from 12 to 17% within 5 years. A full Travel Plan should be secured by condition. .

Planning Obligations

In accordance with London Plan policy 8.3 the Mayor commenced CIL charging for developments on 1st April 2012. Within the City of London, the charge is £50 per square metre. The site is also in the area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (April 2013). In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and this should be reflected in the wording of the section 106 agreement.

The charge under the SPG that should be secured through the S106 is £11,536,490, calculated as follows:

Land Use	Existing (sqm)	Proposed (sqm)	Net change (sqm)	Crossrail charge per sqm	Crossrail charge
Office	26,660	99,267	72,607	£140	£10,164,980
Retail	4,004	19,243	15,239	£90	£1,371,510
Total Crossrail charge payable on commencement to TfL					£11,536,490

We are also aware that the City of London began charging CIL in July 2014 and that the approved Regulation 123 list allows money collected through the CIL to be spent on transport improvements. We would be keen to explore the possibility of using some of the CIL money collected to relieve pressure on existing transport infrastructure or to undertake specific improvements.

In summary, the following further information, mitigation and financial contributions still need to be secured:

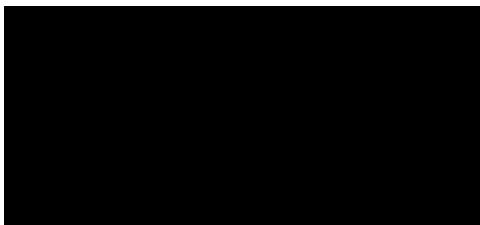
- S106 contribution of £11,536,490 to Crossrail
- S106 contribution for Legible London (sum tbc)
- S106 contribution of up to £200k for Cycle Hire
- TfL should be a formal consultee on the S278 agreement
- Clarification of the exact gradient and total length of the cycle ramp
- Clarification of the practical capacity of the proposed cycle lift (i.e. how many cyclists including those with larger bikes can fit inside at one time and how many at most per hour can use it to reach the basement?)
- All new public realm created at the development as part of the S278 should be step-free and generally open to the public 24/7
- Confirmation that Blue Badge car parking spaces would be made available to Blue Badge holders 24 hours a day with no blocking in by servicing vehicles at any time together with management to ensure the spaces are available to any Blue Badge holder.
- Provision of at least 1,345 long-stay cycle parking spaces should be secured by condition.
- The proposal for 10-15% of the long-stay cycle parking provision to be foldable bicycle lockers is not acceptable to TfL Spatial Planning and should be changed. In the special circumstances of this case up to 5% provision as lockers would be accepted. As at least

5% of spaces should be capable of accommodating larger bikes, this means than standard cycle parking should comprise at least 90% of the total.

- Provision of at least 69 short-stay cycle parking spaces should be secured by condition and the condition wording should specify that at least 75% should be provided at ground level in a permanently publicly accessible area.
- Provision of at least 135 cyclist showers and 1345 cyclist lockers should be secured by condition.
- A S106 obligation for post-occupation trip monitoring either carried out by TRICS or specifying that survey results must be shared with TRICS for their national and London-wide database
- All vehicle movements to/from the site except by Blue Badge holders should be restricted to outside 7.30-9.30 am and 4.30-6.30pm on weekdays via S106.
- A full DSP should be secured by condition
- A full CLP should be secured by condition and discharged in consultation with TfL
- The Council may wish to secure the Travel Plan by condition,

I hope that you find these comments of assistance in your consideration of the application. Please contact myself or the TfL case officer Gavin McLaughlin should you have any queries. His e mail address is gavinmclaughlin@tfl.gov.uk and direct line phone number 020 3054 7027.

Yours sincerely



Anne Crane

**Area Manager
TfL Spatial Planning**

annecrane@tfl.gov.uk

Wells, Janet (Built Environment)

From: DBE - PLN Support
Subject: FW: 100 Leadenhall Street (18/00152/FULEIA) - City of London and GLA/TfL Transport Responses

From: Peter Twemlow <Peter.Twemlow@dp9.co.uk>
Sent: 18 May 2018 15:20
To: Depala, Bhakti <Bhakti.Depala@cityoflondon.gov.uk>
Subject: 100 Leadenhall Street (18/00152/FULEIA) - City of London and GLA/TfL Transport Responses

Bhakti,

Thanks for your email last week. Please find below our responses (in red) to the 9 questions / comments made by Lucy Foreman.

1. There has been some dialogue on whether there will be a physical 'consolidation centre' or whether this will be a 'consolidation strategy'. The Transport Assessment 5.3.2 states 'vehicle deliveries would be made to an off-site location, which is reasonably local, where freight is consolidated...'; the delivery and servicing plan also refers to a 'consolidation centre'. However, in pre-application meetings a physical consolidation centre has not been confirmed. Therefore, please can the applicant clarify what measure of consolidation will take place so that the Transportation Section can assess this fully (see 5.54 in the planning statement)
The applicant agrees to signing up to a wider offsite consolidation strategy using a physical off site consolidation centre serving the City (and central London). In terms of the specifics, the opening year of the 100 Leadenhall Street building is too far in the future to confirm a particular consolidation centre location and, in any event, this will be governed by the City's wider strategy on offsite consolidation of servicing. This is expected to be secured through the s106.
2. The delivery and servicing graph shows that the building can be serviced by 9 vehicles per hour although in the delivery and servicing plan it states 8 vehicles per hour (excluding the peak hours). Therefore, the number should be clarified and should be conditioned in a s106 agreement to ensure it is managed correctly
The correct number is 9, which was the number included in the issued Delivery and Servicing Plan. We would seek some level of flexibility on this number in terms of a condition / obligation, to prevent vehicles having to loiter if they happen to get to arrive slightly outside their delivery time.
3. Are the bollards demarcating where lorries travel HVM bollards?
Correct, they are designed to be HVM bollards.
4. The vehicle/pedestrian conflict is mitigated by the 'landscaping features' outside of the service doors. If this takes the form of a planter/bench, can the applicant confirm whether this will form part of the HVM?
This will be in the form of a planter(s) of sorts and will be incorporated within the HVM strategy (when this is agreed), as required to support this strategy.
5. If a physical off-site consolidation centre is not used, where will the screening of incoming vehicles take place?
N/a ... A physical off-site consolidation centre will be used and secured by a s106 condition through the management strategy (see Q1 response above).
6. HVM should be provided outside of the service entrance, can the applicant confirm what this will be?
The lorry lift doors can be designed to withstand hostile vehicles, if required, and it is anticipated that this be secured as part of a later HVM strategy to be agreed nearer to the opening of the building. That being said, pre-application feedback has suggested that a vehicular barrier is not required as no direct approach is possible. This will be finalised as part of the forthcoming HVM strategy. The use of rising bollards outside of the lift doors can be provided, and two are shown in the submitted planning plans / drawings (Ref A-105).

7. Please can the applicant confirm the gradient of the ramp is manageable for all types of cyclists?
The cycle ramp is 3m wide with an 8% (1:12) and 10% (1:10) gradient on the two sections of ramp – this is suitable for most cyclists. A dedicated cycle lift has also been provided for these and other users (including those with larger bikes or adapted/disability bikes).
8. The applicant has stated that 'a quarter of the short-stay cycle parking can be accommodated in the basement'. The applicant should clarify what is meant by this – does this mean there will be short stay parking in the basement or does this mean that additional long stay parking is being provided?
This will be short-stay cycle parking associated with the office land-use for use by visitors. As part of the building management strategy, security will have to be pre-arranged to enable access into the basement by short term users / visitors.
9. Will the public cycle parking on Cunard Place be retained? The Design and Access statement mentions 'relocated' cycling parking and what is meant should be clarified
The public cycle parking on Cunard Place will be retained. There are cycle parking stands near where the proposed servicing access is and these will be removed as part of the scheme. These cannot be retained due to their location and the wider desire to open up pedestrian access through the site, minimising potential obstructions. The wider approach to visitor / short stay cycle parking is set out in below responses.

In addition, I set out below responses (in red again) to the questions raised by TfL in their letter informing the GLA Stage 1 report.

- TfL Spatial Planning requests clarification of the exact gradient and total length of the cycle ramp, and also the exact capacity of the lift in terms of cycles which can fit within it at one time and how many cyclists it can transfer safely and conveniently per hour to the basement level cycle parking area.
The ramp is in two sections (with a 'landing'). The upper section is 24m in length with a 10% (1:10) gradient and the lower is 17.4m in length with an 8% (1:12) gradient. The cycle lift is predominantly there to accommodate larger cycles and less confident cyclists rather than for increasing capacity. That being said, the lift is able to carry 2-3 bikes comfortably at a time. The forecast number of cycle trips during the peak hour is 310 bikes per hour in the AM Peak and 268 in the PM Peak. The ramp capacity is c.800 cyclists an hour (in a single direction), so will sufficiently cater for the forecast volumes without needing the lift to cope with capacity.
- The capacity of the lift for larger bikes should also be confirmed.
5% of the total cycle parking spaces are designed to be for larger bikes. If, during the am peak hour, 5% of the 310 cyclists were to use the lift then the lift would need to cater for c.16 bikes during the peak hour, which is satisfied through the lift capacity outlined.
- TfL Spatial Planning therefore requests a contribution of up to £200,000 to fund extensions of the 2 closest Cycle Hire docking stations at 30 St Mary Axe and Jewry Street. The feasibility, exact cost and increase in points at each docking station for these extensions should be clarified by the applicant in conjunction with TfL Cycle Hire and TfL Spatial Planning and relevant City Corporation officers prior to determination.
The TfL comments request that the applicant liaise with the TfL Spatial Planning and Cycle Hire teams to determine the feasibility and exact cost of extending the cycle hire docking stations at St Mary's Axe and Jewry Street. The applicant commits to undertaking this task to establish the exact costs of extending these existing facilities and WSP are in contact with TfL on this point.
- The proposal for 10-15% of the long-stay cycle parking provision to be foldable bicycle lockers is not acceptable to TfL Spatial Planning and should be changed. In the circumstances, a maximum of 5% foldable bicycle lockers could be provided and, taking into account 5% will need to be Sheffield stands for larger cycles, at least 90% of the required total long-stay provision should then be provided in complete compliance with LCDS.
The proposed development is compliant with the adopted London Plan standards as a % of cycle lockers is not specified. The draft London Plan requirements, which does not accept foldable bike lockers to be included as part of the total cycle provision, are not yet adopted and therefore not considered to be

appropriate for the purpose of setting the requirements for this scheme. The total number of spaces proposed are therefore compliant with adopted London Plan standards and this is therefore considered to be acceptable.

- Provision of at least 69 short -stay cycle parking spaces should ... be secured by condition and the condition wording should specify that at least 75% must be provided at ground level in permanently publicly accessible areas.

The scheme proposes 25% of the 69 short stay spaces (18 spaces in total) in the basement. No further short stay spaces can be accommodated on the site (at ground floor level), owing to the site constraints and specifically the requirement for the scheme to ensure maximum circulation and permeability of pedestrians through the public realm spaces and to maximise urban greening and landscaping opportunities. As set out above, the Applicant commits to making a contribution to extensions to cycle hire docking stations in the vicinity and on this basis the proposed development and approach to short stay / visitor cycle parking is considered to be appropriate and acceptable.

- The TA states (para 7.7.3) that the development is expected to generate 16 servicing or disabled parking vehicle trips in the AM peak hour and 15 in the PM peak hour, which would have a negligible impact. Clarification - In the peak these trips relate to taxi drop offs and not servicing / disabled parking trips only. Notwithstanding, TfL agree this leads to negligible impact.

Any questions please do come back to me.

Kind regards,

Peter.

Peter Twernlow
Associate

direct: 020 7004 1704
mobile: 07860 946610
e-mail: peter.twernlow@dp9.co.uk

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Historic England

03 2018

LONDON OFFICE

Mr Tony Newman
Corporation of London
Department of Planning & Transportation
PO Box 270
Gulldhall
LONDON
EC2P 2EJ

Direct Dial: 020 7973 3774

Our ref: P00827630

27 March 2018

Dear Mr Newman

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015
100 LEADENHALL STREET, LONDON EC3A
Application No 18/00152/FULEIA**

Thank you for your letter of 7 March 2018 notifying us of the application for planning permission relating to the above site. We do not wish to comment in detail, but offer the following general observations.

Historic England Advice

Historic England has been involved in pre-application negotiations on these proposals for some time, and provided formal pre-application advice to the applicant in 2017. Our enclosed letter from 24 July 2017 sets out our position and the detailed basis for it. The proposals have not changed in any substantive way since this advice was issued, so our pre-application advice letter is valid for the current application.

In addition to the points made in the pre-application letter we would like to add the following points.

- Should the City be minded to grant permission, we urge you to ensure that your local policies safeguard the view from Fleet Street towards St. Paul's Cathedral from any future incursion.
- As part of your decision making process, we urge you to ensure that the applicant's submitted Environmental Impact Assessment as it relates to the impact of the proposals on the Tower of London is in line with ICOMOS guidance, and you are confident that it sufficiently demonstrates that the proposals do not harm the Outstanding Universal Value of the World Heritage Site.

Recommendation

We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on

4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

Stone all
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Historic England

LONDON OFFICE

the basis of your specialist conservation advice. It is not necessary for us to be consulted again. However, if you would like further advice, please contact us to explain your request.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7873 3712).

Yours sincerely,



Michael Dunn
Principal Inspector of Historic Buildings and Areas
E-mail: michael.dunn@HistoricEngland.org.uk



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GREATER LONDON AUTHORITY

**Bhakti Depala,
Development Division
City of London
PO Box 270 Guildhall
London EC2P 2EJ**

**Our ref: GLA/4417/KR/01
Your ref: 18/00152/FULEIA
Date: 16 April 2018**

Dear Ms Depala,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

100, 106-107 Leadenhall Street

Local planning authority reference: 18/00152/FULEIA

I refer to the copy of the above planning application, which was received from you on 19 March 2018. On 16 April 2018, the Mayor considered a report on this proposal, reference GLA/4417/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 57 of the above report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, e-mail gavinmclaughlin@tfl.gov.uk and telephone 020 3054 7027.

Yours sincerely



100, 106/107 Leadenhall Street

in the City of London

planning application no. 18/00152/FULEIA

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and construction of a ground plus 56 storey building (263.4 metres AOD) for office use, retail use at the lower levels, a publicly accessible viewing gallery and restaurant/bar at levels 55/56.

The applicant

The applicant is **Frontier Dragon Ltd** and the architect is **Skidmore, Owings & Merrill LLP**.

Strategic issues summary

Principle of development: The proposed development would respond to established demand for office space within the CAZ, and would support London's continuing function as a World City. It is therefore strongly supported in accordance with London Plan and draft London Plan policies. The publicly accessible viewing gallery on levels 55 and 56 must be secured. (Paragraphs 16–20)

Design: This is an appropriate location for a tall building, and the high architectural quality proposed is fitting for a development of this scale and prominence. Nevertheless further detail required regarding the elevational treatment of the lower floors and the public connections around the site. (Paragraphs 21–33)

Strategic Views: The development would reinforce and enhance the characteristics of strategic views through an improved consolidation of the City's eastern cluster and complies with London Plan Policy 7.12 and Policies HC3 and HC4 of the draft London Plan. (Paragraphs 34–35)

Historic Environment: The development would not compromise the ability to appreciate the Outstanding Universal Value of World Heritage Sites and would not cause harm to the historic environment. Accordingly, the application complies with London Plan policies 7.8, 7.10, 7.11 and 7.12 and Policies HC1, HC2 and HC3 of the draft London Plan. (Paragraphs 36–41)

Further information on **Energy** and **Transport** is required. (Paragraphs 44–45 and 47–53)

Recommendation

That City of London Corporation be advised that while the scheme is broadly supported, it does not yet fully comply with the London Plan and draft London Plan for the reasons set out in paragraph 57 of this report; however, the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 19 March 2018, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the City Corporation with a statement setting out whether he considers that the application complies with the London Plan and draft London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1(B) and 1C(c) of the Schedule to the 2008 Order:

- 1B(c) 'Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings in the City of London and with a total floorspace of 100,000 square metres'
- 1C(c) 'Development which comprises or includes the erection of a building of more than 150 metres high and is within the City of London'

3 Once the City of London has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site is located within the City of London within the 'Eastern Cluster': an area that contains a number of tall buildings located within the Central Activities Zone. The site currently contains three existing office buildings of up to ten storeys (100, 106 and 107 Leadenhall Street), which provide approximately 28,000 sq.m. of office accommodation and ground floor retail space.

7 The surrounding area is characterised by a juxtaposition of modern tall buildings and low-rise historic buildings. Adjoining the site to the north is 30 St Mary Axe (also known as the Gherkin) and further to the north is the Grade I Listed Bevis Marks Synagogue. To the west of the site is the Grade I Listed St Andrew Undershaft Church and to the east of the site across Creechurch Lane is the Grade I Listed St Katharine Cree Church and the Grade II Listed 2-16 Creechurch Lane. Opposite to the south are several medium-rise office buildings. Notable tall buildings within the wider eastern cluster include 122 Leadenhall Street (also known as the Cheesegrater), containing 48 storeys of predominantly office accommodation to the west of the site and 110 Bishopsgate (known as the Heron Tower, containing 46 storeys of predominantly office accommodation to the north-west. Recently consented developments to the west, at 1 Undershaft, 22 Bishopsgate and 6-8 Bishopsgate, (which are 73 storeys, 62 storeys and 40 storeys respectively), and to the south at 52-54 Lime Street at 39 storeys also inform the context. Although the site is not within a Conservation Area, it is adjacent to the St Helens Place, Lloyds Avenue and Bank Conservation Areas.

8 The site fronts Leadenhall Street, St Mary's Axe and Creechurch Lane. Leadenhall Street forms part of the London Cycle Network (route 11). The nearest cycle super highway is CS2, which runs from Aldgate to Stratford. The site is in close proximity to a number of national rail stations (including Liverpool Street, Fenchurch Street and Cannon Street stations) and underground stations (including Liverpool Street, Bank, Monument and Aldgate), and numerous bus services. Measured on a scale of 0-6b where 6b is the highest, the site has a public transport accessibility rating of 6b.

Details of the proposal

9 The applicant proposes the demolition of the existing buildings and construction of a ground plus 56 storey tower (263.4 metres AOD) for office use, retail use at the lower levels, a publicly accessible viewing gallery and restaurant/bar at levels 55/56.

10 The breakdown of the proposed floorspace is as follows:

Use	GIA (sq.m.)	GEA (sq.m.)
Retail (A1/A3/A4)	811 sq.m.	882 sq.m.
Office (B1)	99,267 sq.m.	102,043 sq.m.
Viewing Gallery (Sui Generis)	1,855 sq.m.	1,934 sq.m.
Ancillary (basement/plant)	16,577 sq.m.	17,232 sq.m.
Total Floorspace	118,510 sq.m.	122,091 sq.m

Case history

11 On 18 October 2017, a pre-application meeting was held with GLA officers regarding the above proposal (GLA/4417). The principle of an office led development was strongly supported; however, concerns regarding the following strategic issues were raised; townscape, heritage, design quality, public viewing platform, wind, air quality, green infrastructure, inclusive access, energy, sustainability and transport.

Strategic planning issues and relevant policies and guidance

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London Local Plan and the London Plan 2016 (consolidated with alterations since 2011).

13 The following are also relevant material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance; and
- Draft London Plan (consultation draft December 2017) which should be taken into account on the basis explained in the NPPF.

14 In addition, on 5 March 2018, the Government published the draft revised National Planning Policy Framework for consultation (until 10 May 2018). This should be taken into account appropriately in accordance with its early stage of preparation.

15 The relevant issues and corresponding policies are as follows:

- Central Activities Zone *London Plan; Central Activities Zone SPG*
- Employment *London Plan; Central Activities Zone SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Tall Buildings *London plan; London View Management Framework SPG;*
- Heritage *London Plan; Character and Context SPG; London View Management Framework; London World Heritage Sites SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*

Principle of development

16 London Plan Policies 2.10 and 4.2 and Policies SD4, SD5 and E1 of the draft London Plan recognise the established long-term demand for office space within the CAZ and strongly promote the renewal of office sites within the CAZ in order to meet this demand and support London's continuing function as a World City. Accordingly, the proposed office scheme is strongly supported in principle.

17 The proposal would provide approximately 100,000 sq.m. of high quality B1 office floorspace in a flexible, multi-tenanted building. Strategically situated within the City's 'Eastern Cluster' the scheme is particularly well positioned to support insurance and financial services districts of the City and could accommodate one or more large anchor tenants, as well as a variety of small to medium sized companies. Therefore, the proposal would make a significant contribution to the diversity of workspace and businesses within the CAZ and is supported in accordance with London Plan policy 4.2 and Policy E1 of the draft London Plan.

18 In order to support the vibrancy and vitality of the CAZ, London plan policies 2.11 and 4.3 promote mixed use development including housing, to support increases in office floorspace. The London plan approach (as set out in paragraph 4.17) nevertheless allows for a degree of flexibility with respect to the provision of mixed uses in the CAZ, in recognition of the fact that it may not always be suitable to provide housing on-site. Given the sites location within the eastern cluster and the opportunities it presents for significant office space, the City Corporation should secure an off-site affordable housing contribution in accordance with the tariff established within the City of London Corporation Planning Obligations SPD.

19 The proposal would provide a publicly accessible viewing gallery on levels 55 and 56 which is strongly supported in accordance with London Plan Policy 7.7 and Policy D8 of the draft London Plan. Public access to the gallery, free of charge, for individual, schools, charities and local groups must be secured by legal agreement together with the specification of the spaces. A draft of the associated section 106 agreement clauses must be provided to the GLA for review prior to the Mayor's decision making stage to ensure that the space delivers this public benefit as required by London Plan Policy 7.7. and Policies D7 and D8 of the draft London Plan.

20 The proposal also includes new retail units at ground floor which will help to activate the lower floors and improve retail provision within the CAZ frontage for works and visitors. This is supported in accordance with London Plan and draft London Plan policy.

Urban design

21 The design principles in chapter seven of the London Plan and chapter 3 of the draft London Plan place expectations on all developments to achieve a high standard of design which responds to local character, enhances the public realm and includes architecture of the highest quality that defines the area and makes a positive contribution to the streetscape and cityscape.

22 Overall, the proposal is well considered and appropriate to its context. It will provide an attractive new building, make a positive contribution to London's skyline, consolidate and enhance an existing tall building cluster, increase and enhance the public realm, and complies with London Plan and draft London Plan design policies.

Tall building and architectural quality

23 As discussed above the site is located within the eastern cluster of tall buildings in the City of London. Accordingly, this is a location where a tall building is acceptable in principle, subject to the highest standards of architecture and urban design as prescribed by London Plan Policy 7.7 and Policy D8 of the draft London Plan.

24 The proposed building is 57 storeys (263.4 metres AOD) and is comparable in height with other buildings in the 'inner circle' of the eastern cluster of tall buildings. The applicant is proposing an elegant design approach with an emphasis on verticality. The height and form of the proposed building relates well to the emerging cluster and the rationale for its height is accepted and supported.

25 The proposed provision of a publicly accessible viewing gallery at the upper levels of the building is strongly supported, and noting also the considerations associated with architectural quality, strategic views and the historic environment (refer below), GLA officers are satisfied that the application accords with London Plan Policy 7.7 and Policy D8 of the draft London Plan.

26 As advised at pre-application stage, the scale, proportions and elevation treatment of the podium elements and the ground floor should draw on neighbouring buildings to deliver a high quality and contextual design response. The applicant should submit street level views of the proposal to demonstrate how the design responds to the streetscape as the building touches the ground for further discussion.

27 The submitted townscape assessment demonstrates that the proposed massing and faceted elevations would help to create a simple yet subtly distinctive building. The proposed use of glass 'diamond' glazing as the principal facade treatment is supported, as it creates an elegant distinctive building that demonstrates a high standard of architecture in accordance with London Plan Policies 7.6 and 7.7 and draft London Plan Policies D2 and D8 of the draft London Plan.

Layout

28 The principle of opening up the site to provide links between Billiter Street and 30 St Mary Axe public space is welcomed as is the opening up of the rear of St Andrews Undershaft to create a public pocket space. However, the current alignment of the pedestrian link via Cunard Place is compromised by the vehicle/servicing access to the rear of the tower. The applicant should provide further detail on this and GLA officers will work with the City Corporation and applicant to explore alternate servicing options to avoid the creation of a blind corner.

29 The applicant has provided floorplans that demonstrate that the building allows for uninterrupted open office floorplates that can be configured to provide for a variety of tenancy options which is welcomed.

30 While the applicant's design and access statement states that the viewing gallery at level 55 provides 360-degree views of London, the location of a 'support space' on the northern side of the gallery appears contrary to this statement. GLA officers will work with the City Corporation and the applicant to explore options to relocate the support space to allow for public access across the entirety of level 55.

Landscape and public realm

31 As discussed above and subject to the resolution of the issues raised with the proposed pedestrian link via Cunard Place, the proposed development provides a significant enhancement to the public realm. The proposed public realm has a unified surface across the site, utilising high quality natural stone and a palette of materials favoured by the City Corporation to achieve continuity, which is welcomed. Raised planters and trees have been incorporated into the landscape proposal which is strongly supported. The integration of public seating within the public realm is welcomed as it will enliven the space and provide amenity for workers and visitors alike. In accordance with London Plan Policy 7.3 and Policy D10 of the draft London Plan security and resilience measures have been implemented through the design of street furniture and planters or by the placement of security bollards.

32 The environmental assessment that accompanies the scheme includes an assessment of the effect upon wind microclimate, which has been informed by extensive wind tunnel tests. Consideration was given to the effect upon pedestrian thoroughfares in and around the site, locations representing entrances and amenity spaces. These receptors were generally expected to record an acceptable wind environment for their intended use when tested with the proposed development in place. In a cumulative scenario tested with consented schemes in the surrounding area, wind conditions were generally consistent with or calmer than those recorded in the previous assessment. In conclusion, an acceptable wind environment is expected for all receptors in both the proposed and cumulative scenarios.

33 Overall the emerging landscape proposal demonstrates a commitment to the creation of a public realm of the highest quality and the detailed landscape design including, materials, planting and street furniture should be secured by condition to ensure compliance with London Plan Policy 7.5 and draft London Plan Policy T2.

Strategic Views

34 The site is not over sailed by any strategic viewing corridors; however, given the scale of the proposal, the building would be visible in various strategic view panoramas and river prospects as defined by the London view Management Framework (LVMF) SPG. As part of the environmental assessment which accompanies the scheme, the applicant has presented a wide range of verified view studies (including visualisations of the proposal from LVMF views 1A.1 & 2; 2A, 3A.1; 4A.1; 5A.2; 6A.1; 10A.1; 11B.1 & 2; 15B.1 & 2; 16B.1 & 2; 17B.1 & 2; 19A.1; 25A.1 & 2 & 3; and 26A.1).

35 Having considered these visualisations, GLA officers conclude that whilst the scheme would in many cases be a prominent feature on the capital's skyline, it would be perceived as part of an established grouping of tall buildings within the City of London's eastern cluster, and would preserve the ability to appreciate the various strategic landmarks identified by the LVMF SPG. GLA officers are of the opinion that the proposal would reinforce and enhance the characteristics of strategic views through an improved consolidation of the eastern cluster.

Accordingly, the application complies with London Plan Policy 7.12 and Policy HC4 of the draft London Plan.

Historic Environment

36 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*.

37 The NPPF states that when considering the impact of a proposal 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. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

38 London Plan Policy 7.10 and Policy HC2 of the draft London Plan states that development should not cause adverse impacts on World Heritage Sites or their settings, and, in particular, should not compromise the ability to appreciate Outstanding Universal Value, integrity, authenticity or significance. The submitted townscape, built heritage and visual impact assessment (which includes the abovementioned views study) considers the impact of the proposal on World Heritage Sites and Outstanding Universal Value. Whilst the verified views study demonstrates that the proposal may be seen in the wider setting of a number of World Heritage sites (including the Tower of London and Maritime Greenwich), its impact is most significant on the Tower of London which is the World Heritage Site in closest proximity to the site.

39 Accordingly, the submitted assessment finds that the principal effect on the Tower of London would be a visual change to its setting. The submitted views study (which includes verified visualisations of the proposal from within the Inner Ward of the Tower of London) provides the basis for considering the impact proposed. Important views looking towards and across the Tower of London from the south side of the River (LVMF 25A.1, 25A.2 and 25A.3) and Tower Bridge (10A.1) and views from within the World Heritage Site were assessed. Views 25A and 10A demonstrate that whilst the proposal would increase the perceived step change in scale between the World Heritage Site Tower of London and the Eastern Cluster, the existing clear visual separation between the Cluster and the World Heritage Site would be maintained, with the proposed building featuring amongst various other tall buildings of a similar world city scale. Similarly, views from within the Inner Ward of the Tower of London demonstrate that in instances where the building would be visible, it would be seen in the context of the other existing and consented larger scale buildings within the eastern cluster and would therefore have a negligible impact on the setting of the World Heritage Site and the appreciation of its Outstanding Universal Value.

40 Guidance within the LVMF SPG acknowledges that the juxtaposition between the Tower and the City cluster is a key characteristic of these views, and a relationship that may be seen as a positive. Accordingly, GLA officers conclude that the proposal would reinforce the positive

characteristics of the existing setting to the Tower of London and would not compromise the ability to appreciate the Outstanding Universal Value of this World Heritage Site, or indeed the other World Heritage Sites in the capital. Accordingly, the application complies with London Plan Policy 7.10 and Policy HC2 of the draft London Plan.

41 The juxtaposition between old and new (a defining and positive characteristic of the City of London) is representative of the response of the scheme to designated heritage assets more generally. As mentioned in paragraph 7 (and audited within the submitted built heritage and visual impact assessment), there are numerous heritage assets in the immediate vicinity of the site (including St Helen's Place, Lloyds Avenue and Bank Conservation Areas, and the Grade I Listed St Andrew Undershaft Church, Grade I Listed St Katharine Cree Church, Grade II Listed 2-16 Creechurch Lane and Grade I Listed Bevis Marks Synagogue) as well as various others which the proposal would be seen in conjunction with in longer townscape and strategic views including the Grade I Listed St Paul's Cathedral. Having carefully considered the townscape, built heritage and visual impact assessment, and having special regard to the desirability of preserving the setting of Listed Buildings, GLA officers are of the view that the proposal would not harm the setting of Listed Buildings and would not harm the character/setting of the above-mentioned Conservation Areas. In addition, the proposal would have a beneficial effect on the Grade I Listed St Andrews the Undershaft as it opens up views to the eastern end of the church, enhancing the visibility and setting of the Church. Accordingly, GLA officers are satisfied that the application accords with London Plan Policy 7.8 and Policy HC1 of the draft London Plan.

Inclusive design

42 The scheme represents an important opportunity to promote equal and convenient access to employment opportunities in accordance with the principles of London Plan Policy 4.12 and Policy GG5 of the draft London Plan. As a significant new building on the City's skyline with substantial areas of new public realm, the development will have a wide range of publicly accessible facilities, including the viewing gallery and should achieve the highest standards of accessible and inclusive design in accordance with London Plan Policy 7.2 and Policies D3 and E11 of the draft London Plan. The applicant has set out its response to access and inclusion within the design and access statement, with an access statement prepared by the National Register of Access Consultants (NRAC) accredited consultants.

43 Based on the submitted information the proposals provide the key features for compliant and convenient access and are therefore capable of achieving the high standards for inclusive access to meet the needs of the public and commercial office tenants in accordance with London Plan Policies 4.12 and 7.2 and Policies D3 and E11 of the draft London Plan.

Climate change

Energy

44 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary, the proposed strategy – comprises: energy efficiency measures (including a range of passive design features and demand reduction measures); a communal heating and cooling network fed by a centralised system; and renewable technologies (comprising water source heat pumps). The approach proposed would achieve a 36% carbon dioxide reduction which exceeds London Plan and draft London Plan standards.

45 As the development is located close to the City 2 proposed district heating network; The applicant must demonstrate that this opportunity has been fully investigated by providing

evidence of communication with the network operator to establish the anticipated timeframes of the network and its available capacity for connection. In addition, the applicant must provide additional information relating to the light transmittance of the proposed glazing, the use of two plant rooms and the full 'be lean' and 'be green' BRUKL sheets. This information must be submitted before the proposals can be considered acceptable and the carbon dioxide savings verified.

Urban Greening

46 London Plan Policy 5.10 seeks a 5% increase in green infrastructure within the CAZ by 2030 in order to support urban greening and the capital's response to climate change. GLA officers support the proposed planting of trees and wider landscaping within the public realm and the inclusion of green roofs on the podium elements. GLA officers accept due the height of the building and its raking form the building does not provide additional opportunities for green roofs or other biodiversity enhancements. The proposals are therefore considered to meet London Plan Policies 5.10 and 5.11 and Policy G5 of the draft London Plan.

Transport

47 The trip generation information submitted demonstrates that London's strategic walking, cycling, public transport and highway's networks are likely to be able to meet the demand generated by the development. The City Corporation must secure funding in the section 106 for post-occupation trip generation monitoring of the building including an obligation for the applicant to share the results with TRICS and Transport for London.

48 The public realm on the site will increase by approximately 1000 sq. m. and permeability and pedestrian connectivity will improve both in and around the site and within the wider Eastern Cluster. The City Corporation should secure a condition that ensures that the public realm including access routes are open to the public at all times in accordance with London Plan Policies 6.10 and 7.5 and Policies T2 and D7 of the draft London Plan.

49 Given the close proximity of the basement servicing area to the cycle parking entrance and public realm, the City Corporation must secure a condition restricting the time of deliveries and servicing to outside of cycle network peak times. In addition, further information is required on the gradient, length and capacity of the proposed cycle ramp from Bury Street.

50 The quantum of short stay and long stay cycle parking meets London Plan cycle standards. However, the proposal for 10-15% of long-stay cycle parking to be foldable bicycle lockers is contrary to policy and must be revised to ensure no more than 5% of long-stay cycle parking is foldable bicycle lockers. The proposal includes the provision of 135 cyclist showers within the basement in addition to one locker for each long-stay cycle parking space which is in accordance with London Plan Policy 6.9B. The City Corporation must secure at least 1,345 long-stay and 69 short-stay cycle parking spaces and 135 cyclist showers and one locker for each long-stay space by condition and the condition wording should specify that at least 75% of the short-stay spaces must be provided at ground level.

51 The car free (with the exception of blue badge parking) nature of the development is welcomed. Whilst, the quantum of blue badge parking proposed does not meet London Plan and draft London Plan standards given the high level of wheelchair accessible public transport services in the local area the quantum is acceptable in this instance. The City Corporation should ensure that 24-hour access to Blue Badge parking and step free access in the public realm is secured

52 A Section 278 agreement will be required between the applicant and the City Corporation as the highway authority for the surrounding SRN road network. It should include new Legible London signage funded by the applicant and cycling improvements to Bury Street. Formal consultation with Transport for London on the detailed design of the Section 278 agreement should be secured in the S106 agreement.

53 Conditions and section 106 obligations are required to secure the following; formal consultation of TfL on the Section 278 agreement; post-occupation trip generation monitoring contribution; Crossrail contribution; cycling improvements contribution; legible London signage contribution; Cycle Hire contribution; public realm access; restrictions to delivery and servicing times; 24 hour access to blue badge parking; details of cycle parking; travel plan; delivery and servicing plan; and construction and logistics plan.

Local planning authority's position

54 Planning officers at the City of London Corporation have been involved in extensive pre-application discussions on the scheme and are understood to support the proposal in principle. A date has not been set for the City Corporation to formally consider the application at a planning committee meeting.

Legal considerations

55 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

56 There are no financial considerations at this stage.

Conclusion

57 London Plan and draft London Plan policies on central activities zone; employment; urban design; heritage; inclusive design; transport; and climate change are relevant to this application. The application is broadly supported however it does not yet fully comply with the London Plan and draft London Plan. The following strategic issues must be addressed for the application to fully accord with the London Plan and draft London Plan:

- **Principle of development:** The proposed development would respond to established demand for office space within the CAZ, and would support London's continuing function as a World City. It is therefore strongly supported in accordance with London Plan and draft London Plan Policies. The publicly accessible viewing gallery on levels 55 and 56 must be secured.
- **Design:** This is an appropriate location for a tall building, and the high architectural quality proposed is fitting for a development of this scale and prominence. Further detail

is nevertheless required regarding the elevational treatment of the lower floors and public connections around the site.

- **Strategic Views:** The development would reinforce and enhance the characteristics of strategic views through an improved consolidation of the City's eastern cluster and complies with London Plan Policy 7.12 and Policies HC3 and HC4 of the draft London Plan.
- **Historic Environment:** The development would not compromise the ability to appreciate the Outstanding Universal Value of World Heritage Sites and would not cause harm to the historic environment. Accordingly, the application complies with London Plan policies 7.8, 7.10, 7.11 and 7.12 and Policies HC1, HC2 and HC3 of the draft London Plan.
- **Energy:** The applicant must explore the potential for connection to the City 2 district heat network. Additional information relating to the light transmittance of the proposed glazing, the use of two plant rooms as opposed to one and the full 'be lean' and 'be green' BRUKL sheets must be submitted. This further information must be submitted before the proposals can be considered acceptable and the carbon dioxide savings verified.
- **Transport:** Further information is required on cycle parking. Conditions and section 106 obligations are required to secure the following; formal consultation of TfL on the Section 278 agreement; post-occupation trip generation monitoring contribution; Crossrail contribution; cycling improvements contribution; legible London signage contribution; Cycle Hire contribution; public realm access; restrictions to delivery and servicing times; 24-hour access to blue badge parking; details of cycle parking; travel plan; delivery and servicing plan; and construction and logistics plan.

for further information, contact GLA Planning Unit:
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100 & 106-107 Leadenhall Street

GLA/4417

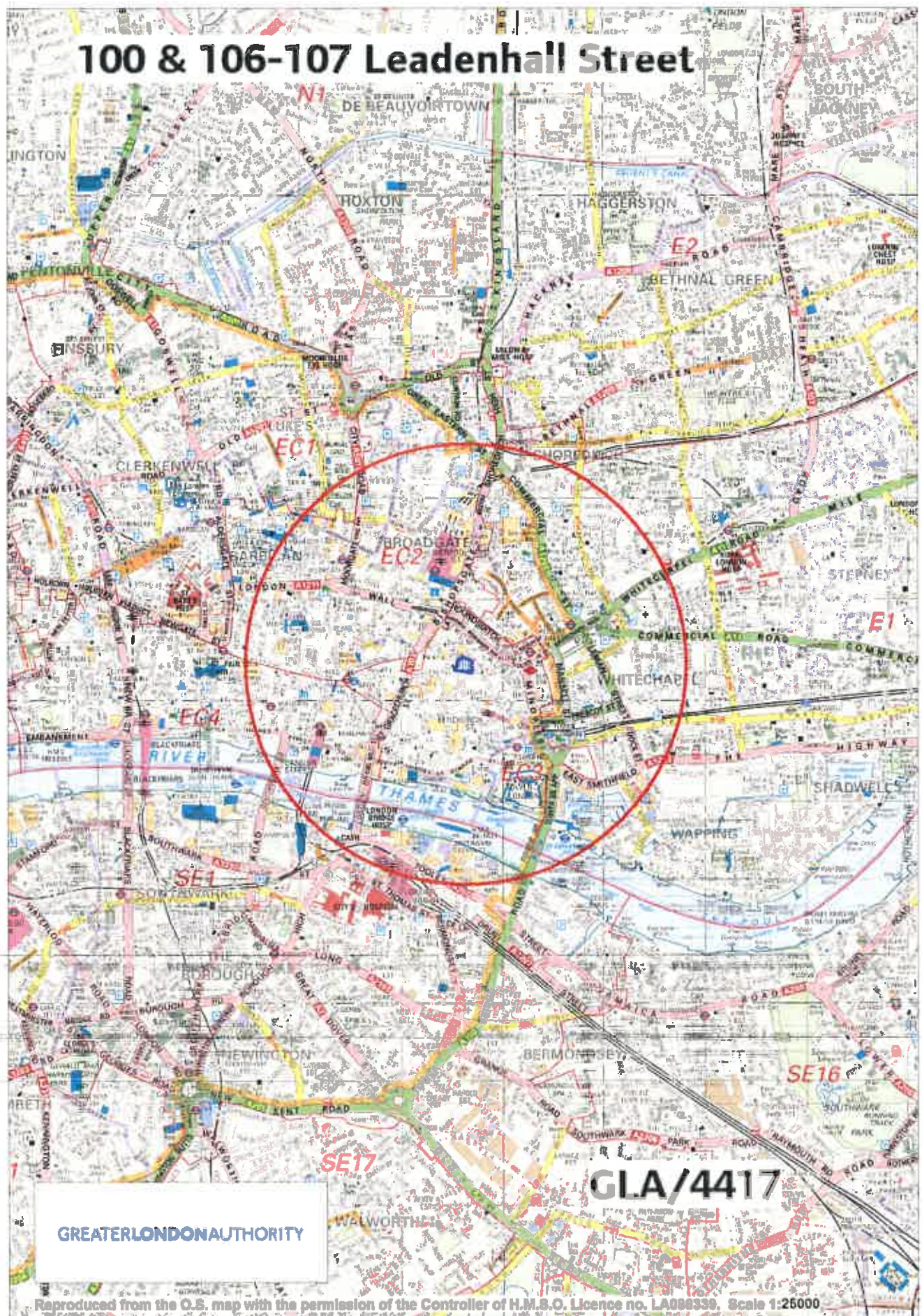
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100 & 106-107 Leadenhall Street



22 May 2018

Director of the Built Environment
City of London
PO Box 270
Gulldhall
London
EC2P 2EJ
By email to: PLNComments@cityoflondon.gov.uk

For the attention of Bhackti Depala, Case Officer

Dear Madam

18/00152/FULEIA: 100 LEADENHALL STREET, LONDON EC3A 3BP

Thank you for notifying Historic Royal Palaces of the planning application received for the proposed development of 100 Leadenhall Street, involving the demolition of the existing buildings and construction of a new ground plus 56 storey building, principally for office use, with retail use at the lower levels.

Because of its location on the eastern edge side of the City's Eastern Cluster of tall buildings, the proposed development is likely to have a significant effect on the setting of the adjacent Tower of London World Heritage Site (WHS). By agreement with the City Corporation, we have therefore delayed our response to the notification while the applicant's heritage and townscape consultants prepared a detailed Heritage Impact Assessment (HIA) in accordance with the guidance provided by the *International Council on Monuments and Sites* (ICOMOS) to supplement the Townscape and Visual Built Heritage Impact Assessment section of the EIA submitted with the planning application. The purpose of such an HIA is to ensure that the likely effect of the proposed development on the Outstanding Universal Value (OUV) of the Tower of London WHS is clearly understood. Historic Royal Palaces received a copy of the completed HIA on 20 April 2018. Our detailed comments on its contents and conclusions are attached to this letter.

Throughout the HIA, a number of key assertions or value judgements are repeated with which Historic Royal Palaces cannot agree. We have summarised our response to the lengthy HIA by focusing on these, as follows:

1 The proposed development will 'consolidate' the shape of the City's Eastern Cluster.



Historic Royal Palaces is the charity that looks after:

Tower of London
Hampton Court Palace
Banqueting House
Kensington Palace
Kew Palace
Hillsborough Castle

We help everyone explore the story of how monarchs and people have shaped society, in some of the greatest palaces ever built.

We raise all our own funds and depend on the support of our visitors, members, donors, sponsors and volunteers.

The architects' Design and Access Statement submitted with the application suggests, in Sections 2.5: *The Emerging Skyline* and 3.7: *Curating the Skyline*, that the shaping of the Cluster was considered principally from the west. Section 2.5 notes, 'When the proposed and approved towers are considered, an axis of height emerges with 1 Undershaft at its peak. There is an opportunity to shape the skyline to consolidate the Cluster and sculpt its form to step down towards the river [to the south] and to St Paul's [to the west]'. There is no indication that the effect of the proposed development on the shaping of the Cluster was considered to the east in relationship to the WHS. We agree that the proposed development would 'consolidate' the density of the Cluster, but it would not, in our opinion, beneficially 'consolidate' its shape in views of and from the Tower from the south-east: rather, as explained in the attached commentary, it would create a high, vertical wall on the eastern edge of the Cluster and the building's assertive form would have an overbearing effect on the setting of the WHS. It does not seem credible to us that the eastern side of the Cluster would end thus, in complete contrast to the western side of the Cluster, the 'profile' of which slopes away at a gradual angle towards 20 Fenchurch Street (an approach endorsed in the view from the west). Historic Royal Palaces therefore disagrees strongly that the proposed development would 'consolidate' the form of the Cluster with positive effect on the setting of the Tower.

2 The (physical) gap between the White Tower and the Eastern Cluster will not be reduced and the dominance of the White Tower will be maintained.

This frequently repeated statement appears to equate 'separation' with 'dominance'. The physical gap between the eastern edge of the Cluster (currently defined by the curving form of 30 St Mary Axe) and the White Tower might remain as now, but the visual relationship between the two would change dramatically as a result of the considerable height of the proposed development and its assertive form and orientation. Where the profile of 30 St Mary Axe leans away from the White Tower at higher level, 100 Leadenhall Street would rise vertically to a much greater height. It would have an over-bearing visual effect on the gap between it and the White Tower, thereby further diminishing the latter's perceived dominance.

Historic Royal Palaces disagrees strongly that the dominance of the White Tower will be maintained simply because the gap between it and the Eastern Cluster will not be reduced.

3 The 'significance of the likely cumulative effect' of the proposed development on the LVMF SPG view 10A.1 (prospect upstream from Tower Bridge) will be 'very major, beneficial'

The LVMF view 10A.1 from the North Bastion of Tower Bridge shows a panoramic view upstream, including both sides of the river. The view reproduced in the HIA, however, shows less than half of the north-east (right-hand) side of the full panorama, focused on the emerging Eastern

Cluster. In this view, the proposed development would largely obscure 30 St Mary Axe and would rise to a significantly greater height. Its flat-topped profile (as seen from this angle) would jut intrusively eastwards into the remaining open sky-space around the White Tower. Due to perspective, the horizontal top of the building would appear to rise upwards towards the Tower, adding to its confrontational visual effect. A natural, calm profile for this side of the Cluster, and one that would be respectful of the WHS, would seem to require a continuation of the curve of the eastern side of 30 St Mary Axe upwards to the top of 1 Undershaft. Clearly, such a profile would be both breached and compromised by the proposed Leadenhall Street development.

Historic Royal Palaces agrees with the HIA assessment of the *magnitude of change* in this view as *very major*; but strongly disagrees with the assessment of the *significance of likely cumulative effect* as *major, beneficial*. We are of the opinion that the outcome would be 'very major, adverse', rather than 'beneficial', as explained above.

4 The 'significance of the likely cumulative effect' of the proposed development on the LVMF SPG views 25A.1-3 (from the Queen's Walk) will be 'major, beneficial'

The three LVMF SPG viewing points 25A.1-3 from the Queen's Walk show the Tower in its panoramic setting between Tower Bridge and the Eastern Cluster. The views reproduced in the HIA, however, show only the western half of each panorama, focused on the Cluster, rather than the Tower. The HIA assessment of likely visual effect then concentrates on the sky-space between the White Tower and the Eastern Cluster, without considering the effect of the development on the overall setting of the Tower as seen in the LVMF panoramas. In this wider setting, the extent to which the historic dominance of the White Tower would be further diminished by the addition of the proposed development to the Eastern Cluster can be fully appreciated. The Tower ensemble would appear reduced in scale by the growing group of towering buildings next to it, which would command the skyline, the contrast emphasised by the tall vertical face that the Cluster, with the addition of the proposed building, would present towards the Tower. It would have an overbearing effect. The LVMF guidance states that: *From all Assessment Points, the World Heritage Site should continue to dominate its surroundings. It is particularly important that any new development relates positively to the White Tower (para 418).* It is Historic Royal Palaces' view that the proposed development fails to comply with this guidance and responds adversely to the setting of the WHS by further diminishing its historical dominance, especially that of the White Tower.

Historic Royal Palaces agrees with the HIA assessment of the *magnitude of change* as *major* in these three views, but strongly disagrees with the assessment of the *significance of likely cumulative effect* as *beneficial* in each case. In our opinion, the likely effect would be extremely visually intrusive and 'major, adverse', for the reasons stated above.

5 Although there would be change to the setting of the WHS, there would be no harm to the relevant attributes of its OUV.

The HIA considers, and seeks to evaluate, the likely visual effects of the proposed development on the three 'attributes' of the Tower's OUV¹ considered to be relevant to the assessment exercise. Historic Royal Palaces does not disagree with the identification of the relevant attributes, but we do disagree with the analyses that follow, which find, in each case, that 'This aspect of the OUV of the WHS would not be harmed'. One of the main arguments supporting these conclusions is the claim that the proposed development would 'consolidate' (beneficially) the form of the Eastern Cluster. We have addressed this assertion above. The views of the proposed development looking north-west from the inner Ward are particularly telling: because of its form and orientation as seen for this angle, as well as its considerable height, the proposed development would visually open up the Cluster on the eastern side, rather than consolidating its overall shape. Commenting on the perceived dominance of the White Tower in its setting, the HIA returns to the point concerning the retention of the existing gap between the latter and the Cluster, which we have also addressed above.

6 The exceptional quality of the architectural design mitigates any potential adverse effects on OUV.

The HIA stresses that the 'exceptional' quality of the design of the building mitigates any potential adverse effects on the OUV of the WHS (although no such effects are acknowledged). Para 8.1 of the HIA states that the proposed development has been adapted and modified during the design development, although clearly giving priority to St Paul's Cathedral, '...to take account of heritage constraints and opportunities'; and that 'Likely adverse effects...are avoided by the submitted design for the proposed development'. Historic Royal Palaces cannot agree with this: the perceived quality of the architectural design does not, in our view, mitigate the potential adverse effects the proposed development is likely to have on the OUV of the WHS, as noted above and explained in our commentary on the HIA.

7 The overall magnitude of effect of the proposed development on the OUV of the WHS will be 'negligible' and the significance of the effect will be 'neutral'.

Historic Royal Palaces cannot agree with the HIA's concluding statement claims (para 9.6) that, 'The likely long-term significant effects of the completed proposed development on the setting of the Tower of London WHS would be major, neutral, with negligible effect on the elements of

¹ The 'attributes' of the Tower's Outstanding Universal Value are identified in the *Tower of London World Heritage Site Management Plan 2016*, available on Historic Royal Palaces' website.

setting that contribute to the relevant attributes of OUV of the WHS.' This conclusion is based on value-judgements by the authors with which we disagree. We consider, and have demonstrated, that the long-term significant effects would not be 'negligible', but 'major', and 'adverse' rather than 'neutral'

Conclusion

On the basis of the above and the further detailed comments set out in our commentary on the HIA, attached, Historic Royal Palaces objects strongly to this planning application because of the potential visual harm that the proposed development would do to the setting, and therefore to attributes of the OUV, of the Tower of London WHS. We do not agree that the proposed development would 'consolidate the form of the Easter Cluster' in a way that was appropriate or respectful to the Tower of London, a designated heritage asset of the highest significance. Rather, we consider that the visual relationship between the two would change to the detriment of the Tower as a result of the considerable height of the proposed development and its assertive form and orientation. The visual dominance of the White Tower in its wider setting and its historic relationship with the City would be further diminished by the construction of so large a development at the eastern edge of the Cluster, creating a tall, vertical cliff face confronting the Tower.

We believe that, if the proposed development proceeds, its cumulative effect could put the WHS' status at risk.

Historic Royal Palaces therefore asks the City Corporation to refuse the application in its current form and seek to negotiate major changes to both the form and height of the building to reduce its adverse visual impact on the Tower of London WHS.

Yours faithfully



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**18/00152/FULEIA: PROPOSED DEVELOPMENT AT 100 LEADENHALL STREET,
LONDON EC3 - HERITAGE IMPACT ASSESSMENT
HISTORIC ROYAL PALACES' RESPONSE**

Introduction/Background

1. When the formal planning application for the proposed development at 100 Leadenhall Street was submitted, it was agreed by the City Corporation, Historic England and Historic Royal Palaces that, in addition to the EIA submitted with the application, a focused Heritage Impact Assessment ('the HIA') should be prepared, to comply with the *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties* published by ICOMOS International (January 2011) ('the ICOMOS guidance'). A brief for the HIA was agreed by the three parties and the HIA, dated April 2018, was prepared on behalf of the applicant by the Tavernor Consultancy.
2. Describing what such an assessment should include, the ICOMOS guidance states that: *'The HIA report should provide the evidence on which decisions can be made in a clear, transparent and practicable way. The level of detail needed will depend on the site and proposed changes. The Statement of OUV will be central to the evaluation of the impacts and risk to the site.'* The proximity of the application site to the Tower of London World Heritage Site (WHS), a designated heritage asset of the highest significance (National Planning Policy Framework March 2012 (NPPF) para 132) and the extent of visual effect that the proposed development, because of its height, form and location, is likely to have on the setting of the WHS has meant that a considerable level of detail has been required.
3. Historic Royal Palaces received a copy of the HIA on 20 April 2018 and we have considered its contents, particularly the conclusions drawn, carefully. Our comments on the document, the results of the assessment process and its conclusions, referenced to the format and headings used in the document, are set out below.

1 Non-Technical Summary

4. The ICOMOS Guidance requires a Non-Technical Summary (NTS) to be included, which should *'...contain all key points and be useable alone'*; in other words, it should provide a stand-alone summary of the key considerations and conclusions of the overall impact assessment.
5. The opening paragraph of the NTS in the HIA states that *'The proposed development has been carefully designed...to respond positively, in concept, scale and mass, to the Tower of London World Heritage Site... Likely adverse effects on the Tower of London WHS have been considered throughout the design process such that all have been mitigated through an iterative design evolution process such that the proposed development would not cause harm to the setting or relevant attributes of Outstanding Universal Value of the Tower of London World Heritage Site.'* Given that the overall assessment process and the conclusions drawn from it are necessarily both qualitative and based on value judgements by the authors, such a categorical statement is questionable, particularly the claim that *"...all [likely adverse effects] have been mitigated through an iterative design evolution process"*. Historic Royal Palaces cannot agree with this statement.

6. The NTS goes on to acknowledge that 'The proposed development for 100 Leadenhall Street would have a 'very major' effect on the designated view upstream from the north bastion of Tower Bridge [LVMF view 10A.1]', yet the authors conclude that the existing visual separation between the City of London's tallest buildings and the White Tower, a key attribute of the Tower's OUV as illustrated in this protected view, would be preserved.
7. Similarly, it is recognised that 'The effects of the proposed development on the kinetic sequence of three designated views from Queen's Wharf to the Tower of London [LVMF views 25A.1-3] would be 'major', yet the conclusion is that 'In this very significant view sequence, the proposed development would notreduce the existing gap between the White Tower and the City's Eastern Cluster. The effects would be beneficial thanks to the proposed development's consolidation of the City's Eastern Cluster.'
8. Historic Royal Palaces does not find this assessment credible. The proposed development, because of its height, design and orientation, does not, in our view, 'consolidate' the composition of the Eastern Cluster in these views, rather it breaches the anticipated downward slope of the Cluster on its eastern side by jutting horizontally into the surrounding open sky, with an overbearing effect (see detailed comments below on LVMF view 25A.1). The proposal thus both dominates the Tower visually by its great height in such close proximity to the WHS and encroaches on the remaining open sky between the Tower and the Eastern Cluster.
9. Nor can Historic Royal Palaces accept the overall conclusion of the NTS that 'The potential visual effects of the completed proposed development for 100 Leadenhall Street on the setting of the Tower of London World Heritage Site would be major, but would preserve the quality of its existing tall modern setting to the west. The impact of the proposed development for 100 Leadenhall Street...would be negligible and the Outstanding Universal Value of the Tower of London World Heritage Site would be preserved' (the legal interpretation of the term 'preserved' in this context being 'to do no harm'). Historic Royal Palaces disagrees strongly with this conclusion and our reasons for doing so are set out below in relation to each of the LVMF protected views concerned.

2 Contents and 3 Introduction

10. Historic Royal Palaces agrees that the contents of the HIA complies with the recommendation in Appendix 4 (page 18) of the ICOMOS guidance insofar as it is relevant and is therefore satisfactory. We have no further comments on these sections.

4 Methodology

11. This section of the HIA sets out the methodology adopted for assessing the likely effects and quantifying the impact of the proposed development on the OUV of the WHS. Para 4.2 states that 'Structured, informed and reasoned professional judgement has been used [by the authors] to take account of quantitative and qualitative factors'; quantitative factors should not, of course, rely on judgement. It is also stated that '...modern buildings of high design quality do not necessarily harm the settings of even the most precious heritage assets', a generalisation too far, since the building's perceived design quality, whether modern or otherwise, may not be the harmful factor.
12. Para 4.5 refers to para 3.2 of the ICOMOS guidance, but the latter does not '...note the importance of identifying...any contribution made to those attributes

by the setting of the WHS.' Rather, it says that *'The HIA should collect and collate information on all aspects and attributes of the cultural heritage....so that the historical development of the property, its context, setting...can be fully understood.'* The guidance encourages a holistic view to be taken to identifying all aspects and attributes of a world heritage property, rather than focusing solely on specific attributes, as the HIA tends to do.

13. The setting of the Tower of London WHS has great historical significance, illustrating the property's original function and relationship to the City. Constructed originally to dominate its surroundings, for centuries the Tower and City grew in parallel, their relationship remaining comparable. The Tower retained a defensive role into the middle of the 19th century, protected by the Liberties, and its former role remains legible in its setting today. The extent of the WHS is limited to the scheduled monument itself, being tightly drawn around the outer moat walls and not even including the associated area of the Liberties. Historic Royal Palaces considers that the setting of the Tower WHS can therefore be said to have greater importance to the OUV of the property than, for example, the setting of larger and more diffuse sites; and that the effect of major development within the setting has a proportionately greater effect on the narrowly-defined WHS, which should be recognised in any visual impact assessments.
14. Para 4.6 of the HIA refers to the stress placed in the ICOMOS guidance on the need for adverse impacts to be mitigated (para 2-1-5), but continues, 'However, echoing the wording of the NPPF, [that] it may be necessary to balance the public benefit of the proposed change against the harm to the WHS. In such cases the weight given to heritage values should be proportionate to the significance of the heritage asset and the impact of the change on it....' The precise wording in the NPPF (para 134) states that: 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the harm should be weighed against the public benefit of the proposal...' Since the HIA neither acknowledges that any potential harm is likely to result from the proposed development, nor quantifies the 'public benefit' that might flow from it, the relevance of this reference is unclear. The HIA itself is limited (in accordance with ICOMOS guidance) to considering the 'perceptible visual and aural effects' of the development on the OUV of the WHS and is not concerned with weighing the balance of these effects with other factors. Nonetheless, if it is considered relevant to the assessment, the term 'public benefit' used here needs explanation.
15. No reference is made in the HIA to the draft revised NPPF, published by MHCLG on 05 March 2018 for consultation (the consultation period ended on 10 May). This revised document, whilst not yet national policy, indicates the government's current direction of travel with regard to protection of the historic environment. In particular, it places an increased emphasis on conserving the significance of WHS not found in the existing NPPF. The new opening paragraph of Section 16: *Conserving and enhancing the historic environment* (para 16.2) states that: 'Heritage assets range from sites and buildings of local historic value, to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.' This at last recognises the UK government's obligations under the World Heritage Convention, which the government ratified long ago, and domesticates them into national policy.

16. The revised NPPF goes on to say (para 189) 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, *irrespective of the degree of potential harm to its significance* (emphasis added). The more important the asset, the greater the weight should be.' In other words, less than substantial harm to a heritage asset of the highest significance, such as a WHS, does not mean that less than great weight can be given to ensuring the asset's conservation, or that the effect on the asset's significance can be assumed to be negligible. This reflects recent judicial interpretations (case law) of the current NPPF, but that does not make it any the less welcome.

Impact Assessment Methodology

17. Under this sub-heading, para 4.8 explains how the HIA methodology conforms with the requirements of the EIA Regulations and uses the terminology of the latter, because the HIA contributes to the full *Townscape and Visual Built Heritage Assessment* in the EIA. It is stated that the HIA also takes account of the ICOMOS guidance in assessing impact on the WHS, although it is acknowledged that the latter uses different methodology focused on OUV and its attributes.
18. The adaptation of the ICOMOS guidance on evaluating impact (Section 5) to meet the EIA requirements has resulted in three composite tables developed by the Tavernor Consultancy: the first (table 4.1) sets out the existing value and sensitivity to change of different elements of the historic environment; the second (table 4.2) identifies the potential magnitude of effect; and the third (table 4.3) quantifies the significance of effect. Historic Royal Palaces does not disagree with the definitions and criteria set out in these tables, but the variation in terminology from the ICOMOS guidance makes their interpretation and application less precise.

Visual Assessment of Views of or from the WHS

19. This section describes the 19 views of or from the WHS that have been selected for assessment "...in consultation with CoL." Historic Royal Palaces was not consulted about the selection, but we agree that the range of views chosen is comprehensive, including the relevant LVMF protected views of the Tower and the key views identified in the *Tower of London Local Setting Study* 2010.

Heritage Impact Assessment

20. Para 4.20 provides a general commentary on aspects and properties of setting. The quotation from para 137 of the NPPF in the final sentence, however, we feel has been taken out of context. This paragraph concerns new development within conservation areas, WHS, or within the setting of heritage assets that will enhance or better reveal their significance. The full quotation is 'Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.'

Assessment of Scale etc.

21. Para 4.21 explains that 'The assessment will include a qualitative and quantitative evaluation against each relevant OUV attribute using the assessment criteria set out in Tables 4-1 to 4-4 which align with the criteria contained in section 5 of the ICOMOS guidance.' Para 4.22 sets out suggested factors that will be taken into account in assessing the magnitude of the impact of the proposed development on the WHS. Historic Royal Palaces does not disagree with any of the above, except to note that such an

evaluation is inherently qualitative, involving value-judgement by the assessor(s)

Evaluation of Overall Impact

22. From this point, Historic Royal Palaces finds the complexity of the evaluation methodology adopted less than clear. We also do not agree with a number of the statements made in para 4.24 about the scale of effects; for example, 'A neutral effect is one where, regardless of the scale of the effect, it has no qualitative effect.' It is hard to envisage a very major effect that would have no qualitative effect on a heritage asset of exceptional importance. Beneficial effects are defined as those that contribute to the 'value' (not defined) of the heritage asset and equate to enhancement in NPPF terms. It is suggested that 'enhancement' may be achieved through the introduction of new, positive attributes, but, for a WHS, its critical attributes are those defined in the agreed Statement of OUV, which relates to cultural heritage value, and which cannot be added to without reference to the World Heritage Committee of UNESCO. Enhancement in the context of the OUV of a WHS is therefore generally achieved by changes which better facilitate people's ability to appreciate those attributes which carry its OUV. Nor can we agree that 'good design' alone can 'reduce or remove potential adverse effects' that may result from the scale, mass or proximity of a proposed development.

Cumulative Assessment

23. It is accepted that schemes currently under construction and consented proposals will affect the current setting of the WHS and should be taken into account in assessing the impact of the proposed development.

5 Site History and Description

24. Historic Royal Palaces has no comments to make on this section, the text of which was agreed as part of the scoping brief for the HIA.

6 Description of Development Proposed

25. We have no comments on this section, except to note that para 6.2 confirms that '...the tower's southern face would be inclined away from Leadenhall Street to reduce the visual impact on views of St Paul's from Fleet Street', but is silent about the adverse visual impact on the Tower of London that would result from the building's orientation.

7 Assessment and Evaluation of Impact

26. Para 7.1 notes that 14 views of or from the WHS have been selected for detailed assessment and agreed with the City of London (5 of the original 19 views having been discarded because the development was not visible in them). It is stated that the effects of the completed development on the WHS will be direct, permanent and long-term. View reference numbers, which are adopted below, are as used in the *Townscape and Visual and Built Heritage Assessment*, Volume 3 of the ES, and are not sequential.

View 08: LVMF 10A.1 River Prospect from Tower Bridge upstream

27. This view is from the north bastion of Tower Bridge looking north-west towards and beyond the Tower of London. The LVMF SPG comments about the view (para 182): 'The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued.'

Also, that: *'The Monument in the centre of the view. 30 St Mary Axe ('The Gherkin') is prominent in its relationship with the Tower of London.'*

28. It should be borne in mind that the LVMF SPG was published in March 2012, when the view north-west from Tower Bridge looked dramatically different, as the photographs show. The Gherkin was then the most significant structure on the eastern side of the Cluster, rising behind the Port of London Authority building, its cylindrical shape curving away from the White Tower.
29. The LVMF *Visual Management Guidance* for this view states (para 183): *'The Tower of London should not be dominated by new development close to it.'* The guidance relating to the background of the views (paras 186 and 187) is quoted in the HIA, but it is worth restating the beginning of para 186: *'Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site.'* Para 186 anticipates that that the cluster of tall buildings in the City will be 'consolidated', without suggesting what form this might take. The authors of the LVMF almost certainly could not have anticipated the rapid growth and densification of the Cluster over the past five years, with its tallest point (1 Undershaft, replacing the much smaller Aviva building) now relatively close to the Tower.
30. The proposed development would largely obscure the Gherkin in this view and rise to a significantly greater height. Unlike the Gherkin, its flat-topped profile (as seen from this angle) does not curve away from the Tower towards 1 Undershaft, but rather juts out eastwards into the open sky-space around the White Tower. Due to perspective the horizontal top of the building appears to rise upwards towards the Tower, creating an overbearing visual effect. A natural, calm profile for this side of the Cluster, however, would seem to be a continuation of the curve of the eastern side of the Gherkin towards the top of the consented proposal for 1 Undershaft. Historic Royal Palaces believed that this profile had been agreed in principle with the City as the extent of the Cluster envelope to the east. Clearly, it would be both breached and compromised by the proposed Leadenhall Street development, as illustrated in the graphic image included at Appendix D.
31. HRP agrees with the assessment in the HIA that the *magnitude of change* in this view would be *major*, and that the *significance of likely cumulative effect* would be *very major*, but we cannot agree that the outcome would be 'beneficial'. In our view, it would be harmful to the western setting of the Tower of London as a result of the proposed development's intrusion into the open sky around the White Tower and visual dominance of the WHS, the tall vertical form confronting rather than deferring to the Tower.

Views 18, 19, 20: LVMF 254.1-3 Townscape view from the Queen's Walk to the Tower

32. These 3 views are considered together, since they form a single panoramic sequence of views of the setting of the Tower of London WHS as seen from the south bank of the river. The panorama extends from Tower Bridge to the east to encompass the Eastern Cluster in the City to the west. Whilst the three viewing positions provide a framework for assessment, they are in effect artificial: in reality, the view is kinetic, the panorama changing and shifting as the observer moves from one position to the next.

33. View 18 (LVMF view 25A.1) is the straight-on view across the river from the central assessment point (from the foot of the pathway from Potter's Fields). View 19 (LVMF view 25A.2) is the assessment point to the west (left) of 25A.1 (in front of the public terraces); while view 20 (LVMF view 25A.3) is the assessment point to the east (right) of 23A.1 (from close to Tower Bridge). The LVMF SPG describes the three assessment points as follows (para 409): *'They provide good views of the Tower of London and the relatively clear [In 2012] background setting of the White Tower, in particular. A Protected Vista is included from Assessment Point 25A.1 and a Protected Silhouette is applied to the White Tower between Assessment Points 25A.2 and 25A.3.'*
34. The SPG goes on to note (para 411) that: *'The modern city is the central characteristic of this view. It includes a rich variety of landmark elements such as 30 St Mary Axe, Tower 42, Heron Tower, the former Port of London Authority building, the Norman White Tower and the Victorian Tower Bridge. The Tower of London was built to dominate the City, and to control the river at its entrance. The City has now grown to encompass the World Heritage Site, the latter retaining only its essential historical relationship with the river and a clear backdrop silhouette to the White Tower from the south-west.'*
35. The City buildings identified in 2012 were all comparatively modest, the tallest being 30 St Mary Axe (the Gherkin). It would therefore not be unreasonable to say that, in 2018, the City is fast overwhelming the WHS. The relative dominance of the White Tower has been diminished by the increasing scale and proximity of the Eastern Cluster encroaching on its western setting. In Historic Royal Palaces' view, the proposed Leadenhall Street development, rather than 'consolidating' the shape of the emerging Cluster as claimed in the HIA, would appear to invite the possibility of the Cluster extending further east, sloping down from the tall, horizontal eastern 'shoulder' it provides in answer 22 Bishopsgate to the west of 1 Undershaft.
36. The SPG *Visual Management Guidance* for these views states that: *'New development in the setting of the Tower of London should be of appropriate height, scale, massing and materials. Its relationship to other buildings in the view and the quality of design is of particular importance... (para 414); New development should respect the setting of the Tower of London and should not dominate the World Heritage Site - especially the White Tower (para 415); and From all Assessment Points, the World Heritage Site should continue to dominate its surroundings. It is particularly important that any new development relates positively to the White Tower' (para 418).* It is Historic Royal Palaces' view that the proposed development fails to comply with this guidance and therefore does harm to the setting of the WHS by further diminishing its historical dominance, especially that of the White Tower.
37. The three LVMF views 25A.1-3 illustrated in the HIA show only the western half of each LVMF composite view, taking the Cluster rather than the Tower as the focus of the view not the whole panorama, as illustrated in the actual LVMF SPG document (the LVMF panoramas are reproduced in Appendix A for ease of reference). The western edge of the White Tower is only just visible in the views. In Historic Royal Palaces' opinion, the dominance of the emerging Cluster, and of 100 Leadenhall Street in particular, on the wider setting of the Tower is therefore not adequately portrayed. The HIA assessment of likely visual effect concentrates solely on the sky-space between the White Tower and the Eastern Cluster, but does not consider the impact on the overall setting of the Tower as seen in the LVMF panoramas from the Queen's Walk. In this wider setting, the extent to which the historic dominance of the White Tower would be further diminished by the addition

of the proposed development to the Eastern Cluster can be fully appreciated. The Tower ensemble would appear reduced in scale by the ever-growing group of towering buildings next to it, which would command the skyline, the contrast emphasised by the tall vertical cliff face that the Cluster, with the addition of the proposed building, would present towards the Tower. It would have an overbearing effect. An additional composite graphic is included at Appendix B, to illustrate this point. We acknowledge that this is not technically accurate, due to differing viewpoints, but we believe it provides a reasonable indication of the visual impact of the proposed development on the LVMF protected view and wider panorama.

38. In summary, Historic Royal Palaces agrees with the HIA assessment of *magnitude of change as major* in the three views, but disagrees with the assessment of the *significance of likely effect as beneficial* in each case. In our opinion, the likely effect would be extremely visually intrusive and 'adverse', for the reasons set out above. A further graphic illustrating our point is included at Appendix C.

Views 26, 27 and 28 Views looking north-west from the Inner Ward

39. In view 26 (from the centre of the Inner Ward), the proposed development appears to rise out of the roof of the grade 1 listed Chapel Royal of St Peter ad Vincula, to the east (right) of 1 Undershaft in the cumulative image, its height exaggerated from this angle by perspective. For the same reason, the horizontal profile of the top of the development appears to slope upwards away from the main Cluster. The rendering of this view is also based on a summer-time photograph, so that the faintly rendered representation of the proposed development is barely discernible against the blue sky, behind an existing tree of some age (and possibly limited life expectancy) in leaf. We do not consider that this a realistic representation of its likely visual impact.
40. Similar comments apply to view 27 (from the southern side of the Inner Ward), except here the base photograph was obviously taken in late autumn, with the trees largely bare of leaves. Due to the angle of the view, the proposed development appears (in the cumulative image) slightly detached from the body of the Cluster and almost as a separate element. It is clearly visible, towering intrusively above the roof of the Beauchamp Tower and adjoining Georgian buildings, with its horizontal top apparently (due to its orientation) sloping upwards into the clear sky. The HIA assesses the *magnitude of change as major*, but the significance of the (cumulative) effect as 'neutral'. Historic Royal Palaces cannot agree that the effect of this major visual intrusion in the view outward from the Inner Ward is 'neutral'.
41. View 28 (from the northern wall walk east of the Devereux Tower) shows the proposed development at its closest to the Tower. In this view, the proposed new tower presents a broad, slightly curved face to the observer, with its height exaggerated by perspective almost to that of 1 Undershaft. The apparent upward slope eastwards of the horizontal top (as a result of both perspective and orientation) leaves the Cluster looking incomplete, rather than 'consolidated', in our view, and seems to suggest the possibility that the overall Cluster could continue upwards and eastwards. The proposed development juts intrusively into the open sky in this view, breaching what would seem to be a natural deferential profile of the eastern side of the Cluster, as illustrated in the graphic at Appendix D, and which Historic Royal Palaces believed had been agreed.
42. Historic Royal Palaces agrees with the HIA assessment of *magnitude of change as major* in each of these views, but disagrees with the assessment of

the *significance of likely effect* as *neutral* (views 26 and 27) and *beneficial* (view 30). In our opinion, the likely effect in each case would be visually intrusive and 'adverse', for the reasons set out above.

Views 29, 30 and 31 Local Setting Study 2010 key views 2, 4 and 5

43. These views all look north-west towards the proposed development. View 29 is from the northern Wall Walk (*Local Setting Study* view 2); view 30 is from the Inner Curtain Wall south (*Local Setting Study* view 4); and view 31 is from the Byward Tower entrance to the Tower (*Local Setting Study* view 5). Comments similar to those set out above in relation to view 28 generally apply to these views, which therefore have not been detailed individually. We would, however, note that the rendering of the proposed development in view 31 appears over favourable: it seems highly unlikely to us that environmental conditions could result in the horizontal top of the building effectively disappearing into the sky, as shown. Overall, Historic Royal Palaces agrees with the HIA assessment of *magnitude of change* as *major* in each view, but disagrees with the assessment of the *significance of likely effect* as *beneficial*. In our opinion, the likely effect in each case would be visually intrusive and 'adverse'.

Effects on the Relevant Attributes of OUV of the Tower of London World Heritage Site

44. This section of the HIA seeks to identify and evaluate the effect of the proposed development on the relevant attributes of OUV of the WHS (the full range of seven attributes having been set out in Section 5). We agree that the likely effects will primarily be direct visual effects on the setting of the WHS (para 7.5). We do not disagree with the identification in para 7.6 of the attributes of OUV most likely to be affected and which are therefore relevant to assessment, but feel that the detailed assessment of the individual components of three of the attributes of OUV alone does not fully reflect the holistic approach to assessment advocated in the ICOMOS guidance. The HIA assessment of the three identified attributes is considered below.

An internationally famous monument

45. Para 7.7 of the HIA opens this section by considering the likely visual effects of the proposed development on the physical form and visual dominance of the White Tower from within the Inner Ward. The 'visual dominance' of the White Tower, a key component of this attribute of OUV, is usually understood to relate to its historical siting and physical setting, being symbolic of its '...*dual role of providing protection for the City through its defensive structure and the provision of a garrison, and of also controlling the citizens by the same means. The Tower literally 'towered' over its surroundings until the 19th century*' (SOUV 2011). Considering the effects of the development on this particular attribute from within the Inner Ward is unusual, but existing and consented tall buildings within the Eastern Cluster and elsewhere (such as 20 Fenchurch Street) certainly do make a significant visual impact on the immediate setting of the White Tower and the historic character of the Inner Ward with its '...*unique sense of place set apart from the modern City outside its walls*' (*Local Setting Study* 2010), from which few buildings outside the Tower were visible until comparatively recently. The proposed development would clearly add to and increase the visual intrusion of the Cluster into the Inner Ward, further and adversely shifting the balance between the Tower and the Cluster.

46. As noted in our comments on the HIA assessment of key views, we do not agree with the statement in para 7.7 (which is repeated frequently throughout the document) that the proposed development would

'consolidate' the form of the Eastern Cluster as seen in views 26, 27 and 28, looking north-west out of the Inner Ward. Indeed, it is acknowledged in this para that "...the effect on the setting of the Inner Ward is not considered to be beneficial." Historic Royal Palaces considers that, as a result of its form and orientation, as well as its considerable height, the proposed development would open up the Cluster on the eastern side, rather than consolidating its overall shape. It does not seem realistic to us that the eastern side of the Cluster would end with the high, vertical cliff that would result from the construction of the proposed development, in complete contrast to the western side of the Cluster, the 'profile' of which slopes away at a gradual angle towards 20 Fenchurch Street.

47. In our view, rather than consolidating the form of the Cluster, the addition of the proposed development on the eastern side would, because of its height and design, invite further development in the space between the Cluster and the White Tower, in order to ameliorate the vertical wall effect that the construction of the proposed development would create. Rather than consolidating the overall shape of the cluster, the addition of the proposed building would result in an unresolved shape.
48. The architects' Design and Access Statement indicates that the shaping of the Cluster was considered principally from the west. Section 2.5 notes, 'When the proposed and approved towers are considered, an axis of height emerges with 1 Undershaft at its peak. There is an opportunity to shape the skyline to consolidate the Cluster and sculpt its form to step down towards the river [due south] and to St Paul's [to the west]'. This consideration does not extend to the Cluster's relationship to the WHS. The proposed development clearly does not 'consolidate' the shape of the Cluster in views of and from the Tower from the south-west. The insistence in the HIA that it does so therefore seems to us to be mistaken.
49. Para 7.8 focuses on the views of the Tower from the Queen's Walk, LVMF SPG assessment points 25A.1-3, quoting from para 411 of the LVMF guidance that '[The Tower of London was built to dominate the City, and to control the river at its entrance.] The City has now grown to encompass the World Heritage Site, the latter retaining only its essential historical relationship with the river and a clear backdrop silhouette to the White Tower from the south-west'. The LVMF was written in 2012, when the Gherkin (30 St Mary Axe) was the tallest building in the emerging Cluster, as the LVMF panoramas reproduced in Appendix C show. The picture looks very different now as a result of the rapid growth in overall height and density of the Cluster, as the views in the HIA show.
50. Historic Royal Palace agrees with the subsequent point that the proposed development would not affect the visual separation of the silhouette of the White Tower. We do not agree, however, that it follows that the White Tower would continue to dominate its surroundings, or that the modern high-rise commercial character of the setting of the western edge of the WHS would be preserved. This is to confuse 'separation' and 'dominance'. The physical distance separating the White Tower from the eastern side of the Cluster may remain unchanged, but the significant increase in the height and density of the Cluster (since 2012) dramatically changes its scale and therefore its visual relationship with the Tower. The proposed development would be the closest building to the White Tower and the second tallest. The former dominance of the White Tower has already been diminished by the height of 1 Undershaft and 22 Bishopsgate and the consequent shift of the highest point of the Cluster (now 1 Undershaft) closer to the Tower. The

proposal for 100 Leadenhall Street would increase that over-bearing effect by 'balancing' the shoulder created by 22 Bishopsgate on the western side. The overall effect would, in our view, be harmful to both the setting of the WHS and the iconic character of the White Tower by further diminishing its historic dominance over its surroundings and through creating a near-vertical edge to the Cluster, which would set up a confrontational relationship with the physically much smaller White Tower.

Landmark siting

51. We agree, as stated in para 7.10, that the strategic physical relationship of the Tower of London to the River Thames remains clear, particularly when viewed from Tower Bridge, but disagree that the same can be said of '...its close relationship to the centre of the city', as we have explained above. Nor, for the same reasons, can we agree that key views of the Tower upstream (LVMF 10A.1), across (LVMF 25A.1-3) and from the river would '...be unharmed'. We have already disagreed strongly with the HIA's statement, repeated again in para 7.11, that the proposed development would 'consolidate' the form of the Eastern Cluster; and have explained that, whilst the physical gap between the Tower and the Cluster would not be reduced, the increasing height of the Cluster buildings, to which the proposed development would significantly add on the eastern side, would result in a significantly changed, confrontational relationship between the east side of the Cluster and the Tower. We consider that this would be adverse and that the historic visual dominance of the White Tower over its surroundings would be further diminished/eroded.

Physical dominance of the White Tower

52. Paras 7.13 and 7.14 of the HIA largely repeat what has already been said about the likely visual impact of the proposed development on the previous two attributes. Our comments on the outcomes of the assessments and the conclusions reached are therefore the same.

Evaluation of the overall impact of the proposed changes

53. We agree with the opening statement in para 7.15 that, 'The change to the setting of the WHS caused by the proposed development would be noticeable... because it would increase the scale, including the height, of the Cluster on its eastern edge and make a noticeable change to the existing Cluster form. Because the sensitivity to change of the WHS is very high, the significance of the change is increased to major [from moderate].' We do not agree that the proposed development would 'consolidate the emerging form and identity of the City's Eastern Cluster in a way that would resolve its relationship with the Tower, or that its claimed 'exceptional architectural quality' would mitigate the visual impact of its overall height and form.
54. For the reasons already rehearsed, Historic Royal Palaces strongly disagrees with the final conclusion of the HIA that, 'Although there would be change to the setting of the WHS, there would be no harm to the relevant attributes of its OUV, and the change to the setting of the WHS is therefore judged overall to be neither harmful nor beneficial, but neutral.'

55. Our own conclusion of the HIA assessment process is as follows:

Sensitivity to change: very high
Magnitude of change to setting: high
Significance of likely effect on setting: major, adverse
Significance of likely effect on relevant attributes of OUV: moderate/high adverse

Table 7-1: Summary of visual assessment (page 82)

For the reasons already set out, we do not agree that the significance of any of the likely effects would be 'beneficial', or that any of the likely cumulative effects would be 'neutral'.

Table 7-1: Summary of effects on the relevant attributes of OUV (page 83)

Similarly, for the reasons already set out, we do not agree with some of the assessments of the 'effect [of the proposed development] on component' [of OUV], specifically that:

The effect on the *physical form and visual dominance of the White Tower* would be 'negligible': we consider it would be 'moderate/major';
The effect on the *Tower's relationship with the City* would be 'negligible': we consider it would be 'major';
The effect on *key views of the Tower up, down, across and from the river* would be 'negligible': we consider it would be 'moderate/major' according to the view.

8 Mitigation

56. Para 8.1 of the HIA is not entirely clear, but appears to state that the proposed development has been adapted and modified during the design development '...to take account of heritage constraints and opportunities'; and that 'Likely adverse effects...are avoided by the submitted design for the proposed development', without further explanation. Historic Royal Palaces understands that the original form and alignment of the building were modified during the design process to avoid encroachment on the protected view of St Paul's Cathedral from Fleet Street. This has been to the detriment of the Tower of London, unfortunately, to which the proposed development now presents its broadest profile. As no likely adverse effects on the WHS are acknowledged in the HIA, no additional mitigation was considered necessary by the applicants.

9 Summary and Conclusions

57. Para 9.1 of the HIA states that the proposed development has been carefully designed through a process of pre-application consultation with stakeholders, to '...respond positively in concept, scale and mass, to the Tower of London WHS.' Historic Royal Palaces was not involved in these stakeholder consultations (by the time the scheme was presented to us, the design was in its final form) and we cannot agree that the design responds positively to the adjacent WHS. The HIA claims that the proposed development would have '...an elegant and distinctive slender, tapering form and would be a building of exceptional architectural quality.' The slender, tapering aspect of its form is angled towards the City, however, and is therefore not evident in views of or from the Tower, towards which the building turns its broader face and horizontal skyline profile.

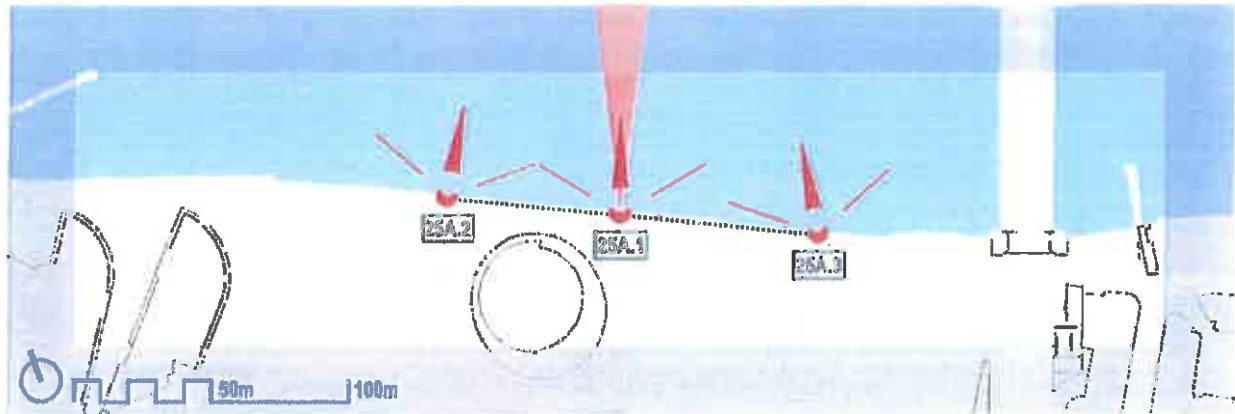
58. It is also stated that all likely adverse effects on the Tower of London '...have been mitigated by design...such that the proposed development would not cause harm to the setting or relevant attributes of OUV of the Tower of London WHS.' This claim, with which Historic Royal Palaces cannot agree, is based on a series of essentially detailed value judgements of the visual impact on attributes of OUV, the conclusions of which are questionable. Whatever mitigation may have been applied during the development of the design of the proposed development, the final proposal, in our opinion, still

causes harm to the setting of the WHS, for the reasons we have detailed above, but principally because of its height, form and orientation in such close proximity to the WHS, at the eastern edge of the Cluster.

59. Para 9.2 acknowledges that 'The Proposed Development would have a 'very major' effect on the LVMF view [10A.1] upstream from Tower Bridge, due to its proximity to the viewing position and the alignment of the proposed development in relation to the WHS', yet still claims that '...the existing visual separation between the City's Eastern Cluster and the White Tower would be preserved...' The effects of the proposed development on the kinetic sequence of LVMF views from the Queen's Walk is recognised as being 'major', yet it is stated that, because the silhouette of the White Tower would not be affected, and the physical gap between the Tower and the eastern side of the Eastern Cluster would not be reduced, the '...effects in all the views would be beneficial in all cases thanks to the proposed development's role in consolidating of the City's Eastern cluster which, as an entity, forms an important characterising element of the panoramic river views as a whole.'
60. We have already made clear in our preceding comments that Historic Royal Palaces does not agree that the proposed development would 'consolidate the Eastern Cluster' in a manner appropriate to its relationship to the Tower and have explained why. The frequent assertions in the HIA that the relationship of the Cluster to the Tower will not be changed because the physical gap between the edge of the Cluster (presently defined by the Gherkin) would not be reduced takes no account of the change of scale of the edge of the Cluster that would result from the proposed development. The gap may remain the same, but the relationship with the WHS changes to one of increased visual dominance and confrontation by the Cluster. We must therefore strongly disagree with the concluding sentence of para 9.2 of the HIA that, 'As the views demonstrate, the proposed development would not [...] have an adverse impact on its skyline as viewed from the river, and would therefore preserve those aspects of the wider setting that contribute to the integrity of the WHS.'
61. Nor can we agree with the HIA's concluding statement in para 9.6 that, 'The likely long-term significant effects of the completed proposed development on the setting of the Tower of London WHS would be major, neutral, with negligible effects on the elements of setting that contribute to the relevant attributes of OUV of the WHS.' We consider, and have demonstrated, that the long-term significant effects would not be 'negligible', but 'major, and adverse' rather than 'neutral'. As the draft revised NPPF makes clear, when the impact of a proposed development on the significance of a designated heritage asset is being considered, 'great weight should be given to the asset's conservation, irrespective of the degree of potential harm to its significance.' In other words, any degree of harm to a designated heritage asset of the highest significance, such as a WHS, cannot be dismissed as negligible.

Historic Royal Palaces
May 2018

LVMF PANORAMAS FROM THE QUEEN'S WALK (2012)



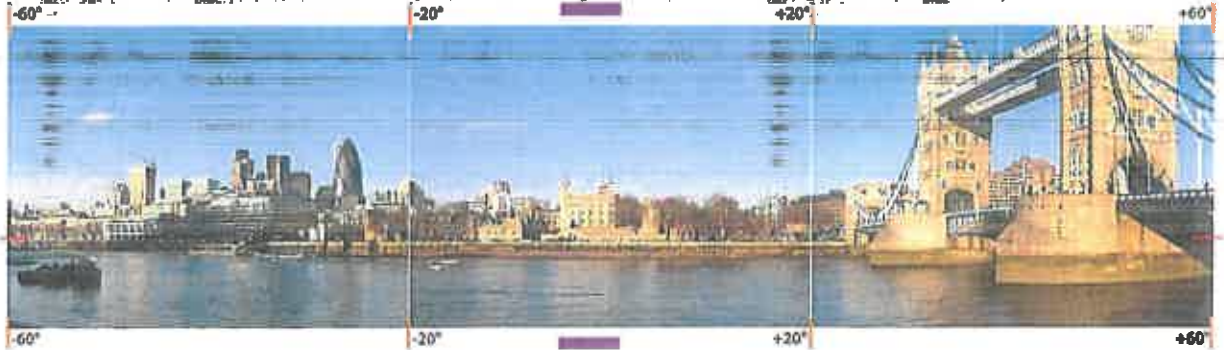
LVMF Assessment Points 25A.1, 25A.2, 25A.3



Panorama from Assessment Point 25A.1 The Queen's Walk at City Hall – foot of pathway from Potter's Fields



Panorama from Assessment Point 25A.2 The Queen's Walk at City Hall – in front of the public terraces



Panorama from Assessment Point 25A.3 The Queen's Walk at City Hall – close to Tower Bridge

LVMF VIEW 25A.1, EMERGING CLUSTER IMPOSED



Panorama from Assessment Point 25A.1 The Queen's Walk at City Hall – foot of pathway from Potter's Fields

The emerging Cluster approximately superimposed on the LVMF panorama; the relationship between the Tower of London and the Gherkin is correct, but the Cluster is stretched slightly to the west compared to the base image

APPENDIX C



© VIEW

APPENDIX D



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25 May 2018

Ms Bhakti Depala
Department of the Built Environment
City of London Corporation
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Dear Ms Depala,

100 LEADENHALL STREET, LONDON, EC3A 3BP, 18/00152/FULEIA

Further to a review of the application noted above and meetings with the applicant I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the application for demolition of the existing buildings and construction of a ground plus 56 storey building with associated works to the public realm at the above address.

The Cathedral wishes to register its strong objection to the proposed scheme which objection centres around the impact on the view of St Paul's via Fleet Street and Ludgate Hill.

Process:

We wish to register the following concerns:

- St Paul's Cathedral was notified by both City and Historic England that there was a pending application under pre-application discussion which would affect the Fleet Street view, but was not permitted to see the proposals due to commercial confidentiality. Both Historic England and the City gave formative and strong pre-application advice which has resulted in the current scheme, without input from St Paul's. The applicant did not consult St Paul's at this early stage despite being advised to do so. By this point, the die was cast, without any public accountability. This procedural imbalance is wrong.
- Having received written advice from HE, the Applicant did eventually consult St Paul's. At that meeting we made clear representations about the technical evaluation process on harms and benefits, the desire to see appraisals of 'no harm' options, and

we communicated our evaluation of the very high significance of the Fleet Street view, and conveyed our considerable concerns on the impact and harm of the proposal at that meeting. However our representations have resulted in no substantive amendment to the harmful impact on the Fleet Street view in the scheme as submitted for consent.

- In our view Historic England's pre-application advice, on which the applicant has placed considerable reliance and, indeed, was clearly very pleased to receive, is flawed. In our opinion Historic England (HE) does not follow the methods of impact evaluation set out in its own policy guidance. We argue in this response that neither HE nor the applicant has attempted to fully understand the special nature of the unfolding Fleet Street view and thus does not adequately recognise the full significance of the 'history in this view'. Their understanding does not extend to a full appreciation of how the prominence and dominance of the Cathedral's outline changes and evolves in an ever-changing kinetic view. In its advice HE has taken a too narrow line on the historical connection London citizens have to this Fleet Street route: there is not sufficient recognition of place, and how the reading of sense of place is manifest and understood.
- We also do not feel that there has been adequate evaluation of the relative harms and public benefits. There is no valid and agreed methodology for weighting the harm for London Citizens on the Fleet Street view and the *limited* benefit, for a *limited* number of people, who would access the public viewing gallery, which the application offers as a counter-weight to the evident public harm. Such a methodology would be subject to public consultation which would inform developers and decision makers.
- We do not understand why the GLA makes no reference to the City's own Local Plan and SPG policies relating to views in their advice to the applicant.

Objection:

The applicant's proposal demonstrably does not comply with the City's Adopted Supplementary Planning Guidance: Protected Views: Paragraph 2.18 which is quite clear on this matter:

*2.18 In some of the views protected by St Paul's Heights tall buildings can be seen in juxtaposition to the Cathedral, compromising its dominance of the skyline. The relationship of tall buildings to the Cathedral varies with the viewpoint. In some cases tall buildings can be seen behind the dome or western towers so that their outlines are impaired. From other viewpoints tall buildings appear above the roof of the Cathedral or crowd close to the Cathedral on the skyline. Views are compromised in these ways from the following locations: the south bank between New Globe Walk and Gabriel's Wharf, and adjacent to Waterloo Bridge; and from the Millennium Bridge, Blackfriars Bridge, the southern part of Waterloo Bridge, Hungerford Bridge, and from Fleet Street. **Within these views, new development and the redevelopment of existing tall buildings should aim not to worsen and, where possible, to improve the backdrop to the views.***

Correcting the Understanding and Significance of this view:

In order to more fully explain our strong insistence that the significance of the Fleet Street view can and must be recognised as one of the highest and most potent in London, we need to further express what is being missed in the applicant's understanding of the view.

The Fleet Street view is not just an intrinsic aspect of Wren's intention and design; nor is it only a potent historical processional route between the Square Mile and the City of Westminster. This is not only about history (ancient and modern); this route has a living legacy. This is the view that every monarch sees, when asserting his or her power over the City, claiming St Paul's as their church and seat of the faith they are sworn to defend. This is where everyone who has lined the streets on days of national celebration or mourning have seen and understood how London is ordered. If you were at Churchill's or Lady Thatcher's funeral, you had this image of London in your mind, seared in the flames of Herbert Mason's immortal photograph, and you recognised this in the view.

The reason the Cathedral sells biscuit tins and other merchandise with the view up Ludgate Hill prominently featuring in its own shop, to people from all round the world who have no deep knowledge of the history and national culture in this view, is because the view has universal recognition. This is the view which represented the motivating spirit of the British Empire, and which shows how the City of London mediates between our identity as a nation with a Christian and ethical heritage, and as the

Surveyor to the Fabric

commercial driver and heart of our national economy. This is not 'just' a view. This view, and protecting it, shows us as a civilised, cultured and independent-minded society that respects our past whilst also living in the exciting and challenging reality of the present.

Decision making and evaluation of harm:

We have sought to concisely explain above why we feel that the applicant's understanding of the view is flawed. Without an adequate understanding the evaluation of significance is too easily downplayed – and thus the applicant chooses to argue that the harm to the view is 'only slight'. On behalf of London citizens, we fundamentally disagree. The continuing encroachment on the sky-space around the dome of the cathedral should not be eroded further, because the absolute limit of harm was set by 122 Leadenhall (the Cheesegrater). It is not acceptable to further chisel-away at the setting of the Cathedral dome. Nor is it acceptable to argue, having set a line after previous consultations and now contemplating encroaching on it, that 'this is the last time there will be a further erosion of the view'.

St Paul's strongly supports a vibrant and commercially healthy City; no one should be in any doubt of this. Yet we need to recognise a basic truth that the values of decision-makers in any one moment of time will always be influenced by the context of the moment – thus it feels acceptable to argue that a 'little bit of extra harm does not matter too much'. We argue that there needs to be recognition of and protection for the universal and globally recognised value of this Fleet Street view, which should not be further harmed by contingent decision making, compromising evaluations and weighting tests. There should be a 'no harm' solution which, given the ingenuity and creativity of the architects and engineers, can actually benefit the unusual and exciting skyline of the central tall buildings cluster through innovative response to essential constraints. We do not believe that, in pre-application consultation, HE or the City sufficiently insisted on the necessary and absolute constraint for this project.

Summary and Conclusion:

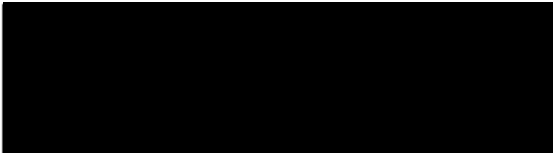
Throughout the pre-application period the Cathedral has been dismayed by the lack of timely and early consultation. It is entirely unsatisfactory that the applicant has been working for such a long period on these proposals and, only when there is a *fait-accompli* have they come to consult us. We understand that both the City of London and Historic England told the

applicant to talk to the Cathedral at an early stage but they did not. Therefore we find that consultation, whilst friendly and well-meant, was not really meaningful:

1. We argue the applicant has not adequately researched, understood and stated the significance of this view. The application should not therefore be determined without this research, which should be subject to public consultation.
2. It is not acceptable that, having initially developed a scheme that is really harmful to the view, the public is now being asked to accept a less intrusive but still harmful scheme as a 'compromise'.
3. It is not acceptable that there has been no serious presentation or development of a well developed option to look at a scheme which would not impact on the view. The applicant cannot claim to have adequately evaluated the options in accordance with NPPF terms if there has been no serious consideration and development of a 'no harm' design solution.
4. In our opinion there has been insufficient examination by the applicant of the history and terms of the debate that led to the "Cheesegrater line". The 122 Leadenhall building was consented in 2004. We understand that the City has checked the planning officer's report on that application which does not reference the debate explicitly, but the lack of an official record does not evidence the contemporary debate. We can imagine there was a hearty debate then about what was an acceptable impact on the Fleet Street view. We would expect that, at the time it was held that 'this is the line, no further' and everyone agreed to that position.
5. The 'stalking horse' argument is entirely unacceptable. Just because there is now an approved application for 6-8 Bishopsgate for a scheme that marginally breaks the 122 Leadenhall line, is not a justification for another building which further harms the view 'which will tidy up the line' - or, in other words, continue to encroach on the 122 Leadenhall sky line. This clearly evidences Chapter's prime argument - far sooner than we might have expected - that every developer and every commercial interest will try to chip away at the principle and every marginal harm will be felt to be 'not bad enough to say no to'. There has to be a line which is considered absolute.

6. The City SPD clearly says '*new development....should aim to not worsen and, where possible, to improve the backdrop to views*' This scheme patently does worsen the view; this is a matter of fact, not opinion. Therefore policy (which has been subject to public consultation) should direct the planning committee to refuse this application.

Yours sincerely,



Surveyor to the Fabric
On behalf of St Paul's Cathedral Chapter.

cc Annie Hampson OBE. Chief Planning Officer.
John Barradell, Town Clerk and Chief Executive
Duncan Wilson: Historic England
The Bishop of London
Catherine McGuinness
The Mayor of London

Director:

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Project Directors:

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14 June 2018

Subject: Planning Application for 100 Leadenhall St. (18/00152/FULEIA)

Dear Bhakti

Further to my email to you of 8th March, I now write on behalf of The PCC of St Helen Bishopsgate, which is responsible for both St Helen Bishopsgate and St Andrew Undershaft, to provide comments on the planning application submitted for a development at 100 Leadenhall St. Representatives from the PCC have been involved in ongoing discussions with the applicant's professional team since August 2017. We have met with representatives from London & Oriental and from DP9 on several occasions, as well as with representatives from EOM, WSP and Arup. Our discussions to date have been constructive and we have enjoyed a good working relationship with the applicant's team.

The applicant's design for a development on its site is sizeable, and has the potential to cause significant disruption to the ministry that takes place at St Andrew Undershaft, and to impact the building significantly. Therefore, we reviewed with care the material submitted with the planning application, and shared three principal concerns with the applicant's team at meetings in 2017: impact of wind changes on the physical fabric of St Andrew Undershaft and St Helen Bishopsgate, noise from the site during demolition and construction, and use of the new "pocket park" open space to the east of St Andrew Undershaft.

Wind

The PCC has recently spent significant sums of money carrying out repair works to St Andrew Undershaft due to significant deterioration of the soft stone. We believe that the rate of erosion to the stonework has increased in recent years due to changes in wind speeds and wind directions as a result of the new high rise buildings that have been constructed in the vicinity of the church, and due to rain being driven against the church as a result of these changes in wind speed and direction.

We therefore asked the applicant at our first meeting in September 2017 to consider the impact of changes in wind due to the proposed development on the fabric of the churches of St Andrew Undershaft and St Helen Bishopsgate. The applicant's ES does consider the impact of the development on wind, but only so far as it affects pedestrian comfort levels. In March RWDI undertook a study on behalf of the applicant to assess external pressures acting on the church buildings as a result of the development. This study did not comment on the significance (or otherwise) of changes in external pressures identified by the study and so no opinion was provided on the impact on the church buildings. The applicant has recently commissioned Arup

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ST HELEN BISHOPSGATE
Charity name – The Parochial Church
Council of the Ecclesiastical Parish of
St Helen, Bishopsgate

REGISTERED CHARITY NO.
1131501

to conduct a separate study on this area. We await the outcome of the study with interest and understand that this will be made available to us before the Planning & Transportation Committee meet to review the planning application. If the study shows that there is no significant impact on either of the two church buildings then our concerns in this area will have been resolved.

Noise

The applicant's ES provides information on predicted noise levels during demolition and construction. At an early stage we shared with the applicant's team our concerns that noise during demolition and construction would severely disrupt the ongoing ministry at St Andrew Undershaft. At the closest point, the church is less than 1m from the applicant's current western façade. The applicant's acoustic engineers (WSP) have now confirmed that even with on-site mitigation, the internal noise levels at the church would likely be well in excess of the recommended upper boundary target in BS8233 for a place of worship. The applicant has therefore agreed – subject to all necessary consents being obtained in due course – to enclose windows on the church's east elevation, and select windows on the church's north and south elevations, in order to provide further mitigation during the works. WSP advise that this will ensure internal noise levels at the church are maintained at an appropriate level throughout demolition and construction. We have no concerns about operational noise levels from the development.

This additional "off-site mitigation" is subject to final documentation in, and signing of, a written agreement between the PCC and the applicant. We expect this to be successfully concluded before the end of June.

Pocket Park

The applicant's design creates a new open space between St Andrew Undershaft and the site. The applicant has referred to this in their planning application as a "pocket park". The PCC recognises that the applicant has sought to enhance the setting of the church as a heritage asset and is supportive of the intent to create more space between the two buildings, and for this to be a space that people can enjoy.

We understand that the detailed design of this open space, as well as its use and management, are to be determined through a variety of planning conditions, and through planning obligations in a section 106 agreement.

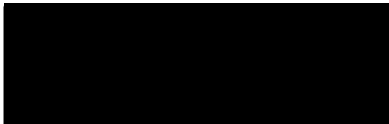
The PCC requests that the following points are addressed in any planning conditions or section 106 agreement (as appropriate), and would like the opportunity to have sight of and comment on the relevant sections of the drafting of a section 106 agreement in due course:

1. Hours of public access to the open space: we understood the applicant proposes 0600-2100.
2. Arrangements for the applicant to consult with the PCC as details for the open space are developed.

3. Submission and approval of hard and soft landscaping, street furniture, lighting, drainage and related construction details as they affect the open space.
4. Design and construction details to take in to account potential for archaeological remains near St Andrew Undershaft.
5. Restrictions on use of the open space. The PCC recognises this will depend in part on how the adjacent retail space is used. The PCC is not opposed in principle to tables and chairs for outside dining associated with (for example) an A3 restaurant, providing that an appropriate management regime is in place to control noise and outdoor activities that may impact on ministry within St Andrew Undershaft.
6. Arrangements to manage, maintain and repair the open space and routes to/from it, including security, cleansing, repairs, insurances and so forth.

In conclusion, we are grateful to the applicant and to their team for their continued engagement with us, and for their recognition of our concerns about the scheme. We look forward to receiving the further wind study that I have spoken about in the next few weeks. Assuming this shows no significant impact on the churches, and assuming that the PCC and the applicant are able to complete the written agreement that will confirm (amongst other things) details of off-site mitigation, then the PCC is supportive of the planning application.

Yours Sincerely,



Mike Burden
Facilities Manager

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cc: Mark Cannell, London & Oriental (by email)
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04 April 2018

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City of London
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PO Box 270
London EC2P 2EJ

Dear Bhakti

Objection by Meron Holdings Ltd to Planning application 18/00152/FULEIA - 100 Leadenhall Street London EC3A 3BP

Please accept this letter on behalf of my client Meron Holdings Ltd as their objection to planning application 18/00152/EIA for the proposed development at 100 Leadenhall Street.

Meron Holdings Ltd is the long leaseholder for John Stow House, 18 Bevis Marks, EC3 which is located to the north of the application site.

Meron Holdings Ltd is concerned about the potentially adverse impacts of the proposed development on the light levels and associated amenity currently enjoyed in John Stow House.

Of particular concern are the results of the Overshadowing Assessment¹ which accompanies the planning application. This shows that in spring, summer and autumn, the proposed building would cast a shadow over all or part of John Stow House in the mid afternoon when people working in the John Stow House offices are currently able to enjoy some natural light.

Meron Holdings Ltd objects to the adverse effects and harm caused to the amenity of John Stow House and its occupiers by this overshadowing which would be contrary to policies 7.6Bd and 7.7Da of the London Plan (2016):

***"Policy 7.6 ARCHITECTURE
B Buildings and structures should:***

d) not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings"

"Policy 7.7 LOCATION AND DESIGN OF TALL AND LARGE BUILDINGS

D Tall buildings:

a) should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference"

¹ GIA Overshadowing Assessments (Dec 2017) in Appendix 14.4 of 100 Leadenhall Street Environmental Statement, Volume 2, (Feb 2018)

Meron Holdings Ltd is also concerned that proposals for tall buildings on other sites nearby could result in a 'building canyon' and further overshadowing of John Stow House. In accordance with para 3.14.4 of the City of London Local Plan (2015), the cumulative impact of any such proposals along with those for 100 Leadenhall Street and existing tall buildings should be taken into account in the assessment of all the schemes. Meron Holdings Ltd may submit further representations regarding such cumulative impacts should other relevant planning applications be submitted.

I hope these representations are clear but please let me know if you have any queries or require further information.

Yours sincerely,



John Watson MRTPI
Director

Bevis Marks Synagogue - Heritage Impact of Proposed Development at 100 Leadenhall

8th June 2018

Introduction and Purpose

This paper summarises advice provided to the S&P Sephardi Community regarding proposals for a new development in the vicinity of Bevis Marks Synagogue at 100 Leadenhall (City of London planning application reference 18/00152/FULEIA). It also includes our response to the supplementary information provided by the Tavernor Consultancy, first issued on 27 April 2018 and revised and re-issued on 17 May 2018.

The Significance of Bevis Marks Synagogue

The following text is taken from the first draft of the Bevis Marks Synagogue Conservation Plan (Caroe Architecture Ltd):

A Grade I listed building of 1699-1701, red brick, steep roofed, a major single volume galleried interior, original 'Ark' (Ehal), as well as original benches and related furniture, Bevis Marks synagogue is widely regarded by architectural historians as a building of national and international significance.¹ In 1928, the Royal Commission dubbed it a historic structure of 'outstanding value, most worthy of preservation'.² The Grade I listing places Bevis Marks in the highest category of importance among designated buildings - on a level with St Paul's Cathedral and the Tower of London. The Synagogue has often been likened to a contemporary non-conformist chapel but it owes as much to these as to late 17th Century Anglican churches such as those designed by Sir Christopher Wren and his office for the City of London. The design of these chapels and churches derived from religious architecture in Amsterdam and the Netherlands³, and they share the characteristics of a single volume rectangular space with galleries on three sides and tall, leaded plain glazed windows.

Bevis Marks is the oldest synagogue in use in the UK and is well documented and attested to be the oldest synagogue in continuous use for worship in Britain.⁴ Indeed, it has also been argued that 'No other synagogue in Europe has this continuity of practice, of community, of building, of collections', arising for complex mid-20th Century political reasons when continental Synagogues were suppressed under fascism.⁵ It also has a special place in the international story of synagogue architecture and Jewish worship, both for the Sephardim (Jews of Spanish and Portuguese descent) who built it (the congregation having outgrown its previous synagogue established in 1657 within the upper storey of a house in nearby Creechurch Lane), and those who worship there still, and for the

¹ Chris Wakeling, author of *Chapels of England* (2017), in correspondence with Jeremy Musson for Caroe Architecture Ltd, April 2018.

wider Anglo-Jewish identity. The historic synagogue of the Ashkenazi (Jews of largely mid and Eastern European and Russian descent) – also a building of considerable architectural significance on nearby Duke's Place - was rebuilt twice and then destroyed by bombing in 1941.

Widely recognised both within and without the Jewish community Bevis Marks is the repository of a layered inheritance. This consists of the building, its Courtyard setting, and the space and furnishings it contains, as well as the associated physical collections (Torah scrolls, pictures, ritual silver, and textiles) and the intangible heritage – minhag – of customs and melodies used in worship, handed down since the re-establishment of the Jewish community in England in 1656. No other synagogue in Europe has this continuity of practice, of community, of building, of collections.

It is this combination of significance to the history of Anglo-Jewry and the historic and little altered architecture, as well as continued daily use for prayer that is the heart of the significance and value of Bevis Marks Synagogue.

Overall significance of Bevis Marks Synagogue: Exceptional (International)

Heritage Impact Considerations applicable to the development proposals

In its description of the history and significance, whilst acknowledging that the Synagogue is 'elegantly proportioned' the Tavernor Consultancy suggests that architectural style was not a 'primary consideration' in the commissioning of Bevis Marks. There is an implication that perhaps the building is somewhat impoverished due to the hardships and challenges facing the resettled Jewish community. The simplicity and 'undemonstrative' nature of the building should not in any way be seen to undermine the quality of the design, materials and construction employed (as evidenced by the quote from the building contract below). The Sephardi Community certainly did not set their sights low in architectural terms: Joseph Avis is known to have worked on a number of city churches for Sir Christopher Wren and Dr Robert Hooke – two internationally renowned figures and architects who were instrumental in the revival and re-edification of the City of London after the Great Fire. The Synagogue is designed in the spirit of well-proportioned classical architecture associated with Wren and the office of works generally. Indeed, as explored above, it shares many characteristics of the post-fire church building tradition, with broad rectangular plan, being galleried and lit by tall round-headed windows of leaded lights.

Nor is it entirely true to say that the historical significance of the Synagogue derives primarily from its 'age and rarity' as our analysis of significance above sets out – its illustrative and associative historical significance are much richer and more nuanced than this.

The proposed development at 100 Leadenhall will overshadow and appear in the background of Bevis Marks Synagogue Courtyard. The Courtyard is not only the immediate setting to the Synagogue but also an intrinsic part of the Bevis Marks complex (comprising Synagogue, Courtyard, Beadle's (now the Rabbi's) House and 20th Century Annexe). It is part of the historic fabric and to

some extent, an extension of the Synagogue itself. On the most basic level the Courtyard is the point of entry from the street into the Synagogue. However, it is also a place where people gather before and after services for social and religious discussions, in anticipation of weddings and for weddings (weather permitting) and in preparation for tours. In many respects it is where community itself is built. Indeed, many events take place in the Courtyard, including BBQs, lectures, and the weeklong outdoor festival of Tabernacles in the temporary booth which is erected there annually.

The Tavernor Consultancy quote the NPPF's definition of setting and Historic England's guidance on the setting of heritage assets, noting that the importance of setting lies in what it 'contributes to the significance of the heritage asset or to the ability to appreciate that asset.' They discuss the variability of capacity to accommodate change and the variability of sensitivity to change but we do not understand the derivation or meaning of their conclusion that the sensitivity of the setting of the Synagogue cannot therefore be directly compared to other Grade I listed buildings. We would assert that particularly given the previous high level of change to the surroundings of Bevis Marks Synagogue and the resultant fragility of the historic character of the Courtyard and Synagogue, the Courtyard makes a very positive contribution to the significance of the heritage asset and the ability to appreciate it, has a high sensitivity and a low capacity to accommodate further change, and is key to revealing its significance. These are vital factors in assessing the impact of the proposed development at 100 Leadenhall.

By its nature the Courtyard is an enclosed space contributing to the historic character of the Synagogue building, which is not easily discernible from the street and revealed fully only upon entry to the Courtyard. The Courtyard is a public space with restricted access, however, Historic England's good practice advice document on the setting of heritage assets notes:

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.²

Views are acknowledged as a key contributor to the setting of heritage assets:

Views and setting

The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.³

The Tavernor Consultancy note that the contribution of setting to the significance of a heritage asset is often expressed through the assessment of change to views of or from the asset. Views across and out of the Courtyard, as well as visibility of the sky are important contributors to the setting of the Synagogue, as well as the Courtyard's amenity value. We concede that these views were not designed, for example, to link the Synagogue to other heritage assets or natural features.

² Historic England, The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), p.2

³ *Ibid.* p.6

By the strictest definition these views do not directly contribute to the historic significance of the Synagogue building but the loss of views of the open sky and the increasing sense of enclosure by buildings of a totally alien scale and massing does undoubtedly affect the historic character of the Synagogue building in its Courtyard setting and the viewer's ability to appreciate its historic and aesthetic significance. The ability to appreciate the significance of the heritage assets has already been compromised by unsympathetic, poor quality development and will be detrimentally affected by further proposed development at 100 Leadenhall.

We do not disagree that the dramatic juxtaposition of other Grade I listed historic places of worship with tall modern buildings can have merit, for example, when the design and materials of the modern building are of the highest quality. Number 30 St Mary Axe is a good example of a tall building visible from the Courtyard which can reasonably be argued to provide a pleasing juxtaposition. In other successful cases the modern building has been designed with a direct visual relationship to the heritage asset in mind, but this cannot reasonably be argued in the case of 100 Leadenhall.

The image provided on page 3 of the Tavernor Consultancy's supplementary information images document (captioned 'View from inside the entrance to the courtyard') crops out and fails to show the current 'skyscape' over the Synagogue. Their visualisation provided on page 6 of the same document ('Cumulative view south'), however, shows the dramatic rather than small incremental impact on the skyscape that the 100 Leadenhall development will have: introducing a building of an altogether different scale to what can currently be seen when looking in this direction. They suggest that the new building will recede in the view as you move southwards across the Courtyard, but the short distance travelled is not likely to diminish the visual impact of such a large and imposing structure.

The Tavernor Consultancy finds no evidence that the courtyard 'which originally formed part of the pre-existing public street network, was designed to make a contribution to the symbolic or ceremonial significance of the Synagogue', however, it was deemed of sufficient importance to be included in the original building contract and design (*modell*), signed on 22 Feb 1699:

...The imposing stone doorcase which provides such an important focus, is set out along with the paving of the courts: 'shall make one stone doorcase [. . .] west and six foot wide with three han[d]some stone steps and shall pave all around the said new building with free stone according as the same is designed in the said modell thereof here unto annexed'.⁴

Regardless of whether it was originally part of the public street network, as an historically and aesthetically significant part of the designed ensemble, the Courtyard could possibly even be argued to not only be the setting of the Synagogue but also a feature of its special architectural and historical interest. The Planning (Listed Buildings and Conservation Area) Act 1990 sets out that:

¹ Dr Sharman Kadish, and various

² Royal Commission, 1928

³ Kadish, 2001, 1

⁴ Bevis Marks: statement of significance, 2017, Introduction

⁴ From the building contract for Bevis Marks Synagogue, quoted in Caroe Architecture Ltd, *Bevis Marks Synagogue Conservation Plan* draft text

In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority ... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.⁵

Bevis Marks is situated in a densely built area which is undergoing considerable development. A number of buildings are already visible in views upwards and outwards from the Courtyard and the cumulative effects of new development are a key consideration in the evaluation of impact on setting. 100 Leadenhall alone will have a significant impact on the setting of Bevis Marks Synagogue. The anticipated cumulative effects of the proposals for 100 Leadenhall when considered in conjunction with consented schemes at 1 Undershaft and 40 Leadenhall will be even more significant. They will significantly affect its setting, the views and atmospheric qualities of the Courtyard, particularly as experienced upon coming through the entrance gates. Historic England's good practice advice is that if the setting of a heritage asset has been compromised by what has happened previously this does not mean further impact from new development should not be considered harmful, and opportunities should be taken to improve the setting of the heritage asset:

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.⁶

Through the independently demonstrated effects of overshadowing created by the proposed new developments, it is also likely that the historic character and experience of being inside the Synagogue building will be affected by reduced light levels during services- both in terms of direct light and that reflected from the façades of the buildings immediately surrounding the Courtyard. As with most historic places of worship, the large upper windows of the Synagogue were designed to maximise the amount of natural light entering the building. As noted in the guidebook for Bevis Marks 'Good lighting is essential in the synagogue, where reading from the Torah scrolls is central to many services'⁷ and light is a key element in Judaism symbolised by the *Ner Tamid*, the eternal flame or perpetual lamp hanging in front of the Ark. It should be noted that Jewish laws forbid the turning on or off of light (electric and candles) during the Sabbath and on most high holidays. Therefore, this is not simply an issue of visitors being able to appreciate the heritage significance of the splendid interior as suggested by the Tavernor Consultancy, nor those worshipping inside simply to 'maintain an appreciation of the outside world'.

Economic viability of the Synagogue and the impact on the vital commercial aspects of its operation are other important considerations in the case of Bevis Marks. Reduction in the amenity and spatial/atmospheric qualities of the Synagogue, Courtyard and the glazed roofed Annexe building by the new developments could make Bevis Marks a less attractive tour group/visitor destination,

⁵ Planning (Listed Buildings and Conservation Area) Act 1990 S.66(1)

⁶ Ibid. p.4

⁷ Kadish, S (2001) *Bevis Marks Synagogue: A short history of the building and an appreciation of its architecture*, Survey of the Jewish Built Heritage in the United Kingdom & Ireland and English Heritage, p.12

wedding venue and function/café venue reducing business and income levels and having a detrimental impact on the financial sustainability of Bevis Marks. This is another relevant aspect highlighted in Historic England's good practice advice on setting:

Setting and economic viability

.....the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.⁸

City of London Tall Buildings Policy

Bevis Marks Synagogue is located in one of two areas identified by the City of London as *not inappropriate* for tall buildings, namely the Eastern Cluster which is considered the most appropriate area for a *group* of tall building developments. The City selected the Eastern Cluster area on the basis that it is less constrained by views protection policies. The City of London recognises, however, that all locations within the City are sensitive to tall buildings, and point 3 of the Core Strategic Policy CS7: Eastern Cluster (*City of London Local Plan 2015*) states that tall building developments within the Eastern Cluster must adhere to 'the principles of sustainable design, 'conservation of heritage assets and their settings' as well as taking account of their effect on the wider London skyline and protected views.

The City of London must also determine planning applications in accordance with the relevant policies set out in the Mayor of London's *London Plan* (2016). These include 7.7 Location and Design of Tall and Large Buildings which states that '...tall buildings should not affect their surroundings adversely in terms of ...overshadowing...' and 7.8 Heritage Assets and Archaeology which states amongst other things that 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.'

The Tavernor Consultancy's supplementary information suggests that 'dramatic juxtapositions of old and new and of the visibility of taller buildings seen in the backdrop to historic roofscapes' are part of the 'established character' of this part of the City. It should be acknowledged, however, that tall buildings of the scale of 100 Leadenhall (in excess of 200m AOD) have only been a feature of the City of London in the 21st Century, and even buildings in excess of 100m AOD were rare before the 1980s⁹. This is a very short period in the long history of Bevis Marks Synagogue. The individual and cumulative effects of these tall building developments on the significance of relatively diminutive heritage assets like the Synagogue and its setting were not factored into the City's identification of the Eastern Cluster and there was no specific consideration of the Synagogue in the *City of London Tall Buildings Evidence Paper* (2010) as suggested by the Tavernor Consultancy.

Overall, we do not concur with the Tavernor Consultancy's conclusion that the historic significance of the listed building would not be harmed by the proposed development at 100 Leadenhall.

⁸ Ibid. p.6

⁹ Buildings in excess of 100m AOD completed by 1980 include 1 Undershaft (1970), Barbican's Lauderdale, Cromwell and Shakespeare Towers (1972), 99 Bishopsgate (1976), and 25 Old Broad Street (completed 1980). Before the start of this century, they were joined by 6-8 Bishopsgate (1982), the Lloyd's Building (1986), 125 London Wall (1992) and 200 Aldersgate Street (1992).

DP4190/PT/BJC

13 June 2018

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BY EMAIL

Dear Mr Phillips

100 LEADENHALL STREET, LONDON, EC3A 3BP (18/00152/FULEIA)

Thank you for your letter dated 22nd May and enclosed detailed commentary on the submitted Heritage Impact Assessment ('HIA'), prepared by Tavernor Consultancy ('Tavernor'). We have now reviewed this and would like to take this opportunity to firstly thank HRP for the input into the assessment undertaken and the acknowledgement in your response that Tavernor has provided a considerable level of detail and that, critically, *"the contents of the HIA complies with the recommendation in Appendix 4 of the ICOMOS guidance"* (referring to paragraph 10 of your detailed commentary note).

Turning to the detail of your response, we recognise that in a number of places reference is made to the conclusions of the HIA being based on (Tavernor's) *"value-judgements"* and that these are not in line with the views (being value-judgements themselves) of HRP. This is important to note as it is on this basis that you conclude in your letter that HRP *"objects strongly to this planning application because of the potential visual harm that the proposed development would do to the setting, and therefore to attributes of the OUV, of the Tower of London WHS"*. Similarly, based on the value judgements of HRP it is concluded that, *"if the proposed development proceeds, its cumulative effect could put the WHS's status at risk"*. Tavernor has reviewed the detailed responses provided in relation to your seven remarks on the HIA, but reaffirm that their conclusions are considered to be valid and robust both in terms of the methodology used and the assessment criteria applied (including the appropriate application of relevant NPPF 'tests'). Whilst a difference in opinion is expressed, Tavernor are satisfied that their conclusions are broadly consistent with those of Historic England and the GLA.

As a point of clarification, referring to paragraph 14 of your detail note, Tavernor's assessment demonstrates that no harm would arise as a result of the proposed development, but that notwithstanding this conclusion, 'public benefits' are set out in the Planning Statement, these including the introduction of a new high level public viewing gallery at the top of the building; the delivery of new public spaces and routes and a 'pocket park' at ground floor level; and the optimum viable use of the site (responding to NPPF paragraph 134).

If you have any questions, please do not hesitate to contact Peter Twemlow or myself.



Barnaby Collins
Board Director
DP9

CC Bhakti Depala (City of London)

DP4190/PT/BJC

13 June 2018

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BY EMAIL

Dear Mr Caroe,

100 LEADENHALL STREET, LONDON, EC3A 3BP (18/00152/FULEIA)

Thank you for your letter dated 25 May 2018. We acknowledge your comments and seek to address them here.

When we met with you in July 2017, you indicated a general support for the proposals from an architectural point of view and an understanding of the site constraints, but noted clearly that St Paul's had an established and long standing objection to anything appearing in the view along Fleet Street. For clarity, we respond to your comments in the order in which they are presented in your letter.

Firstly, in response to the concerns you highlight in relation to 'process', we are sorry to note your comment that the applicant did not consult you early. Both the City of London Corporation ('the City') and Historic England ('HE') advised us to engage with you in the early stages and this we did in July 2017 (seven months prior to the submission of our planning application). We had only consulted with the City and HE prior to you (and Historic Royal Palaces ('HRP'), who we saw on the same day) as the convention is to engage with the Local Planning Authority and the principal statutory consultee at the outset in order to discuss the project and understand the primary planning considerations. Under the guidance and direction of the City and HE, we had full regard to all heritage assets affected, including St Paul's, and, in fact, through these early discussions we trimmed back the massing of the proposed building to respond to the views of St Paul's as one moves east along Fleet Street. Our pre-application design evolution is set out in the submission material (namely Skidmore, Owing and Merrill's Design & Access Statement). Since meeting with you in July 2017, we undertook further detailed assessment as part of the submitted Townscape and Visual and Built Heritage Assessment ('TVBHA') prepared by Favemor Consultancy and Cityscape Digital, and this supports our findings that the proposed development is, in our opinion having adopted the appropriate assessment criteria, acceptable in townscape, visual and built heritage assessment terms, including in relation to St Paul's, as a recognised important heritage asset of national and international significance.

In our opinion, HE's pre-application advice followed the same process of assessment (including engagement with the London Advisory Committee due to the significance of the proposal) and it is clear that HE has rigorously tested the proposed development – including earlier iterations of the scheme – and that this fully accords with their own detailed methods of impact evaluation.

The TVBHA submitted as part of this planning application provides a detailed evaluation of the impact of the proposals, namely the impact on designated heritage assets, with the Planning Statement setting out, in full, the public benefits of the scheme. The methodology of assessing harm is well established, in particular in this context, and that undertaken as part of the TVBHA is compliant with national, regional and local policy requirements and guidance. The balancing of this harm with these public benefits,

including, but not exclusively, the public viewing gallery, has been subject to consultation by virtue of the detail of the offer submitted with the application.

Turning to the 'objection' section of your letter, and the claim that the application fails to comply with the City's Protected Views SPG, the SPG recommends that new development "*should aim not to worsen and, where possible, to improve the views*". We have adopted this guidance and conclude that, in accordance with it, the view is not worsened (as the impact is negligible where it can be seen in views).

Considering your comments on 'correcting the understanding and significance of this view', we believe that the Fleet Street view is reported in our application as being of great importance. Indeed, there is a significant assessment of the scheme in this view, recognising that the outline of St Paul's changes and evolves on the basis that this is a dynamic / kinetic view of the processional route where the Cathedral comes into and out of view. As such, four static viewpoints are included in the TVBHA and an animation designed to simulate the kinetic effects of the full view sequence from Fleet Street tested during the design development process. Notwithstanding, this, we believe that the proposed development does not challenge your assertion that the view protection should "*show us as a civilised, cultured and independent-minded society that respects our past whilst also living in the exciting and challenging reality of the present*". The very juxtaposition of the past and the presence of the City is an essential part of the City's heritage, be that the relationship with St Paul's, the Tower of London and the many other listed buildings and heritage assets. The proposals do not diminish the view or its importance and simply add to the understanding of the present relationship between the "*vibrant and commercially healthy City*" and the Cathedral. With reference to 122 Leadenhall, and to be clear, there is nothing in planning policy (or guidance) to suggest that this building sets a line in the sky as an absolute limit; indeed it was an arbitrary line drawn by that scheme's architect and that has since been amended by 6-8 Bishopsgate. The application submission shows how the proposed development responds to the setting of St Paul's and that there is a minor, almost imperceptible slither of the proposed 100 Leadenhall Street building in this view, which does not, in our opinion, amount to "*further erosion of the view*" and certainly not in a manner that could be described as significant or dramatic. To reiterate, this view, and the need to avoid harming the existing setting of St Paul's in this view, has been an important consideration as part of pre-application discussions.

Please do not hesitate to contact Peter Twemlow or myself should you wish to discuss matters further.



Barnaby Collins
Board Director

DP9

CC Bhakti Depala (City of London)

From: Zachary Osborne <Zachary@georgiangroup.org.uk>
Sent: 14 June 2018 16:57
To: PLN - Comments
Cc: Consult
Subject: 18/00152/FULEIA - 100, 106 & 107 Leadenhall Street, London, EC3A 3BP

Categories: Green Category

Dear Sir/Madam,

18/00152/FULEIA - 100, 106 & 107 Leadenhall Street, London, EC3A 3BP

The Georgian Group have been informed of the above application and would like to lodge an objection as a statutory consultee. Our concerns are outlined below.

Bevis Marks Synagogue

The Grade I listed synagogue was built 1699-1701, in red brick with Portland stone dressings, pitched roof and a galleried interior. The building's fixtures and fittings survive in a remarkably complete state, including benches, wainscot, Ark, brass chandeliers, and screened gallery fronts.

Bevis Marks is the oldest surviving synagogue in the UK; the second to be built after the resettlement of 1656. As noted in the Statement of Significance, 'No other synagogue in Europe has this continuity of practice, of community, of building, of collections', due, in part, to the suppression of mainland European synagogues during the earlier-20th century. Although relatively austere in outward appearance, the design of Bevis Marks shares many aspects of the architectural language of Wren's post-fire Office of Works, with influence from the Netherlands. The synagogue was designed by Joseph Avis, who was known to have worked on a number of City churches with Wren and Robert Hooke; both leading figures in the rebuilding of London. The building's national and international significance derives not just from its exceptional historic and communal value, but also from its aesthetic and evidential value.

The Proposed Development

The proposals consist of the demolition of the existing buildings and the construction of a ground floor plus 56-storey building, principally for office use with retail at the lower levels.

The Impact of the Proposed Development

The Group consider that the courtyard surrounding Bevis Marks synagogue forms an extension to the synagogue itself, not just through its present functional relationship, but also as part of the building's immediate setting, and the space in which it is experienced. It is noted that the original building contract for the synagogue makes reference to "paving of the courts", suggesting that the courtyard was always intended to form the setting of the synagogue and may have made a specific contribution to the ceremonial or functional use of the building. Nonetheless, the subsequent historical development, which has led to the specific enclosed character of the courtyard, must be considered relevant, resulting in a courtyard that makes a contribution to the significance of the synagogue.

Although a number of unsympathetic, larger-scale modern buildings are visible from within the courtyard, the impact of 100 Leadenhall, and the consented schemes of 1 Undershaft and 40 Leadenhall; would represent a significant increase in the visual intrusion of substantial modern buildings from within the courtyard, especially from the perspective of the access to the courtyard from Bevis Marks Road; perhaps the key view of the building.

Historic England's guidance, The Setting of Heritage Assets, notes that:

"Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the

last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it."

The Group assert that the visibility of 100 Leadenhall would further compromise the setting of Bevis Marks Synagogue, and would have a negative impact on views from within the courtyard and on the character and experience of the space. Given the essential relationship between the courtyard and synagogue, this would cause harm to the significance of the Grade I-listed building. This harm, to a heritage asset of the highest grade, has not been sufficiently acknowledged by the applicant, and is therefore not adequately balanced against the benefits of the scheme, as outlined in paragraph 134 of the National Planning Policy Framework.

Yours sincerely,

Zachary Osborne
South East Caseworker



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From: Depala, Bhakti
To: DBE - PLN Support
Subject: FW: 100 Leadenhall Street - Response to Eversheds Sutherland LLP on behalf of the Leathersellers
Date: 19 June 2018 12:57:15
Attachments: [2955ac3f-91ac-45a5-b1ed-d37ea1867b8c.png](#)
[9035-REL02-JS10-005-PROP-3D VIEW.PDF](#)
[9035-REL02-JS10-006-PROP-3D VIEW.PDF](#)
[9035-REL02-JS10-004-PROP-PLAN VIEW.PDF](#)

From: Peter Twemlow <Peter.Twemlow@dp9.co.uk>
Sent: 19 June 2018 12:50
To: Depala, Bhakti <Bhakti.Depala@cityoflondon.gov.uk>
Subject: 100 Leadenhall Street - Response to Eversheds Sutherland LLP on behalf of the Leathersellers

Bhakti,

Further to our discussion last week, we provide the following formal responses to the letter prepared by Eversheds Sutherland LLP on behalf of The Wardens and Society of the Mistery of Art of the Leathersellers of the City of London ('the Leathersellers'), dated 26 March 2018.

Referring to this letter, the Leathersellers' objections relate to heritage impact (section 2 of letter); daylight and sunlight impacts (section 3); public transport (section 4); and waste (section 5). Following the satisfactory resolution of matters with colleagues of yours in relation to public transport and waste – and also with the GLA / TfL – we will focus on the other two matters, namely heritage impact and daylight and sunlight impacts. Our responses to both are set out below.

Heritage Impact

Paragraphs 2.1-2.9 (of the letter):

The St Helen's Place CA is a small and tightly defined conservation area. Existing tall buildings, including 30 St Mary Axe, the Aviva Tower and the Leadenhall Building, form the immediate close setting to the east and south of the CA with the proposed development at 100 Leadenhall Street seen beyond, further from its boundary. The established character of this part of the City is one of dramatic juxtapositions of old and new and of the visibility of taller buildings seen in the backdrop to historic roofscapes. The conservation area is already surrounded by taller modern development and this contrast in part contributes to the distinctive character and appearance of the CA. The consented 1 Undershaft, on the Site of the Aviva Tower, is taller than the proposed development and closer to the conservation area – as is 122 Bishopsgate under construction to the south-west of the conservation area. Because the townscape to the south-east is characterised by tall modern buildings, this aspect of the setting of the conservation area has a relatively low sensitivity to further tall building development. The proposed development would make only a minor change to its south-easterly setting, a sliver of it being visible in some locations between existing tall buildings. In relation to the Act and the NPPF Tavernor Consulting has reviewed this (as part of the submission, and reviewed again) and do not believe that harm would be caused to the character and appearance of the St Helen's Place CA.

Paragraph 2.10:

Tavernor Consulting are not certain on what basis the objector considers that the impact of the proposed development has been underplayed. There is a very comprehensive assessment of

townscape, visual and heritage impacts underpinned by the assessment of 71 verified views and a further 16 unverified views.

Paragraphs 2.11-2.14:

Relating to Policy DM10.1, the bulk and massing of the scheme has been developed in consultation with key stakeholders, including Historic England, to ensure that it would relate well to both the historic character of the site and the modern one. For example, a fine grain of development would be created on Leadenhall Street that would re-establish some of the permeability through the site, part of *"the City's characteristic network of streets and alleyways"* that existed before the 20th century. On Leadenhall Street three existing buildings of low or negligible heritage value would be replaced by high quality new development and the loss of these existing undistinguished buildings would be outweighed by the benefits of the proposed development.

Daylight and Sunlight Impacts

GIA's assessment of the proposed development considers the impact to 19 windows within 33 Great St Helens. In the 'existing v proposed' scenario, 18 out of 19 windows will pass the primary daylighting test, the Vertical Sky Component (VSC). The remaining window (W5/ F02) experiences a minor loss of 23.8% against a target value of 20%. This impact is exaggerated in percentage terms as the existing VSC level is very low at 8.8%, meaning even a small change would result in a loss of greater than 20%, as is the case here.

When the rooms are assessed against the secondary daylight methodology, the No Sky Line (NSL), all 7 rooms will meet the BRE criteria for NSL.

In relation to sunlight, all windows will meet the BRE guidance for both Total and Winter Annual Probable Sunlight Hours.

GIA's assessment of the cumulative scenario demonstrates that 14 of the 19 windows within 33 Great St Helens will experience reductions in light which are beyond BRE guidance; however, it is clear from the appended that the vast majority of this light loss would be attributed to the permitted scheme at 1 Undershaft.

We are aware that BRE are undertaking an independent third party review of the daylight and sunlight work and we would expect that this supports GIA's findings and summary herein in relation to 33 Great St Helens.

I trust that the above is useful in terms of having our formal response to the matters raised. Should you have any questions please do not hesitate to contact me.

Kind regards,

Peter.

Peter Twendow
Associate

direct: 020 7063 1704

mobile: 07800 946610
e-mail: peter.twemlow@dp9.co.uk

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SOURCES OF INFORMATION

NEW NOTES
R003-08100008
PROPOSED SCHEME
R007-040007
SCH Architects

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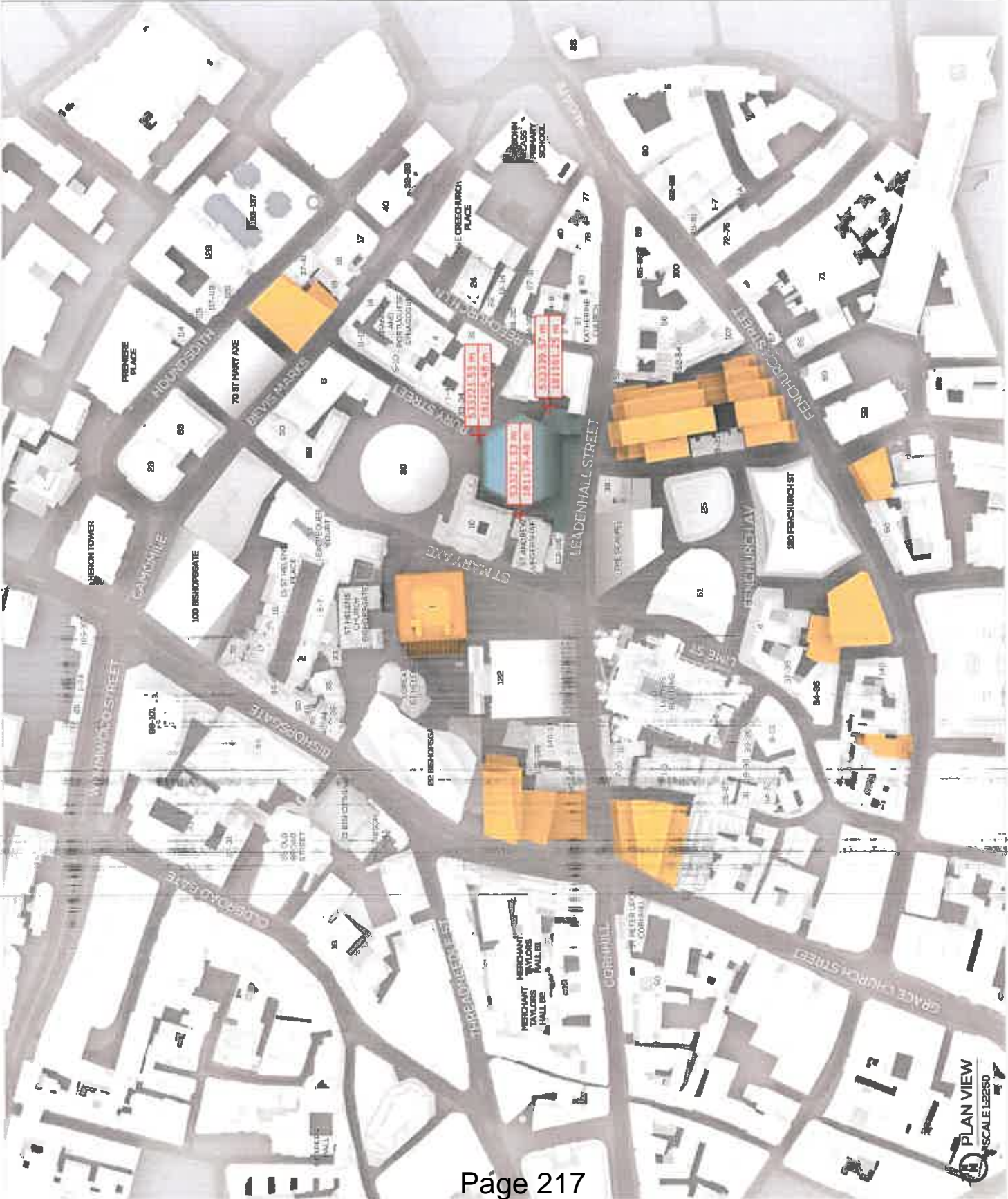
DRAWING NAME
CUMULATIVE SCENARIO PLAN VIEW
PROPOSED SCHEME
R007 RECEIVED AT R40817

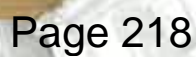
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SH	1:200	CBC	100%	14/11/17
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SOURCES OF INFORMATION

MSA MODEL
RDS-0010202005
PROPOSED SCHEME
R007-240817
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R007 RECEIVED AT 24/08/17

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SH	1:100	CRC	-	24/08/17
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Wells, Janet (Built Environment)

From: PLN - Comments
Subject: FW: ROL00037 4-8 Creechurch Lane and 100 Leadenhall Street

From: Lance Harris <LanceHarris@ansteyhorne.co.uk>
Sent: 16 May 2018 14:06
To: Depala, Bhakti <Bhakti.Depala@cityoflondon.gov.uk>
Cc: Stephen Friel <Stephen.Friel@gia.uk.com>; Kevin Francis <kevin.francis@gia.uk.com>
Subject: ROL00037 4-8 Creechurch Lane and 100 Leadenhall Street

Dear Ms Depala

I was recently appointed by a collection of residents in 4-8 Creechurch Lane, to advise them on the proposed redevelopment by London and Oriental of 100 Leadenhall Street with reference to the subject of light.

I have visited site, read the detailed daylight and sunlight report prepared by GIA on behalf of the applicants, and attended a meeting between several residents and representatives of London & Oriental including GIA and DP9, on Wednesday 21st March. That meeting was held at St Katherine Cree Church and was organised to have a discussion about daylight and sunlight issues and give the opportunity to GIA to explain their technical analysis relative to 4-8 Creechurch Lane.

Having discussed the matter with the residents in follow up to that meeting I have been asked to send you this note, setting out my thoughts and proposals with regard to the daylight and sunlight issues.

1. It seems that the GIA study was based upon a suitable survey, such that their contextual model should be accurate and fit for purpose. In that sense I am therefore taking their results as read, having not carried out any form of technical analysis myself. However, it is my understanding that the daylight distribution analysis showing the impacts upon the affected rooms, is based upon some plans GIA managed to obtain from other projects. I make no criticism of that, but my clients believe there have been changes to the internal arrangements such that it would be prudent for GIA to inspect the relevant apartments and confirm the accuracy of their assumptions, or otherwise. I think it is hard to argue that logic because we all want to make sure we are working from the most accurate assessment possible.

I note that the GIA report does not include the plans showing the daylight distribution results, instead providing numeric data only. Going forward, I think it would be useful to see the relevant floor plans and contours.

2. The first analysis undertaken by GIA is a strict existing to proposed comparison, which effectively ignores the various other, large scale developments coming forward in the area, some of which are already underway and others of which are consented but not yet started. I can understand why that might be a starting point, but obviously it does not represent the true picture because in reality there will be other schemes coming forward and the real impact upon 4-8 Creechurch Lane will be materially more on a cumulative basis.

GIA then prepare a cumulative assessment, but I do not think it is very helpful in trying to understand the real impacts of the 100 Leadenhall Street scheme. The GIA approach is to compare the existing condition (ignoring other schemes coming forward) to a notional proposed condition that groups all

of the consented and commenced schemes together, including 100 Leadenhall Street. Unsurprisingly that study confirms material reductions in light that will transgress the BRE guidance, but it makes no attempt to separate out the impacts of 100 Leadenhall Street. All one therefore gains from this assessment is that if all the schemes are taken account of 4-8 Creechurch Lane will suffer material reductions in light.

I appreciate the fact that there are umpteen different technical permutations one could run in an attempt to fully understand the impacts of the various schemes coming forward, but my belief is that it would be informative to run a third assessment which builds all of the other consented schemes (some commenced, others not) in to a notional existing condition and then separate out 100 Leadenhall Street as the proposed condition. In that way at least we can see and understand the extra-over impact that 100 Leadenhall Street will create. Bearing in mind that all of the other schemes already have a consent and we are currently considering the impacts of 100 Leadenhall Street, that seems to me to be a logical and fair approach.

3. As stated earlier, the cumulative study undertaken by GIA does serve to confirm that if one ignores the impacts of individual schemes, the combined impact of the various schemes consented and coming forward is material and will impact upon the residents to a significant extent. I think that is a problem in itself, but emphasises the need to better understand the impacts of 100 Leadenhall Street at this stage.
4. While I have the GIA daylight distribution numeric results for the scenario studied to date, the GIA report does not appear to include the daylight distribution contours so that one can see how the light losses will be distributed within the affected rooms. I believe that information will be readily available on the GIA files and I think it would be rather informative for the plans to be released. Of course, those plans may need to be updated once access to measure up has been organised.

The residents want to deal with this matter in a very open and honest fashion, because they are not against development per se it is simply the case that they are very concerned about the fact that various other schemes will already be damaging their light and 100 Leadenhall Street, as proposed, could make a further material difference. It is perhaps also important to note that if one looks at the various schemes in question, 100 Leadenhall Street is very much the most dominant impact upon the light to their apartments.

In the interests of trying to progress this matter as soon as possible you will see that I have copied this note to Kevin Francis and Stephen Friel of GIA. My hope is that GIA can obtain instructions to produce the additional information requested above, in which case I will consider and report back to my clients quickly thereafter. I hope you agree that this is a perfectly reasonable and sensible approach, so that you have the most useful data in front of you before forming any conclusions. If you have any queries on the above please do give me a call.

Regards

Lance Harris
Director



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Background Papers

Background Papers

Online, 13th June 2018, James Warman

Online, 13th June 2018, Ian Hazell (commented on London Bridge application but representation relates to Cannon Street Rail Bridge)

Email, 20th June 2018, Michelle Lovric

Email, 20th June 2018, Port of London Authority

Letter, 27th June 2018, Environment Agency

Email, 28th June 2018, Worshipful Company of Lightmongers

Email, 28th June 2018, Jackie Power

Letter, 29th June 2018, Chris Livett Livett's

Application Documents and Consultee Representations

Illuminated River Environmental Statement Volume 1 Non-Technical Summary

Illuminated River Volume 2

Illuminated River Volume 3 Heritage Townscape and Visual Impact Assessment

Volume 4 Appendix

Volume 5 Annex

Project Overview Design Statement

Blackfriars Railway Bridge (18/00452/FULEIA)

Design Statement

Existing Drawing Numbers: 1028_10_BL_X0101, 1028_10_BL_X0102_A, and 1028_10_BL_X0161_A.

01.06.2018 Email Heathrow

01.06.2018 Email NATS Safeguarding

Undated Letter Historic England

16.06.2018 Email Natural England

08.06.2018 Email Transport for London

19.06.2018 Letter London Borough of Tower Hamlets

27.06.2018 Memo CoL Department of Markets and Consumer Protection

Blackfriars Road Bridge (18/00455/FULEIA and 18/00456/LBC)

Design Statement

Existing Drawing Numbers: 1028_09_BD_X0101_A, 1028_09_BD_X0102 and 1028_09_BD_X0161_A

08.06.2018 Email London City Airport

15.06.2018 Email GLA

18.06.2018, Email TfL

19.06.2018 Letter London Underground

19.06.2018 Letter London Borough of Tower Hamlets

19.06.2018 Email Natural England

20.06.2018 Letter City of Westminster

Millennium Bridge (18/00458/FULEIA)

Design Statement

Existing Drawing Numbers: 1028_11_MI_X0101_B, 1028_11_MI_X0102_B and 1028_11_MI_X0161_C.

14.06.2018 Email London City Airport

14.06.2018 Email NATS Safeguarding

18.06.2018 Email Transport for London

19.06.2018 Letter London Borough of Tower Hamlets

21.06.2018 Email Historic England

25.06.2018 Letter City of Westminster

Cannon Street Railway Bridge (18/00457/FULEIA)

Design Statement

Existing Drawing Numbers: 1028_13_CA_X0101_A, 1028_13_CA_X0102_B and 1028_13_CA_X0161_A.

11.06.2018 Email NATS Safeguarding

12.06.2018 Email London City Airport

18.06.2018 Email Transport for London

19.06.2018 Letter London Borough of Tower Hamlets

20.06.2018 Letter City of Westminster

21.06.2018 Email Historic England

Southwark Bridge (18/00453/FULEIA and 18/00454/LBC)

Design Statement

Existing Drawing Numbers: 1028_12_SO_X0101_A, 1028_12_SO_X0102_B and 1028_12_SO_X0161_A.

05.06.2018 Email Heathrow

06.06.2018 Letter Historic England

06.06.2018 Email NATS Safeguarding

08.06.2018 Email London City Airport

11.06.2018 Email Historic England

18.06.2018 Email Transport for London

20.06.2018 Email Natural England

25.06.2018 Letter City of Westminster

London Bridge (18/00451/FULEIA)

Design Statement

Existing Drawing Numbers: 1028_14_LO_X0101_A, 1028_14_LO_X0102_A and 1028_14_LO_X0161.

30.05.2018 Email Heathrow

31.05.2018 Email NATS Safeguarding

08.06.2018 Email London City Airport

12.06.2018 Letter London Underground

15.06.2018 Email Natural England

18.06.2018 Email Transport for London

26.06.2018 Letter London Borough of Tower Hamlets

Comments for Planning Application 18/00458/FULEIA

Application Summary

Application Number: 18/00458/FULEIA

Address: Millennium Bridge London EC4

Proposal: The installation of fixtures, fittings and ancillary equipment and associated works to illuminate the bridge in conjunction with the Illuminated River Project.

This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from Montagu-Evans, 5 Bolton Street, London, W1J 8BA.

Please note: This is a cross boundary application. An identical application has been submitted to the London Borough of Southwark. All representations received will be shared with the London Borough of Southwark.

Case Officer: Gemma Delves

Customer Details

Name: Mr james warman

Address: queens quay 58 upper thames st london

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:Of all London's bridges this has a special serenity at night because it is unlit and gives anyone on the bridge unparalleled views of London's riverside and St Paul's with minimum light pollution.i can't help but think that to illuminate this bridge would diminish the essence of its appeal.

Comments for Planning Application 18/00451/FULEIA

Application Summary

Application Number: 18/00451/FULEIA

Address: London Bridge London EC4

Proposal: The installation of fixtures, fittings and ancillary equipment and associated works to illuminate the bridge in conjunction with the Illuminated River Project.

This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Copies of a CD containing the Environmental Statement may be obtained from Montagu-Evans, 5 Bolton Street, London, W1J 8BA.

Please note: This is a cross boundary application. An identical application has been submitted to the London Borough of Southwark. All representations received will be shared with the London Borough of Southwark.

Case Officer: Catherine Linford

Customer Details

Name: Mr Ian Haxell

Address: 13 Horseshoe Wharf Apartments 6 Clink Street London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Is the committee aware that most nights there are floodlights on the surface of Cannon St railway station which may well drown out the illumination at the side of the bridge? Careful coordination with Network Rail would be required if the desired effect is to be achieved.

[REDACTED]

From: Michelle Lovric <[REDACTED]>
Sent: 22 June 2018 10:17
To: PLN - Comments
Subject: FW: Attn Catherine Linford

Resending email from June 20th

From: Michelle Lovric <[REDACTED]>
Sent: 20 June 2018 10:03
To: 'PLNComments@cityoflondon.uk' <PLNComments@cityoflondon.uk>
Cc: [REDACTED]
[REDACTED]
Subject: Attn Catherine Linford

Dear Ms Linford

Proposed new illuminations of London Bridge

Thank you for your letter of June 8th. I am writing on behalf of around 100 residents in Clink Street who will be directly impacted by the proposed illuminations.

We are concerned about possible light pollution through the night, as many have bedrooms on the river.

We are also concerned about the brightness of the proposed illuminations.

Given that we are such a large group, and that our residential amenity is likely to be substantially affected by any increase in the lighting, we wondered if some kind of presentation could be arranged for us, or for CGIs sent to show the effect of the lighting. Could you post me a copy of the CD mentioned in your letter (to 5, Winchester Wharf, 4 Clink Street London SE1 9DL)? I'd be most grateful.

We would also like to suggest that the illuminations are turned off by 11pm each night, for both amenity and environmental reasons. We already suffer from the loud music of party boats on the river. If the lighting were to provoke or incite more noise from those on the boats – this would also affect our amenity.

Should the applicants/officers visit at least one of our homes to understand and assess the impact on this substantial community?

We are, in fact, surprised that we were not approached before the application went in, but perhaps those concerned are not aware of the density of the residential population that will be impacted? People are often surprised to hear how many people live in this street.

Do you have an opposite number at Southwark Council who is protecting the interests of Southwark residents? If so, I would be grateful to have that contact and their email. We have received a letter from you – for which we are grateful - but nothing from Southwark Council by way of consultation, and we are now late into the consultation period.

I am copying this to our ward councillors too.
I look forward to hearing from you
Yours sincerely
Michelle Lovric, Clink Street Residents Group

Devlia, Neel

From: Delves, Gemma
Sent: 28 June 2018 14:28
To: Devlia, Neel
Cc: Linford, Catherine
Subject: FW: Illuminated River - See references in main text of email (DC830)

Hi Neel

Please can the below be added to the list of background papers for the illuminated River applications?

Thanks

Gemma

From: Lucy Owen <lucy.owen@pla.co.uk>
Sent: 20 June 2018 16:45
To: 'rvrlc@lambeth.gov.uk' <rvrlc@lambeth.gov.uk>; 'southplanningteam@westminster.gov.uk' <southplanningteam@westminster.gov.uk>; Linford, Catherine <Catherine.Linford@cityoflondon.gov.uk>; Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>; 'patrick.cronin@southwark.gov.uk' <patrick.cronin@southwark.gov.uk>; 'planning@wandsworth.gov.uk' <planning@wandsworth.gov.uk>; 'planning@rbkc.gov.uk' <planning@rbkc.gov.uk>
Subject: Illuminated River - See references in main text of email (DC830)

FAO: Gemma Delves and Catherine Linford - City of London
FAO: Matthew Mason - City of Westminster
FAO: Emily Walsh – Kensington and Chelsea
FAO: Rozina Vrlc – Lambeth
FAO: Patrick Cronin – Southwark
FAO: John Vale - Wandsworth

Thank you for consulting the PLA on the following applications for the Illuminated River Project (IRP):

City of London: 18/00451/FULEIA (London Bridge), 18/00452/FULEIA (Blackfriars Railway Bridge), 18/00453/FULEIA (Southwark Bridge), 18/00455/FULEIA (Blackfriars Bridge), 18/00457/FULEIA (Cannon Street), 18/00458/FULEIA (Millennium Bridge)
City of Westminster: 18/03769/FULL (Chelsea Bridge), 18/03772/FULL (Vauxhall Bridge), 18/03774/FULL (Grosvenor Bridge), 18/03775/FULL (Westminster), 18/03777/FULL (Lambeth), 18/03780/FULL (Waterloo), 18/03782/FULL (Golden Jubilee Bridge)
Kensington and Chelsea: PP/18/02574 (Albert Bridge), PP/18/02584 (Chelsea Bridge)
Lambeth: 18/01990/EIAFUL (Golden Jubilee Bridge) 18/01991/EIAFUL (Westminster Bridge), 18/10992/LB (Westminster Bridge), 18/01993/EIAFUL (Lambeth Bridge), 18/01995/EIAFUL (Vauxhall Bridge)
Southwark: 18/AP/1553 (Blackfriars Railway Bridge), 18/AP/1554 (Millennium Bridge), 18/AP/1555 (Southwark Bridge), 18/AP/1558 (London Bridge), 18/AP/1559 (Tower Bridge)
Wandsworth: 2018/2362 (Albert Bridge), 2018/2365 (Grosvenor Bridge), 2018/2366 (Chelsea Bridge)

Whilst each Council's interest relates to specific bridge(s), the PLA's interest extends to all 15 bridges. One consultation response has therefore been produced and I trust this is acceptable.

The PLA had extensive pre-application discussions with the Applicant and their consultants and attended the regular Project Advisory Group meetings. The discussions at pre-application were extremely useful given the scope of the development that is proposed and the PLA would like to highlight the constructive nature of those discussions. The Applicant is also aware of the need for River Works Licences from the PLA.

Notice has been served on the PLA but this appears to be limited to Tower Bridge and London Bridge. It is questioned why Notice has not been served on the PLA for all the bridges where the PLA owns the riverbed.

Policy Context

The Vision for the Tidal Thames ("Thames Vision") sets out a 20 year view of the river's future, developed with stakeholders with the goal of making the most of its potential, for the benefit of all. The Thames Vision contains a number of goals and priority actions including:

- Community and Culture: More people enjoying the Thames and its banks.

The Illuminated River Project clearly has the potential to bring people to the River and the riverside, particularly at night to enjoy the Thames in accordance with this Thames Vision goal.

In addition, there would appear to be support for the IRP in the extant London Plan (2015) which seeks at policy 4.6 to provide support for and enhancement of arts, culture, sport and entertainment. The draft London Plan (2017) also contains policies that support the proposed development for example, policy HC5 supports London's culture and creative industries and policy HC6 supports London's night time economy. Policy SI16 C seeks to support development proposals for cultural facilities and events, taking into consideration the protection and other uses of the waterways.

Finally, the draft Cultural Strategy for London (2018) includes specific reference to the IRP, referring to it as a 'major new attraction for the City.' The Cultural Strategy refers to the IRP having two practical aims: (1) making the riverside pathways safer and more welcoming and (2) through technology making the lighting on the bridges more environmentally sustainable. The IRP is identified under policy 7 as a project which will integrate culture into major infrastructure projects.

In principle the IRP would therefore appear to make an important contribution towards realising a number of cultural goals and policies. As such, the PLA is supportive in principle of the project. This is subject to the detailed technical consideration of the proposal and its impacts on the river and river users as set out below.

Phasing

It is proposed to light 15 existing bridges from Albert Bridge to Tower Bridge. It is currently proposed to carry out the project in five phases. Phase one relates to London Bridge, Cannon Street Railway Bridge, Southwark Bridge and Millennium Bridge and it is proposed that installation on these four bridges will take place from September to December 2018. The phasing plan highlights that the phasing strategy 'will be subject to change as the scheme progresses' therefore given the detailed navigational planning that will be required, a condition on any grant of planning permission should condition phase 1 installation to be between September and December 2018. A detailed phasing plan for each subsequent phase of the project should then be required to be submitted and approved on completion of each phase. This would mean for example that the phase 2 phasing plan should be submitted on completion of the phase 1 installation works.

Installation and Maintenance

At this stage in the project it is not possible to provide detailed installation methodologies for each bridge. The Applicant has advised that these will not be fully developed until principal contractors are appointed post planning. Therefore to support the planning application (and River Works Licence) draft / outline rules have been developed for the phase 1 bridges and are set out in the Project Overview document. A framework Code of Construction Practice (CoCP) has also been submitted.

The detailed installation methodologies and risk assessments are of critical importance to the PLA to ensure the safety of navigation is maintained during construction. Therefore a condition on any planning permission must require the submission and approval of detailed rules for the phase 1 bridges prior to the commencement of the phase 1 construction works. Detailed rules must then be submitted for each subsequent phase prior to the

commencement of construction works for that phase. This would allow adjustments to be made to the installation methodologies if required.

A condition must also require the submission and approval of detailed CoCP's prior to the commencement of each phase of work. The Applicant is advised that it will be important to use the correct terminology in these documents. For example, the Framework CoCP makes reference to night time working where closure of a 'navigational channel' is required. As the navigable channel is shown by the pecked lines on the PLA's charts and is a single entity, it is assumed that the Applicant actually means closure of the main navigable arch.

Whilst it is anticipated that there would be a decreased maintenance requirement associated with the new LED fittings compared to the existing lighting and that any maintenance required will be undertaken as part of the existing maintenance regime, it will be important to fully understand the maintenance methodologies and timings. It is therefore recommended that a condition on any grant of planning permission requires the submission and approval of maintenance methodologies for each bridge. The PLA would then need to be notified of the timings of any maintenance works.

Should the project be time limited (the scoping report referred to 'more than 10 years') then it will be important that a condition on any grant of planning permission secures the submission and approval of a decommissioning plan at the appropriate time.

Lighting/Light Spill

Due to the changing nature of the River and riverside within the project area, 13 of the bridges have been classed as urban setting with high district brightness (Class E4) and Albert and Chelsea bridges have been classed as suburban medium district brightness (Class E3). The Applicant has used these classifications and undertaken calculations to determine the target luminance level on the face of each bridge; illustrative lux levels 1 m above the highest spring tide level; and has assessed compliance with the 'Institution of Lighting Professionals Guidance for Reduction of Obtrusive Light'.

A range of mitigation measures are also proposed during the operational phase including:

- Directional lighting
- No direct lighting of the water column
- Use of light shields
- Retaining the existing bridge 'light up' hours

Tables 3.3a and 3.3b in the Environmental Statement (ES) set out the existing and target luminance and illustrative lux levels.

In terms of luminance on the face of the bridge, levels would be significantly reduced at Albert Bridge, Chelsea Bridge and Tower Bridge. Nine bridges would have target luminance levels higher than the existing average luminance levels and on three bridges the luminance levels would stay the same as existing.

In terms of lux levels, again there is a mixture of results with reductions in light spill at Albert Bridge, Southwark Bridge, London Bridge and Tower Bridge. At all other bridges the lux levels would increase over existing levels and this increase would be between 0.7 lux and 4.7 lux. The maximum reflected light at 1m above the highest spring tide level will be <5 lux directly beneath Albert Bridge, Chelsea Bridge, Grosvenor Bridge, Vauxhall Bridge, Lambeth Bridge, Westminster Bridge, Golden Jubilee Bridge, Blackfriars Road Bridge, Blackfriars Railway Bridge, Millennium Bridge, Southwark Bridge and Tower Bridge. The maximum reflected light beneath Waterloo Bridge, Cannon Bridge and London Bridge will be approximately <6 lux.

Based on the above information, the Applicant has concluded that the ILP "*will meet or exceed the recommendations of the Institution of Lighting Professionals Guidance for Reduction of Obtrusive light*"

As the Applicant recognises, the work they have undertaken on luminance and lux levels are targets and illustrative. A condition on any grant of planning permission should therefore require the spill light survey and

luminance survey to be undertaken again on completion of each phase of the project and a report submitted showing compliance against the levels set out in tables 3.3.a and 3.3b. The condition should provide the opportunity to require the lighting to be adjusted if the levels set out in tables 3.3a and 3.3b are being exceeded.

The use of energy efficient LED's would help contribute to the Thames Vision priority action 'to encourage the uptake of new and green technologies to reduce the port's environmental impact.' Additionally the removal of existing redundant lighting on the sides and underside of the bridges where required to facilitate the new installation would provide a positive benefit, reducing the clutter on the bridges. The removal of this redundant lighting should therefore be required by condition. The PLA's navigational lighting will remain.

It will be important to ensure that there is no conflict between the proposed lighting and the standard navigational lighting for open/closed arches. This will require the carrying out of trials to ensure continued visibility of the navigational lighting and to establish if there is any potential electromagnetic interference. It will also need to be established whether there is a need to provide mitigation or to re-arrange any of the PLA's existing systems. This will need to be progressed with the PLA as each phase of the project is progressed and will be addressed through the PLA's RWL regime.

Conclusions

The IRP provides an exciting opportunity to bring more people to the River and riverside in line with a number of organisations goals and policies. Subject to the securing of the necessary conditions detailed above, the impacts on the river and river users would appear to be acceptable and the PLA has no objection to the proposed development.

I hope the above is of assistance.

Regards
Lucy

Lucy Owen
Deputy Director of Planning and Environment
Port of London Authority

London River House, Royal Pier Road
Gravesend, Kent, DA12 2BG
01474 562384
07738 028540
www.pla.co.uk



Catherine Linford
Corporation Of London
Planning & Transportation Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2018/128721/01-L01
Your ref: 18/00457/FULEIA
Date: 27 June 2018

Dear Ms Linford

The Installation Of Fixtures, Fittings And Ancillary Equipment And Associated Works To Illuminate The Bridge In Conjunction With The Illuminated River Project. This Application Is Accompanied By An Environmental Statement Which Is Available For Inspection With The Planning Application. Copies Of A Cd Containing The Environmental Statement May Be Obtained From Montagu-Evans, 5 Bolton Street, London, W1J 8BA.

Please Note: This Is A Cross Boundary Application. An Identical Application Has Been Submitted To The London Borough Of Southwark. All Representations Received Will Be Shared With The London Borough Of Southwark. Cannon Street Railway Bridge Cousin Lane London, EC4

Thank you for consulting the Environment Agency on the above planning application which we received on 31 May 2018.

We have **no objection** to the planning application as submitted, subject to the attached **condition**. Without this condition, the proposed development may pose an unacceptable risk to the environment.

Please note this response is for **Millennium Bridge, Blackfriars Bridge, London Bridge, Cannon Street Railway Bridge and Blackfriars Railway Bridge.**

Planning Condition 1 Lighting

No development shall take place until a detailed lighting management strategy has been submitted to and approved in writing by the local planning authority. This shall deal with the treatment of any environmentally sensitive areas, their aftercare and maintenance as well as a plan detailing the proposed works and lighting levels.

Such a strategy shall include details of the following:

- the location and direction of artificial lights on each bridge / adjacent to the River Thames
- details of how the ambient light levels will be lowered throughout the post midnight hours, for example 12 am - 5am
- The works shall be carried out in accordance with the approved strategy.

Reason

This condition is necessary to ensure the protection of wildlife and supporting habitat in line with national planning policy. Artificial lighting may disrupt long term Circadian rhythms which may impact on breeding seasons and thus a carefully balanced ecosystem. This condition is in accordance with the [London Plan- Policy 7.19 Biodiversity and access to nature](#), which sets out that (A) “ The Mayor will work with all relevant partners to ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity in support of the Mayor’s Biodiversity Strategy”. It seeks to obtain (C) “positive gains for nature” and ensures development proposals “make a positive contribution to the protection, enhancement, creation and management of biodiversity”

The National Planning Policy Framework (NPPF) paragraph 109 recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible.

Further Advice

The location and direction of external artificial lights, especially those within 5 metres of the top of bank of the watercourse are maintained at background levels. The Environment Agency considers background levels to be a Lux level of 0-2. The lighting scheme should incorporate these sensitivities.

As discussed at pre application meetings we recommend lowering of ambient light levels and the potential to maintain darker periods throughout the post midnight hours, for example 12 am-5am, which may further benefit river and terrestrial species.

Bats, Fish, Eels and invertebrate species could potential be negatively affected by the installation of lights at the specified bridge sites along the Thames. Lighting may disrupt long term Circadian rhythms which may impact on breeding seasons and thus a carefully balanced ecosystem.

We recommend post lighting checks should take place to ensure that all the lighting has been installed by the contractors in accordance with the design.

Informatives

Flood Risk Activity Permit

Under the terms of the Environmental Permitting Regulations a Flood Risk Activity Permit is required from the Environment Agency for any proposed works or structures, in, under, over or within 16 metres of tidal defences on the River Thames, designated a ‘main river’. Details of lower risk activities that may be Excluded or Exempt from the Permitting Regulations can be found on the gov.uk website. Please contact us at PSO-Thames@environment-agency.gov.uk

Marine Management Organisation Licence

A Marine Management Organisation Licence covers inshore areas, and include any area which is submerged at mean high water spring tide up to the territorial limit. They also include the waters of every estuary, river or channel where the tide flows at mean high water spring tide. Should you require a licence or further information, this is available at <https://www.gov.uk/guidance/do-i-need-a-marine-licence>

Please do not hesitate to contact us if you have any further questions.

We would be happy to discuss or meet with the applicant to discuss optimising their lighting to benefit migrating species.

Yours sincerely

Ms Juliet Amoruso
Planning advisor

Direct e-mail hnl sustainableplaces@environment-agency.gov.uk

cc Montague Evans LLP

End

From: Phillip Hyde [REDACTED]
Sent: 28 June 2018 19:52
To: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>
Subject: Letter of Support WC Lightmongers - Illuminating the Bridges Project



28 June 2018

Gemma Delves

City of London

gemma.delves@cityoflondon.gov.uk

Dear **Gemma Delves**,

Illuminating the Bridges Project

As the Worshipful Company of Lightmongers we are concerned with the art and science of lighting and how it can be used to enhance our night time experience. London is one of the world's pre-eminent cities attracting millions of visitors every year who contribute to the economy. It is only fitting it should have world class lighting.

There is a growing movement for cities to use lighting to enhance the night time experience and studies have shown that this has brought real value to the local community. This is both financial but also in the civic pride it brings to citizens. Look at any postcards of London and you will see night time images.

Over the years there have been many attempts to bring a coordinated lighting plan to the river but these have all failed. This initiative by the Illuminated River Foundation is built on a solid foundation and has all the hallmarks of success. It will be a unique attraction to London to have all 15 bridges not only illuminated but done so in a coordinated way as a show piece of public art across the city.

It also has the possibility to reach out and engage with local communities as well as being part of all major celebrations centered around the city. We hope that beyond the initial 10 year period of this project the local boroughs can work together to maintain the installations well into the future. It has the potential to become one of London's iconic symbols.

The Worshipful Company of Lightmongers fully support and endorse this exciting project and look forward to seeing the first bridges illuminated next year.

Yours sincerely

[REDACTED]

Phillip Hyde

Clerk

[REDACTED]

From: [REDACTED]
Sent: 28 June 2018 18:22
To: PLN - Comments
Cc: [REDACTED]
Subject: Blackfriars Railway Bridge - Illuminated River Project

For the attention of Gemma Delves

Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Your ref: 18/00456/LBC

Good afternoon,

With reference to your letter dated the 8th June - received during the week beg. 12th June re the above development. I have some concerns and would like to make the following comments.

I have looked at the documents on-line to appraise myself of this scheme.

I left a message for the planning officer to clarify some points as I have mobility issues and was not able to visit the Guildhall in time to request further information/clarification. But did not receive a reply to my message (left on 27th June).

My first concern is about the installation (length of time and noise nuisance) of the project and secondly the permanent nature of the lighting.

I live next to Blackfriars Railway bridge on the south side - my bedroom window and main living area face the station and are about 50 yards from the railway bridge. It is already illuminated at night as it is a working station.

I assume the illumination will be from dawn to dusk although I could not find this in the documents - only the information about the status of all the bridges and their current illumination times.

I do feel that as Blocks 1-3 Falcon Point are so close to railway bridge the illuminations will be visually intrusive into the most of floors and a further source of light pollution - from which I will not be able to escape or 'turn off'. Regardless of the what the promotional material states throughout the documentation and the stated energy saving nature of the lights to be used. It may also cause intrusion to the other Falcon Point blocks as many of their (bedroom) windows face the station.

I am a captive audience not a visiting one; being disabled and also having one through room from north to south means I will have to install different blinds/curtains or black-out material if I want to escape an escalation of the light pollution. This is just one more light source in the continuing brightening of the night time landscape around my home.

I would need to know what ameliorating measures the promoters of the scheme and City of London will be providing for residents living so close to the railway bridge if this application is approved - and also how my needs are to be taken into account when deciding on this application.

Yours faithfully

J Power

Jackie Power (Ms)

2 Falcon Point

Hopton Street

London SE1 9JW

LIVETT'S



KNOT HOUSE
2-7 BREWERY SQUARE
LONDON
SE1 2LF

29th July 2018

Ms Gemma Delves
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Dear Ms Delves

Re: Illuminated River

Livett's has been part of the Thames community for many years; our family have worked the river for many generations with pride and a great appreciation for its role within the city. We are passionate about developing the positive usage of the Thames. As such, we are writing to support the planning applications submitted for Illuminated River.

We believe that this project will positively contribute to the economy of the river, increasing the opportunities on the riverside for recreation and enjoyment.

This exciting project provides a unique opportunity to deliver a unified artwork along the river, as well as bringing a new appreciation of these sometimes-overlooked crossings. Public art on this scale will be an important part of London's cultural offering for both Londoners and visitors alike.

This project will enhance the chosen bridges highlighting their architectural heritage and the features of each of them, giving a new perspective on them and their surrounding environments. It will refresh key river views.



Christopher J Livett
WATERMAN TO HM THE QUEEN

This scheme has been developed through extensive engagement with stakeholders and residents. It appreciates the environmental impacts of light at night, not only for residents but for wildlife so the scheme has been developed with this sensitivity in mind. As part of the project the inefficient, outdated light fittings will be replaced new, modern and energy efficient fixtures reducing their carbon footprint.

We believe that this project will positively contribute to London's World City status, and whole-heartedly support these applications.

Yours sincerely



Chris Livett
Managing Director

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