



## Planning and Transportation Committee

**Date:** TUESDAY, 5 OCTOBER 2021  
**Time:** 10.30 am  
**Venue:** INFORMAL VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

4. **BURY HOUSE, 31 BURY STREET LONDON EC3A 5AR**  
Report of the Chief Planning Officer and Development Director.

**For Decision**  
(Pages 3 - 236)

Item received too late for circulation in conjunction with the Agenda.

**John Barradell**  
**Town Clerk and Chief Executive**

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# 31 BURY STREET

OCTOBER 2021



1.0

THE EXISTING BUILDING

2.0

STAKEHOLDER CONSULTATION

3.0

SUSTAINABILITY

4.0

CONTEXT AND PUBLIC REALM

5.0

PUBLIC, COMMUNITY AND CULTURAL SPACE

6.0

CREECHURCH ECOSYSTEM

7.0

DESIGN OF FACADE

8.0

DAYLIGHT AND SUNLIGHT

# 1.0

# THE EXISTING

# BUILDING

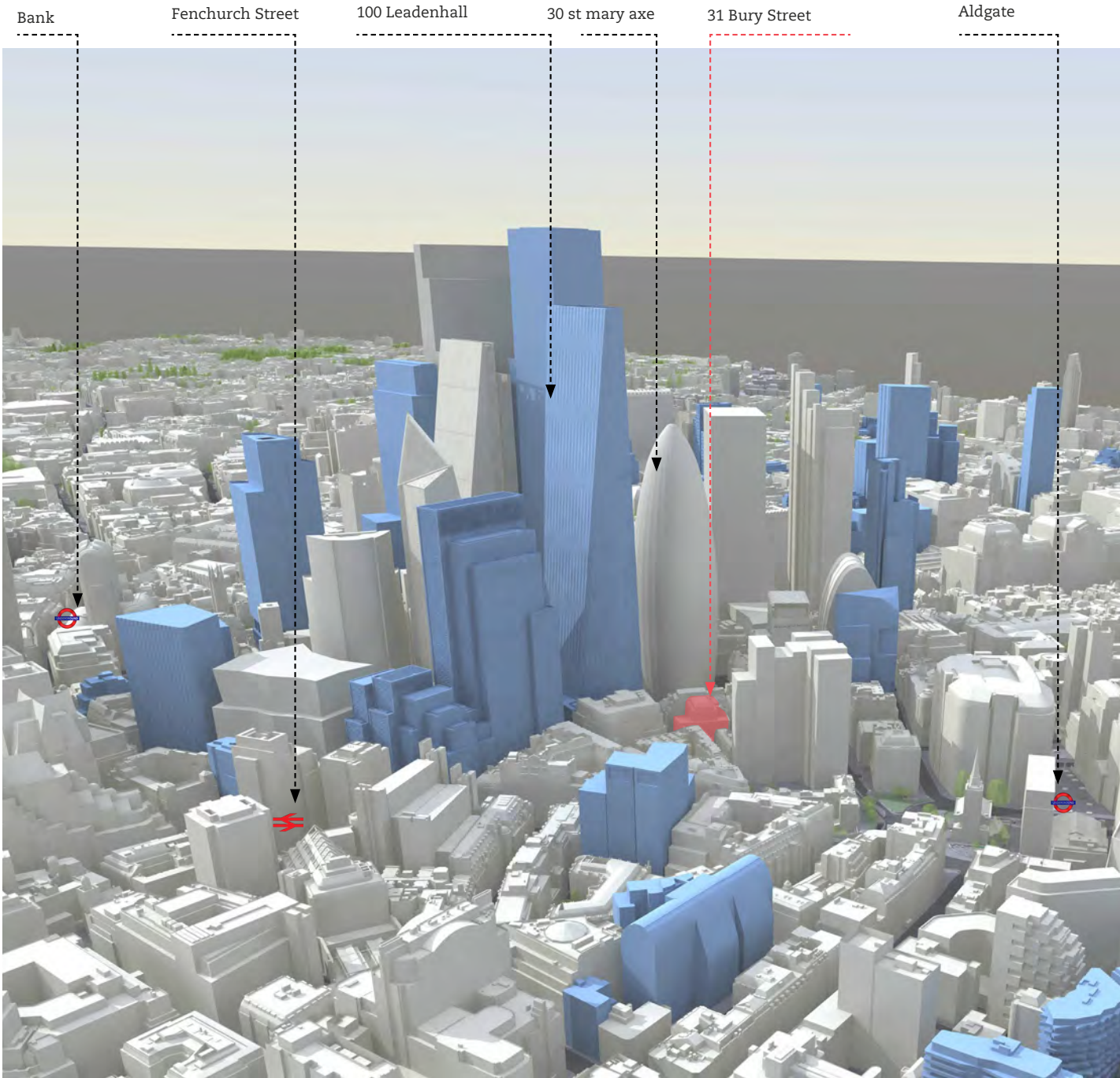
Page 5



1.0 THE EXISTING BUILDING

1.1 Eastern Cluster

Page 6



31 Bury Street Eastern Cluster



1.0 THE EXISTING BUILDING

1.2 Existing building analysis

- Page 7
- 1

The building was originally constructed in 1967.
- 2

The facade systems are towards the end of their life and have a poor thermal performance.
- 3

The floor to ceiling heights are poor (2.55m - 2.3m).
- 4

The floor plates are poorly lit due to the heavily tinted glazing.
- 5

The building is under lifted.
- 6

The core provides insufficient WC facilities.
- 7

The M+E systems are inefficient and reaching the end of their serviceable life.
- 8

The existing built form doesn't maximise the use of this prominent City of London location (27,696 soft NIA).
- 9

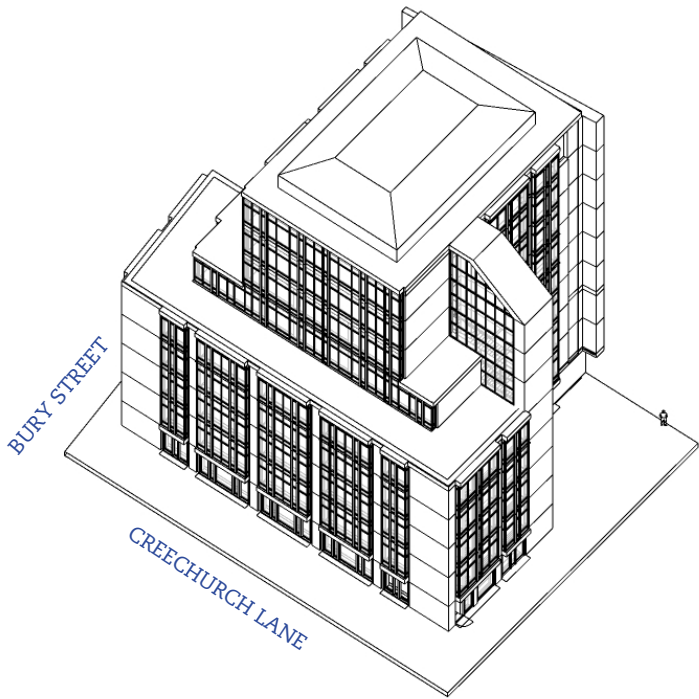
The quality of existing office accommodation is poor and doesn't meet modern occupier demands.
- 10

The existing building provides little opportunity for active frontages and benefit to the public realm.
- 11

There is little opportunity for tenant amenity or end of trip facilities.
- 12

There is very little biodiversity or urban greening.
- 13

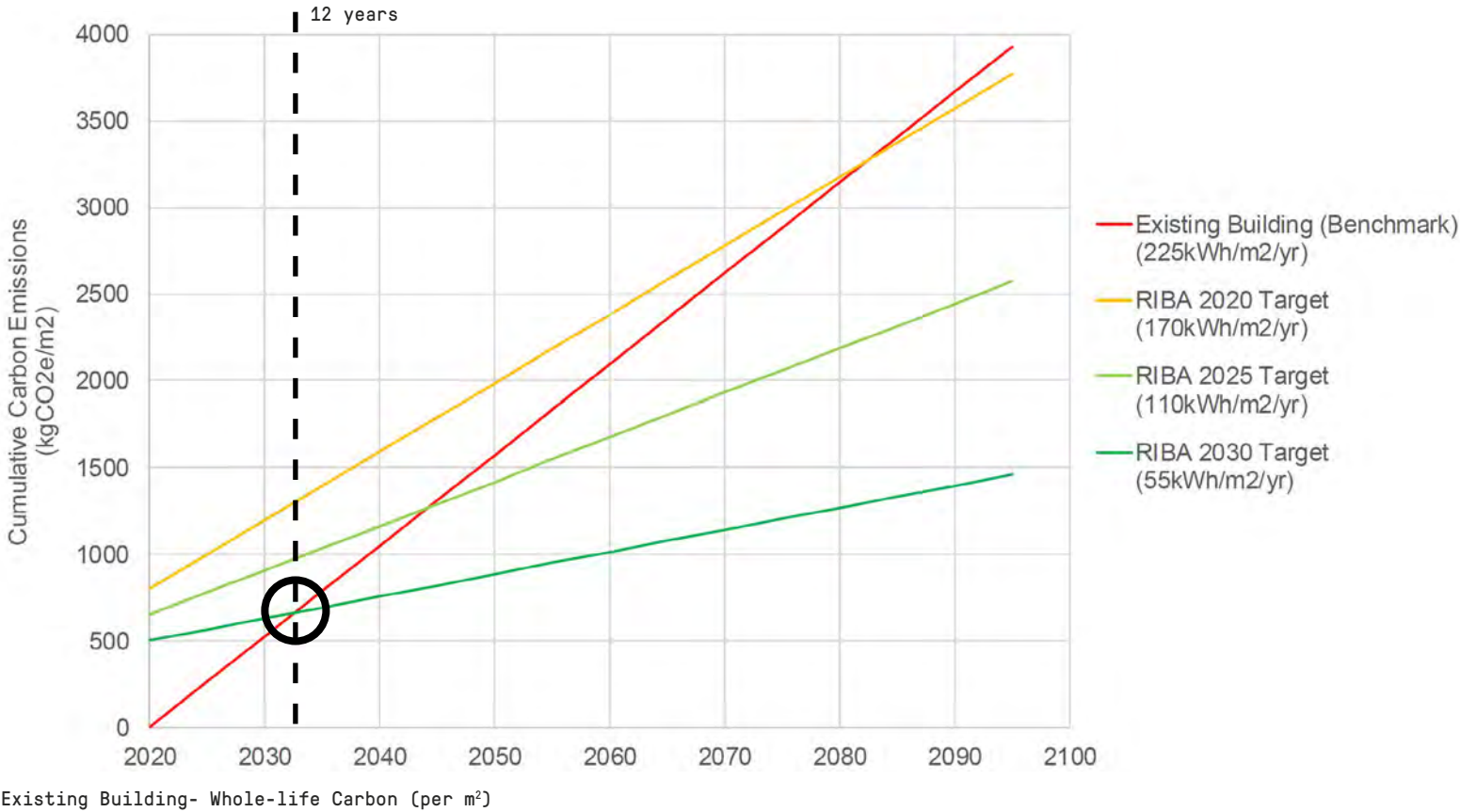
Has 18 car parking spaces that are largely obsolete.



Existing Building Axo



Existing Building Photograph



# 2.0

# STAKEHOLDER CONSULTATION

2.0 STAKEHOLDER CONSULTATION

2.1 Consultation Timeline

LOCAL STAKEHOLDERS

- Community & residents' groups
1. Aldgate Community Events

2. Aldgate Estate Residents' Association

3. Aldgate Gardening Club\*

4. Aldgate Ward Club

5. City Parent Carer Forum

6. Golden Lane Estate Residents' Association

7. Mansell Street Women's Group

8. Middlesex St Estate Neighbourhood Watch

9. Middlesex Street Estate Residents' Association

10. Petticoat Square Leaseholders' Association

11. Portsoken Activities Group\*

12. Portsoken Ward Club\*
- Community facilities
13. Artizan Street Library and Community Centre

14. Cass Child and Family Centre

15. Guildhall Library

16. Portsoken Health and Community Centre

17. Shoe Lane Library^

18. St Hilda's East Community Centre^

19. The Attlee Youth and Community Centre
- Business & professional groups
20. City Architecture Forum\*

21. City Business Library

22. City Property Association\*

23. The Aldgate Partnership
- Charities & not-for-profit organisations
24. Bishopsgate Institute

25. Citizens' Advice Bureau

26. Homeless Link

27. Sir John Cass's Foundation

28. SocietyLinks

29. Square Mile Food Bank

30. The Brokerage

31. Tower Hamlets Education Business Partnership

32. Toynbee Hall

33. TSE Youth

34. Volunteer Centre Tower Hamlets

- Education
35. Canon Barnett Primary School

36. Christ Church Primary School

37. English Martyrs Catholic Primary School

38. London Metropolitan University

39. Mulberry School for Girls

40. Prior Weston Primary School

41. Sir John Cass's Foundation Primary School

42. St Paul's Cathedral School

43. The Complete Works

44. The City of London School for Girls
- Art & culture
45. Arc

46. Arts Admin Toynbee Studios

47. Barbican Centre

48. Framed Film Club

49. Guildhall School

50. Rich Mix^

51. V22
- Museums & galleries
52. Bank of England Museum

53. Guildhal Art Gallery

54. Museum of London

55. Tower of London

56. Whitechapel Gallery
- Faith groups
57. All Hallows by the Tower

58. Christ Church Spitalfields

59. Dutch Centre

60. East London Mosque & London Muslim Centre

61. S&P Sephardi Community (Bevis Marks Synagogue)

62. Sandys Row Synagogue

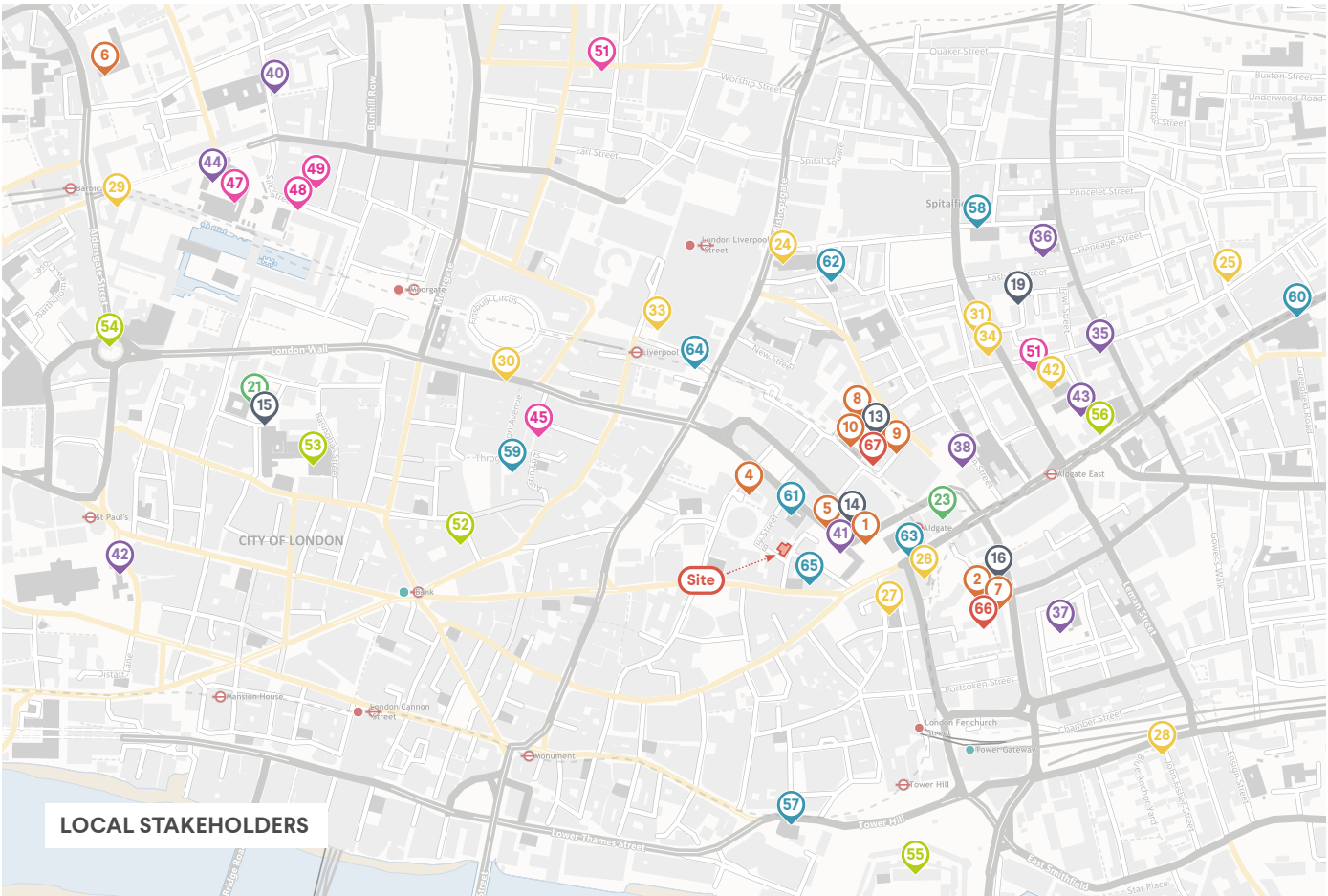
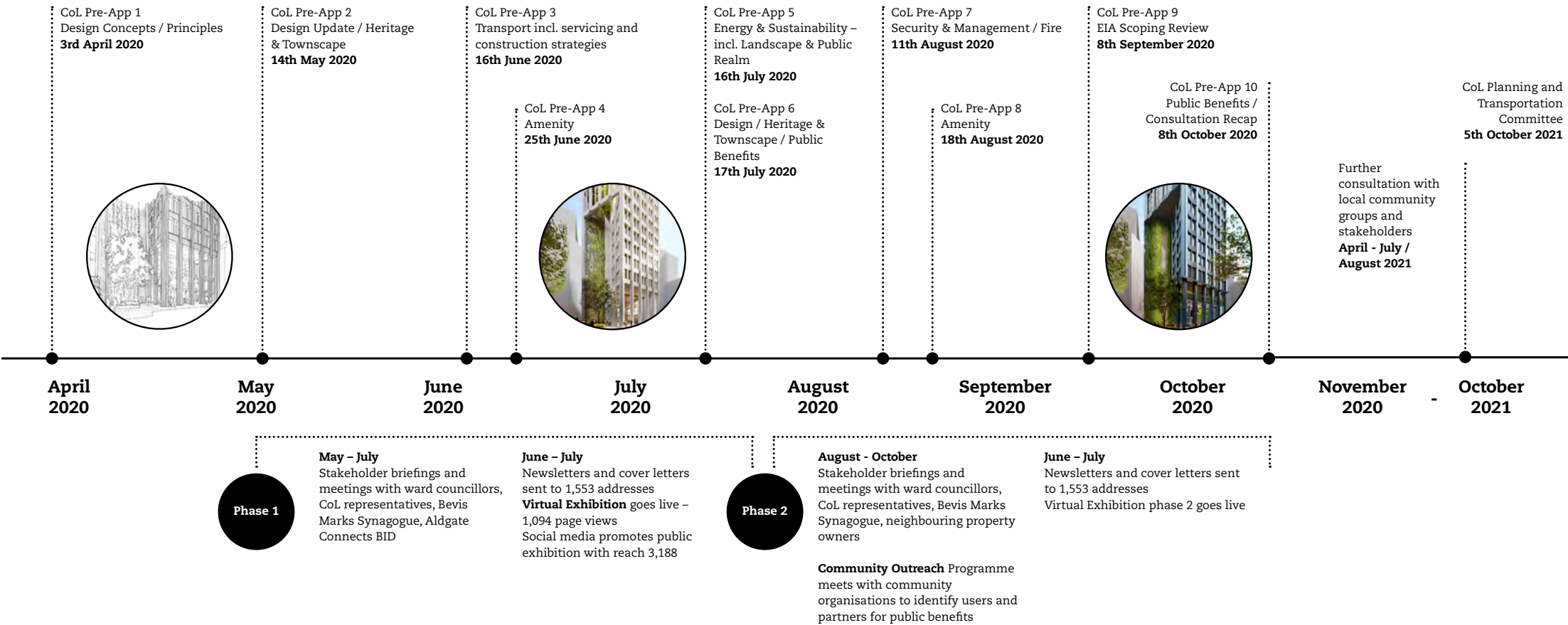
63. St Botolph's without Aldgate

64. St Botolph's without Bishopgate

65. St Katharine Cree Church
- Housing Estates
66. Mansell Street Estate (Guinness Partnership)

67. Middlesex Street Estate

\* No fixed location  
^ Outside out map



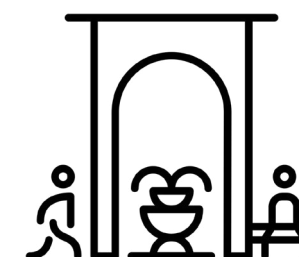


### 2.2 Key Benefits

1. Helped to shape the economic development proposals to create a building ecosystem which supports **SMEs** and **helps businesses scale-up** within the building including a whole floor of **affordable workspace**.



2. Developed a **community space** (Creechurch Hall) with its design and use shaped to meet local need. This includes a guaranteed 8 hours per week as an outreach, training and skills centre.



3. Established a retail strategy to complement the other emerging uses in the area, including the **Bevis Marks Museum**.



4. Nominated one of the **retail units** within the arcade as a dedicated space for **art and maker space uses**.



5. Developed **partnerships with local schools** for apprenticeships, art projects, construction workshops and help shape their access to the building.



6. Created over **300m<sup>2</sup> of additional public realm** through the creation of **Heneage Arcade and James' Court**.





# 3.0

# SUSTAINABILITY

3.0 SUSTAINABILITY

3.1 Aspirations

1

Extended Public Realm at street level, optimised for active travel: access , storage, facilities.

2

Mixed-mode ventilation offers future climate adaptability.

3

Facade optimised for daylight levels and thermal comfort.

4

Accessible roof amenity space, provides fresh air and views out.

5

Urban greening winter gardens and enhanced biodiversity.

6

Small floorplates encourage vibrancy & promote tenant diversity.

7

Health and wellbeing at the heart of design

8

Rainwater harvesting for landscape irrigation

9

Net zero carbon in operation through air source heat pumps energy strategy with zero combustion on-site

10

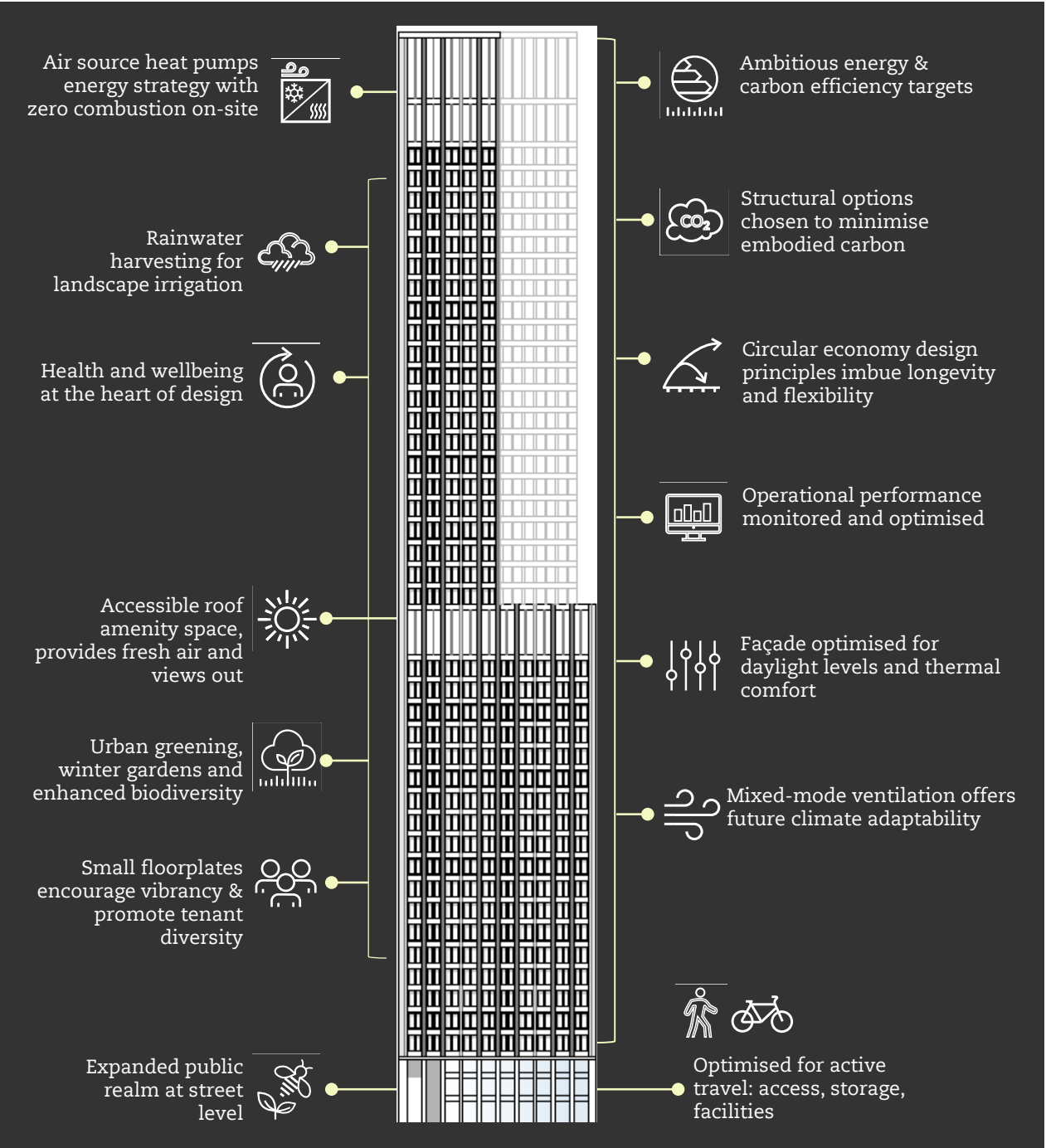
Structural options chosen to minimise embodied carbon.

11

Circular economy design principles imbue longevity and flexibility

12

Ambitious energy & carbon efficiency targets



Illustrative diagram

# 4.0

## CONTEXT AND PUBLIC REALM



4.0 CONTEXT AND PUBLIC REALM

4.1 Heritage Impact Assessment

The Site is not located within a Conservation Area nor does it contain a listed building. It is, however, located directly adjacent to the grade II\* listed Holland House and in close proximity to the grade I listed Bevis Marks Synagogue. The Tower or London World Heritage Site is located approximately 600 m to the south-east of the Site. The Heritage, Townscape, Built Heritage Visual Impact Assessment prepared by Montagu Evans considers the impact of the Proposed Development upon all these receptors.

Application Site

Conservation Areas

- A. St Helen's Place CA
- B. Lloyd's Avenue CA
- C. Bishopsgate CA
- D. Fenchurch Street Station CA
- E. Leadenhall Market CA

Listed Buildings

Grade I

- 1. Synagogue, Bevis Marks and Henage Lane
- 2. Church of St Katherine Cree, Leadenhall Street
- 3. Church of St Andrew Undershaft, St Mary Axe
- 4. Church of St Helen, Bishopgate and Great St Helen's
- 5. Church of St Botolph, Aldgate High Street
- 6. Guild Church of St Ethelburga the Virgin, Bishopgate
- 7. Lloyd's Building, 1 Lime Street

Grade II\*

- 8. Holland House, Bury Street
- 9. Sir John Cass School, Duke's Place and Mitre Street
- 10. Lloyd's Registry, Fenchurch Street

Grade II

- 11. 2-16 Creechurch Lane
- 12. Gateway in yard of Church of St Katherine Cree
- 13. Archway between numbers 39 and 40 Mitre Street and at rear number 72 and 73 Leadenhall Street
- 14. 38 St Mary Axe
- 15. Pump at junction with Leadenhall Street
- 16. 10 and 11 Goring Street
- 17. Iron gates and railings to entrance of Church of St Andrew Undershaft
- 18. 20 and 21 Billiter Street
- 19. 72-75 Fenchurch Street
- 20. Iron gateway to the yard of Church of St Botolph
- 21. Police public callbox outside St Botolph Aldgate Church
- 22. Sir John Cass College
- 23. Gatepiers at entrance to Port of London Authority's warehouses
- 24. House to east of entrance entrance to Port of London Authority's warehouses
- 25. 139-144 Leadenhall Street

- 26. Lloyd's Building
- 27. 52-68 Bishopgate
- 28. 48 Bishopgate
- 29. Lloyd's Avenue House
- 30. 46 Bishopgate
- 31. Pair of houses to north of entrance entrance to Port of London Authority's warehouses
- 32. Front block of Fenchurch Street Station

Scheduled Monuments

- 33. London Wall: remains of Roman wall, bastions and city gate of Aldgate from 17 Bevis Marks to India Street
- 34. London Wall: remains of Roman wall and bastion, Goring Street
- 35. London Wall: remains of Roman wall and bastion, Camomile Street

World Heritage Site: Tower of London (Inset Map)

Grade I

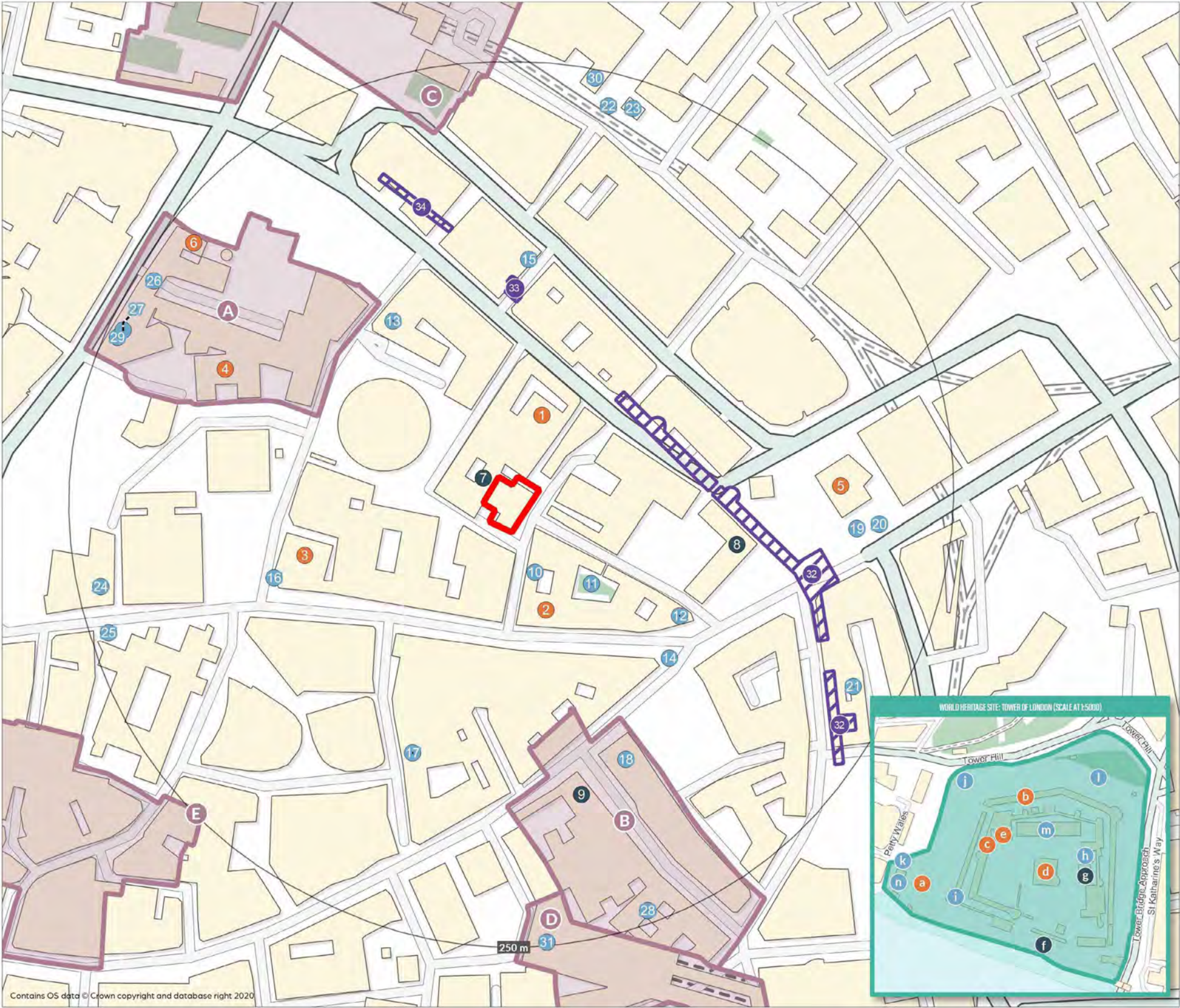
- a. The Middle Tower, with Causeway to Byward Tower (QV) and Remains of Causeway to Lion Tower to West
- b. Outer Curtain Wall with Casements and Mural Towers
- c. Tower of London (Inner Curtain Wall with Mural Towers, The New Armouries, The Queen's House and Tower Green)
- d. The White Tower
- e. Chapel of St Peter Ad Vincula

Grade II\*

- f. Revetment Wall to South Side of Moat, from Tower Bridge approach to Middle Tower (QV)
- g. The Old Hospital Block and Raised Terrace and Railings

Grade II

- h. Museum of The Royal Fusiliers and Attached Terrace to Front
- i. K6 Telephone Kiosk Outside Gateway of Byward Tower
- j. Revetment Wall to West and North Side of Moat, from Outwork Attached to Middle Tower (QV) to Tower Hill Postern
- k. 8 Bollards (On Pavement Outside Main Entrance to Tower of London)
- l. Revetment Wall to North Side of Moat, from Tower Hill Postern to Tower Bridge Approach
- m. Waterloo Block
- n. Former Pump House

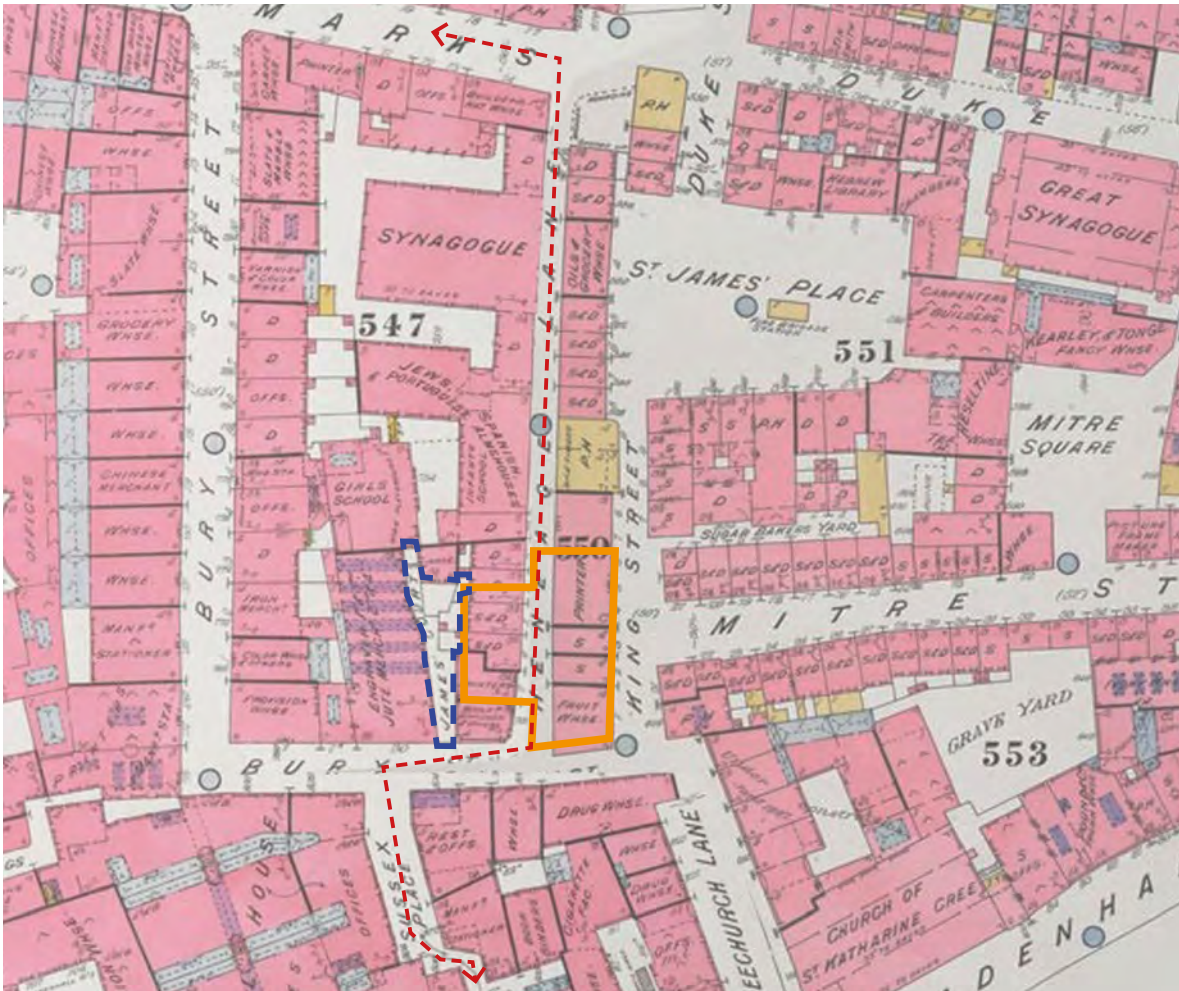




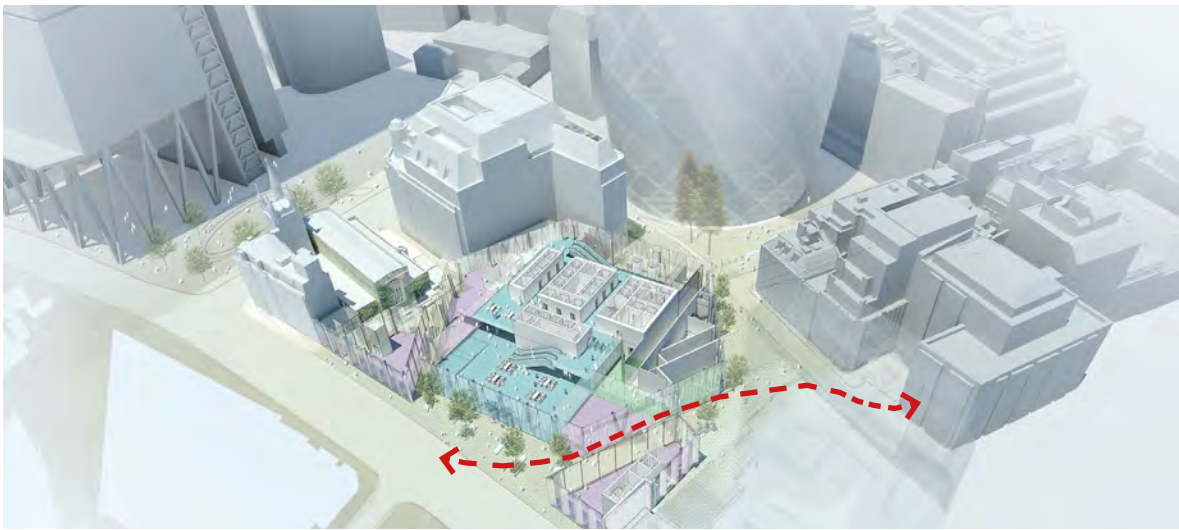
4.0 CONTEXT AND PUBLIC REALM

4.2 Heneage Lane: Evolving street pattern

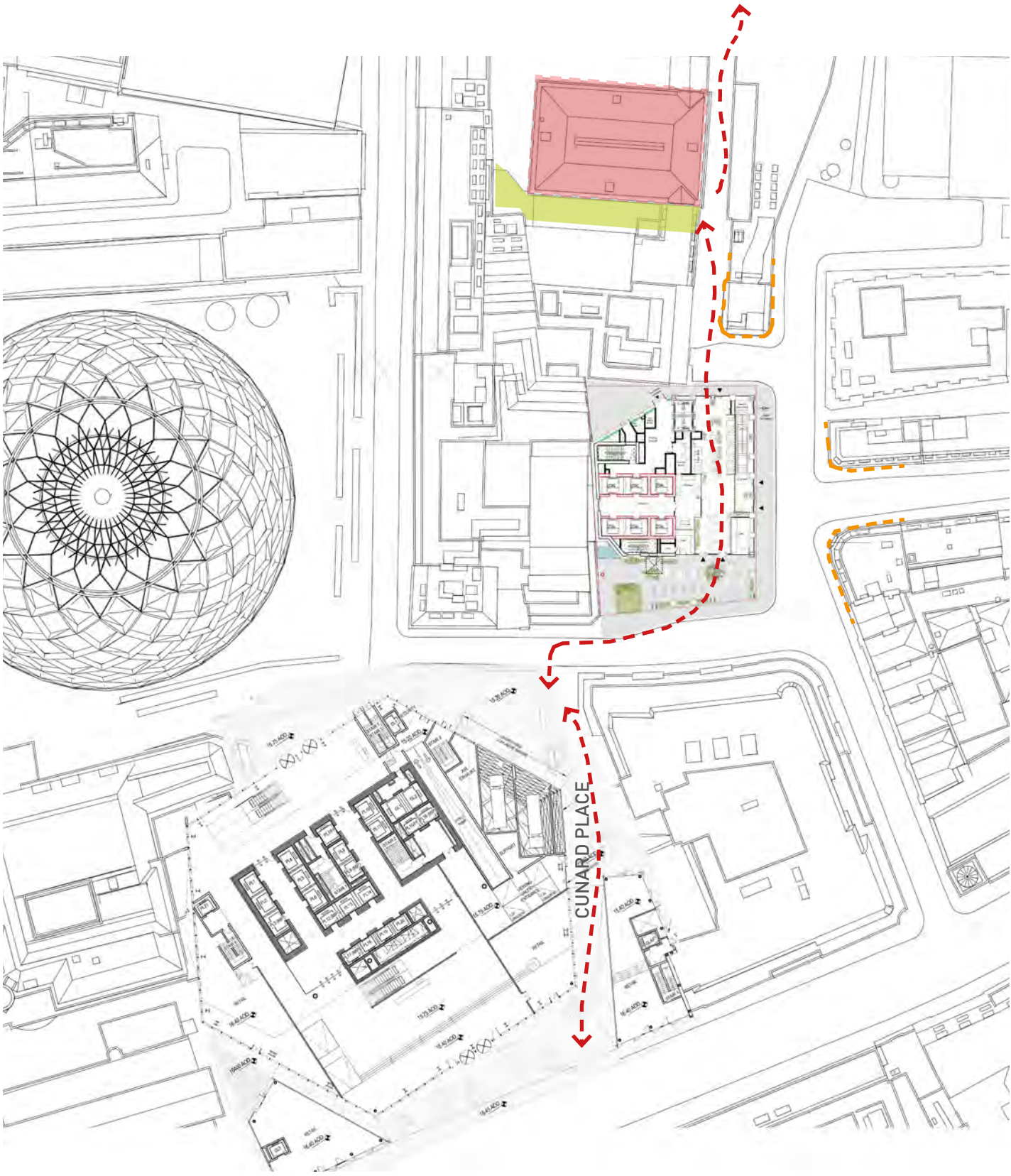
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James' Court  
31 Bury Street



[Link to 100 Leadenhall Street](#)

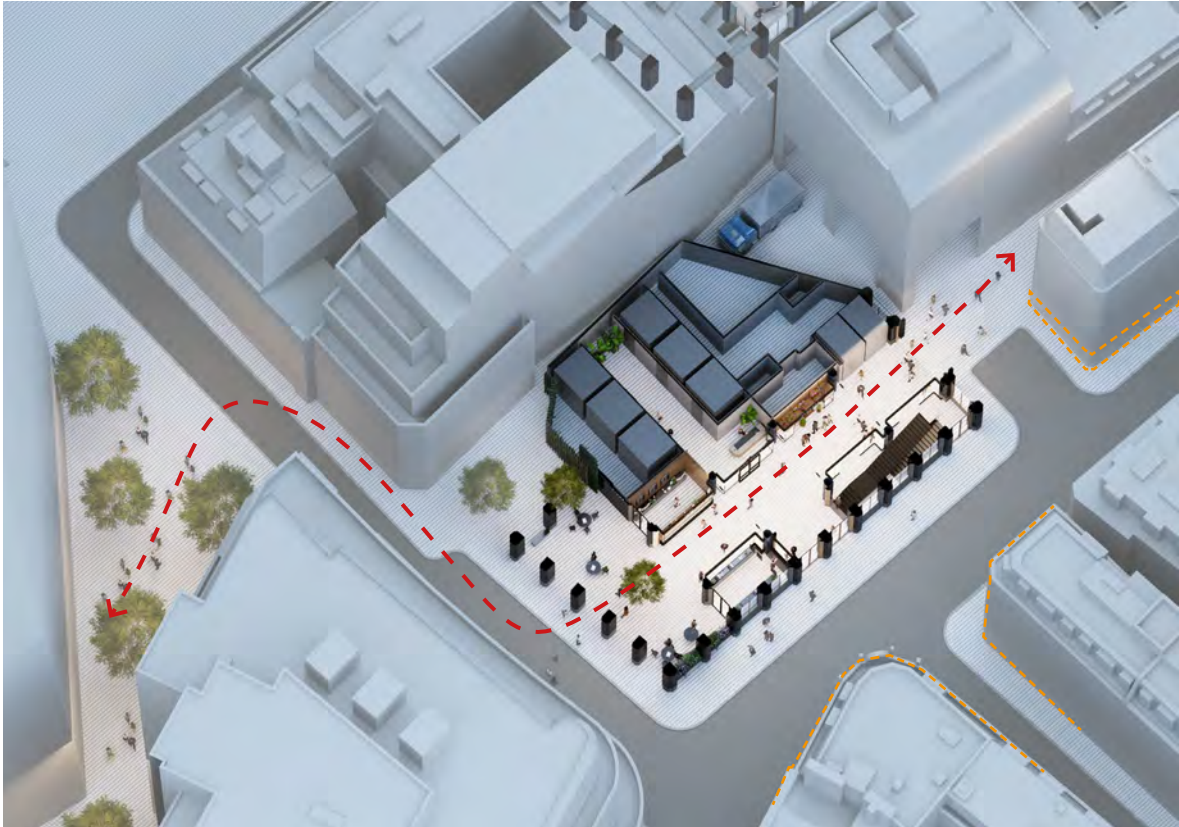


Proposed Bury House

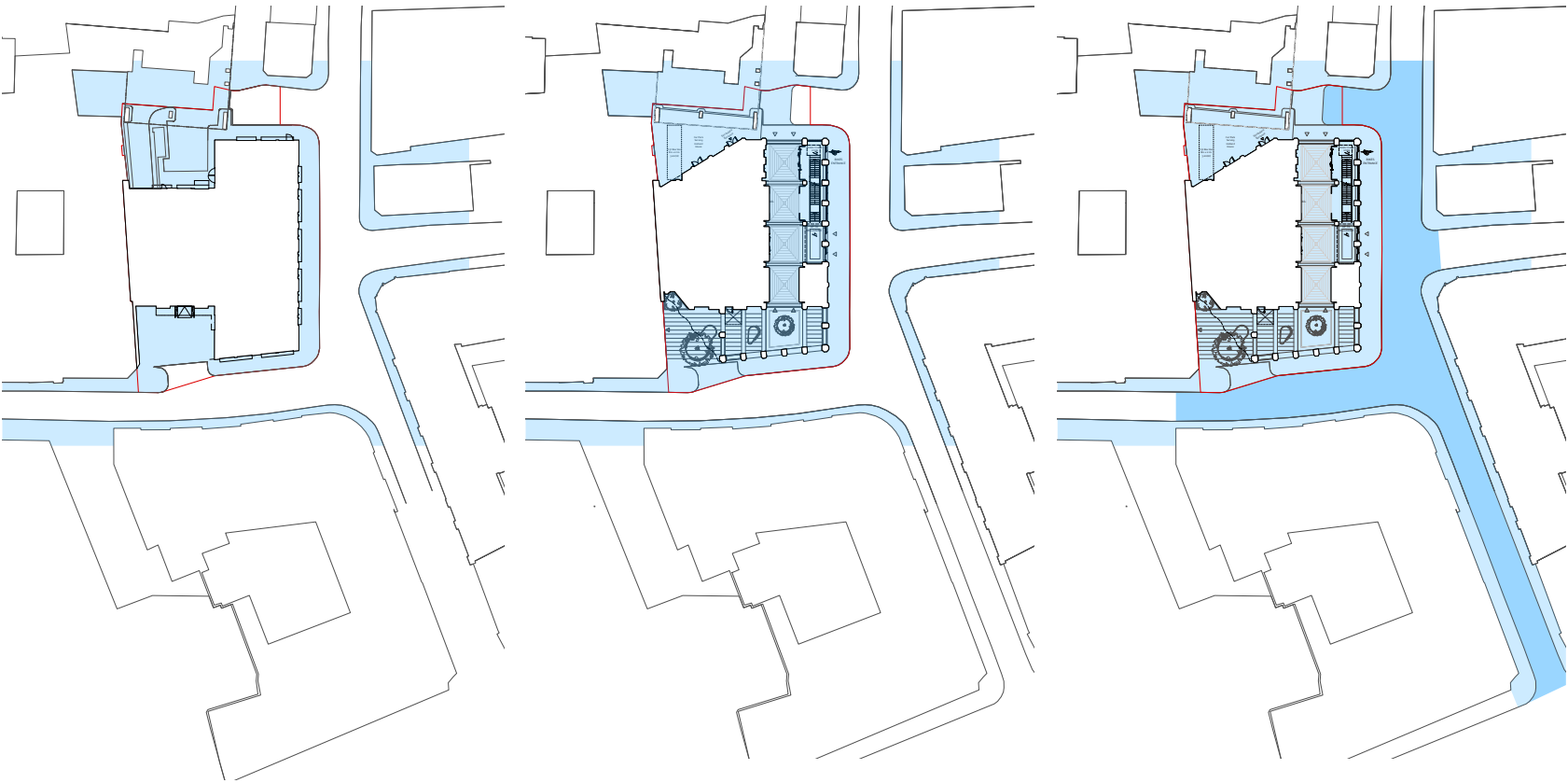


4.0 CONTEXT AND PUBLIC REALM

4.3 Public Realm



Illustrative view from Heneage Lane



Existing Condition

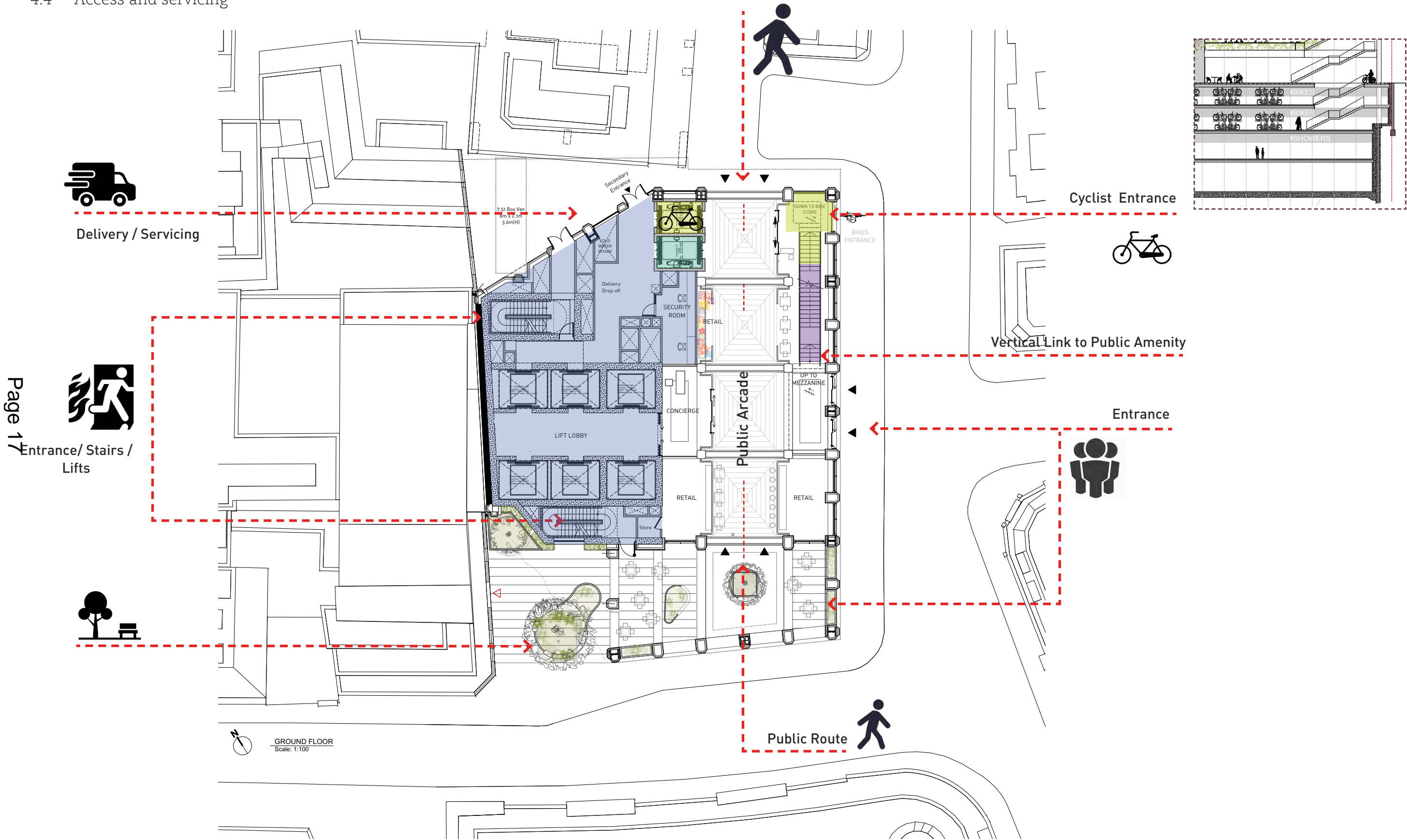
Planning Application

Area of enhancement

Increase of public realm by 238.9%  
95m<sup>2</sup> existing to 322m<sup>2</sup> proposed

- + 645sqm ENHANCED FOOTWAY PAVING IN ADOPTED HIGHWAY.
- + 283 sqm NEW PUBLICLY ACCESSIBLE SPACE WITHIN THE SITE BOUNDARY.
- + 882 sqm RAISED CARRIAGEWAY IN GRANITE SETTS.

4.4 Access and servicing



# 5.0

## PUBLIC, COMMUNITY AND CULTURAL SPACE



5.0 PUBLIC, COMMUNITY AND CULTURAL SPACE

5.1 Public Benefit

Events Across First and Mezzanine:  
Standing Event - approx 700 people  
Standing and Seating - approx 500 People

Public Benefit:

50% of Existing GEA will be dedicated to public space in the proposed design, covering the ground, mezzanine

Existing Ground Floor	Proposed Ground Floor plan
95% Inactive frontage	37% Inactive frontage
5% Active frontage	63% Active frontage
	44 m Internal active frontage

First Floor:

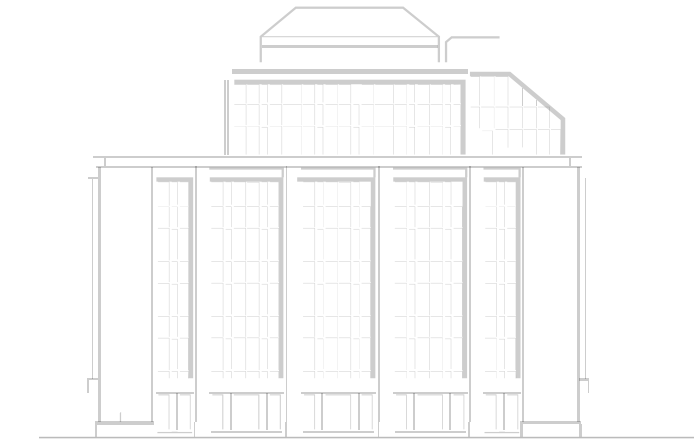
Creechurch Hall

Mezzanine Floor:

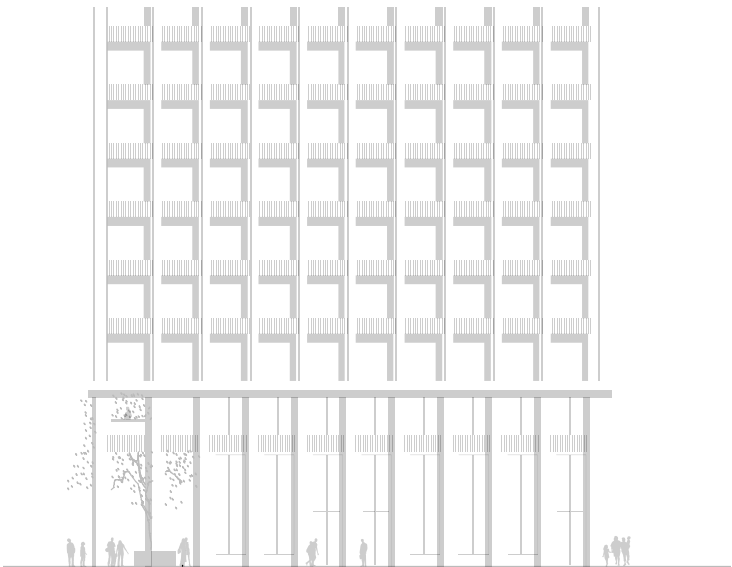
Creechurch Vestibule

Ground Floor:

Extended Public Realm  
Heneage Arcade  
James' Court  
Heneage Lane



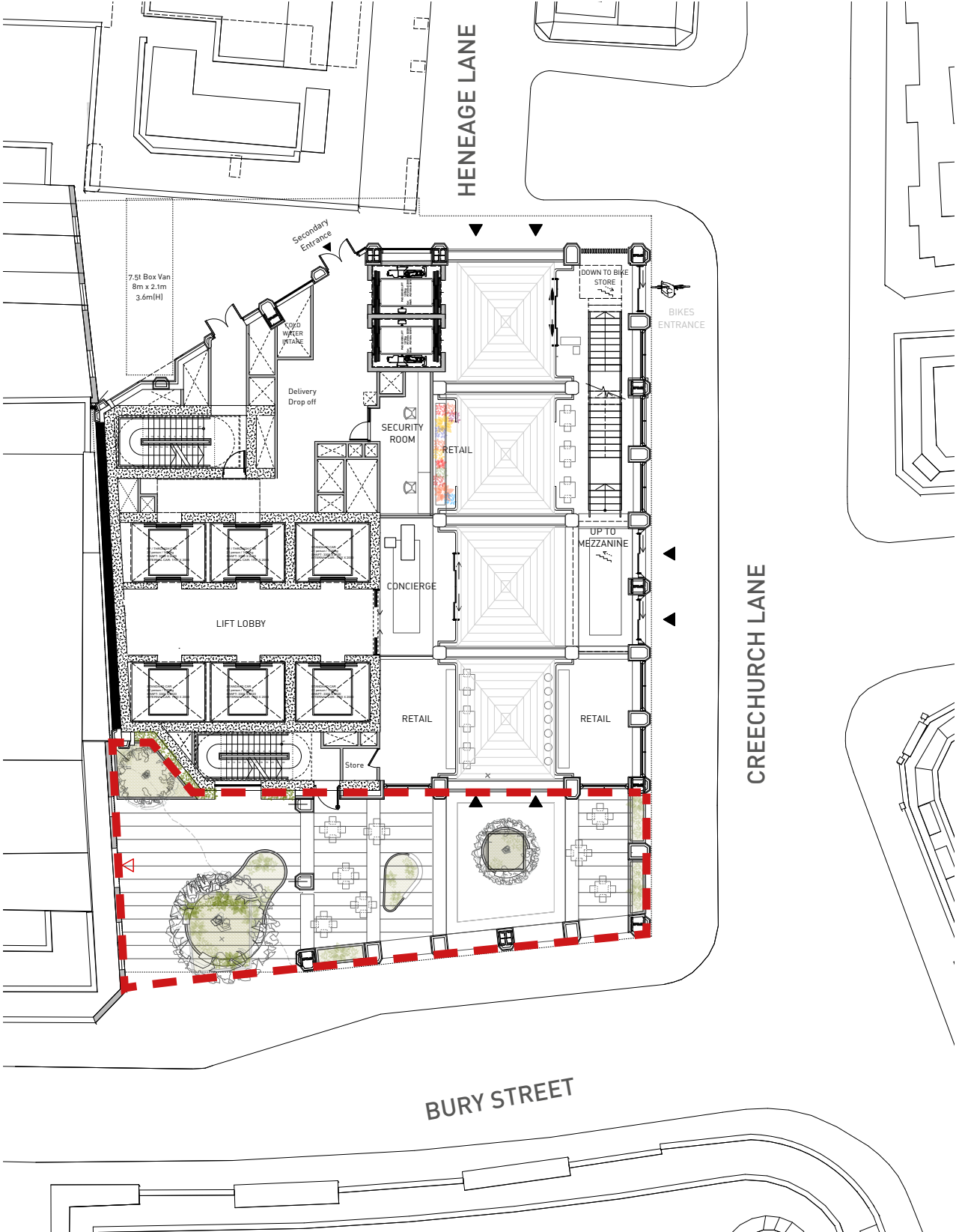
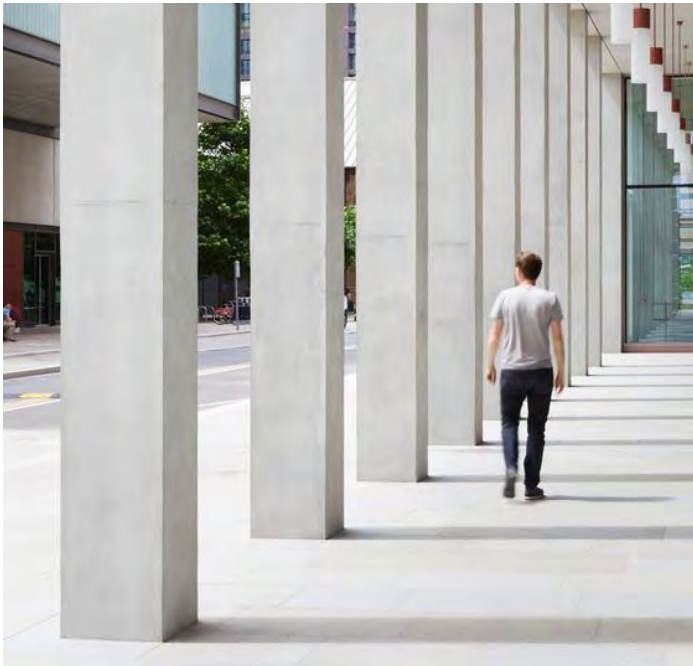
50% of existing GEA =  
100% of Ground floor + Mezzanine floor + First floor





5.0 PUBLIC, COMMUNITY AND CULTURAL SPACE

5.2 James' Court

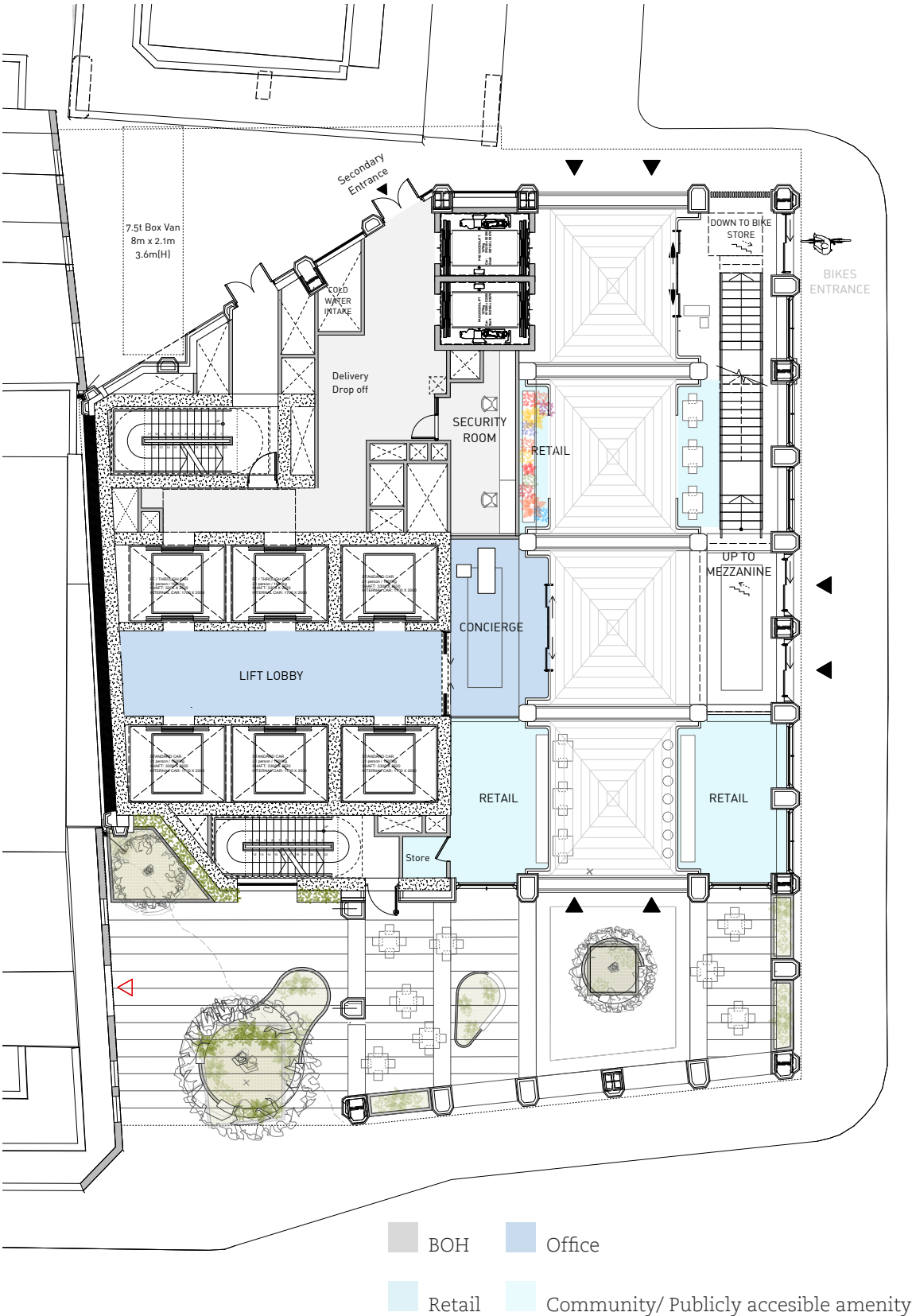




5.0 PUBLIC, COMMUNITY AND CULTURAL SPACE

5.3 Proposed ground floor

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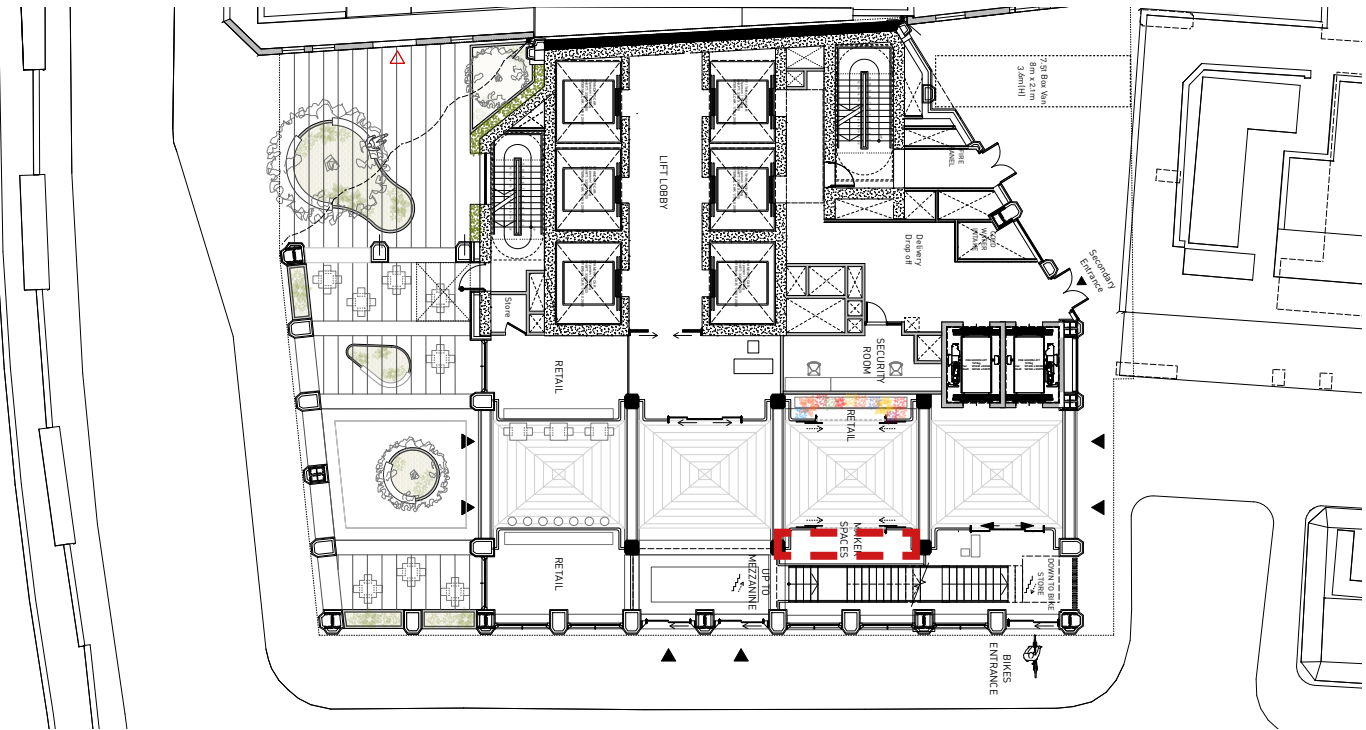
5.0 PUBLIC, COMMUNITY AND CULTURAL SPACE

5.4 Art and Cultural display

The spaces lining the arcade route are designed to be utilised as vitrines for a rolling programme of displays. This could include:

- + Artwork (collaborations with organisations such as City and Guilds of London Art school, Sculpture in the City, etc),
- + Local community group information,
- + Displays and reference to the important history of the site
- + Projects from local schools,
- + Products of local artisans, etc.

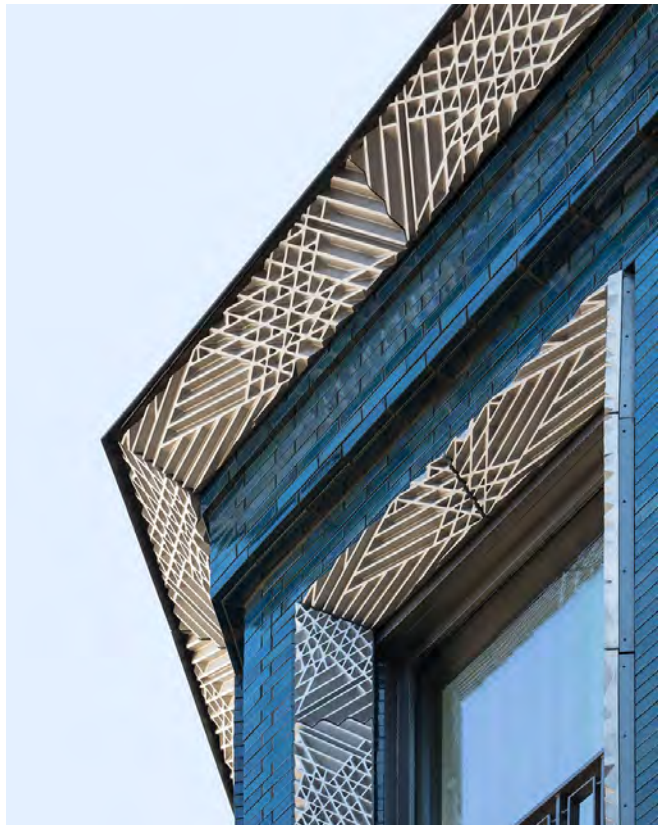
31 Bury Street aims to facilitate cultural and commerce exchange through creative activation, building skills and knowledge through cross-sector innovation as highlighted by the Cultural and Commerce Taskforce in their “Cultural and Commerce: Fuelling Creative Renewal” report.





5.6 Art Integration: The City & Guilds of London Art School

Within the public realm, it is proposed to have areas for the display of art installations, including sculptures, with the intention to use these areas for the showcasing of local artists' work, including but not limited to City & Guilds students.



Illustrative view showing potential temporary art work location





5.0 PUBLIC, COMMUNITY AND CULTURAL SPACE

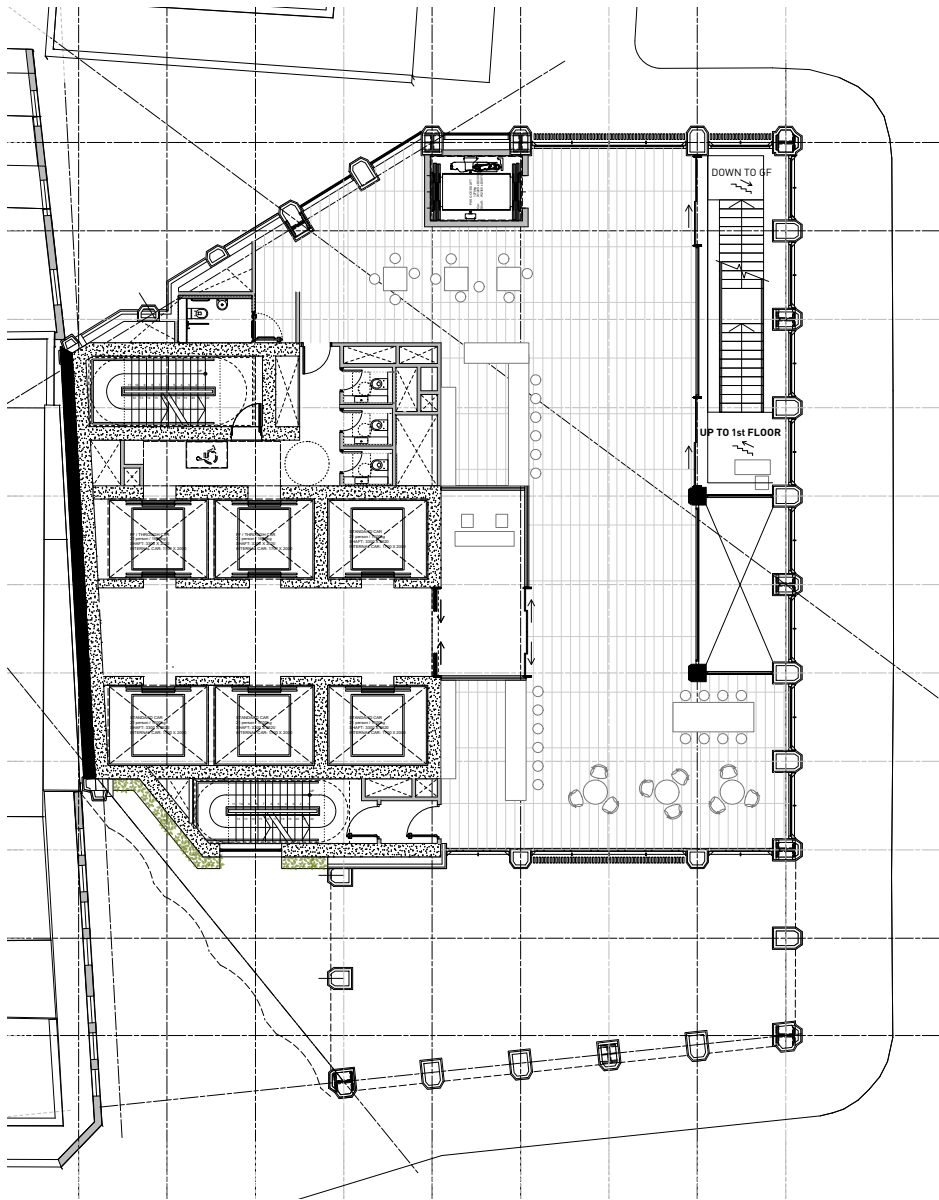
5.7 Proposed mezzanine floor



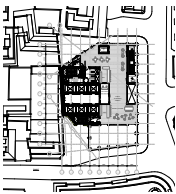
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Illustrative view showing mezzanine floor



Proposed Mezzanine Floor Plan

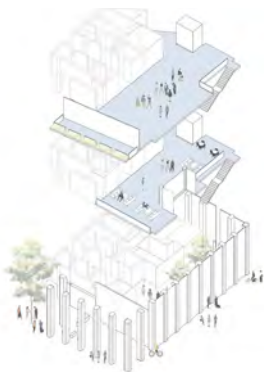




5.0 PUBLIC, COMMUNITY AND CULTURAL SPACE

5.8 Creechurch Hall: Hall

Sculpture in the City



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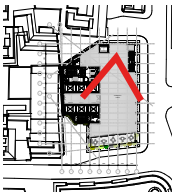


DBOX FOR B60

Illustrative view showing first floor level: Cultural Event



Proposed First Floor Plan



Open Layout:  
Standing Event - 480 people  
Mixed Standing and Seating - 360 People

Meeting Room Layout:  
2 x 16 People Meeting Rooms  
1 x 8 People Meeting Rooms  
1 x 10 People Meeting Room  
3 x 4 People Meeting Table

Conference Layout:  
120 People Seated Auditorium  
Layout  
28 People in Presentation Room

Banquet Layout:  
220 People Seated



5.0 PUBLIC, COMMUNITY AND CULTURAL SPACE

5.9 Proposed first floor

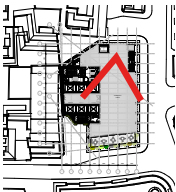
Aldgate School Lantern Parade



Illustrative view showing first floor level: Educational Event



Proposed First Floor Plan



# 6.0

## CREECHURCH ECOSYSTEM



6.0 CREECHURCH ECOSYSTEM

6.1 Creechurch Hive

- +

The building has been designed to operate as an incubator for SME businesses.
- +

Affordable workspace is provided at L2 and the building caters for business growth and development within.
- +

The smaller floor plates cater for the scale of 99% of City office occupiers.
- +

The workspace is situated over and accessed from the public, community and cultural City activities at the base of the building.
- +

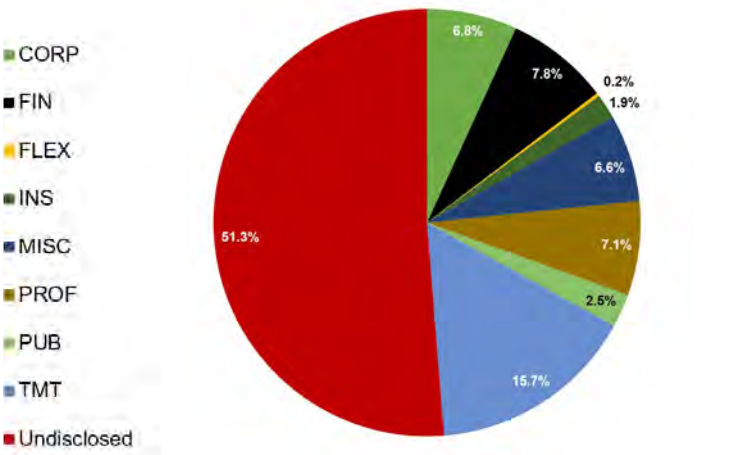
A communal hub has been located at the heart of the office accommodation to provide amenities and foster collaboration between businesses.
- +

This collaborative community of businesses will be further supported through technology and rolling programs of events.

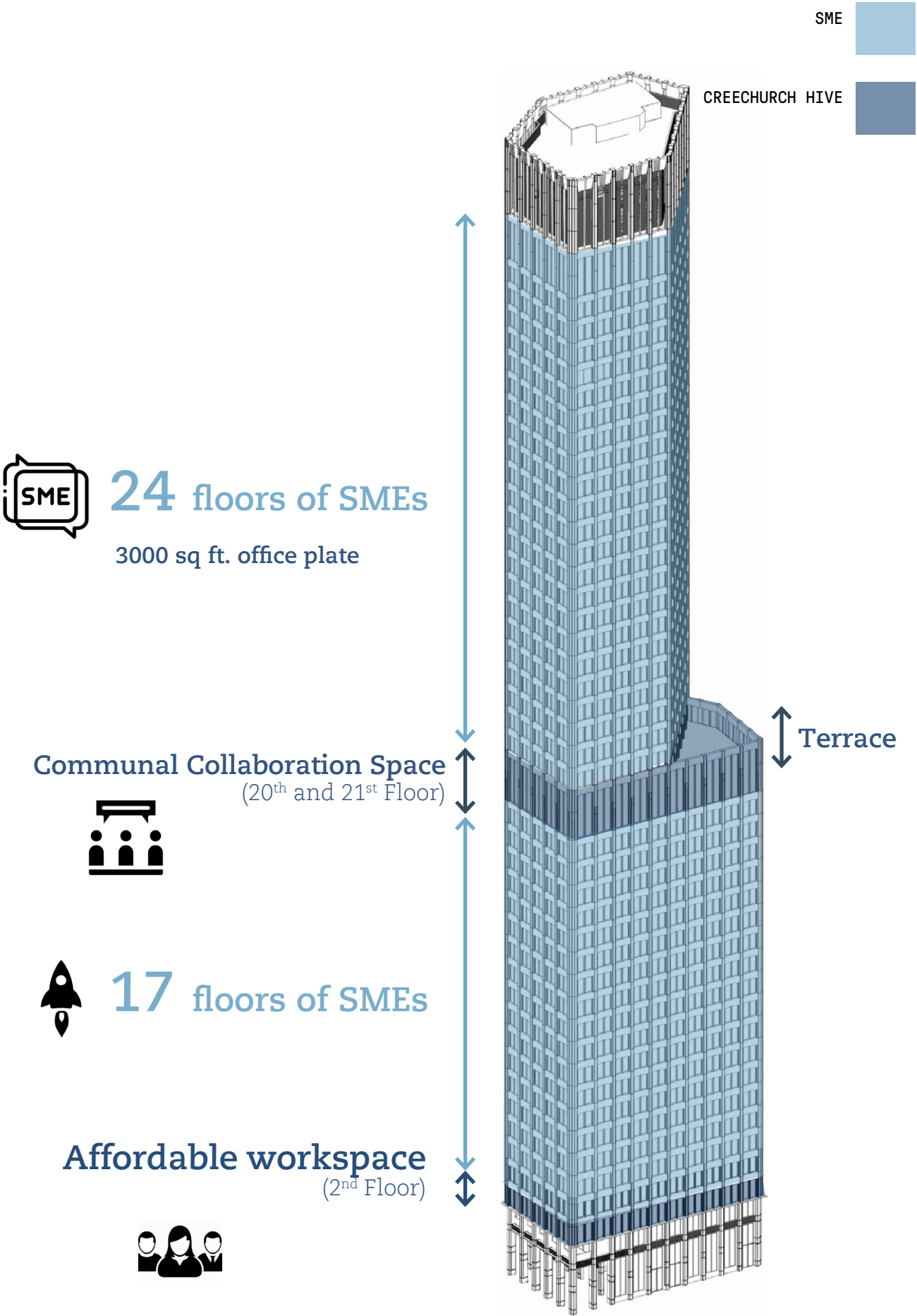
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Diagram taken from CoL's corporate plan 2018-2023



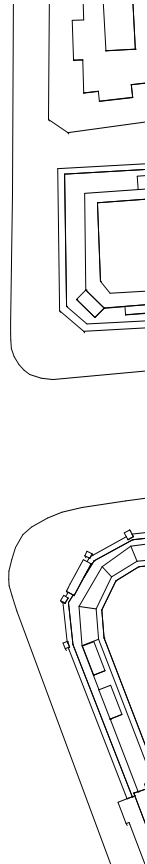
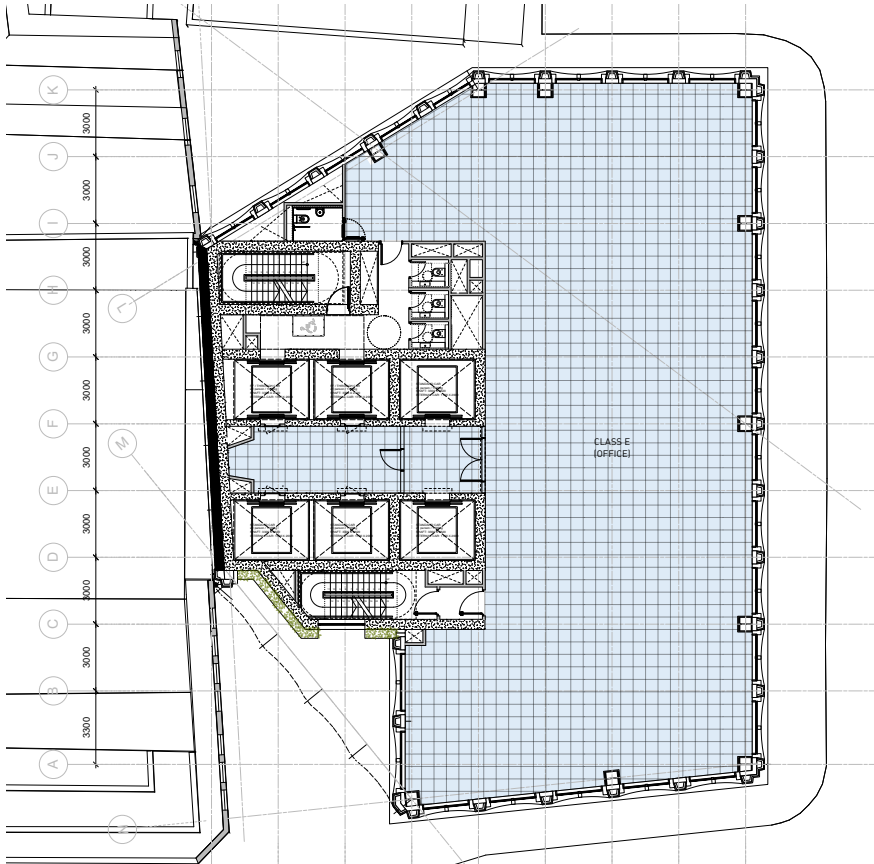
Pie chart showing % mix of tenants acquiring smaller floor plates



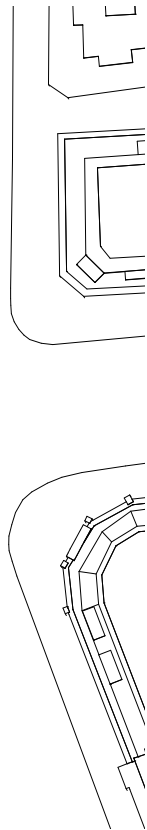
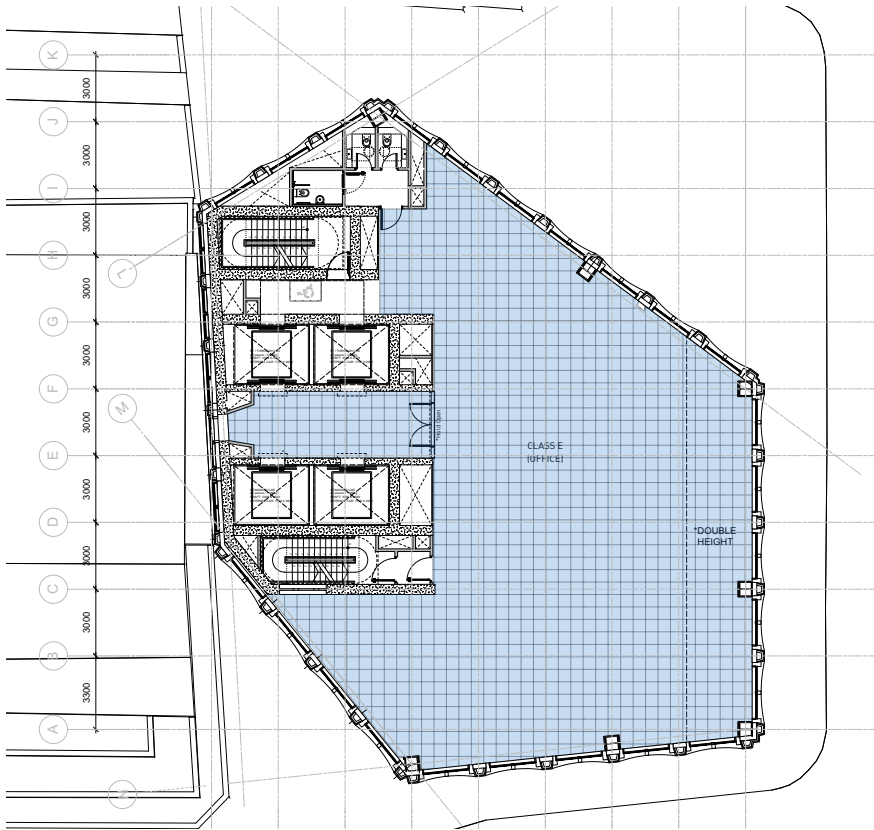


6.2 Typical Office Floors

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- BOH
- Retail
- Office
- Community/  
Publicly accesible  
amenity



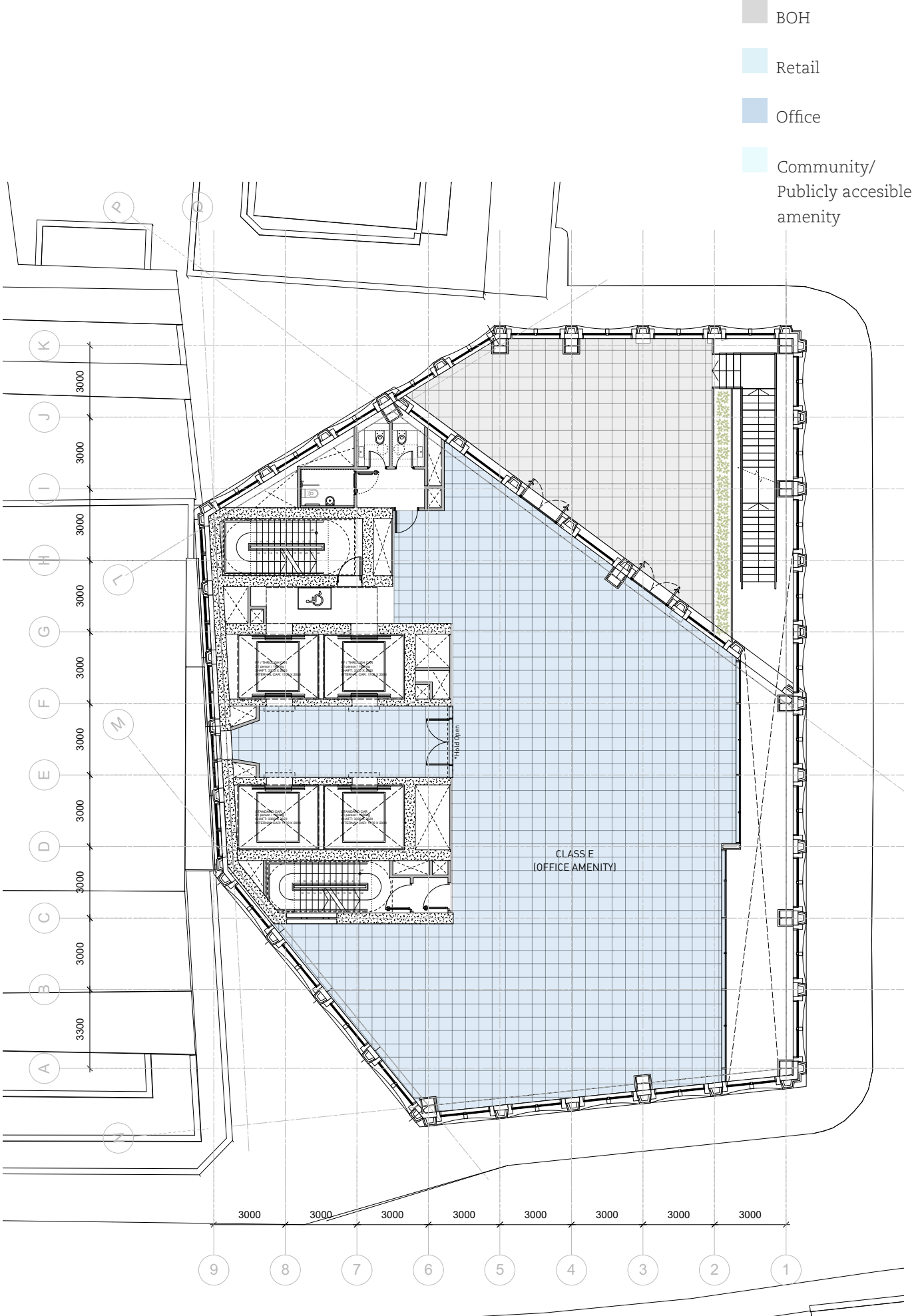
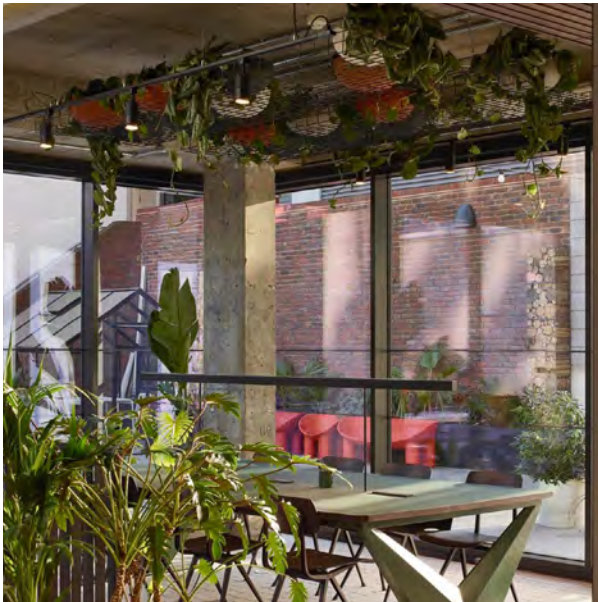
Mood Images



6.3 Proposed 21<sup>st</sup> Floor



Mood Images





6.0 CREECHURCH ECOSYSTEM

6.4 End of Trip facilities

Number of bikes:

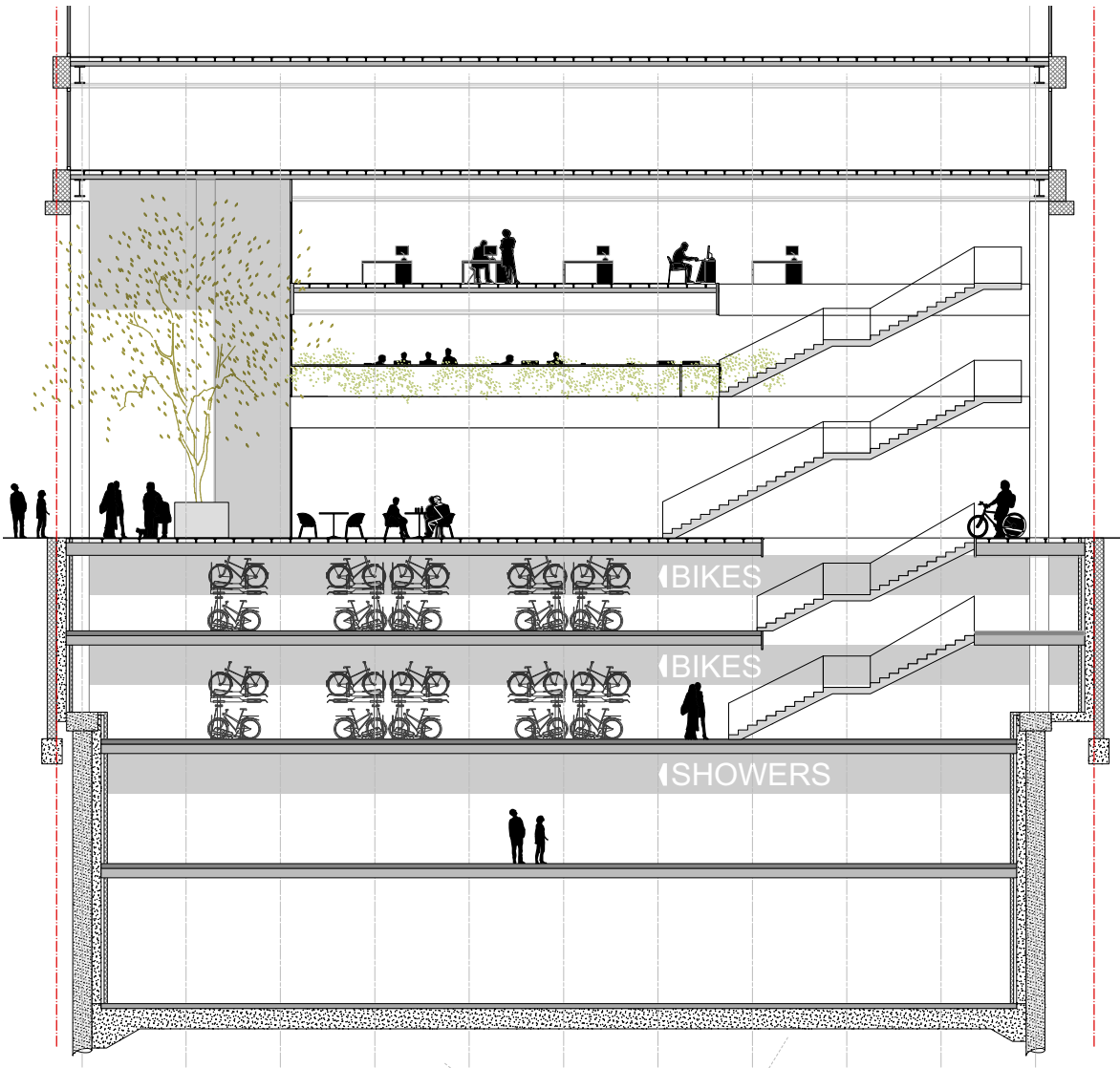
Long Stay 443  
Short Stay 26  
\*Total 469 bikes 451 lockers for Long Stay within secure area  
398 High-Density solutions [Standard 2 Tier Bike Rack] (85% of total)  
47 Folding Bike Lockers (10% of total)  
24 Sheffield Stand (5% of total)

Showers:

The shower and changing facilities are located at B2 Mezzanine and B2. The number of shower and lockers are in accordance with the New London Plan calculations.  
  
Shower total 46 per Long Stay:  
18 Shower Male (40% of total)  
18 Shower Female (40% of total)  
10 Shower Unisex (20% of total)



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Illustrative Section Showing End of Trip facilities

Mood Images



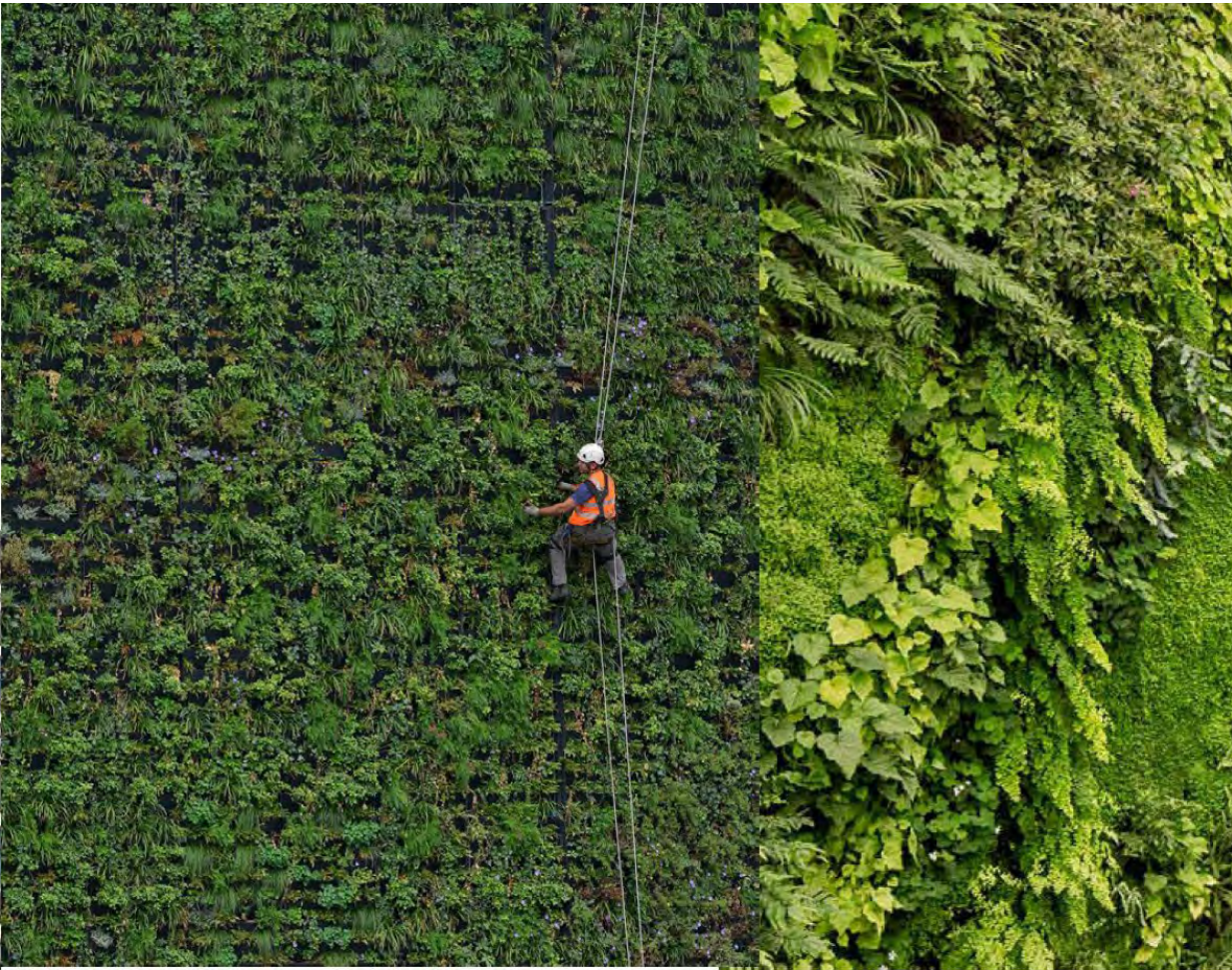
6.0 CREECHURCH ECOSYSTEM

6.5 Biodiversity

> 100m2 of intensive planting.  
> 300 m2 of green walls  
> 50 m2 of green proof with additional permeable surfacing  
Overall UGF=0.46, 50% better than CoL minimum



Patrick Blanc's green wall on the Atheneum



The Ruben Hotel Victoria - Treebox System

Large textural green wall





# 7.0

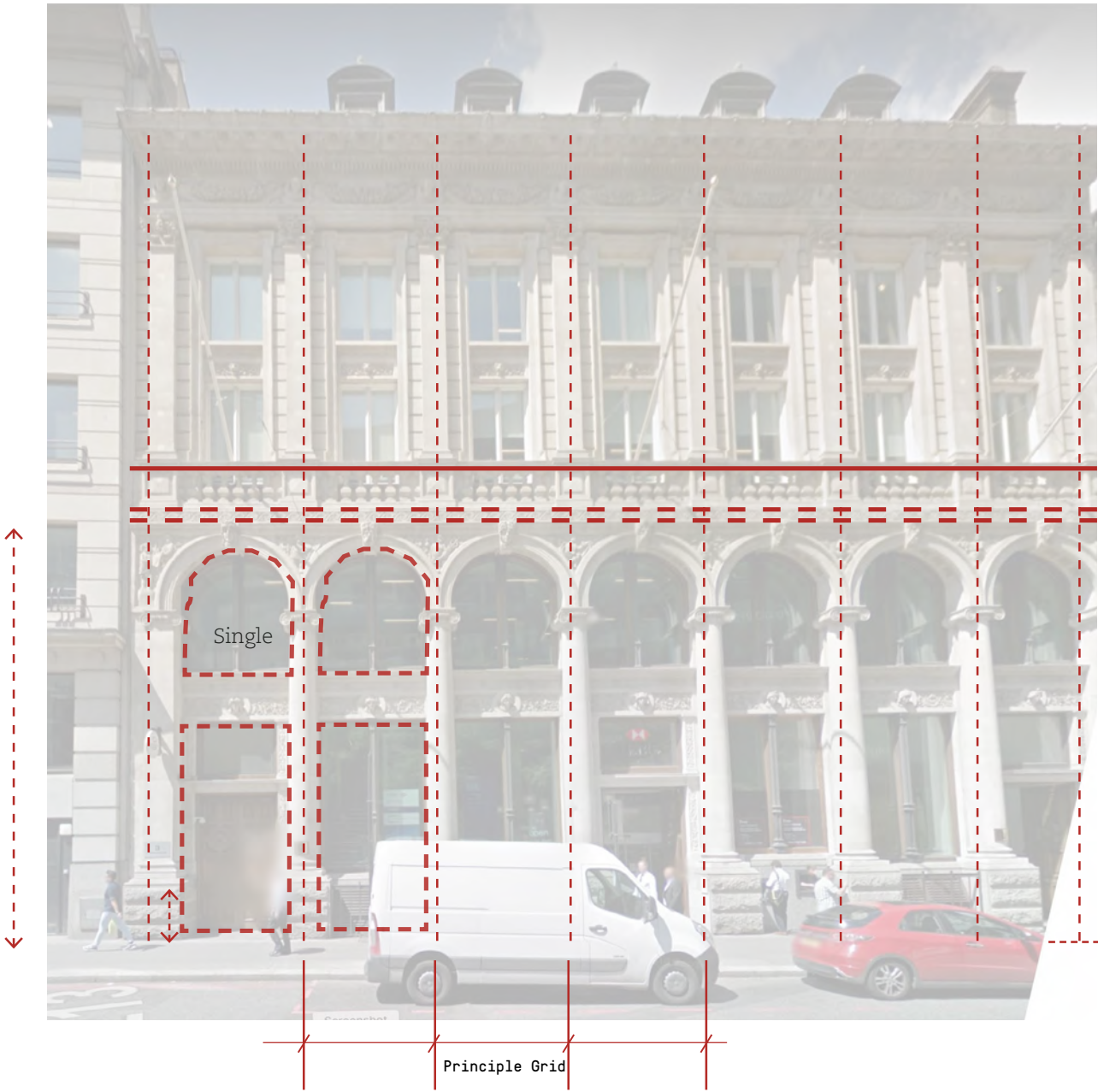
## DESIGN OF FACADE

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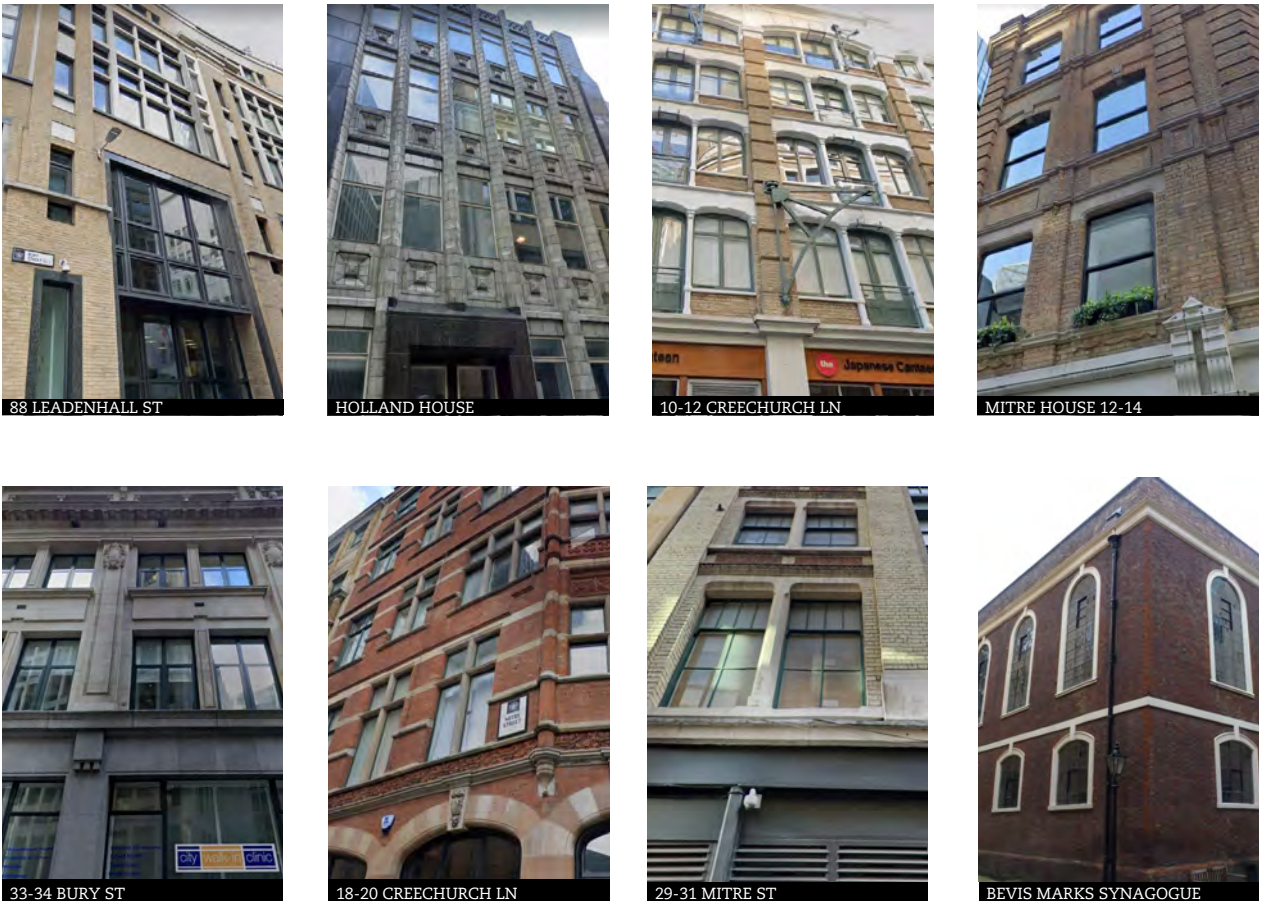


7.0 DESIGN OF FACADE

7.1 Local Context



3 Bishopsgate Elevation

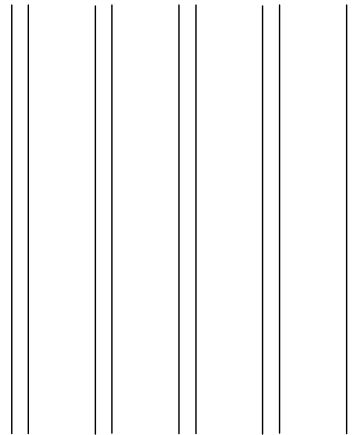


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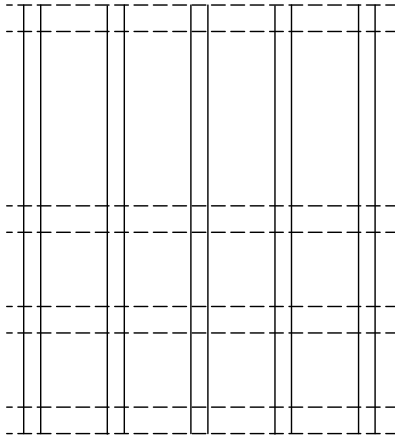




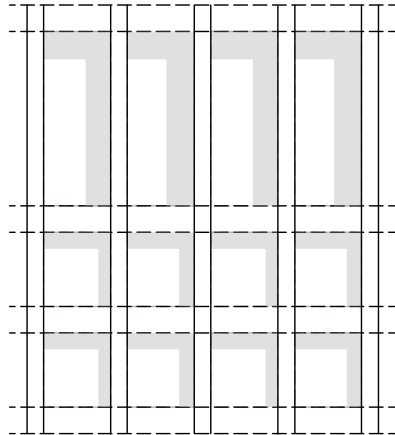
- + Materiality and faience
- + Punched window wall rather than glazed or framed facade



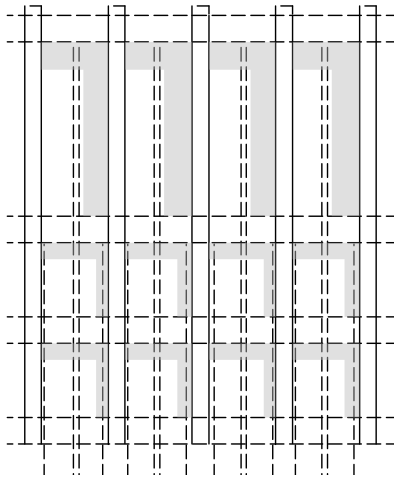
1 Vertical Grid



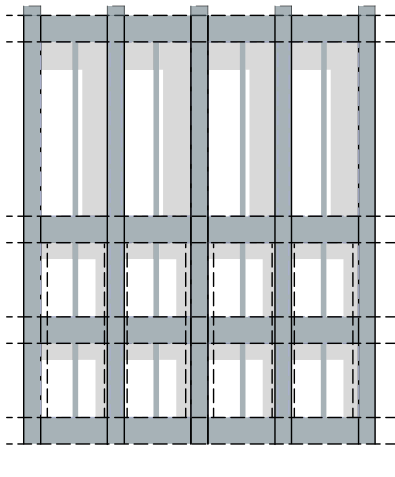
2 Horizontal Element



3 Punched Wall



4 Second Vertical Layer & extend parapet



5 Uniform Material



6 Greenery & Modeling of the Facade



7.0 DESIGN OF FACADE

7.3 Proposed Materials & colours



Celadon



Holland House

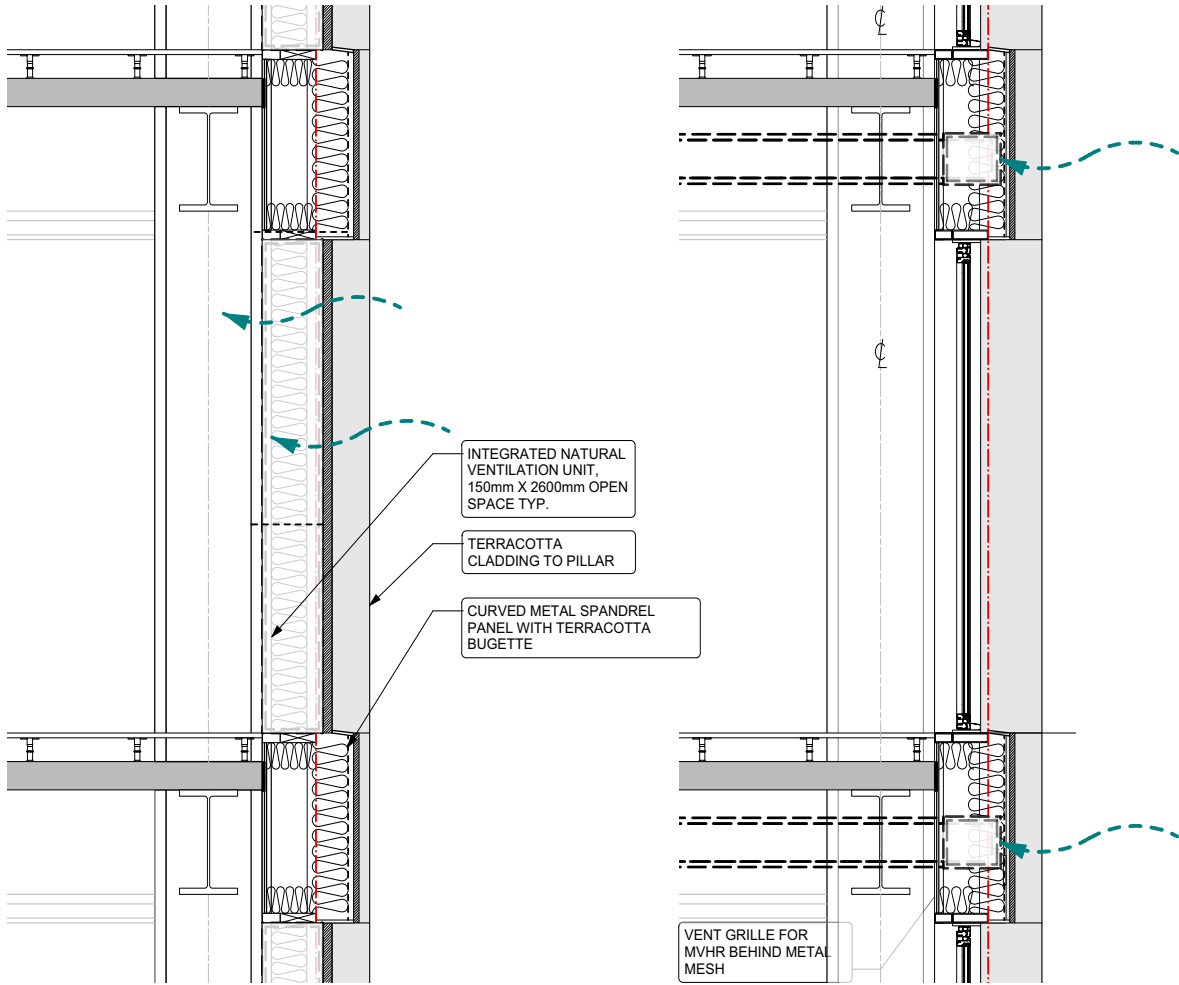


Chinese Song Dynasty blue



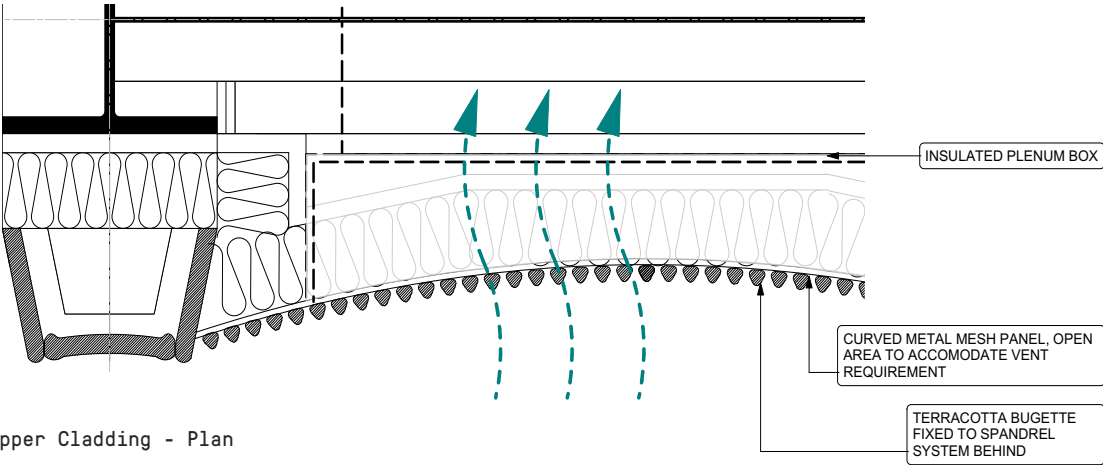
Blue tonality City cluster





Upper Cladding - Section A

Upper Cladding - Section B



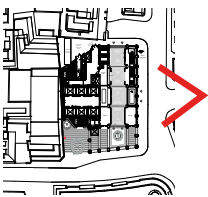
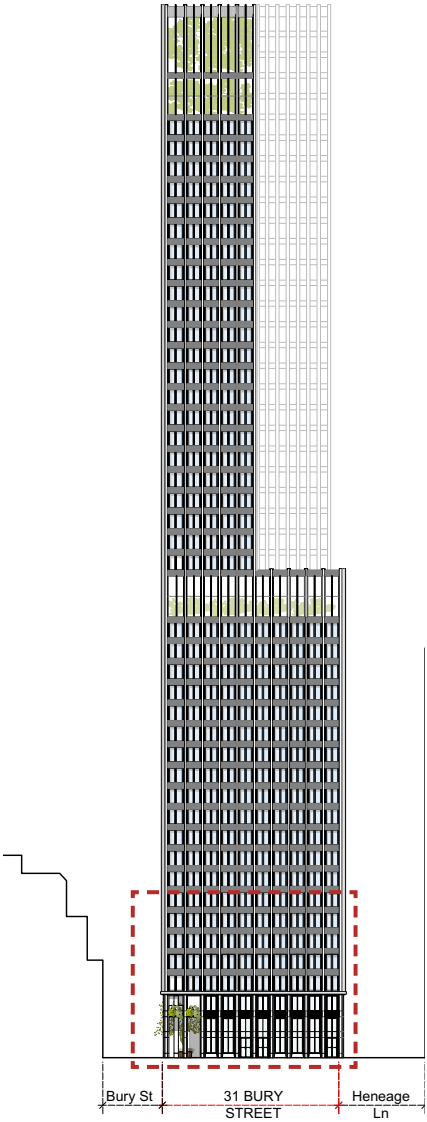
Upper Cladding - Plan



7.0 DESIGN OF FACADE

7.6 Illustrative View

Page 40



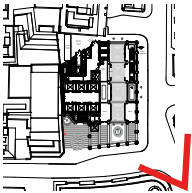
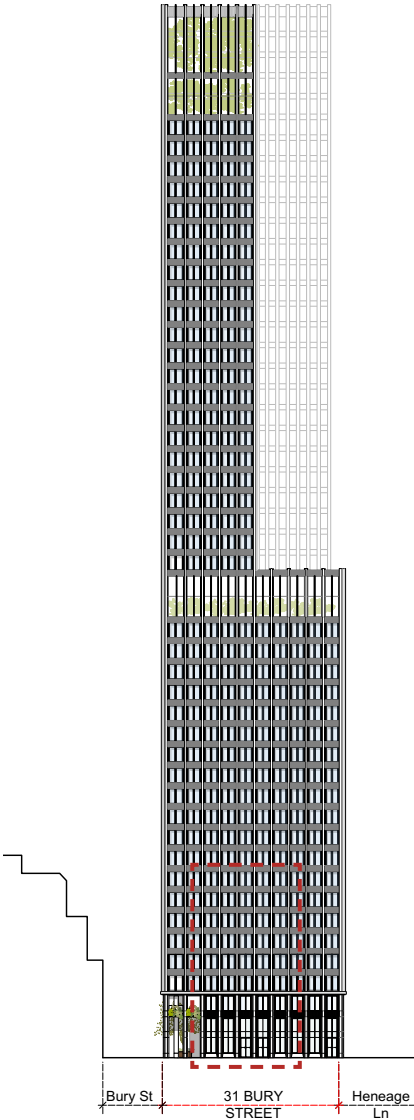
Illustrative view from Creechurch Lane



7.0 DESIGN OF FACADE

7.7 Illustrative View

Page 41



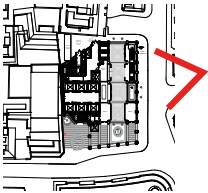
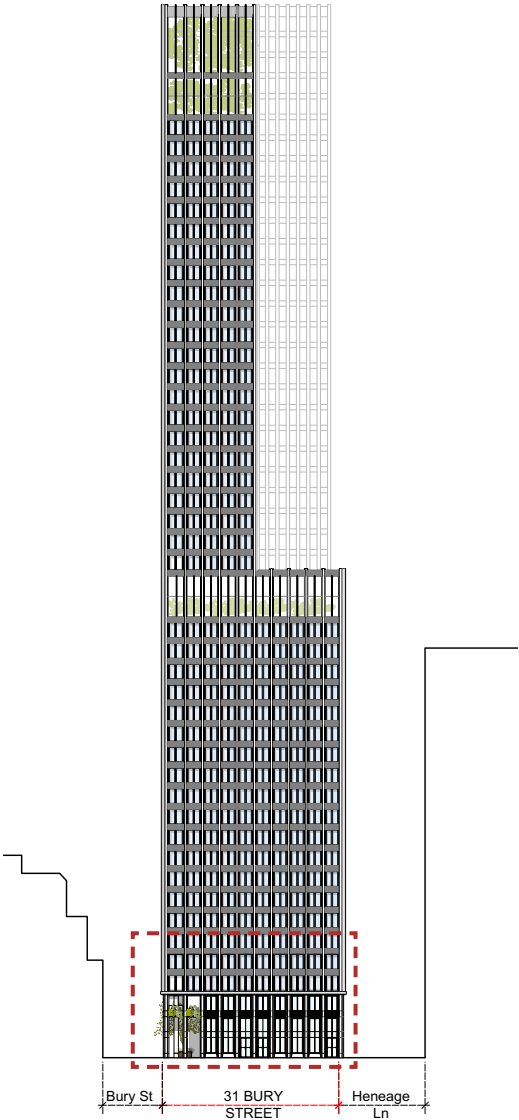
Illustrative view from Mitre Street



7.0 DESIGN OF FACADE

7.8 Illustrative View

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Illustrative view from Mitre street



## 7.0 DESIGN OF FACADE

### 7.9 Illustrative View





# 8.0

## DAYLIGHT

## SUNLIGHT



The planning application is accompanied by a full ES chapter, produced by Avison Young, covering all aspects related to Daylight and Sunlight.

Daylight and sunlight is considered by reference to Policy DM 10.7 of the City of London Plan, which states the following:

*“3.10.40 The amount of daylight and sunlight received has an important effect on the general amenity of dwellings, the appearance and enjoyment of open spaces and streets, and the energy efficiency of all buildings.*

*3.10.41 The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments. The City Corporation will apply these methods, consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations.*

*When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals. Where appropriate, the City Corporation will take into account unusual existing circumstances, such as development on an open or low-rise site and the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive.”*



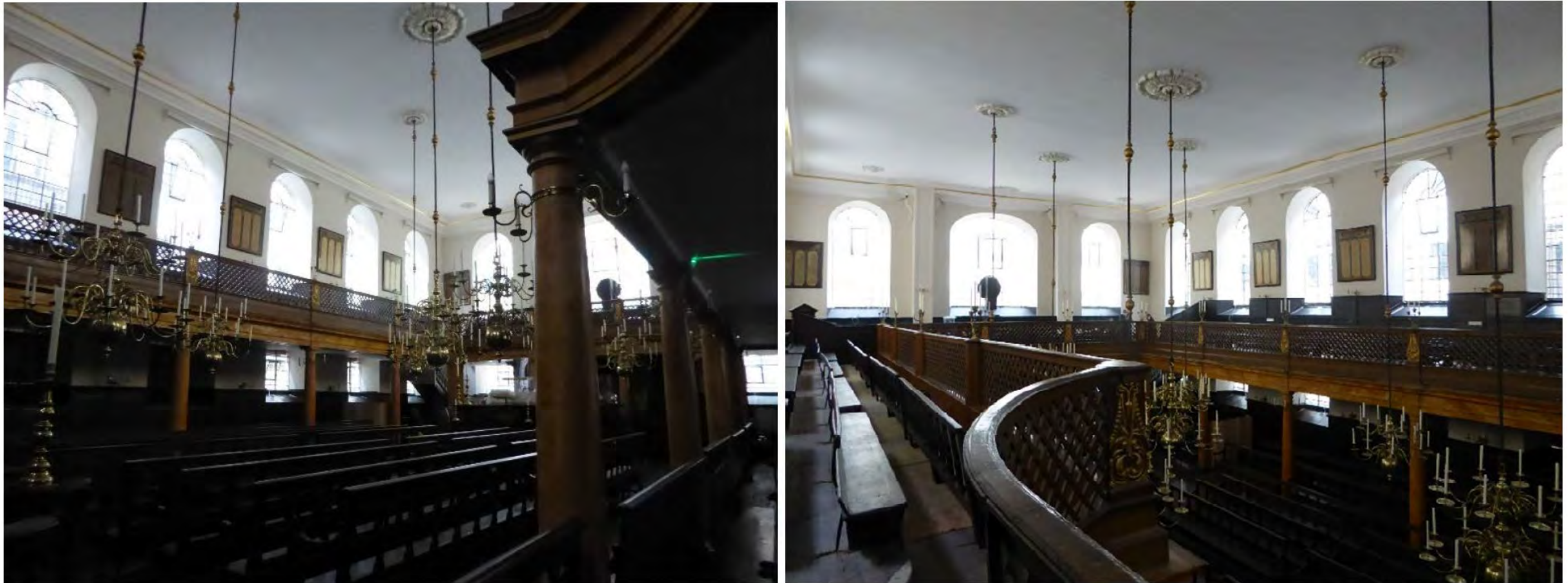
CoL requested that an additional specialist 'Radiance' based assessment of the Bevis Marks Synagogue and the affected residential properties along Creechurch Lane was undertaken. These have been produced by GIA.

The Radiance studies do not supersede those included within the ES chapter, but provide an additional and deeper layer of information and communicate the levels of light visually.

The submitted reports have been reviewed independently by two external consultants, including BRE on behalf of CoL, and there is no disagreement in relation to the impacts on the Synagogue or Creechurch Lane.

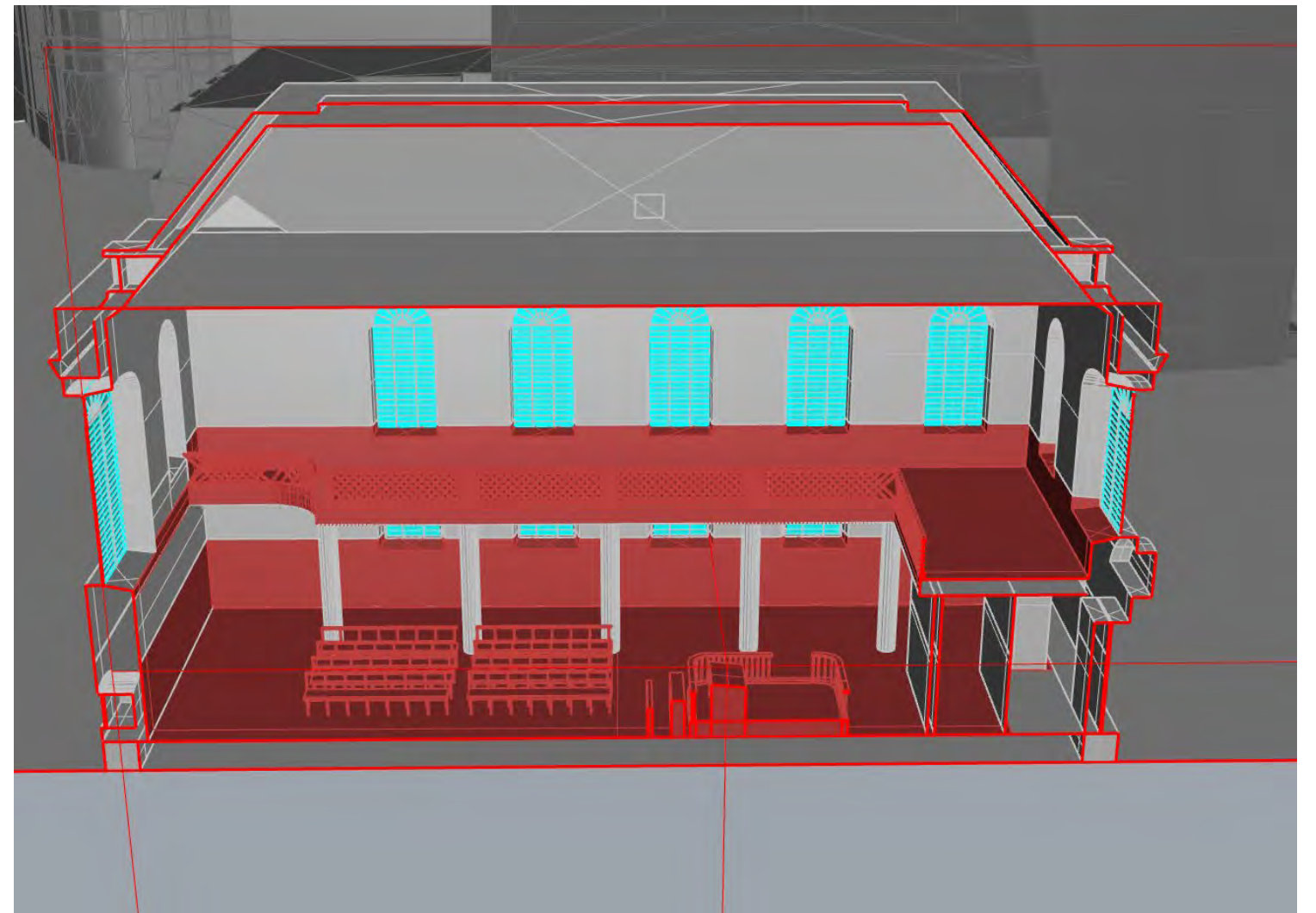
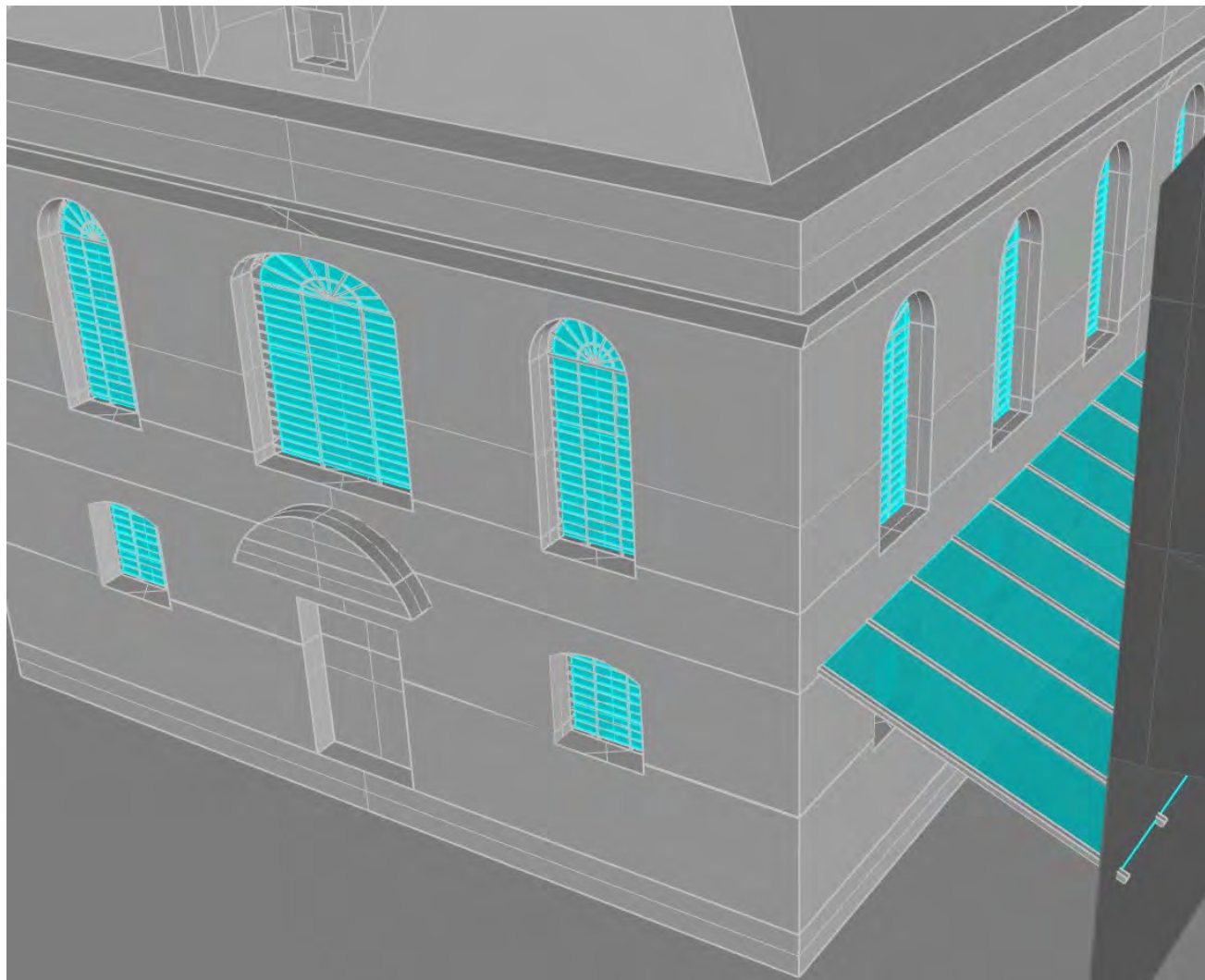


BRE's images of the interior of the Synagogue taken during a site visit on the 10<sup>th</sup> of September 2021





Before running the Radiance studies GIA added all of the relevant detail for the analyses

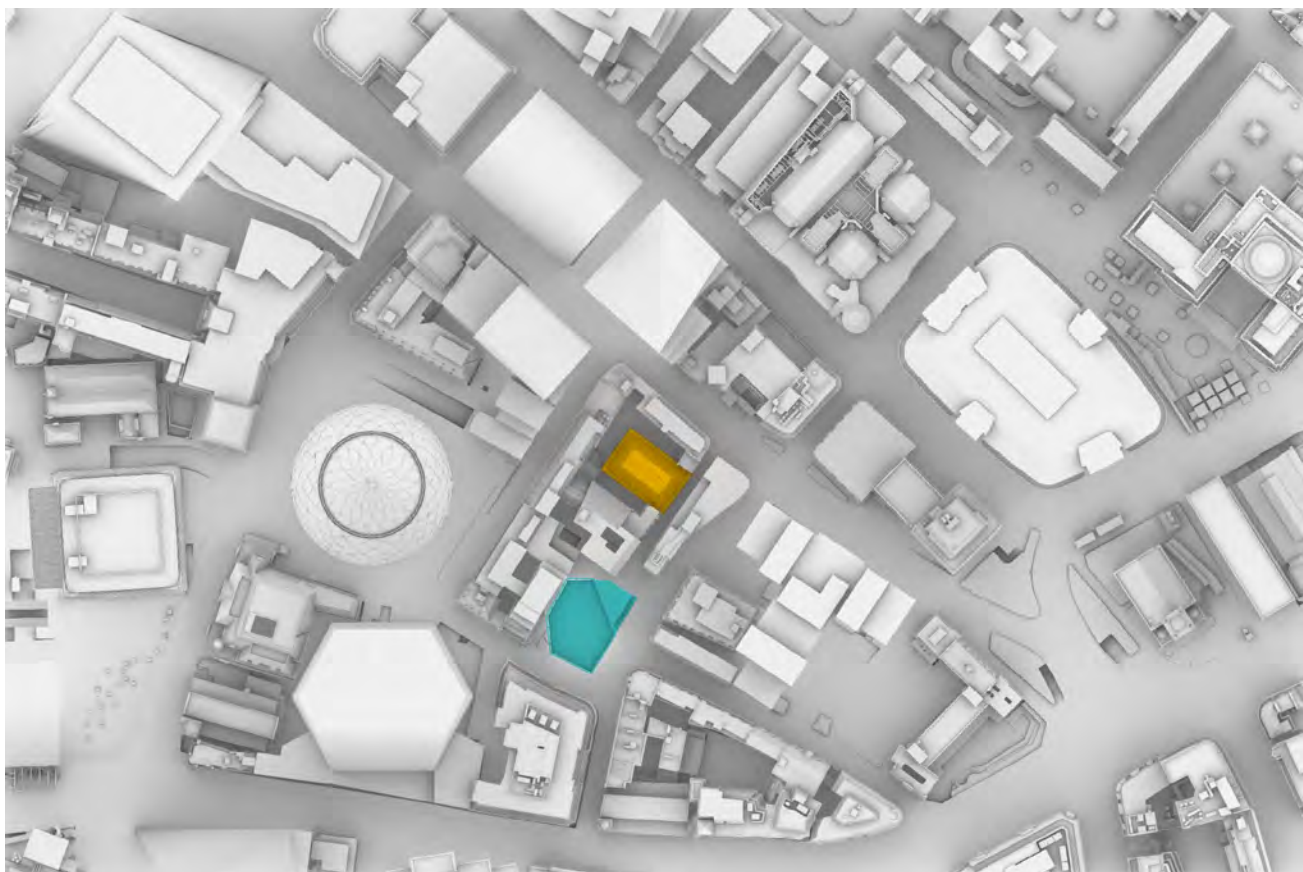




Future Baseline 1 - Existing



Future Baseline 1 - Proposed



● Includes all relevant consented buildings



## Future Baseline 1v Proposed Development

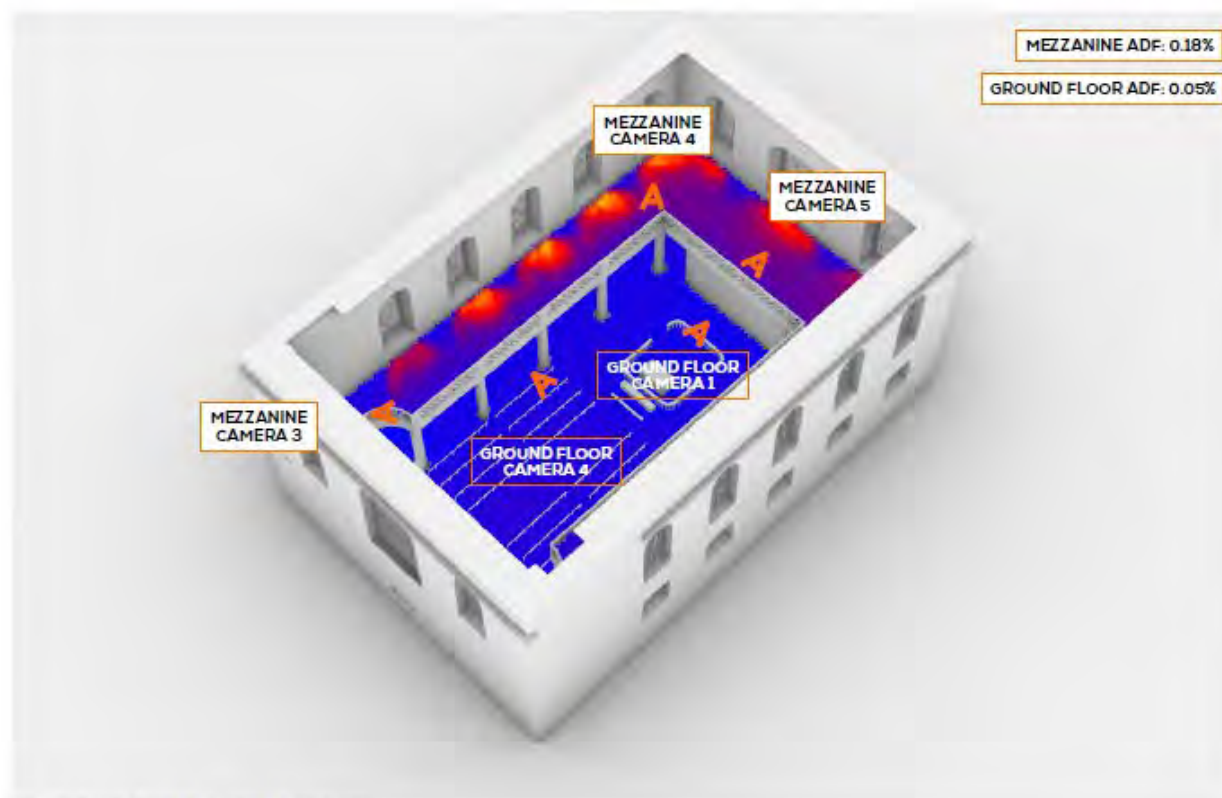


Fig. 08: Future Baseline 1 - View from North

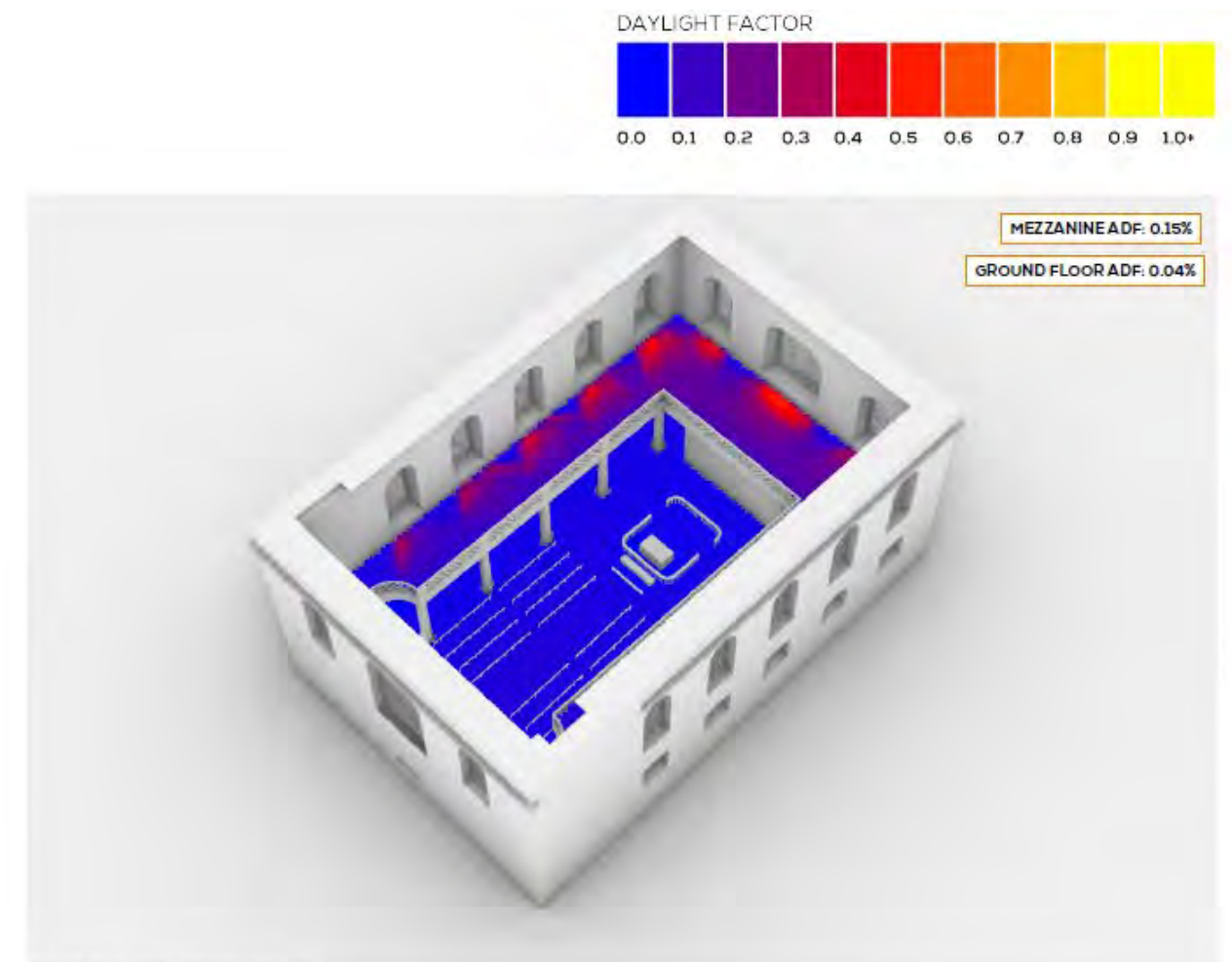


Fig. 08: Proposed - View from North

BRE's independent review states that *"Despite the importance of daylight within the space, the magnitude of loss of daylight would be classified as a **minor adverse impact**, because the relative loss is not far outside the BRE guidelines, and the affected room has other sources of daylight. The conclusions seem to be supported by GIA's Radiance studies"*.



Future Baseline 1



Fig. 30: Future Baseline 1



Fig. 31: Proposed

FACTOR IMAGE

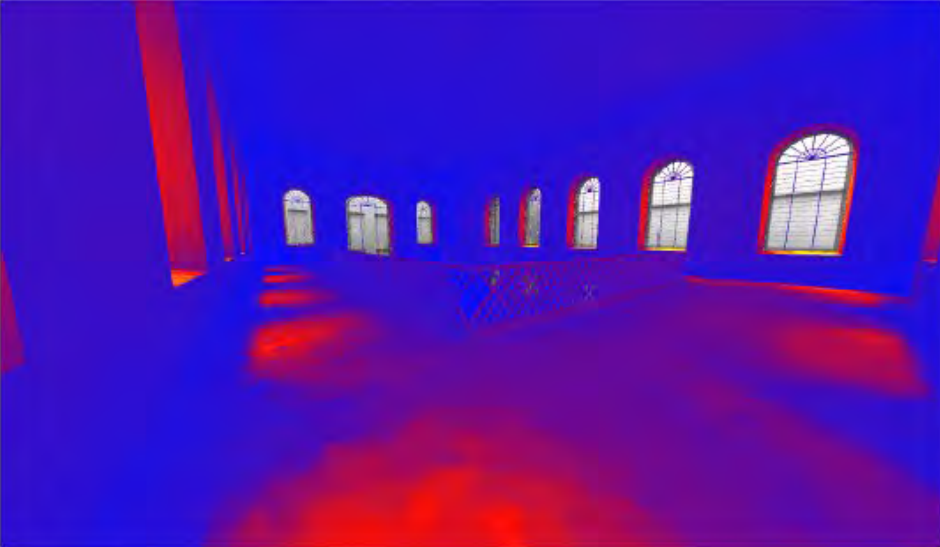
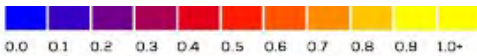


Fig. 32: Future Baseline 1

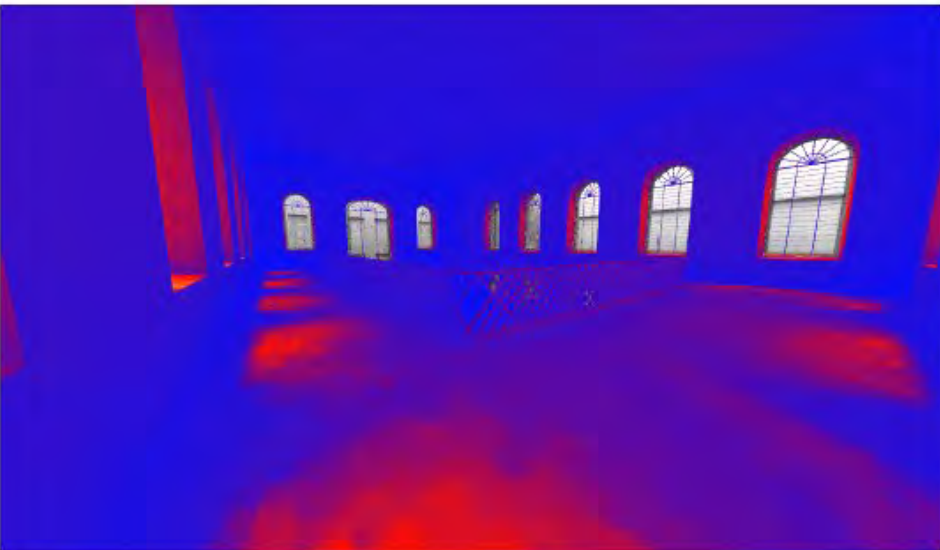


Fig. 33: Proposed



DAYLIGHT STUDY  
MEZZANINE  
CAMERA 6  
HUMAN VISUAL RESPONSE IMAGE

Future Baseline 1



Fig. 50: Future Baseline 1



Fig. 51: Proposed

DAYLIGHT STUDY  
MEZZANINE  
CAMERA 5  
FALSE-COLOURED DAYLIGHT  
FACTOR IMAGE

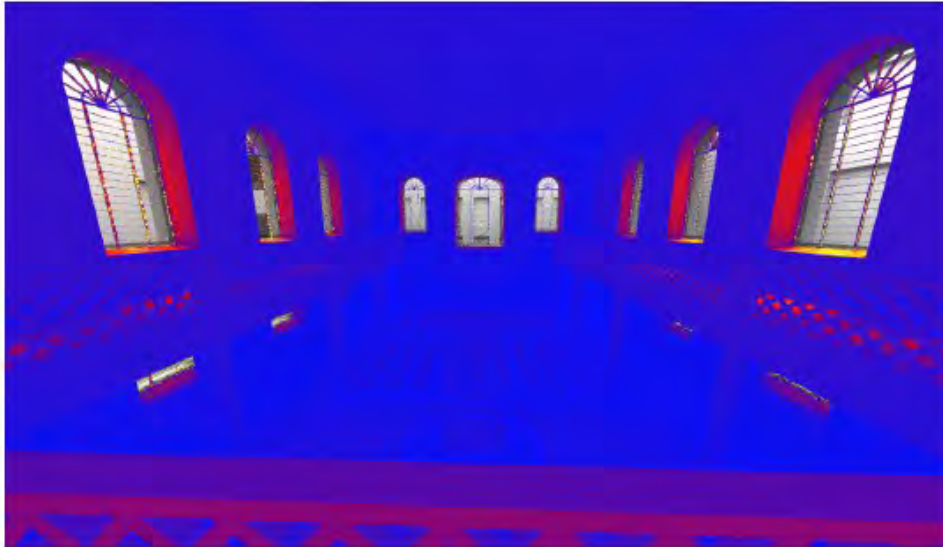


Fig. 52: Future Baseline 1

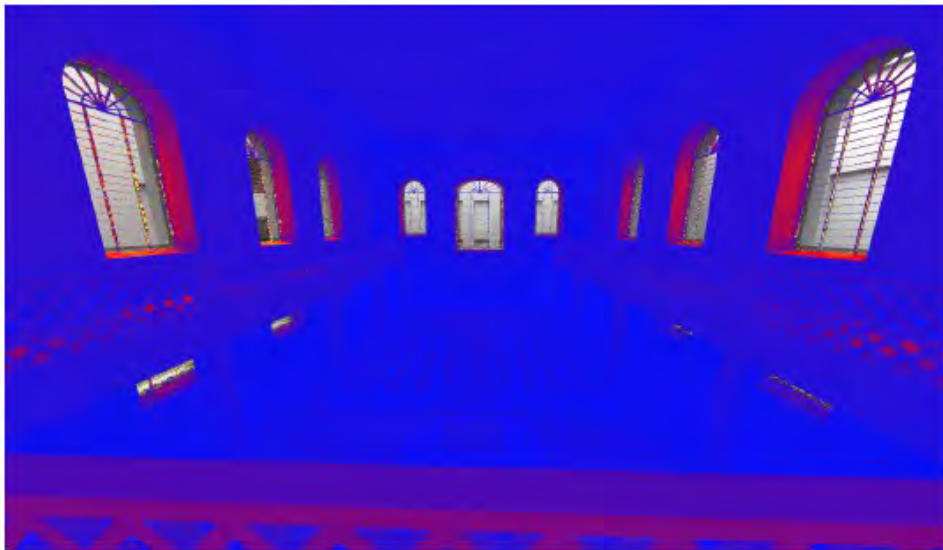
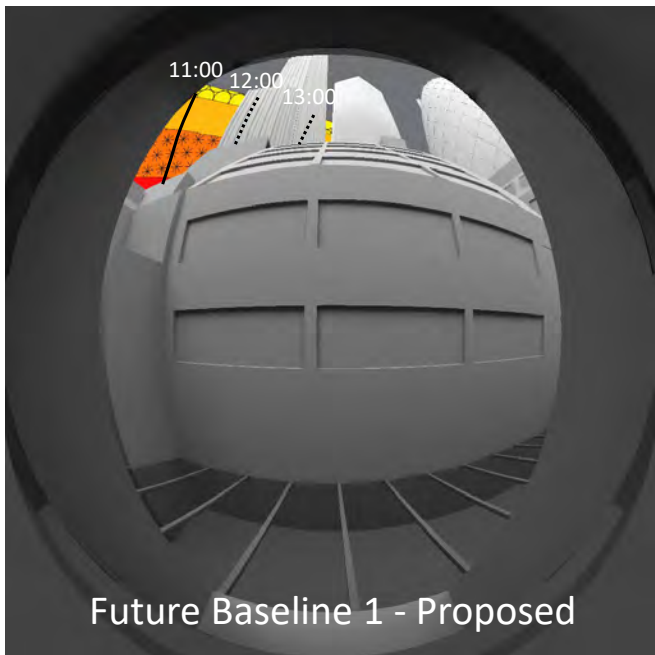
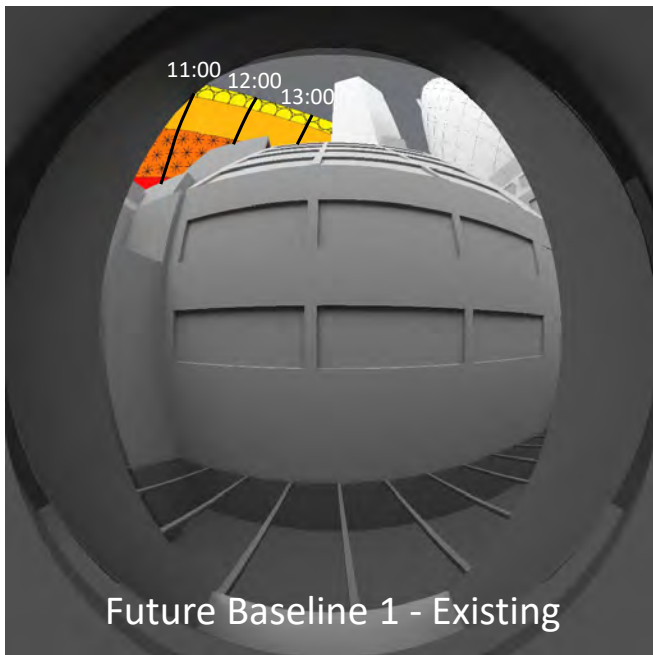
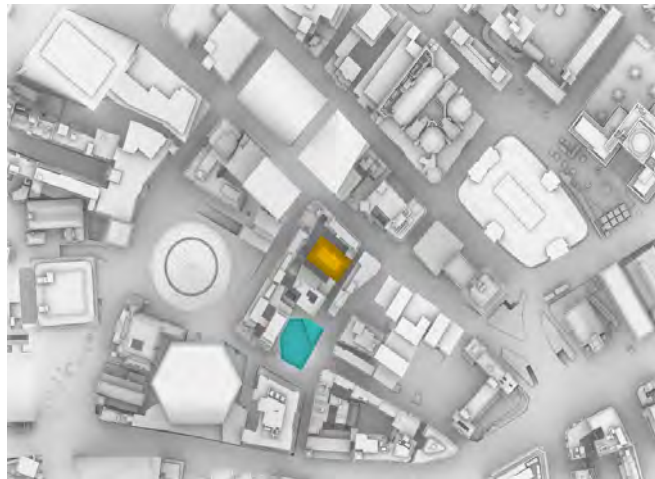
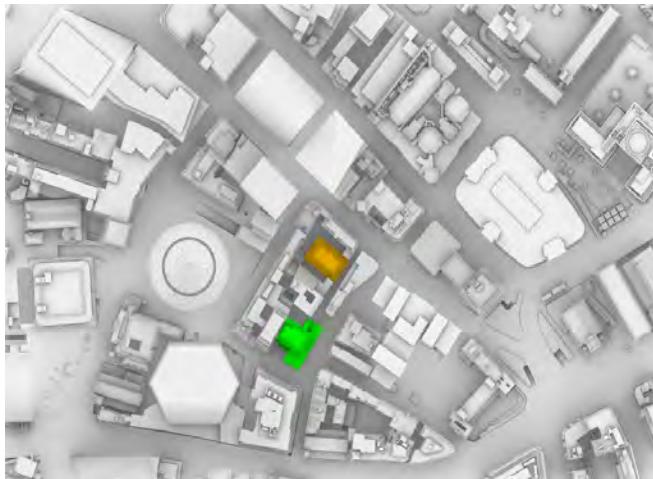
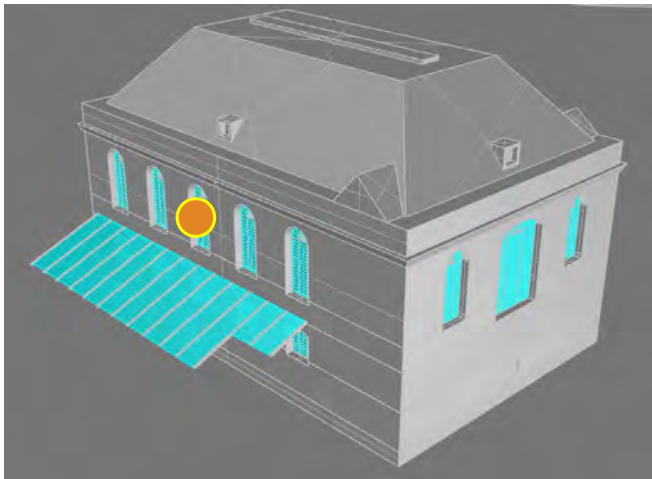


Fig. 53: Proposed



# Daylight and Sunlight





- *A full ES was provided and reviewed by two consultants for the City of London including the BRE*
- *GIA were requested to provide a second opinion using Radiance*
- *GIA's analysis supports the original advice to the City of London regarding daylight: minor adverse impact*
- *GIA agree that whilst there may be a noticeable loss of sunlight, it is not material*
- *GIA consider the scheme complies with policy Local Plan Policy DM10.7 and therefore is acceptable in terms of amenity*







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00:00:00.000 --> 00:00:29.450

Morris, Alexander

Thank you for your time today. I appreciate I met a number of you during the recent site visits, but by way of introduction my name is Alexander Morris and I represent well put the owner of the application site. I have a number of our project team with me today to support the presentation and answer any questions from the Members in due course. The advent of the virtual world has created efficiencies for the future office, but one thing that's become clear is that it cannot replace personal interaction, collaboration, talent retention and team building.

00:00:29.970 --> 00:00:36.980

Morris, Alexander

The office space needs to respond to these requirements in addition to the high demand for high quality and best in class sustainable offices.

00:00:37.730 --> 00:01:08.100

Morris, Alexander

With all the current positive messages around the economy, the recovery and return to work we are proposing to commit 350 million capital investment in the city that also provides 4.4 million annual spend within the Eastern Cluster. KPMG predict an increase of 100,000 people in the city and the BBC reported that 1000 new financial services applications to work in London have been received since Brexit. Just with these stats alone, London needs in excess of 10 million square feet of additional offices as investors.

00:01:08.160 --> 00:01:14.010

Morris, Alexander

And developers in central London offices. We have one and a quarter million square feet of development pipeline in central London.

00:01:14.990 --> 00:01:45.360

Morris, Alexander

A brief to the design team was to provide a best in class sustainable building, targeting 99% of all employers in the city or Smas, as well as including a significant affordable workspace mixed with community accessible space which has been enhanced further through the conversations with the city and the GLA officers, the GLA stated that the proposals will cater for small and medium enterprises not usually found in the Eastern cluster and would complement the existing office of this part of the city we've carried out.

00:01:45.420 --> 00:02:16.500

Morris, Alexander

An extensive consultation pre and post application that has shaped the proposals. The substantial public benefits and the design that is described by officers as slender and sophisticated within the cares and the eastern cluster, the GLA said a tall building is acceptable in principle given the site is located within the Eastern cluster and officers concluded that the proposed building is considered to harmonize with the principles of the NPPF in that is a building which is sustainable and beautiful, being a well designed proposal.

00:02:16.690 --> 00:02:25.290

Morris, Alexander

Which would enhance the city's architectural character and would be sympathetic to the character of the locality function well and add to the overall quality of the area.



00:02:26.190 --> 00:02:55.250

Morris, Alexander

We carried out our consultation using social media, virtual meetings, virtual exhibitions, letter drops, and, uh, consulted with a wide audience in the City of London and neighboring boroughs. This does include the Bevis, Marks, Synagogue and many other key stakeholders. The all Gaetan Portsoy can ward councillors with two written letters of support. The Middlesex St Estate, all of the Greek Church Lane residents, city, London and GLA officers local schools, theaters, trusts or gate bid who all provided letters of support.

00:02:55.870 --> 00:03:25.770

Morris, Alexander

His name of London and sculpture in the city and local churches with support from Saint Helen's Bishopsgate. I acknowledge the fact that we have received a large number of injections as part of the formal public consultation with the vast majority from the international Jewish community. Although we did receive over 30 letters of support, I think it's important for Members to know that the very first stakeholder meeting was with the synagogue and my last meeting was a conversation with the President of the trustees. We had more meetings with the synagogue than any other consulte.

00:03:26.000 --> 00:03:56.930

Morris, Alexander

Including presentations to all the trustees meetings with Rabbi Morris and they would agree that all conversations have remained civil, open and respectful as they recognized in all their representations to the city in order to assist the synagogue, we as submitted a lot of additional studies to provide further assurances. We've provided financial support to them to employ consultants to review and comment on the application documents and still remain committed to working with the synagogue in the future. These include additional cumulative assessments of emerging developments.

00:03:57.170 --> 00:04:28.080

Morris, Alexander

And the commissioning of a specific radiant study of which Gordon Ingram will discuss further shortly. I personally have been involved in all of the consultation, and I was disappointed to see the recent media coverage where the majority of quotes made would appear to relate to the impact of an unconsented undetermined and potentially emerging development as 33 creatures slain, which sits 3 meters away, and our sites it's 30 meters away. This is more clearly evidence in a number of the written objections that are factually incorrect.

00:04:28.420 --> 00:04:36.730

Morris, Alexander

We do not have a party war with the synagogue and as confirmed by the city's assistant district surveyor or construction will not result in any issues with its foundations.

00:04:37.380 --> 00:05:06.840

Morris, Alexander

We have remained silent within the media, but would want the members of the committee to know there are some key points to highlight respect solely of the 31 Berry St application and the neighboring Bevis Marks Synagogue in response to those objections, the committee report following independent advice from Doctor Littlefair says that the loss of light would be largely due to the other



consented buildings in their potential future cumulative scenario in some cases, including 33 church and very little of it will be due to the proposed development. 31 Berry St.

00:05:07.540 --> 00:05:38.710

Morris, Alexander

The office is further confirmed that 31 Berry St proposals were preserved. The special interest and significance of the synagogue. Historic England, said the proposed scheme would cause a small degree of incremental harm or be at the existed consented. Tall buildings within the Eastern cluster already present a significant impact. The officer included that the daylight effects of 31 Berry St are minor adverse and that the proposed development would not noticeably reduce daylight and sunlight in the synagogue and courtyard to unacceptable levels. And finally.

00:05:38.930 --> 00:05:55.540

Morris, Alexander

That development complies with the current London plan and emerging city plan in respect of daylight and sunlight. In fact, our application aligns or goes beyond all current and emerging policies. Before I introduce the architects talk about the proposals, I would like to make two further comments.

00:05:56.250 --> 00:06:26.030

Morris, Alexander

The current climate crisis is strongly influenced by the built environment, and that's the number one consideration for all our developments is good, sustainable design, but ultimately good design creates stunning results. As you will see, this can be further evidence at our 105 Victoria Street project in Westminster, which confirms the results of good, sustainable design that starts on site next year, whilst BREEAM outstanding Andy PCA or advertised as a sustainable benchmarks which we will achieve, we are focused on designing the building to minimize.

00:06:26.260 --> 00:06:57.420

Morris, Alexander

The embodied and operational carbon to be truly sustainable and the certificates are given by removing all fossil fuels from the building and supplying 100% electricity from renewable sources. We will provide a net zero operational carbon building at practical completion. Whilst that is a simple but important commitment, we're also working very hard to minimize the embodied carbon within the new build. Looking at innovative ideas and considerations operationally, we've also developed designs to minimize the use of electricity, including natural ventilation.

00:06:58.120 --> 00:07:27.910

Morris, Alexander

We also provide a building with an urban greening factor in excess of the current GLA policy. Whilst whole life carbon profiling is the only way to truly assess the sustainability of the built environment, we have to continue to push the opportunities our project is achieving. The industry standards set by the Oribe in response to the 2050 Paris Agreement are submitted. Lifecycle carbon analysis to the GLA is ahead of their benchmark targets, but our team aspire to achieve the GLA aspirational targets.

00:07:28.510 --> 00:07:58.360

Morris, Alexander

Another important commitment is to consolidated servicing strategy, which provides a zero increase in TRIPS to the site compared to the current use of 31 Berry St I cycle to work five days a week and



actively support and promote sustainable travel in all our developments across London. In 31 Berry we are providing enough bike spaces for over a third of the tenants to cycle to work traffic calming, public realm improvements. In addition to the new cycle, high stations as well as restricting deliveries to 31 Berry St outside.

00:07:58.410 --> 00:08:28.320

Morris, Alexander

The normal morning lunchtime and evening peak periods, the entry to the cycle parking connects perfectly with existing cycle lanes on creatures flying from the east and the West of the building. The second point is the substantial benefits of this development to the wider community, which are clearly highlighted in the office of report, but the introduction of the Cree Church Hall, which provides public access akin to a village hall at the base of the building that is the hub to the wider community, benefits which will be open. 10:00 AM to 9:00 PM weekdays.

00:08:28.580 --> 00:08:58.780

Morris, Alexander

At 9:00 AM to 5:00 PM on Saturdays, this awful was driven by the demand of many consultees and community groups, including the local schools, where we discussed events such as the Lantern Parade, the Tower Hamlets Education Business Partnership to connect the young to the city Employers, citizen Helen's Bishopsgate creature, its residents, as well as the synagogue in the final virtual exhibition feedback before the submission. Last year, three residents, including Rabbi Morris, said the space is positive for the local community to have.

00:08:58.830 --> 00:09:15.160

Morris, Alexander

Readily accessible facilities open on evenings and weekends, and additional space for our activities would be welcome. We have committed to providing this space free of charge for Community charities, local residents and 20% is dedicated to career opportunities in the city.

00:09:16.110 --> 00:09:26.840

Morris, Alexander

I will now pass over to Dan Campbell from 7 trillion architects who would describe the proposal and then Gordon Rule commentary on the technical analysis undertaken around daylight and sunlight.

00:09:29.130 --> 00:09:36.360

Daniel Campbell

Thank you Alexander and just to confirm I'm going to share the slides. Or is that going to be done by others?

00:09:38.290 --> 00:09:38.620

Daniel Campbell

Quinn

00:09:40.990 --> 00:09:42.120

Richards, Gwyn

are you able to share them?

00:09:42.050 --> 00:09:47.290

Daniel Campbell

Yes I can. Yeah, it's probably easier rather than saying next, slide each that OK, I'll proceed then, thank you.



00:09:43.260 --> 00:09:44.590

Richards, Gwyn

Yes please, please do so.

00:09:50.990 --> 00:10:07.960

Daniel Campbell

So I'm going to share these slides to expand upon our architectural approach and proposals today, and we're going to start with the site area, which at 31 Berry St sits within the Eastern Cluster on the corner of Cree Church and Bury St itself.

00:10:08.660 --> 00:10:38.490

Daniel Campbell

Our initial design considerations reviewed the opportunity for re use of the existing 60s building. However, the opportunities were limited due to the poorly performing building envelope and the limitations of the superstructure due to the low slab to slab levels and inflexible structural arrangement and the inefficient core and MVP. In addition, the existing building doesn't optimize this important site, providing a negative contribution to the locality with little public realm, urban greening or active.

00:10:38.540 --> 00:10:39.010

Daniel Campbell

Frontages

00:10:40.020 --> 00:10:45.710

Daniel Campbell

the consultation process has been extensive and engaging since the inception of this project.

00:10:46.430 --> 00:11:17.700

Daniel Campbell

As Alexander is explained and as I will aim to highlight in this presentation, this process has shaped the submitted proposals before you sustainability is at the forefront of the design retaining the basement structures and embodied carbon where possible. Adopting circular economy and climate resilient design principles utilizing low carbon construction techniques, installing highly efficient all electric MVP systems with no on site combustion. Integration of passive measures through facade design and natural ventilation.

00:11:18.060 --> 00:11:29.930

Daniel Campbell

Which will reduce operational carbon by 50%. Harvesting rainwater, significant urban greening, maximizing the public realm, and the promotion of sustainable means of transportation and servicing.

00:11:30.790 --> 00:12:01.040

Daniel Campbell

This is resulted in a BREEAM outstanding design with an EPC rating of a delivering the highest standards of sustainable design through. Net operational carbon, the proposals being closely analyzed with regards to the prevailing heritage assets and the contextual studies, have significantly influenced the architectural response. An early review of the historic St patterns and the emerging context informed the public round proposals. These include the.



00:12:01.100 --> 00:12:16.990

Daniel Campbell

Publicly accessible James Court, Pocket park and hen huge arcade, which cuts through the center of our site, the arcade reinstates the original length of Henige Lane from Bevis Marks to Bury St and links to the proposed cooner place through to lead and Hall St.

00:12:18.020 --> 00:12:21.470

Daniel Campbell

Scheme aims to maximize the permeability across the site.

00:12:22.150 --> 00:12:31.560

Daniel Campbell

Increasing the public realm within the red line alone by nearly 240% and in addition extends beyond to St improvements along the length of Cree Church.

00:12:32.480 --> 00:12:58.740

Daniel Campbell

The the publicly accessible ground floor playing provides access to the extensive range of community facilities whilst also incorporating entrances to the upper floor officers, facilitating off St servicing and providing a prominent concierge entrance for tenants and visitors to the secure cycle parking facilities directly off Cree Church. The lower floors of the development are designed for public and community use.

00:12:59.630 --> 00:13:03.460

Daniel Campbell

The area provided equates to 50% of the existing building area.

00:13:04.250 --> 00:13:15.210

Daniel Campbell

The southern end of the site has been prioritized to accommodate James Court. This is a reinterpretation of the historic courtyard which once sat adjacent to the western edge of the application site.

00:13:16.170 --> 00:13:45.790

Daniel Campbell

This landscaped area would provide a blend of open and partially covered public space for people to dwell and enjoy. The facilities on site and in the locality all year round. Henige Arcade runs north from James Court. It's activated by retail makerspace and display the architectural designs, provide the opportunity for the incorporation of artwork, informative display and resonate with the traditional arcades and passages which were inherent part of the city grain.

00:13:46.920 --> 00:14:07.290

Daniel Campbell

Located on the mezzanine and 1st floor or the community creature at all the mezzanine level works as a flexible vestibule to the main hall space. Above the hall provides highly adaptable space which can facilitate a range of events and activities which have been identified through our stakeholder engagement process.

00:14:08.120 --> 00:14:16.410

Daniel Campbell



The office floors have been designed as an integrated ecosystem specifically created to meet the growing demands of small and medium enterprise businesses.

00:14:17.480 --> 00:14:31.260

Daniel Campbell

The floor plate provides highly flexible column free space which ranged between 3 and 5000 square feet. Affordable and SMB workspace orientates themselves around the central hive at levels 20 and 21.

00:14:32.100 --> 00:14:42.730

Daniel Campbell

This provides a highly amenitized space for collaboration and well being. The office and Community facilities are supported by extensive end of trip and secure cycle parking at basement level.

00:14:44.190 --> 00:14:58.200

Daniel Campbell

From the landscape ground plane. The proposals integrate planting throughout the height of the building permeating the office, floors, terraces, balconies, and crowning the top of the building. The result is an urban greening factor, 30% greater than GLA targets.

00:14:59.370 --> 00:15:13.880

Daniel Campbell

The genesis of the facade designs emanates from studies of the neighboring historic buildings with support from the city's planning officers. This has led to a new typology and a departure from the plane of glazed elevations which are predominant amongst the city's tall buildings.

00:15:14.850 --> 00:15:44.730

Daniel Campbell

The proposals adopt greater solidity with punched facades joining reference from the proportions and composition of traditional city buildings. Less than 50% of the facade will be glazed to avoid over reliance on mechanical systems. The materiality has been informed by their neighboring Holland House adopting profiled glazed Terra cotta fins. This offers a low embodied carbon recyclable, durable and adaptable solution which, through careful color selection, can sit harmoniously.

00:15:44.910 --> 00:15:49.960

Daniel Campbell

Within the immediate context and be integrated within the General Pavement of the cluster.

00:15:50.950 --> 00:16:21.360

Daniel Campbell

This facade approach presents significant benefits through self shading, the integration of natural ventilation, the accommodation of floor by floor, plant which breathes through the permeable spandrel panels. This reduces the requirement for central plant and caters for tailored installations designed for actual occupational levels rather than the wasteful over provision. For potential maximum calculations, it also facilitates future adaptability for alternative uses, looking well beyond the usual design.

00:16:21.870 --> 00:16:23.580

Daniel Campbell

Of a traditional office development.



00:16:24.440 --> 00:16:27.370

Daniel Campbell

That developed massing has derived from careful analysis.

00:16:28.070 --> 00:16:39.060

Daniel Campbell

Of local views and longer range views of the cluster, the massing and fenestration at the base response to immediate townscape. This transitions at the 21st floor shoulder.

00:16:39.930 --> 00:16:51.420

Daniel Campbell

To present a slender profile against the skyline relating proportionally to the overall cluster, I will now pass you on to Gordon Ingram who will talk you through the technical analysis around the daylight sunlight.

00:17:03.490 --> 00:17:27.010

Gordon Ingram

Good afternoon ladies and gentlemen, I'm I'm going to give you a brief overview of of this and on my personal involvement in this and then take you, particularly through the position in relation to the synagogue. So I started as we're we're bound to start by looking at planning policy and understanding what's taken place in relation to this particular site.

00:17:28.080 --> 00:17:39.280

Gordon Ingram

The developer originally engaged within an organization called Adverse and Young to provide a proper daylight and sunlight report and incorporate that into an environmental statement.

00:17:40.190 --> 00:18:09.420

Gordon Ingram

This was all done quite properly in the overview that GYA have undertaken of that particular report in terms of looking at all of the relevant neighboring properties and taking into account the Breg guidelines. So whilst planning policy particularly focuses on dwellings, it did, it also highlights the use of the BRE and its relevance and all of you will be aware that we've had previous discussions in the past about where there are potentially.

00:18:10.000 --> 00:18:30.200

Gordon Ingram

Contentious schemes or considerations that need need a deeper dive. It is possible to undertake further daylight analysis through the form of radiance, but just really to highlight for all of you that everything that has been done by aberson young in our view, has been done correctly and in accordance with policy.

00:18:31.780 --> 00:18:48.660

Gordon Ingram

So the RADIANTS study that was undertaken with particularly done with Bevis, Marks, Synagogue and as well as that we undertook some further analysis along Creek Church Lane with the residential there to basically verify the conclusion so to come out of the S2.

00:18:50.370 --> 00:19:21.020

Gordon Ingram

So if I start with the internals in relation to the synagogue, and you can obviously see end overview



who've been inside, it's actually not particularly well lit space at the moment, and that's contributed firstly on the outside by the number of buildings, which are obviously quite high in the existing situation around it, and therefore you're going to limit the amount of sky visibility. But also you can see the color of the furniture and all of the finishes inside.

00:19:21.220 --> 00:19:28.490

Gordon Ingram

A lot of them very dark as well, so in particular analysis looked at not only the ground floor but also the balcony area.

00:19:30.530 --> 00:20:01.420

Gordon Ingram

So you can see in relation to enter, just skipped a slide. I think they're just check up so you can receive in relation to our analysis compared to the original work there was undertaken by overusing Young, which is that the normal level to undertake things they had basically made assumptions in relation to the window, the actual frames or the the sort of general details that you would expect the quality of the fenestration and the reflectivity of the internal surfaces.

00:20:01.710 --> 00:20:18.760

Gordon Ingram

So they're they're assumptions. We actually put all the nuanced elements in and you can see the right hand side of that diagram where we particularly looked at all the furniture. The colors of that, the furniture, and we pick up all the precise detail to do a very detailed analysis.

00:20:20.570 --> 00:20:50.220

Gordon Ingram

So that analysis took into account and I don't know if you can easily see it, but you can see 3 blue dots there. It takes into account the consented building. Supers oversee being consented, their material consideration. You can see 40 leaden hall there at the bottom, one undershaft to the left of that, and slightly higher up, and then Bevis Marks house at the top. So it takes into account. This analysis takes into account the presence of those buildings, obviously not the Tulip.

00:20:50.320 --> 00:20:58.510

Gordon Ingram

N 33 creatures slain because neither of those are recognized as being consented and therefore not material in relation to this application.

00:21:00.340 --> 00:21:30.520

Gordon Ingram

So here you'll see a 3D image that highlights that the depth of the radiance analysis. Now it's important to note that I had to do this because it's the only way to try and illustrate where any change actually occurs, that the gradations system, if you look at the chart that that kind of bar chart colored bar chart in the top right hand corner of the slide. That's going from zero up to 1% daylight factor will normally that chart is broken down, sorta up.

00:21:30.570 --> 00:22:00.650

Gordon Ingram

To 5% and and we've broken it down into single nought point 1% factors. And that's because the actual change in daylight is so small, and the purpose of that is to highlight that it there is a very small change which is taking place and you can see that there's a brighter red on the left hand



diagram, which is the existing and on the right hand side it's a less bright red, so it's in that realm of a change within red off about nought .1 to north.

00:22:00.720 --> 00:22:31.070

Gordon Ingram

.2% average daylight factor change now I appreciate it when you undertake an analysis against VRE guidelines, you get a very simplistic linear analysis, which said if there's a 20% reduction, that's going from an existing to proposed the Breg automatically say, well, that will be noticeable. And having said that, they would question whether it would be noticeable in reality when you look at it in the depth that we have, but where we are totally in agreement.

00:22:31.120 --> 00:22:40.790

Gordon Ingram

Is that this is undoubtedly a minor adverse impact to the balcony area. There's clearly going to be no noticeable change whatsoever to that ground floor space.

00:22:41.980 --> 00:23:10.890

Gordon Ingram

Now this is evidenced with what's called the human visual response, so the left hand side if Connor Connor rendered images and you can see at the top it says future baseline one and the bottom is the proposed and it takes that image that you saw previously where it's showing the colored that false color image, and illustrates that if you are looking at with your eye, the perception the human visual response on the left hand side, it's very.

00:23:10.940 --> 00:23:29.080

Gordon Ingram

Very hard indeed to see any real change and that's why it is minor, adverse and the BRE and ourselves, and indeed the City of London had another consultant to do a review of the ES. We all agree that that is a minor adverse impact. It would be a challenge to be noticeable whatsoever.

00:23:30.610 --> 00:23:56.280

Gordon Ingram

Here's a second image which highlights particularly the impact down on the ground floor. And again, it wouldn't be a noticeable change whatsoever, and therefore the overall conclusion in relation to daylight and connection with the synagogue. It's that if there is potentially a noticeable when we question, and I genuinely and my review think there won't be any noticeable change in the experience of daylight within the synagogue space.

00:23:57.360 --> 00:24:01.320

Gordon Ingram

Sunlights also been raised as a consideration and obviously whilst

00:24:01.380 --> 00:24:31.900

Gordon Ingram

and the particular planning policy doesn't focus so much about sunlight to places of religious worship that you, your officers, I have wanted to understand what the sunlight impacts would actually be. Now that you'll notice here that we've taken of one example of 1 window just in the central space, overlooking the site from the synagogue, and in that sort of no straightforward way to try and explain what you're looking at and that sort of fisheye lens.



00:24:31.960 --> 00:25:02.520

Gordon Ingram

Diagram on the bottom the left hand side shows the existing situation and the top. The Yellow band is effectively the height of the sun in June, and that's about 61 degrees. When you get down to that sort of orangy band down there, you're down in an area where it's sort of March, September, and it's about 3740 degrees. The heights of the sun, so it's only going to be affected in as one would expect, because in winter months.

00:25:02.570 --> 00:25:32.580

Gordon Ingram

Height of the Suns lower, so with other existing presence of buildings already there, you won't get wintersun in the existing circumstance, so the left hand diagram shows the potential for son and you can see the clock there 11/12 one o'clock and that was right. Hand diagram shows the presence of the scheme which is actually being put in place there and you can see that roughly around 12:00 to 1:00 o'clock. It's about now now and a quarter. The presence of the scheme would affect some of the sunlight, just.

00:25:32.700 --> 00:25:59.840

Gordon Ingram

That period of time? Now appreciate, that's one window, but of course you would expect a very similar effect and impact for all of the other windows. It's very clear, therefore, and obviously this is just purely sunlight. Doesn't take account of the fact there are normally a lot of shady days, as we all already know in London 2, but it highlights that it's a very limited amount of time in the middle of the day where there would be any effect whatsoever.

00:26:00.370 --> 00:26:28.020

Gordon Ingram

Come to the sunlight to the property and, of course, you also understand there that that order element at the building, even if there was no tool element to it, it wouldn't make any difference to the change in sunlight as that occurs on a on a much lower threshold. But the overall effect and some like terms, as far as we're concerned, is that whilst it might be noticeable for that period of one or so errors one and half hours, and perhaps in the middle of the day, it's going to be very limited.

00:26:29.150 --> 00:26:30.900

Gordon Ingram

And in our view, not material.

00:26:32.810 --> 00:27:02.500

Gordon Ingram

So in conclusion, we were asked to review the ES and we're happy with what was provided in in the S in terms of the analysis. We deepened the analysis of, particularly around daylight and using the radiance technique, which we've discussed before the daylight impact to the synagogue was certainly, in our view, minor, adverse and not noticeable, and whilst this slide doesn't particularly highlight it or.

00:27:02.560 --> 00:27:33.050

Gordon Ingram

We came to the same view in relation to Cree Church Lane. There the IT was not going to be significant and once they might be a noticeable loss of sunlight, we don't consider it material. And



what I am clear about is that this is a scheme which completely complies in my view with the policy DM 10 and in terms of the daylight. Sunlight impact generally not just to those two buildings, but generally it is when we would be capable of fully supporting and it adheres to policy. So I'll now hand back across to Alexander.

00:27:36.470 --> 00:28:06.460

Morris, Alexander

I'm just in conclusion the extended benefits will be provided as part of his application. Many developed through a rigorous and collaborative consultation process, of which we appreciate and acknowledge the engagement and openness of the synagogue that drive to push boundaries of sustainability and Wellness beyond certificates to provide a net zero operational carbon building which promotes pedestrian and cyclist movements in the city. We're also pleased to see the positive recommendation made by the officers and that the application responds to current and emerging policies.

00:28:06.800 --> 00:28:37.150

Morris, Alexander

And at 31 Berry St provides an office design to support and respond to 50% of all employees in the city working for Smas. Finally, I would like to conclude by reflecting that we believe 31 Berry St aligns with the aspirations and targets of the city. Where is exactly the ambitions of the city's recovery and future as per the following quote from the city's Recovery Task force to create the world's most innovative, inclusive and sustainable business ecosystem as an attractive place to invest, work, live and visit.

00:28:37.500 --> 00:28:40.690

Morris, Alexander

Thank you very much your time and I would welcome any questions.

00:28:42.920 --> 00:28:44.450

Richards, Gwyn

Graham has a question.

00:28:53.520 --> 00:28:56.330

Graham Packham (Guest)

Can I can I ask a question? I've got to leave fairly quickly.

00:28:58.740 --> 00:28:59.430

Richards, Gwyn

Carry-on gram

00:28:59.760 --> 00:29:02.090

Graham Packham (Guest)

Yeah, thank you. Yes, it's for Mr Ingram.

00:29:02.910 --> 00:29:11.570

Graham Packham (Guest)

I'm good distillate legislation regarding the impact of light. Consider the the concept of cumulative impact.

00:29:12.340 --> 00:29:23.590

Graham Packham (Guest)

So for example, in licensing, our local authority can declare an area cumulative impact zone to control the the.

00:29:25.330 --> 00:29:33.070

Graham Packham (Guest)

Deleterious effects with new licensed premises or increases in hours. Does that apply in in in, in the area of.

00:29:33.660 --> 00:29:39.890

Graham Packham (Guest)

Uhm, light attenuation from new buildings and if not, does that mean we should just consider?

00:29:40.580 --> 00:29:41.130

Graham Packham (Guest)

Ah.

00:29:42.180 --> 00:29:48.460

Graham Packham (Guest)

The current situation consented buildings and the one new building which is under application.

00:29:50.100 --> 00:29:50.980

Graham Packham (Guest)

I hope that's clear.

00:29:52.470 --> 00:30:19.680

Gordon Ingram

no. I think I'm clear in relation to question. Thank you. I mean, it may well be one that Gwen you may want to comment on as well, but the environmental statement considers all the cumulative impacts as well as the solitary impact of the scheme. And that's all taken into consideration. The I assume you mean with the additional building that you're talking about. 33 Church Lane as well. Not, not necessarily.

00:30:19.870 --> 00:30:23.390

Graham Packham (Guest)

No, no, I understand that's out of scope in and not external.

00:30:23.440 --> 00:30:37.480

Gordon Ingram

So, so the environmental statement considers the cumulative impact of consents plus buildings which have been built as well as the proposal, and they look at it cumulatively, but also separately, just with the scheme alone.

00:30:40.900 --> 00:31:00.470

Richards, Gwyn

Perhaps I can just add to that there's case law that suggests that a material consideration in the determining an application you can't take into account schemes which haven't got consent, and you can't disregard them, but I think it would be reasonable for you to put less weight on those schemes given that they haven't gone through to a decision.

00:31:02.470 --> 00:31:04.390

Richards, Gwyn

I've got a question from John Edwards.



00:31:08.850 --> 00:31:16.180

John Edwards (Guest)

Hey yeah, thank you. This is a question for Gordon I got if you go to slide 44 or 49 at probably illustrates the question.

00:31:20.890 --> 00:31:22.980

Gordon Ingram

It's just coming on the second John.

00:31:22.870 --> 00:31:23.840

John Edwards (Guest)

Let's see.

00:31:25.150 --> 00:31:25.620

Gordon Ingram

Yes.

00:31:25.420 --> 00:31:28.750

John Edwards (Guest)

OK, right? So on on on the left hand side.

00:31:28.820 --> 00:31:39.650

John Edwards (Guest)

I did, I'm sure the the synagogue and you showed that external glazing, which which is covering the lower windows, so I'm assuming that's a Ruth on the heritage center.

00:31:40.870 --> 00:31:45.370

Gordon Ingram

Yes, that's the kind of feed over the top. That's right. We formerly housed a restaurant at one point.

00:31:44.250 --> 00:31:44.470

John Edwards (Guest)

Yes.

00:31:46.090 --> 00:31:50.650

John Edwards (Guest)

That's gone and doesn't exist. The thing there at the moment.

00:31:47.750 --> 00:31:48.080

Gordon Ingram

Yep.

00:31:50.950 --> 00:31:51.420

Gordon Ingram

Yes.

00:31:51.960 --> 00:31:59.210

John Edwards (Guest)

So I said my my first question is, uh, I'm from this slide. I'm assuming that all your capital nations have been made.

00:32:01.200 --> 00:32:02.520

John Edwards (Guest)

Assuming this exists.

00:32:03.470 --> 00:32:25.920

Gordon Ingram

Yes, so we actually have done an analysis without it and we put it in because it formed. These student was the existing as in a temporary state of nothing being there and and as we understand is going to be replaced by a museum which is going to be there for the the future lighting position and I think to clarify. And perhaps I you know should have referred to this and milk depth.

00:32:26.610 --> 00:32:49.200

Gordon Ingram

Our position on that is that the presence of the canopy and the lack of presence doesn't make much material difference at all to the day lighting situation, because you're just going through glass into other glass, but also it was the existing position previously, and if we were looking at as a temporary scenario, you'd look at what's being proposed and forthcoming as well. Does that help?

00:32:50.980 --> 00:32:57.740

John Edwards (Guest)

Not not completely, because you have reflected light and so that the inside wall of that you build it will will be brick so so.

00:32:57.800 --> 00:33:28.360

John Edwards (Guest)

Come, you're getting a light with geysing, but not not up from from the inside wall and actually put artificial lighting in that building and it's it just seems to be a lot that could be done with that new build to change the ambient light in the synagogue, which is just stop being discussed or addressed by anyone. I mean, it's very clear there's a reluctance to put more artificial lighting in the synagogue, but doesn't clearly going to be artificial lighting in that heritage center, and that could be on all the time.

00:33:29.010 --> 00:33:48.520

John Edwards (Guest)

Plus the fact that the glazing itself must be supported by structure, so and must be it must be making some compromises which could be overcome. It's it just seems like a something we need the whole the whole. That'll thousands of pages have been reading as they ignored this all together and and and going on from that there must have been a.

00:33:49.450 --> 00:33:58.660

John Edwards (Guest)

A balance of of used, you know, within the decision makers of the synagogue, on on on whether to do this, heritage centre or keeper.

00:33:59.630 --> 00:34:23.980

John Edwards (Guest)

I can make it a bigger courtyard because right now there is effectively a courtyard, so of course all those decisions wouldn't have any public controversy because it's all entirely freehold property of the scenario goal, but that that that the balance, the bigger balance we're talking about. Or we'll be talking about tomorrow is inherent in in in this heritage center as well. Excel on a smaller scale, but exactly the same issue which light into the synagogue.



00:34:25.250 --> 00:34:34.560

Gordon Ingram

Yeah, yeah. So I think if I was sort of take everything you've just said what the synagogue choose to do with that space for themselves.

00:34:34.830 --> 00:35:04.650

Gordon Ingram

Uhm, it won't actually make much difference to the ground for in terms of the light, but the way they're treating that space, in my view, suggests that they already know that, which is why they could easily, as you suggested, but artificial light in there and do a lot of different things which could enhance both that space and the synagogue behind it. But the fact that that you know that they've got the choice to do that it's obviously not something that the applicant can determine the outcome, but in terms of the ground floor.

00:35:04.700 --> 00:35:19.750

Gordon Ingram

The application doesn't actually make any difference to the ground at all, in any event, but the presence of that canopy and what they choose to do. In fact, when it was a restaurant, they had latticing over that internally, which suggested that daylight wasn't a consideration for them.

00:35:22.690 --> 00:35:23.190

John Edwards (Guest)

Bro.

00:35:23.880 --> 00:35:29.350

John Edwards (Guest)

Exactly and and it barely even now and that design. There must be some structure holding their glass off, which obstructs the light.

00:35:30.520 --> 00:35:42.030

Gordon Ingram

Yes, yeah, I I, I think genuinely my view of it. Is anyone who's doing that work in that in that particular area would not be concerned about natural day lighting.

00:35:31.880 --> 00:35:32.190

John Edwards (Guest)

Yep.

00:35:44.730 --> 00:35:45.280

John Edwards (Guest)

Thank you.

00:35:47.110 --> 00:35:55.020

Richards, Gwyn

Am I haven't a question from Natasha Lloyd Owen in the chat bar. Read it out. So hopefully somebody from the application team can respond.

00:35:55.390 --> 00:35:56.240

Richards, Gwyn

Uhm?

00:35:57.320 --> 00:36:06.490

Richards, Gwyn

How do you? How do the estimated total annual carbon emissions from the proposed development compared with those from the existing one?

00:36:07.340 --> 00:36:11.470

Richards, Gwyn

I'm totally not peer square meters geometer. Read that out again.

00:36:15.430 --> 00:36:46.300

Morris, Alexander

No no, no I got the the message I actually did. Actually Natasha asked that question during the site visit. So I actually got some detailed stats for you in terms of the emissions of the current building. Actually it is measured and I don't have it in total, but it's measured in carbon per square meter per year and that is 93.3 kilograms of carbon per square meter per year. The new building is 80% reduction to that and is 16.8 kilograms of carbon.

00:36:46.360 --> 00:37:12.650

Morris, Alexander

Per square meter per year, but I've obviously as part of our proposal, we have introduced an electric only building, which obviously in the future of decarbonization, or even if we're buying from resource renewable resource, is that future capacity is reduced to almost zero if not zero, purely and simply by the decarbonization over the next 5-10 years. That's going to happen in in the UK. I hope that answers the question.

00:37:16.190 --> 00:37:20.500

Richards, Gwyn

I'm John, your hand is up. I'm not sure if that's a legacy hand.

00:37:23.470 --> 00:37:24.110

Richards, Gwyn

Yes he was.

00:37:26.530 --> 00:37:39.820

Lloyd-Owen, Natasha

Hey, sorry Gwen, I I wrote a follow up in the chat. Thank you for the answer. Can I just confirm so it follows? Does it follow that we don't have or you're not able to provide the total carbon emissions? You can only provide it per square meter.

00:37:27.980 --> 00:37:28.390

Richards, Gwyn

Yep.

00:37:41.190 --> 00:37:41.720

Morris, Alexander

I.

00:37:41.250 --> 00:37:43.580

Lloyd-Owen, Natasha

In terms of the comparison, is that right?



00:37:42.920 --> 00:38:05.300

Morris, Alexander

In in, in terms of as, I'm sitting here today, I don't have the exact tonnage here, but I can circulate it, but based on the principles of how it's compared with others and how people like the ROBA, Letty, the GLA earth, that's the only point it is I can give you the answer by doing the calculation but we.

00:37:48.510 --> 00:37:49.380

Lloyd-Owen, Natasha

London Bridge

00:37:58.140 --> 00:37:59.950

Lloyd-Owen, Natasha

yeah no, I understand that.

00:38:01.730 --> 00:38:02.090

Lloyd-Owen, Natasha

That

00:38:04.550 --> 00:38:14.100

Lloyd-Owen, Natasha

yes, that would be. That would be extremely helpful 'cause I think I obviously we'd flute discussed it on the Friday, and then I'd hope that we might have the answer. So if that if that's possible for tomorrow's meeting, that will be extremely helpful.

00:38:06.890 --> 00:38:07.250

Morris, Alexander

OK.

00:38:14.460 --> 00:38:15.390

Morris, Alexander

Happy to do that.

00:38:15.660 --> 00:38:16.280

Lloyd-Owen, Natasha

Thank you.

00:38:16.710 --> 00:38:17.220

Morris, Alexander

No problem.

00:38:20.120 --> 00:38:25.800

Richards, Gwyn

I'm not seeing any more hands, so if any members got anymore question, I was time to ask them.

00:38:32.160 --> 00:38:32.950

Richards, Gwyn

Yes, I agree.

00:38:34.470 --> 00:38:42.970

Pollard, Henry

Yeah, can I just ask the viability of the building? If it was any shorter and whether that fits into the plant at all, or what flexibility you have.

00:38:49.030 --> 00:39:11.890

Morris, Alexander

Uh, I think the the the simple answer about viability is that it it? It's not. It's not viable to be reduced in height. The principle around the way of being able to make it viable is the introduction of a lifting strategy that reduces the courts so that the quarter office ratio works for the future. So we've introduced a lot of expense to create the.

00:39:11.940 --> 00:39:30.370

Morris, Alexander

The, UM, great the the building and in terms of viability, it it. It struggles when when the numbers are the floor, plates are are are reduced. It's probably the most expensive building that we that we have built and will build purely and simply because of the floater will ratio and the technologies we've installed.

00:39:38.200 --> 00:39:40.270

Richards, Gwyn

Aren't you seeing no other Hanzo?

00:39:41.630 --> 00:39:43.230

Bright, Toni

Natasha has another question.

00:39:44.190 --> 00:39:46.190

Richards, Gwyn

Question or a sorry?

00:39:46.370 --> 00:39:53.330

Bright, Toni

About when the when the transcript will arrive, that Asher probably in about 20 minutes, half an hour.

00:39:55.570 --> 00:40:00.920

Bright, Toni

I'll send the link to all the PM team members in public access.

00:40:04.980 --> 00:40:06.380

Lloyd-Owen, Natasha

Thank you, that's really helpful.

00:40:09.880 --> 00:40:11.080

Bright, Toni

Brian has a question.

00:40:12.570 --> 00:40:14.220

Bright, Toni

Your brain you're on mute mute.

00:40:18.120 --> 00:40:31.070

Mooney CC, Brian

I do apologize, I've come to this meeting very late. I'm afraid I was detained at another earlier meeting. I couldn't get out off and I will look at the full transcript, but could I as I have you here, please ask.



00:40:31.920 --> 00:40:37.430

Mooney CC, Brian

If you could summarize for me, and this is probably going to be going over what you've already said. How we?

00:40:38.820 --> 00:40:41.810

Mooney CC, Brian

And this is on there not strictly planning, but how are we?

00:40:43.430 --> 00:41:13.040

Mooney CC, Brian

Going to counter deal with the this exceptional avalanche of complaints that have come from the supporters of the the the arguments that the Bevis marker putting up about the the community coming under threat and so on and so forth. What what're you as the applicants? What? What is your? What is your reach out to them? What is what is your reply to them? I mean, you probably already answered this question, but I would just like to hear it. In summary.

00:41:13.440 --> 00:41:16.650

Mooney CC, Brian

To prepare myself for tomorrow's meeting, please thank you.

00:41:17.970 --> 00:41:47.860

Morris, Alexander

And I think the there is been a huge amount of consultation with the synagogue through the last 18 months. I've I've had more meetings with them than anybody else. There are many things that we discussed privately, and I have respectfully remained very private and not discuss things in the media. If you were to look at all the media and a lot of the objections that have followed from media introductions, you will find that the majority of the comments and made in there.

00:41:48.060 --> 00:42:18.470

Morris, Alexander

Or actually not referenced to our particular project. I think the, uh, the answer is we we have discussed lots of things. I spoke to the trustee, the President of the trustees as my last consultation. My first meeting was with the synagogue. And what can I do? I I actually have remained in that position where I want to work with the synagogue. We've had many discussions about how we can help, how we can support them in the future, and we will continue to do that. I'd rather not say.

00:42:18.520 --> 00:42:48.470

Morris, Alexander

What those things are? Because they're private between the two parties, but you know, take, take an example. We we, we discuss the opportunities of me inviting a very good friend of mine, Mark Masia, who is a specialist lighting consultant to come and speak to the rabbi and the synagogue about their lighting internally. Whether there's opportunities to change what are fluorescent lights to Eli D lights? So I I'm constantly talking about those opportunities with them, responding to the objections.

00:42:48.540 --> 00:42:57.790

Morris, Alexander

I'll be honest, I'm I I. I could. I could go out in the public domain, but I feel that that's not appropriate and I have retained what I think is the respectful process.

00:42:57.840 --> 00:42:58.280

Morris, Alexander

Uhm?

00:42:59.350 --> 00:43:04.600

Morris, Alexander

And I'm quite frankly, I suppose in a way that's important is we have.

00:43:05.400 --> 00:43:23.600

Morris, Alexander

I policy compliance project and I have put forward with a lot of the consultation and extra amount of benefits that relate to the Community to to, to support and also with the with the conversation with the synagogue as well. And so I think I probably.

00:43:22.110 --> 00:43:27.230

Richards, Gwyn

I'm just saying we've come up to 45 minutes in order to be equitable to both parts.

00:43:25.610 --> 00:43:26.900

Morris, Alexander

OK sorry sorry.

00:43:27.420 --> 00:43:37.720

Mooney CC, Brian

Kick could I could I just jump in with us? Uh, plenty. There were you there for surprised at the fact that you've had more than 3000 or almost 3000 objections.

00:43:27.850 --> 00:43:28.510

Richards, Gwyn

Conscious.

00:43:39.590 --> 00:43:44.890

Morris, Alexander

Uh, I I think based on the application going in October of last year.

00:43:45.890 --> 00:43:49.240

Morris, Alexander

Uh, I was surprised to see 3000 objections.

00:43:50.910 --> 00:44:12.910

Morris, Alexander

If you'll see where the objection started, the first round of injections was at the end of the consultation period up until December of 2120. Sorry, and then obviously, when we were deferred from the April committee, then there was a conditional set of objections that were issued.

00:44:12.970 --> 00:44:20.140

Morris, Alexander

Uhm, in after that a deferral, and as I say, referencing the the the media.

00:44:21.550 --> 00:44:45.380

Morris, Alexander

I suppose the one thing that I probably should mention is the in terms of 31 Berry St and if we just look at that application, I think the number is probably a lot less than half, so the number that you



refer to their counselor but you know member. Sorry member, but you know that's for the officers to do. Probably give you the further information.

00:44:47.480 --> 00:44:49.050

Mooney CC, Brian

Thank you very much, thank you.

00:44:49.030 --> 00:44:49.520

Morris, Alexander

No problem.

00:44:49.060 --> 00:45:02.760

Richards, Gwyn

Conscious with come up to time but but I have got a question from Natasha which wants clarification as to expects what is specifically meant by valuable. If we could be quick because we need to be equitable.

00:45:08.440 --> 00:45:18.260

Morris, Alexander

Via the word fireball. In terms of the project in terms of the investment and and return in terms of a building in in central London.

00:45:20.490 --> 00:45:22.600

Richards, Gwyn

Very cryptic, John. I think you've got one question.

00:45:24.790 --> 00:45:54.830

John Edwards (Guest)

Uh, it's just a point, really. In relation to what we just heard about this internal discussion since about the with the synagogue about the lighting inside, and you probably know this, but there is some inconsistency in the documentation they supplied, uh, about the historic nature of it on the fabric of the building, that the ceiling, and in fact not old at all. It was rebuilt after the the IR a bombing, so it's so the ceiling does offer an opportunity. It's not. It's not 17 / 1 at all. It's it's very recent anyway. I'd probably know that, but.

00:45:55.170 --> 00:45:56.510

John Edwards (Guest)

Others died, thank you.

00:45:57.630 --> 00:45:59.360

Richards, Gwyn

I'm just wondering now whether we should.

00:46:00.740 --> 00:46:01.680

Richards, Gwyn

Finish the meeting.

00:46:04.240 --> 00:46:05.420

Richards, Gwyn

Thank you very much everyone.

00:46:06.940 --> 00:46:07.310

Richards, Gwyn

OK.

00:46:07.890 --> 00:46:09.090

Morris, Alexander

Thank you bye bye.



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Opposing the  
proposed development

*Three key grounds for refusal*

Sir Michael Bear



# Specific contraventions to statutory policy plans and frameworks

1. **The overbearing presence of the proposed development** within the setting of the Grade I listed Bevis Marks Synagogue would cause harm to the contribution made by the setting to its architectural interest and the ability to appreciate the significance of this Grade I listed building.
  - The public and economic benefit of the provision of Class 'E' uses on the site would not outweigh the harm caused and similar benefit could be secured from a less harmful scheme.
  - The proposals are therefore contrary to:
    - London Plan Policies D9, HC1;
    - City of London Local Plan policies CS7, CS12, CS14, DM12.1 and DM12.3;
    - National Planning Policy Framework.
2. **The cumulative impact of this development** together with other consented and proposed developments within the setting of the Grade I listed Bevis Marks Synagogue would cause harm to the contribution made by the setting to its architectural interest and the ability to appreciate the significance of this Grade I listed building.
  - The result is an unacceptable impact at Bevis Marks Synagogue by reason of the loss of daylight and sunlight.
  - The proposals are therefore contrary to:
    - London Plan Policies D9, HC1;
    - City of London Local Plan policies CS7, CS12, CS14, DM10.7, DM12.1, DM12.3, DM21.3.
3. **The proposed development would be detrimental to the setting of the Tower of London World Heritage Site** by reason of its height, form, design and materiality along with its prominence which would adversely affect the following attributes of the Outstanding Universal Value of the Tower, the physical prominence of the White Tower; the site's strategic and landmark setting and the site's status as an internationally famous monument.
  - The harm would be significant and whilst it would be 'less than substantial', it would be at the upper limit of this range.
  - The public and economic benefit of the provision of Class 'E' uses on the site would not outweigh the harm caused and similar benefit could be secured from a less harmful scheme.
  - The proposals are therefore contrary to:
    - London Plan Policies D9, HC1, HC2, HC3, HC4;
    - City of London Local Plan policies CS7, CS12, CS14, DM12.1;
    - London's World Heritage Sites – Guidance on Settings SPG (March 2012);
    - guidance within the Tower of London World Heritage Site Management Plan;
    - National Planning Policy Framework.



# Professor Abigail Green

Professor of Modern European History  
Brasenose College,  
University of Oxford



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# Bevis Marks: Synagogue and Setting



- ‘...the curtilage of a building (the principal building) is in general terms any area of land and other buildings that is around and associated with that principal building’
- ‘...unless the list entry explicitly says otherwise, the law (Section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990) says that the listed building includes any ancillary object or structure within the curtilage of the building, which forms part of the land and has done so since before 1st July, 1948.’

Historic England, *Listed Buildings and Curtilage: Historic England Advice Note 10* (February 2018), pp.4 & 5.

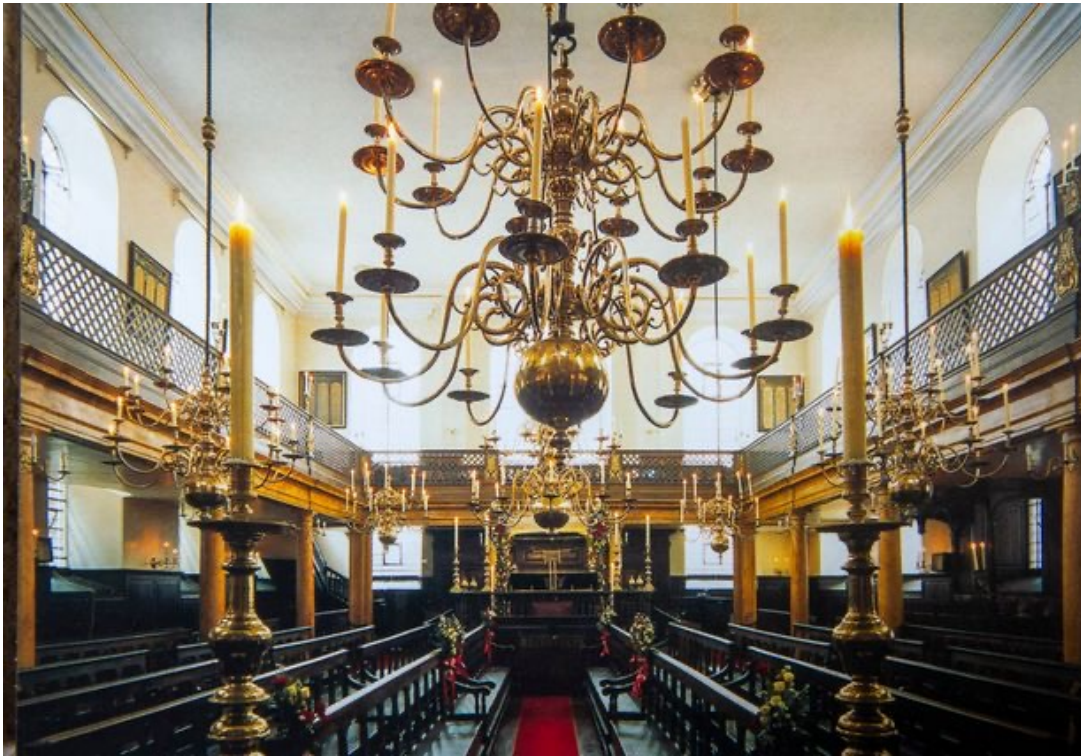
# City of London Policies

- “Safeguarding the City’s listed buildings and their settings, while allowing appropriate adaptation and new uses” (CoL Local Plan 2015: CS1)
- ““To sustain and enhance heritage assets, their settings and significance”. (CoL Local Plan 2015: DM12.1)
- “Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.” (CoL Local Plan 2015: DM12.1)
- 4. “Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline, and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings...” (CoL Local Plan 2015: DM 12.1)



# Bevis Marks: Heritage Principles and Values

Page 86



- Principle 3: Understanding the significance of places is vital
- Principle 4: Significant places should be managed to sustain their values
  - *Historic England Conservation Principles, Policies and Guidance (2015)*

# 4 Kinds of Heritage Value

- Evidential value: the potential of a place to yield evidence about past human activity.
- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.
- Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

*Historic England Conservation Principles, Policies and Guidance (2015)*



# People and Place over time: 1701-2021



1815



1884





# Bevis Marks: Heritage Principles and Values

Page 89



- Principle 3: Understanding the significance of places is vital
- Principle 4: Significant places should be managed to sustain their values
  - *Historic England Conservation Principles, Policies and Guidance (2015)*



# What is intangible heritage?

- Cultural heritage does not end at monuments and collections of objects. It also includes traditions or living expressions inherited from our ancestors and passed on to our descendants....
- While fragile, intangible cultural heritage is an important factor in maintaining cultural diversity in the face of growing globalization. An understanding of the intangible cultural heritage of different communities helps with intercultural dialogue, and encourages mutual respect for other ways of life.

*Unesco Convention on Intangible Heritage*

# Social and Communal benefits?

- “Foster good relations between persons who share a relevant protected characteristic and persons who do not share it”

*The Public Sector Equality Duty (Equality Act, 2010)*



# Two World Heritage Sites

Page 92



# National significance

- Bevis Marks Synagogue is .. much more than a Grade 1 listed building. It is the 'Cathedral' Synagogue to Anglo Jewry and should be protected in its cultural, historical and religious significance in the same vein that St Paul's Cathedral or Westminster Abbey could expect from its local and national government. ... The Synagogue deserves the protection that ought to be afforded to it in ensuring that the building and its community are able to exist as intended which includes streaming natural light through its beautiful windows and being a place of private reflection for worshipers.

*London Jewish Museum submission*



# Campaigning for civil and religious equality: Jews in the City of London



Sir David Salomons, MP: first Jewish Lord Mayor of London (1855).



Lionel de Rothschild, the first Jewish MP, is welcomed into the House of Commons in 1858.

He was first elected MP by the City of London in 1847, but could only take his seat ten years later.



Sir Albert Sassoon, a Jew, is the first Indian to receive the Freedom of the City of London (1873)



# Professor Abigail Green

Professor of Modern European History  
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University of Oxford



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# Impact of developments on the daylighting within and around the Bevis Marks Synagogue

4th October 2021

Dr Stephen Cannon-Brookes

Dr John Mardaljevic



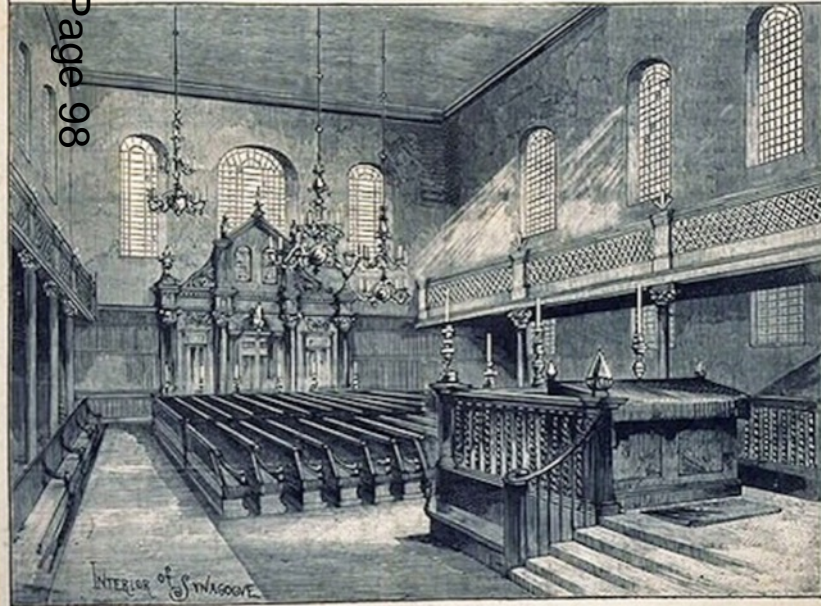


Interior of the Synagogue during recent redecoration on an largely overcast day

(photo SCB 26-08-21)







THE OLD BEVIS MARKS SYNAGOGUE  
Where Benjamin Disraeli and his forefathers worshipped, and where the birth of Lord Beaconsfield is recorded.

Page 98



Once a protection, the courtyard no longer guarantees the Synagogue's daylight

(photos SCB 26-08-21)





**BRE guidelines equate internal daylight to the view of the sky from windows**

(photos SCB 26-08-21)





The vast majority of daylight in the Synagogue is reflected from adjacent buildings

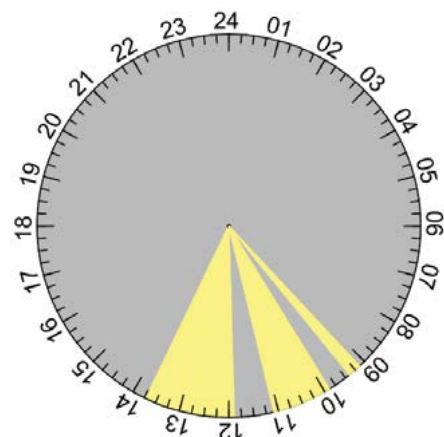
(photos SCB 26-08-21)



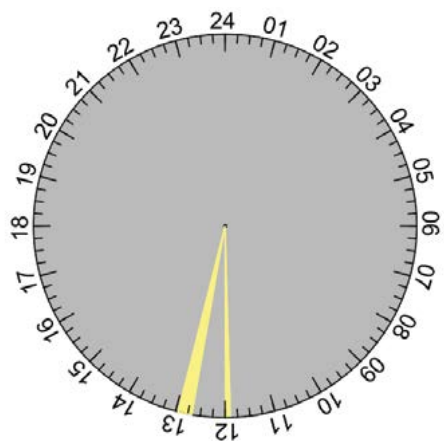
# Duration of Direct Sunlight

## Cumulative Impact Assessment of Proposed Developments

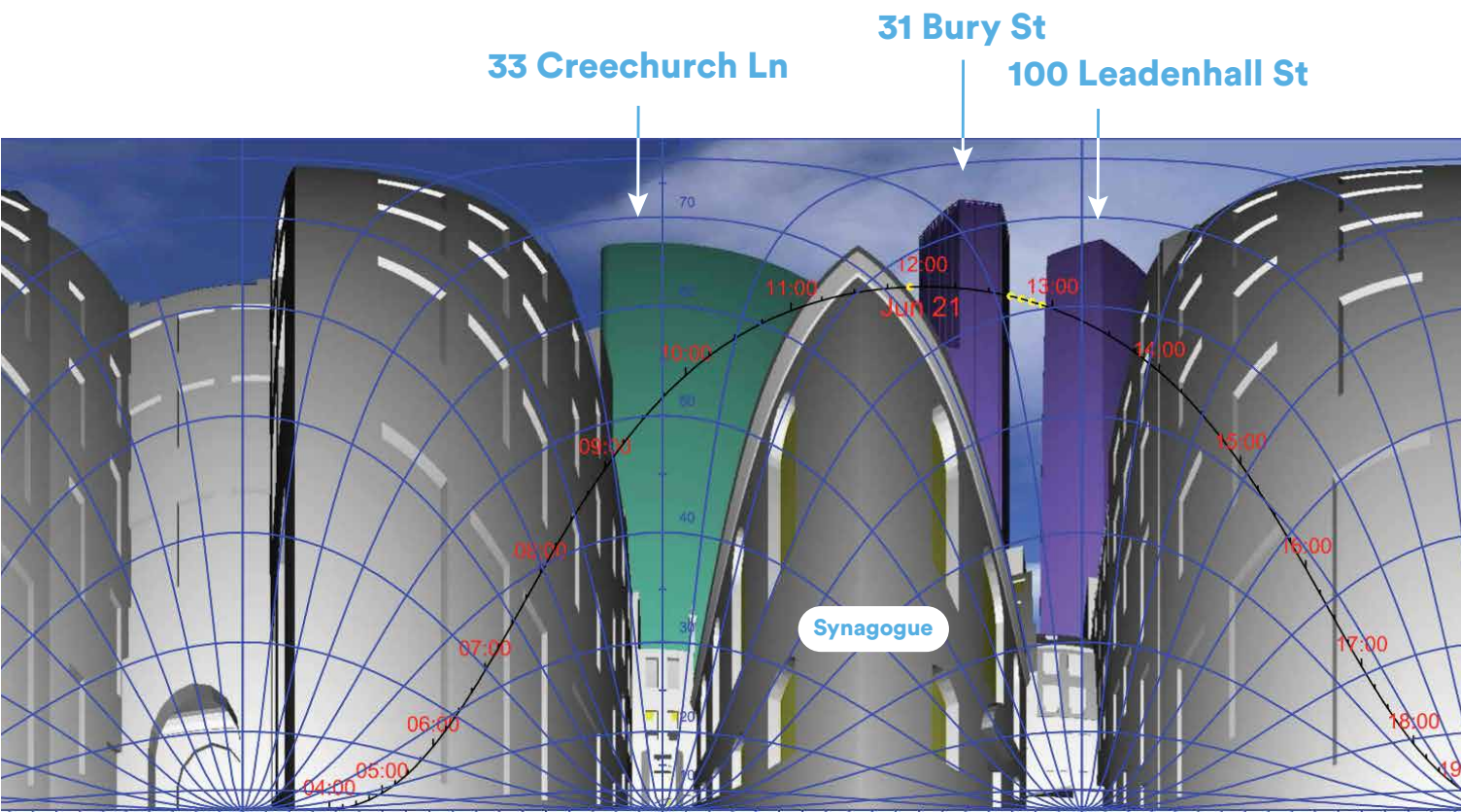
Solar Paths on 21st June



Existing



With Proposed Schemes



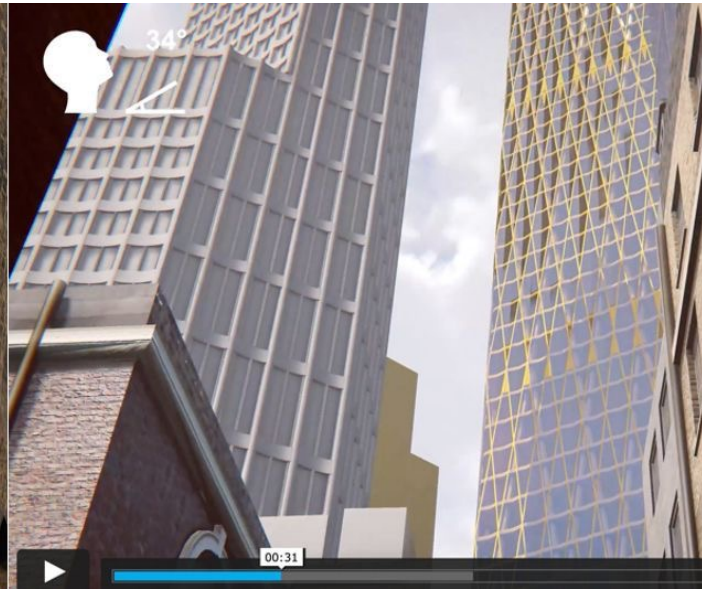




Further obstruction of daylight will render the interior consistently dim and increasingly unusable



## Vibrant life at the Synagogue





# Bevis Marks' heritage value

## *What's changed?*

Page 104



See P4 alts  
REPORT OF THE CITY ARCHITECT & PLANNING OFFICER

CAFO 550/78  
19th June 1978

24(6) Committee  
2

PLANNING AND COMMUNICATIONS COMMITTEE  
TUESDAY 27th JUNE 1978  
REGISTERED PLAN NO. 4780

The City Architect & Planning Officer RECOMMENDS the grant of PLANNING PERMISSION for the development referred to in the undermentioned schedule in accordance with the plans submitted, subject to the conditions set out therein.

Schedule

Registered Plan No.	Premises	Proposed Development As Applied For
4780	17-35 Creechchurch Lane & 16A Bevis Marks (Ward of Aldgate)	Redevelopment for offices and wine bar (approximate gross office floor-space 28,242 sq.ft.).

Conditions

- The buildings must conform to building lines and site boundaries to be set out on the site by the City Engineer.
- Particulars and samples of materials to be used in all external faces of the buildings and surface treatment must be submitted to and approved by the Common Council before any works affected thereby are begun.
- That in the case of any of the above reserved matters, application for approval must be made not later than the expiration of three years beginning with the date of the grant of this permission.
- That the development to which this permission relates must be begun not later than whichever is the later of the following dates:-
  - the expiration of five years from the date of this permission; or
  - the expiration of two years from the final approval of the above reserved matters or, in the case of approval on different dates the final approval of the last such matter to be approved.
- A clear unobstructed headroom of 15 ft. (4.6m) must be maintained in the areas (including access ways) to be used for loading and unloading.
- The areas shown on the drawings 909(c) 201 and 203, to be set aside for loading and unloading, must remain ancillary to the main use of the building and be available at all times for the sole use of the occupiers and visitors thereof. The areas set aside for these purposes shall not at any time be used for purposes other than those for which they are respectively provided, except as may be approved by the Common Council from time to time.
- The public wine bar in the basement shown on drawing no. 909(c) 202 shall be used for a public wine bar <sup>only</sup> and for no other purpose.

Reasons therefor To ensure:

- Compliance with the proposed building lines and site boundaries.
- A satisfactory external appearance.
- Compliance with the terms of Section 42 of the Town & Country Planning Act 1971.
- Satisfactory servicing facilities.
- Satisfactory vehicular circulation within the curtilage of the site.

/contd.

## Report of the City Architect & Planning Officer 19th June 1978

“RECOMMENDS the grant...  
subject to the conditions set out therein.”



4. I consider the means of access to the service area to be a dangerous manoeuvre. All traffic should enter and leave the site in a forward direction only.
5. I have no objections to any necessary closure of part of Crecchurch Lane.

a further letter dated 25th May 1978 he states:-  
In my opinion the revisions shown in the drawing do not improve the previously proposed traffic movement or servicing facilities."

These comments have been taken into account by the applicants as far as possible in their revised drawings. The proposed position of the service bay provides the best solution to the problem of servicing the new building and is felt to be satisfactory, in the circumstances, by Mr. Engineer.

The application has been advertised under Sections 27 & 28 which has resulted in two letters of objection. The letters were from Messrs. Peter Black & Partners on behalf of 4/6 Heneage Lane dated 2nd May 1978 and Mr. Peter Temple on behalf of the Spanish and Portuguese Synagogue and 2 Heneage Lane dated 15th May 1978. The points raised in these letters mainly concern the possible infringement of daylighting. The revised drawings show that the fourth floor is to be set back from the edge of the building on the Heneage frontage opposite No. 2 Heneage Lane and the Synagogue and the plant room will have a sloped mansard roof. These amendments have in fact slightly improved the existing situation for the Synagogue.

The applicant has introduced glazing into the southern end of the Heneage Lane elevation, which has resolved a point raised by Peter Black & Partners.

In fact these two letters of objection have been withdrawn by a letter from Tarmac Properties Ltd. who are the developers for 4/6 Heneage Lane dated 8th June 1978 and a letter from Peter Temple dated 15th June 1978.

From a visual point the observations were as follows:-  
The applicant's scheme is as follows:-

"The revisions to this scheme are fairly satisfactory although we would prefer the vertical granite strips to be reduced in width with a reduction in the amount of granite used on the Heneage Lane elevation."

The elevation in question has been amended accordingly since this comment was made.

As a conclusion I would point out that the site is difficult to redevelop with the limitations imposed by the shape of the site. The service bay does provide on-site servicing and is located in a position which takes account of the future road widening proposals for Bevis Marks. The infringement of the daylight standards has been rectified by the revised drawings. The daylighting aspect has been the subject of protracted negotiation and detailed calculations.

Accordingly I RECOMMEND that planning permission BE GRANTED subject to the attached conditions.

Registr  
Plan N

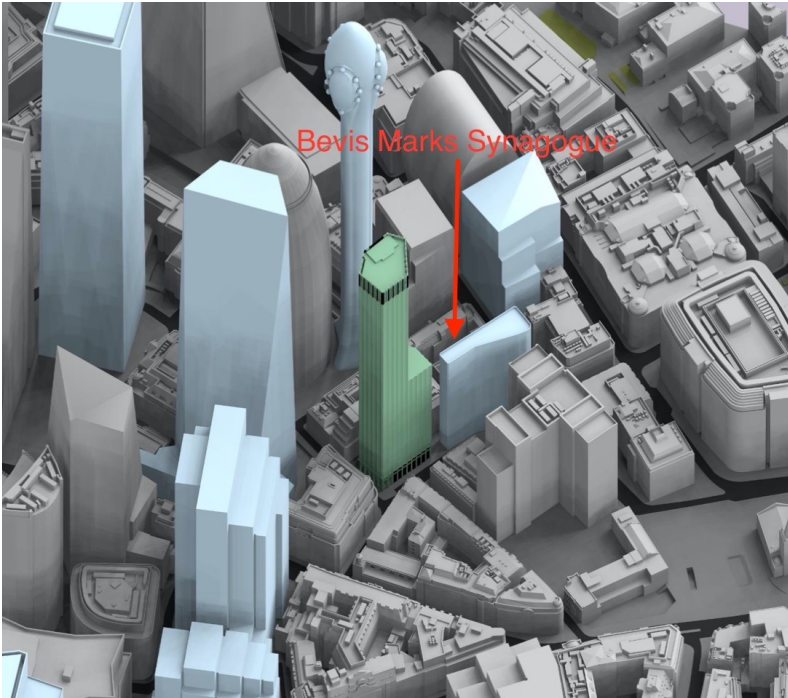
4780

"The points which were raised in these letters mainly concerned the possible infringement of daylighting. The revised drawings show that the fourth floor is to be set back from the edge of the building of the Heneage frontage opposite No. 2 Heneage Lane and the Synagogue and the plant rooms will have a sloped mansard roof."

These amendments have in fact slightly improved the existing situation for the synagogue."

*What's changed?*

**SIR MICHAEL BEAR  
PRESENTATION TO PLANNING COMMITTEE MEMBERS  
MONDAY 4 OCTOBER 2021**



Opposing the  
proposed development

*Three key grounds for refusal*

Sir Michael Bear

Thank you, Stuart.

1. Thank you for giving us the opportunity to meet with you to present our concerns about the devastating impact which would result from approving the 31 Bury Street Application.
2. It takes a unique set of circumstances to get a Bear out of hibernation - and this is indeed one of those unique circumstances!
3. The decision facing your Committee tomorrow is crucially important and will have long lasting implications for the City and its Role and Reputation respecting it's Heritage.
4. Our presentation today will be based on data, not emotion: it will not be glitzy, high tech and expensive like that produced by the Developer who has been able to outspend our small community budget by over a hundred to one. None-the-less we have today assembled world-class experts in their fields to present our case.
5. What is our case?



6. In essence you have before you a Planning Officer's Report which is seriously flawed and draws conclusions from evidential studies which are wrong.
7. Not only wrong, but as your own officers' report accepts, the proposal is in fundamental breach of the City's own Development Plan. We operate on what is supposed to be a plan-led system. Parliament has accorded a statutory presumption in favour of the Local Plan, yet you are being asked by the developer to approve a development which is in clear conflict with that plan.
8. The Planning (Listed Buildings and Conservation Area) Act 1990 establishes that when "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 feature of special architectural or historic interest which it possesses." (s66(1) P(LBCA)A 1990). For reasons which will be made clear, Bevis Marks' setting, as well as its special architectural and historic interest, are distinctly at risk.
9. That is why I, as a former member of your Committee, a former Lord Mayor and huge supporter of tall buildings in the City, find myself in the unusual position of leading today's discussion on behalf of the objectors to this scheme.
10. The fact that the application site lies in the Eastern Cluster might be thought by some to justify the unforgiving dominance of this proposal and this indeed appears to be the approach adopted by the Applicant.
11. But in no sense can the Planning Policy Position be regarded as a free pass to justify overwhelming Bevis Marks, this greatly treasured place of worship.
12. Quite the reverse. As is self-evidently the position here, significant harm would be caused to the synagogue and its setting, affecting the provision of daylight and sunlight which our expert will address later.
13. Planning Regulations have always been imperfect in judging the harm to adjacent buildings. This often ignores the very special nature of some buildings that, like Bevis Marks, have a living, breathing and spiritual purpose.
14. An interpretation of a different nature is required, of the data before you.
15. So, our professional team have drafted three fundamental grounds for refusal of this planning application, giving details and clause references on each policy contravention against your own City of London Planning Policies, The London Plan Policies, and the National Planning Policy Framework. We have arranged for you to have a copy of this information for your consideration.

## SLIDE 2: SPECIFIC CONTRAVENTIONS

### Specific contraventions to statutory policy plans and frameworks

1. **The overbearing presence of the proposed development** within the setting of the Grade I listed Bevis Marks Synagogue would cause harm to the contribution made by the setting to its architectural interest and the ability to appreciate the significance of this Grade I listed building.
  - The public and economic benefit of the provision of Class 'E' uses on the site would not outweigh the harm caused and similar benefit could be secured from a less harmful scheme.
  - The proposals are therefore contrary to:
    - London Plan Policies D9, HC1;
    - City of London Local Plan policies CS7, CS12, CS14, DM12.1 and DM12.3;
    - National Planning Policy Framework.
2. **The cumulative impact of this development** together with other consented and proposed developments within the setting of the Grade I listed Bevis Marks Synagogue would cause harm to the contribution made by the setting to its architectural interest and the ability to appreciate the significance of this Grade I listed building.
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3. **The proposed development would be detrimental to the setting of the Tower of London World Heritage Site** by reason of its height, form, design and materiality along with its prominence which would adversely affect the following attributes of the Outstanding Universal Value of the Tower, the physical prominence of the White Tower; the site's strategic and landmark setting and the site's status as an internationally famous monument.
  - The harm would be significant and whilst it would be 'less than substantial', it would be at the upper limit of this range.
  - The public and economic benefit of the provision of Class 'E' uses on the site would not outweigh the harm caused and similar benefit could be secured from a less harmful scheme.
  - The proposals are therefore contrary to:
    - London Plan Policies D9, HC1, HC2, HC3, HC4;
    - City of London Local Plan policies CS7, CS12, CS14, DM12.1;
    - London's World Heritage Sites – Guidance on Settings SPG (March 2012);
    - guidance within the Tower of London World Heritage Site Management Plan;
    - National Planning Policy Framework.

#### 1. You will shortly be hearing from our experts on:

- The unique use of the Synagogue
- Its importance to the community
- Heritage
- Light

As to why this Application should be refused outright.

2. You have in your hands the freedom to decide the fate of the Bevis Marks Synagogue.
3. I will now pass over to our three speakers who will introduce themselves and explain in detail the grounds for rejecting this application.



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PROF. ABIGAIL GREENE  
PRESENTATION TO PLANNING COMMITTEE MEMBERS  
MONDAY 4 OCTOBER 2021

Professor Abigail  
Green

Professor of Modern European History  
Brasenose College,  
University of Oxford



Thank for you for the opportunity to address you.

I speak to you as an international expert on Jewish history, with extensive experience working with national and international heritage organisations like Historic England, the National Trust, and the European Association for the Preservation and Promotion of Jewish Culture and Heritage.

I also speak in a personal capacity: my family have worshipped in this synagogue since it was built, and I too was married here.

---

SLIDE 2: BM SYNAGOGUE AND SETTING

## Bevis Marks: Synagogue and Setting



- '...the curtilage of a building (the principal building) is in general terms any area of land and other buildings that is around and associated with that principal building'
- '...unless the list entry explicitly says otherwise, the law (Section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990) says that the listed building includes any ancillary object or structure within the curtilage of the building, which forms part of the land and has done so since before 1st July, 1948.'

Historic England, *Listed Buildings and Curtilage: Historic England Advice Note 10* (February 2018), pp.4 & 5.

You are asked to consider the impact of this proposal on this Grade 1 listed building **AND ITS SETTING**, that is to say it's **curtilage**. The principle of curtilage listing is established by law.

For this reason, both the City of London Local Plan 2015 and the London Plan 2021 underline the importance of **SETTING**, as we see here.



---

### SLIDE 3: BM CITY OF LONDON POLICIES

## City of London Policies

- “Safeguarding the City’s **listed buildings and their settings**, while allowing appropriate adaptation and new uses” (CoL Local Plan 2015: CS1)
- ““To **sustain and enhance heritage assets, their settings and significance**” (CoL Local Plan 2015: DM12.1)
- “Development will be required to **respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.**” (CoL Local Plan 2015: DM12.1)
- 4. “Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline, and the relationship with the space around them at ground level, **while adhering to the principles of sustainable design, conservation of heritage assets and their settings...**” (CoL Local Plan 2015: DM 12.1)

Note the use of words like “sustain” and “respect”.

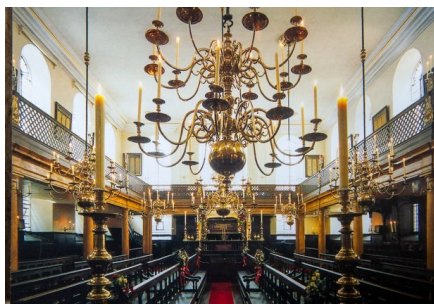
So what does it mean to sustain and respect a Grade 1 heritage asset?

These are the principles that Historic England recommend you should apply.

---

### SLIDE 4: HERITGE PRINCIPLES

## Bevis Marks: Heritage Principles and Values



- Principle 3: Understanding the significance of places is vital
- Principle 4: **Significant places should be managed to sustain their values**
  - *Historic England Conservation Principles, Policies and Guidance (2015)*

I want to draw your attention to **Principle 4 which highlights the connection between places and “their values”**. With a site of powerful religious significance like Bevis Marks, **this is the key**.

Historic England defines the importance of heritage assets through 4 key heritage values. All apply in this case.

---

## SLIDE 5: HERITAGE VALUES

### 4 Kinds of Heritage Value

- Evidential value: the potential of a place to yield evidence about past human activity.
- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.
- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.
- Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

*Historic England Conservation Principles, Policies and Guidance (2015)*

Bevis Marks has aesthetic value.

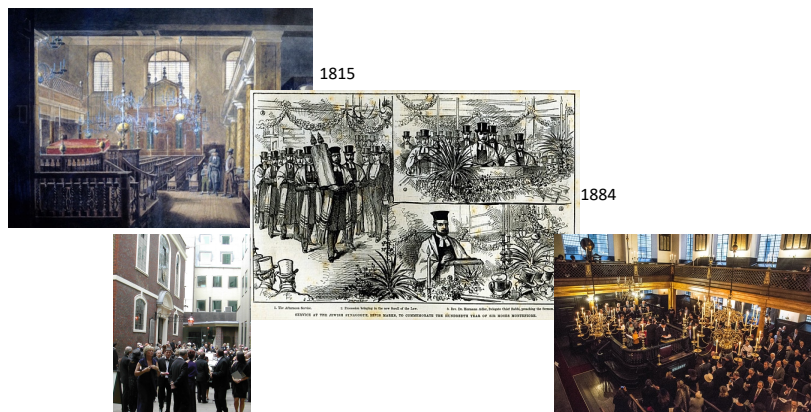
It has evidential value as a perfectly preserved early 18<sup>th</sup> century synagogue in a secluded setting that recalls the private courtyard in which it was built.

But its real value is **historic** and **communal**, and that value lies in **the unique fact of its continuous use over centuries**.

---

## SLIDE 6: PEOPLE AND PLACE OVER TIME

### People and Place over time: 1701-2021



The point is that **for this site historic and communal value cannot be disentangled**.

All over Europe there are beautiful synagogues which are empty shells, because the Jews were either killed or left. They have historic value, **not** communal value.

This synagogue is a living community. It is unique in the way that British Jewish history is unique because it did not experience the rupture of the Holocaust.



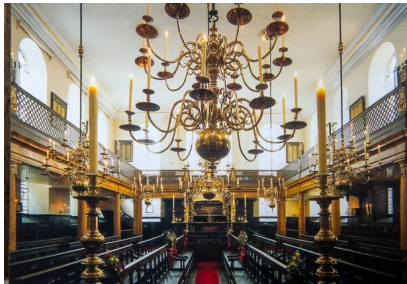
The Planning Officer's Report, and in particular what it says about Bevis Marks, demonstrates a limited understanding of the historic and communal value of this building and its setting, **because although some consideration is given to architectural and historic value, no consideration is given to communal value**, or to what London Supplementary Planning Guidance described in 2014 as "Character and Context".

It is clear from the strength of the response from members of the Jewish community that **the proposal does not reflect an attempt to manage the site in a way that respects its Character or sustains the values of those who use it: it ignores Principle 4.**

---

## SLIDE 7: PRINCIPLES

### Bevis Marks: Heritage Principles and Values



- Principle 3: Understanding the significance of places is vital
- Principle 4: Significant places should be managed to sustain their values
  - *Historic England Conservation Principles, Policies and Guidance (2015)*

Too much attention is paid to the "visitor's" view, "aesthetic appreciation", "visual experience" and the technical capacity to read and lead a service.

No mention is made of **spiritual experience in which light plays such a fundamental role**, although this lies at the heart of **the use and historical significance of the building**.

No attention is paid to the **holistic experience of a community at prayer**, or the role of the courtyard as a social space in **sustaining that communal experience**.

These things may be intangible, but intangible heritage is an extremely important consideration when considering historic and communal value.

---

## SLIDE 8: INTANGIBLE HERITAGE

### What is intangible heritage?

- Cultural heritage does not end at monuments and collections of objects. It also includes traditions or **living expressions inherited from our ancestors** and passed on to our descendants....
- While fragile, intangible cultural heritage is **an important factor in maintaining cultural diversity in the face of growing globalization**. An understanding of the intangible cultural heritage of different communities helps with intercultural dialogue, and encourages mutual respect for other ways of life.

*Unesco Convention on Intangible Heritage*

This is how the Unesco Convention defines intangible heritage.

In the City of London, you may want to think about the role respecting minority heritage plays in enhancing social cohesion and social inclusion.

---

## SLIDE 9: PUBLIC SECTOR EQUALITY DUTY

### Social and Communal benefits?

- “Foster good relations between persons who share a relevant protected characteristic and persons who do not share it”

*The Public Sector Equality Duty (Equality Act, 2010)*

Your Planning report refers to the social and communal benefits of this proposal as significant.

No mention is made of **the damage that will be done to community relations and social cohesion** by the failure to treat the most important site in Britain for the Jewish community in a way that is consistent with the **values** of that community, or **respects** its attachment to it.

Here I draw your attention to **the Public Sector Equality Duty** to foster good relations between those who share a relevant protected characteristic and those who do not. That duty has plainly been ignored. There is no reference to it in your report.

**So why does Bevis Marks matter?**



---

## SLIDE 10: TWO WORLD HERITAGE SITES

### Two World Heritage Sites



Historic England have focused on the Tower of London World Heritage Site, but **in terms of Jewish heritage this IS a world heritage site.**

Bevis Marks is the oldest continuing functioning synagogue in Europe. It preserves a unique liturgy. It lies at the heart of the Sephardic diaspora: a history that is properly global. That's why this has generated newspaper coverage in New York and Israel, and objections from Jewish groups in continental Europe and the US.

Both as a British and a Jewish historian, I would say that the Tower is in fact a more parochial, less internationally resonant site.

---

## SLIDE 11: NATIONAL HERITAGE

### National significance

- Bevis Marks Synagogue is .. much more than a Grade 1 listed building. It is the 'Cathedral' Synagogue to Anglo Jewry and should be protected in its cultural, historical and religious significance in the same vein that St Paul's Cathedral or Westminster Abbey could expect from its local and national government. ... The Synagogue deserves the protection that ought to be afforded to it in ensuring that the building and its community are able to exist as intended which includes streaming natural light through its beautiful windows and being a place of private reflection for worshipers.

*London Jewish Museum submission*

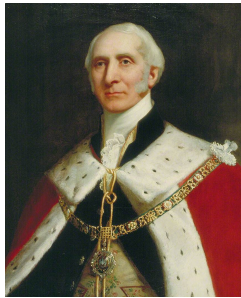
The Jewish Museum's submission captures this very well.

**This is the single most important historic site for British Jews.** In the heart of the City, close to the Bank of England and the Mansion House, it speaks to their history since the readmission under Oliver Cromwell, and to their unique status as the only significant Jewish community in Europe with a continuous history of this kind.

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## SLIDE 12: JEWS IN THE CITY OF LONDON

### Campaigning for civil and religious equality: Jews in the City of London



Sir David Salomons, MP: first Jewish Lord Mayor of London (1855).



Lionel de Rothschild, the first Jewish MP, is welcomed into the House of Commons in 1858.

He was first elected MP by the City of London in 1847, but could only take his seat ten years later.



Sir Albert Sassoon, a Jew, is the first Indian to receive the Freedom of the City of London (1873)

As the only non-Christian religious site in the City, Bevis Marks packs an enormous symbolic punch.

It speaks to the diversity of the City over centuries; to the vital role British Jews have played in the City's evolution as a global financial and commercial centre; and to the honourable role the City of London played as the platform from which British Jews asserted their claim to equal civil and political rights as non-Christians in this country – paving the way for Hindus, Muslims, Sikhs and other minorities.

The City has an extraordinary Jewish heritage, of which Bevis Marks is now the prime symbol. This heritage was valued in the 19<sup>th</sup> century, when non-Jews campaigned to defend the setting around this building. It was valued in the 1970s. This committee should have the courage to show that it still values that heritage today.

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Professor Abigail  
Green

Professor of Modern European History  
Brasenose College,  
University of Oxford





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00:00:00.000 --> 00:00:10.920

Richards, Gwyn

I would respectfully ask that the presentations are limited to no more than 30 minutes. This is enable to enable the Members to ask any questions to your team.

00:00:11.690 --> 00:00:29.500

Richards, Gwyn

I'm on a housekeeping notes it would be helpful to my colleagues if in in aligning the transcript with the presentations that went when you were going through the presentation when he moved the slide. If he could just say next slide so there's an alignment there. So I think that's all from me, so please feel free to begin.

00:00:31.050 --> 00:00:33.700

Sir Michael Bear (Guest)

OK, thank you very much. It's Stuart. Do you want to?

00:00:34.470 --> 00:00:46.850

stuart (Guest)

Well, thank you very much for the opportunity to you offered just to talk to you. And I'm the President of the SNP congregation in London and.

00:00:46.910 --> 00:01:02.180

stuart (Guest)

Uhm, I'm very grateful to the people who you are going to hear speak tonight. It's afternoon at for the effort they put into it and I'll now have Sir Michael to carry on and I will come back at the very end. I get the last word.

00:01:04.010 --> 00:01:04.610

stuart (Guest)

To Michael.

00:01:04.060 --> 00:01:17.490

Sir Michael Bear (Guest)

Thank you, thank you very much as Stuart and and and could. I thank you to the planning and Transportation Committee for giving us the opportunity to meet with you to present our concerns about.

00:01:18.470 --> 00:01:23.270

Sir Michael Bear (Guest)

The devastating impact which would result from approving the 31 Bury St application.

00:01:24.130 --> 00:01:33.640

Sir Michael Bear (Guest)

And it takes a unique set of circumstances to get a bear out of hibernation, and this indeed is one of those unique circumstances.

00:01:34.810 --> 00:01:47.590

Sir Michael Bear (Guest)

The decision facing your committee tomorrow is crucially important and will have long lasting implications for the city and its role and reputation in respecting and protecting its heritage.



00:01:49.080 --> 00:01:53.450

Sir Michael Bear (Guest)

Our presentation today will be based on data, not emotion.

00:01:54.260 --> 00:01:57.330

Sir Michael Bear (Guest)

It will not be click see high tech and expensive.

00:01:57.930 --> 00:02:03.610

Sir Michael Bear (Guest)

Like that produced by the developer who's been able to outspend US small community budgets.

00:02:04.250 --> 00:02:06.090

Sir Michael Bear (Guest)

By over at 100 to one.

00:02:07.040 --> 00:02:12.620

Sir Michael Bear (Guest)

Nonetheless, we have today assembled world class experts in their fields to present our case.

00:02:13.810 --> 00:02:15.260

Sir Michael Bear (Guest)

So what is our case?

00:02:16.310 --> 00:02:29.090

Sir Michael Bear (Guest)

In essence, you have before you a planning officers report, which we believe is seriously flawed and draws conclusions from evidential studies which are quite frankly in our view, ROM.

00:02:30.220 --> 00:02:38.380

Sir Michael Bear (Guest)

Not only wrong, but as your own officers report accepts, the proposal is in fundamental breach of the city zone.

00:02:39.540 --> 00:02:40.760

Sir Michael Bear (Guest)

Development plan.

00:02:41.760 --> 00:02:45.650

Sir Michael Bear (Guest)

We operate on what is supposed to be a plan lead system.

00:02:46.560 --> 00:02:57.670

Sir Michael Bear (Guest)

Parliament has accorded a statutory presumption in favor of the local plan, yet you're being asked by the developer to approve a development which is in clear conflict with that class.

00:02:59.610 --> 00:03:11.130

Sir Michael Bear (Guest)

The planning listed building and Conservation Act of 1990 establish is that when considering whether to grant planning permission for development, which affects are listed building or it's setting.

00:03:11.820 --> 00:03:28.390

Sir Michael Bear (Guest)

The local planning authorities shall have special regard. That's special regard to the desirability of preserving the building, or it's setting or any feature of special architectural or historic interest which had possesses, and that's in the 1990 clauses.

00:03:29.030 --> 00:03:38.800

Sir Michael Bear (Guest)

For reasons which would be which would be made clear that Beavers mark setting as well as its special architectural historic interest are distinctly at risk.

00:03:39.690 --> 00:03:56.220

Sir Michael Bear (Guest)

And that is why I myself, as a former member of your committee and a former Lord Mayor and a huge supporter of tall buildings in the city. Find myself in the unusual position of leading today's discussion on behalf of the objectors to the scheme.

00:03:57.360 --> 00:04:01.330

Sir Michael Bear (Guest)

The fact that the application site lies in the Eastern cluster.

00:04:03.570 --> 00:04:04.500

Sir Michael Bear (Guest)

To justify.

00:04:05.080 --> 00:04:08.680

Sir Michael Bear (Guest)

The unforgiving dominance of this proposal.

00:04:09.600 --> 00:04:13.770

Sir Michael Bear (Guest)

And this indeed appears to be the approach adopted by the applicant.

00:04:14.900 --> 00:04:27.620

Sir Michael Bear (Guest)

But in no sense can the planning policy position be regarded as a free pass to justify overwhelming Beavers marks. This greatly treasured place of worship.

00:04:28.630 --> 00:04:42.700

Sir Michael Bear (Guest)

Quite the reverse, as if self evidently the position here significant harm would be caused to the synagogue and it's setting affecting the provision of daylight and sunlight, which are experts will address in detail later.

00:04:43.920 --> 00:04:58.770

Sir Michael Bear (Guest)

Planning regulations have always been in perfect in judging the harm to adjacent buildings. This often ignores the very special nature of some buildings that like leave us marks, had a living, breathing, spiritual purpose.



00:04:59.480 --> 00:05:04.990

Sir Michael Bear (Guest)

And interpretation of the different nature is required of the data before you.

00:05:06.080 --> 00:05:07.560

Sir Michael Bear (Guest)

So our professional team.

00:05:08.630 --> 00:05:11.670

Sir Michael Bear (Guest)

Have three fundamental grounds.

00:05:12.290 --> 00:05:17.340

Sir Michael Bear (Guest)

For refusal for this planning application and they use our drafted for you.

00:05:19.270 --> 00:05:20.230

Sir Michael Bear (Guest)

The references.

00:05:21.060 --> 00:05:30.330

Sir Michael Bear (Guest)

For this refusal for these refusal detail, each policy convention contravention against your own city of london planning policies.

00:05:31.280 --> 00:05:35.780

Sir Michael Bear (Guest)

The London Plan policies and the National Planning policy framework.

00:05:36.730 --> 00:05:41.150

Sir Michael Bear (Guest)

We have arranged for you to have a copy of this information for your consideration.

00:05:42.160 --> 00:05:43.130

Sir Michael Bear (Guest)

Are we on that slide?

00:05:44.690 --> 00:05:46.600

Abigail Green

I'm worried that Maxine's frozen.

00:05:46.350 --> 00:05:47.720

Sir Michael Bear (Guest)

Right, ah.

00:05:49.720 --> 00:05:50.340

Sir Michael Bear (Guest)

Maxine.

00:05:58.960 --> 00:05:59.190

Sir Michael Bear (Guest)

I.

00:06:00.340 --> 00:06:04.430

Sir Michael Bear (Guest)

OK, I'll continue. But basically the.

00:06:04.480 --> 00:06:17.970

Sir Michael Bear (Guest)

There is a screenshot. I don't expect you to look at the detail of the three specific contraventions to statutory policy plans and frameworks which we've drafted for your attention.

00:06:19.190 --> 00:06:23.790

Sir Michael Bear (Guest)

And you will shortly be hearing from our experts, and this really does require a sharing the screen.

00:06:24.540 --> 00:06:30.560

Sir Michael Bear (Guest)

As to the unique use of the synagogue, it's important to the Community heritage and light.

00:06:32.010 --> 00:06:39.060

Sir Michael Bear (Guest)

And this really leads toward only one conclusion, and that is that the application should be refused outright.

00:06:40.120 --> 00:06:41.200

Sir Michael Bear (Guest)

In conclusion

00:06:41.900 --> 00:06:44.000

Sir Michael Bear (Guest)

you have in your hands the freedom.

00:06:44.710 --> 00:06:47.030

Sir Michael Bear (Guest)

In deciding the fate.

00:06:47.760 --> 00:06:50.040

Sir Michael Bear (Guest)

Of Bevis Marks synagogue.

00:06:50.900 --> 00:06:55.780

Sir Michael Bear (Guest)

Now we ask you to make your own independent judgment on these facts before you.

00:06:57.830 --> 00:07:07.400

Sir Michael Bear (Guest)

I will now pass over to our three speakers, who will introduce themselves and explain in detail the grounds for rejecting this application.

00:07:16.120 --> 00:07:18.750

Sir Michael Bear (Guest)

Some very important, could you stop the clock when 'cause this?



00:07:19.950 --> 00:07:21.630

Sir Michael Bear (Guest)

This this was a little bit unfair.

00:07:23.050 --> 00:07:23.400

Maxime (Guest)

Is.

00:07:23.600 --> 00:07:30.290

Richards, Gwyn

That's fine if you go over your half an hour, just that would mean less time for members to ask questions. But we're in your hands.

00:07:31.110 --> 00:07:31.780

Sir Michael Bear (Guest)

OK.

00:07:32.180 --> 00:07:35.270

Sir Michael Bear (Guest)

Uh, I I, we really don't have much choice there.

00:07:36.430 --> 00:07:38.440

Sir Michael Bear (Guest)

How how we doing uhm?

00:07:38.970 --> 00:07:49.620

Abigail Green

Well, maybe I'll start by introducing myself in the hopes that the PowerPoint will appear because it is really essential to substantiate what I'm saying, so I.

00:07:42.060 --> 00:07:42.430

Sir Michael Bear (Guest)

Yes.

00:07:48.930 --> 00:08:00.020

Alastair Moss

So sorry so sorry, interrupt we do. Actually I think Toni got the things I wonder whether Toni my email then through 'cause I think the deputy chairman. I've got them so we've just got some Mike was referring.

00:07:48.940 --> 00:07:49.400

Sir Michael Bear (Guest)

Thank you.

00:07:59.590 --> 00:08:05.920

Bright, Toni

Sorry I missed a hold on hold Alastair. Hold on just a second. I've got the presentation.

00:08:08.260 --> 00:08:11.190

Bright, Toni

So hold on just a second while I.

00:08:12.500 --> 00:08:13.850

Bright, Toni  
Find.

00:08:16.510 --> 00:08:17.460

Bright, Toni  
Find it.

00:08:20.070 --> 00:08:26.410

Doug Barrow  
We've all been circulated this. I'm all Members have actually got a copy by email at this presentation.

00:08:26.750 --> 00:08:28.480

Sir Michael Bear (Guest)  
OK thanks Sir.

00:08:28.100 --> 00:08:31.490

Abigail Green  
OK, that's not my bit of its, but I'll just proceed.

00:08:28.730 --> 00:08:35.820

Bright, Toni  
This is this is this is this. This is the three. This is the three grounds for approval, right?

00:08:37.110 --> 00:08:39.940

Sir Michael Bear (Guest)  
For for no, not for approval, for rejection.

00:08:39.930 --> 00:08:44.190

Bright, Toni  
Sorry, objection, sorry no sorry, sorry, sorry. Three grounds for objection.

00:08:44.430 --> 00:08:46.000

Sir Michael Bear (Guest)  
Yeah or refusal rather yeah.

00:08:48.390 --> 00:09:18.080

Abigail Green  
Well, I think I'll just continue and hope that at some point my screen, my my slides will become available. So I speak. I'm Abigail green. I'm an international expert on Jewish history with the extensive experience working with national and international heritage organizations like Historic England, the National Trust, and the European Association for the Preservation and Promotion of Jewish Culture and Heritage. I'm a professor at Oxford and I also speak in a personal capacity.

00:09:18.440 --> 00:09:24.150

Abigail Green  
My family have worshipped in this synagogue since it was built and still do and I was married in it.

00:09:24.970 --> 00:09:33.920

Abigail Green  
So you're asked to consider the impact of this proposal on this grade, one listed building and it's setting. That is to say, it's curtilage.



00:09:35.070 --> 00:09:40.140

Abigail Green

The principle of curtilage listing is established by law that Slide 4.

00:09:41.950 --> 00:09:53.180

Abigail Green

And for this reason, both the City of London local Plan 2015 and the London Plan 2021 underlined the importance of setting as we can see next slide.

00:09:54.380 --> 00:10:08.010

Abigail Green

Notes the use the next slide is cityoflondon policies. Note the use of words like sustain and respect in these policies. So what does it mean to sustain and respect a Grade 1 heritage assets?

00:10:08.880 --> 00:10:26.520

Abigail Green

Next slide, these are the principles Historic England recommend you should apply and I want to draw your attention to principle, for which highlights the connection between places and their values with the site of powerful religious significance like Beavis marks. This is the key.

00:10:27.170 --> 00:10:36.160

Abigail Green

Historic England defined the importance of heritage assets through four key heritage values. All apply in this case. Next slide.

00:10:37.390 --> 00:11:00.610

Abigail Green

Beavis Marks has aesthetic value. It has evidential value as a perfectly preserved early 18th century synagogue in a setting that records the courtyard in which it was built. But it's real value is historical and communal, and that value lies in the unique fact of its continuous use. Over centuries, people and place over time. Next slide.

00:11:01.370 --> 00:11:28.240

Abigail Green

The point is that for this site, historic and communal value can't be this entangled all over Europe. There are beautiful synagogues which are empty shells because the Jews were either killed or left. They have historic value, not communal value. This synagogue is a living community. It's unique in the way that British Jewish history is unique because it didn't experience the rupture of the Holocaust.

00:11:28.990 --> 00:11:54.500

Abigail Green

The planning officers report and what it says about Bevis Marks demonstrates a limited understanding of the historic and communal value of this building and its setting. Because while some consideration is given to architectural and historical value, no consideration is given to communal value or what London supplementary planning guidance described in 2014 as character and context.

00:11:55.230 --> 00:12:21.030

Abigail Green

So it's clear from the strength of the response from the Jewish community that the proposal does

not reflect an attempt to manage the site in a way that respects its character qualities, or sustains the values of those who use it. Next slide. It ignores principle for too much attention, is paid to the visitors view aesthetic appreciation, visual experience, and the technical capacity to read and leader service.

00:12:21.670 --> 00:12:44.130

Abigail Green

New mention is made of spiritual experience in which light plays such a fundamental role, or Revis is actually at the heart of the use and historical significance of the building. No attention is paid to the holistic experience of a community at prayer or the role of the courtyard as a social space in sustaining that communal experience.

00:12:44.850 --> 00:12:54.780

Abigail Green

So these things may be intangible, but intangible. Heritage is a very important consideration when considering historical and communal value. Next slide.

00:12:55.640 --> 00:13:17.400

Abigail Green

So this is how the UNESCO convention defines intangible heritage and in the city you may want to think about the role respecting minority heritage plays in enhancing social cohesion and social inclusion. Next, slide the planning officers report refers to the social and communal benefits of this proposal as significant.

00:13:18.080 --> 00:13:48.440

Abigail Green

No mention is made of the damage that will be done to Community relations and social cohesion by the failure to treat the most important site in Britain for the Jewish community in a way that is consistent with the values of that Community or respects its attachment to it. And here I draw your attention to the public sector equality duty to foster good relations between those who share a relevant protected characteristic and those who do not. That duty has plainly been ignored.

00:13:48.490 --> 00:13:50.580

Abigail Green

There's no reference to it in the report.

00:13:51.240 --> 00:13:53.170

Abigail Green

So why does be bismarcks matter?

00:13:54.050 --> 00:14:24.230

Abigail Green

In their report, historic England next slide have focused on the Tower of London World Heritage Site, but in terms of Jewish heritage, this is also a World Heritage site. It's the oldest continuing functioning synagogue in Europe. It preserves a unique liturgy. It lies at the heart of the global Safar \*\*\*\*\* Diaspora. And that's why this development has generated news coverage in New York and Israel, and objections from Jewish.

00:14:24.290 --> 00:14:26.990

Abigail Green

Groups in the US and Continental Europe.



00:14:27.590 --> 00:14:36.210

Abigail Green

As a British under Jewish historian, I would say in fact that the tower is the more parochial, less internationally resonance site.

00:14:37.580 --> 00:15:00.000

Abigail Green

Now I'm going to talk about national heritage next slide, so I think the Jewish Museum submission captures the significance of this very well. It's the single most important historic site for British Jews in the heart of the city, close to the Bank of England and the Mansion House, and it speaks to their history since the return of Jews to England's under Oliver Cromwell next slide.

00:15:00.710 --> 00:15:31.060

Abigail Green

As the only non Christian religious site in the city, Beavis marks packs a huge symbolic punch. It speaks at the diversity of the city over centuries to the vital role British Jews have played in the city's evolution as a global financial and commercial center and to the Rover. City played as the platform from which British Jews asserted their claim to equal rights as non Christians in this country, paving the way for Hindus, Muslims, Sikhs and other minorities.

00:15:31.660 --> 00:15:48.990

Abigail Green

The city has an extraordinary Jewish heritage, of which Bevis Marks is now the prime symbol. This heritage was valued in the 19th century when non Jews campaign to save it. It was valued in the 1970s. You should have the courage to show you still value that heritage today, Steven.

00:15:54.470 --> 00:15:54.850

Cannon-Brookes, Stephen

Thank you.

00:15:54.780 --> 00:15:55.100

Sir Michael Bear (Guest)

Thanks.

00:15:59.550 --> 00:16:29.800

Cannon-Brookes, Stephen

I'm grateful for the opportunity to address this meeting and share with committee members that review made by my colleague, Doctor John, Mud, elevation myself. My name is Stephen, Canon Brookside, an associate professor in the Institute of Environmental Design and Engineering, UCL. My colleague John Model Lurch, was recently professor of building daylight modeling at Loughborough University, is responsible for key advances in daylight simulation, and was the UK principle expert in the formation of current European Day lighting standards.

00:16:29.850 --> 00:16:30.550

Cannon-Brookes, Stephen

For buildings.

00:16:31.990 --> 00:16:40.550

Cannon-Brookes, Stephen

Uh, before starting, Please note I've used my own photographs to try and convey actual lighting conditions within and around the synagogue.

00:16:42.340 --> 00:16:43.370

Cannon-Brookes, Stephen

Next slide, please.

00:16:44.610 --> 00:16:47.920

Cannon-Brookes, Stephen

Today the Beavers Marks Synagogue is at risk.

00:16:49.270 --> 00:17:19.200

Cannon-Brookes, Stephen

Synagogue was consciously designed as a day. Let building with large windows on all four sides. Unlike in Christian churches, members of the congregation have always expected enough daylight to read by during services. Blockers for books have provided under receipt and these have been used in the same way for over 300 years. As Professor Green has noted, daylight is not purely functional. It is also a spiritual part of worship. It is fundamental to the buildings.

00:17:19.260 --> 00:17:26.060

Cannon-Brookes, Stephen

Design and use, and by extension the sustainability of the congregation. Next slide.

00:17:28.090 --> 00:17:43.790

Cannon-Brookes, Stephen

From the 18th century, the surrounding courtyard, on four sides and Henige Lane on the 4th, has protected the daylight reaching the windows, the synagogue. The effectiveness of this, Carter has gradually declined. It's the height of the surrounding perimeter. Buildings increased.

00:17:44.660 --> 00:18:14.570

Cannon-Brookes, Stephen

PA's concern for the synagogue, daylight availability availability is Elliot, evident in the cutbacks on 33 creechurch and Valiant House. This extends to the use of pale materials for surrounding walls to assist the reflection of sunlight and skylight into the synagogue, as noted in last month. Building Research Establishment report commissioned by the City of London planning to pumped. Recently, such concerns appeared have been ignored, heard for more distant buildings.

00:18:14.630 --> 00:18:20.320

Cannon-Brookes, Stephen

You substantial height well nevertheless have us have similarly detrimental shading effects.

00:18:20.890 --> 00:18:40.950

Cannon-Brookes, Stephen

The current proposals will further diminish the daylight provision to the synagogue. Today's challenge is how to realistically determine it, determine the magnitude of the daylight injury in terms of its actual effect on the use of the building by the Congregation of the synagogue. Next slide.

00:18:43.210 --> 00:19:13.500

Cannon-Brookes, Stephen

Current VRE derived guidelines provide a standard geometrical technique to assess the degree sky visible from a window. This allows determination of the degree of change resulting from further obstructions. The technique is widely employed to protect the interests of domestic interiors and officers, but rarely the needs of historic buildings with such specific concerns as fevers marks daylight impact reports for 31, Bury St and other developments.



00:19:13.800 --> 00:19:40.870

Cannon-Brookes, Stephen

Tech knowledge, their additions to the skyline will deliver further incremental reductions to what they claim are already limited levels of daylight within the synagogue. Their case, however, rests on questionable logic, having decided apriori on the basis of the incomplete analysis that daylight is already insufficient, they conclude that any further incremental reductions are negligible.

00:19:42.320 --> 00:19:59.870

Cannon-Brookes, Stephen

While questioning some of the technical details, the Breg report does not address the fundamental issue of the lack of realism in these routinely used assessment methods, which crucially do not quantify the contribution, either direct or reflected sunlight.

00:20:00.820 --> 00:20:12.350

Cannon-Brookes, Stephen

It does, however, bring attention to this deficiency by concluding that if all the proposed schemes are implemented, there would be major injury to sunlight reaching the synagogues windows.

00:20:13.500 --> 00:20:24.370

Cannon-Brookes, Stephen

May I repeat this according to these results? The internal day lighting will be almost unaffected. Accumulative sunlight reduction is counted a major injury.

00:20:25.800 --> 00:20:55.690

Cannon-Brookes, Stephen

This office contradiction is the product of the acknowledged fundamental limitations in the standard internal daylight calculations used in planning. The methodology excludes all contributions of sunlight on an overcast sky. Light in the prediction of daylight levels, most egregiously for the synagogue congregation. That presentation presented assessment exclude the all important contribution of reflected daylight under realistic de Son.

00:20:55.760 --> 00:20:56.870

Cannon-Brookes, Stephen

And sky conditions.

00:20:57.740 --> 00:21:11.050

Cannon-Brookes, Stephen

These weaknesses in prediction methodology allow the developers consultants to substantially under represent the true scale of the injury. This Linux daylighting next slide, please.

00:21:13.010 --> 00:21:15.200

Cannon-Brookes, Stephen

Stand in the middle of the synagogue and look up.

00:21:16.090 --> 00:21:23.620

Cannon-Brookes, Stephen

You cannot see the sky and the lights you receiving is almost entirely reflected from the surrounding buildings.

00:21:24.970 --> 00:21:31.070

Cannon-Brookes, Stephen

Recognition this is key to comprehending the sensitivity of this issue now and in the future.

00:21:32.000 --> 00:21:52.190

Cannon-Brookes, Stephen

Presence of daylight and the synagogue is largely a gift from its neighbors and not due to access to the sky as state in the Bury methodology on a fair day, the interior is made bright by sunlight and skylight reflected from the surrounding walls. Compared this to a dull overcast day.

00:21:52.780 --> 00:22:02.650

Cannon-Brookes, Stephen

When the interior becomes subdued and the congregation is that threshold of being able to read their sacred texts, clearly a tipping point has already been reached.

00:22:03.660 --> 00:22:24.450

Cannon-Brookes, Stephen

Developments, especially the South that reduce it light from afflicted sunlight and broken cloud cover, will extend the proportion of the year when daylight levels drop below the threshold of sufficiency. This will have a direct impact on our congregations ability to read by available light and properly communicate during services.

00:22:25.060 --> 00:22:25.990

Cannon-Brookes, Stephen

Next slide, please.

00:22:27.430 --> 00:22:53.220

Cannon-Brookes, Stephen

In summary, none of the techniques currently used in planning realistically present the consequences of further obstructing the sky around the synagogue. Sun path diagrams show reductions in potential errors, notably to a mere one hour in Midsummer, but not the effect of blocking reflected light from surrounding buildings, and in particular, the impact of shading by substantial developments to the South of the synagogue.

00:22:54.180 --> 00:22:54.730

Cannon-Brookes, Stephen

Next slide.

00:22:56.650 --> 00:23:28.000

Cannon-Brookes, Stephen

Overcast sky analysis by definition, misses these contributions altogether. Given the nurse substantial dependence on reflected light from the surrounding buildings, any assessment day lighting within the synagogue must include the reflective contribution of both sunlight and non overcast skylight to accurately represent both existing conditions and proposed changes. But daylight assessments submitted with the current development proposals failed to include sunlight.

00:23:28.060 --> 00:23:36.550

Cannon-Brookes, Stephen

Contribution rendering the findings incomplete and leading to severe underestimation of negative impact on the synagogue.

00:23:37.330 --> 00:23:57.960

Cannon-Brookes, Stephen

Apply to a grade one listed building that is a living synagogue. These daylight assessment methods



are being used outside of their domain of applicability and cannot therefore revealed the true extent in the reduction of functional daylight to what the users of this unique space will be expecting.

00:24:00.300 --> 00:24:11.430

Cannon-Brookes, Stephen

Accordingly, the Committee has not yet been provided with the quality of the information it requires in order to make an informed decision on this historic case.

00:24:12.820 --> 00:24:13.330

Cannon-Brookes, Stephen

Thank you.

00:24:15.210 --> 00:24:27.640

Sir Michael Bear (Guest)

Thank you very much, Steve. And I think we need to move swiftly onto a shallow and and and then I think we're gonna run over. But so be it. That's less time for members. OK, Rabbi Shalom.

00:24:28.120 --> 00:24:58.880

Rabbi Shalom Morris

Thank you, we've asked for this meeting for the opportunity to speak plainly with you today, so I apologize in advance to the Chief Planning Officer. It is our contention that the officers report is strikingly misleading, likely due to profound misunderstanding of the nature of the synagogue. It is therefore intent to clarify the truth, so you can make an independent, informed, and educated decision and not just follow the lead of a deeply flawed report you just heard from world experts.

00:24:58.960 --> 00:25:16.930

Rabbi Shalom Morris

In heritage and light and the reasons why the Tower 31 Bury St is simply unacceptable in planning terms as the rabbi about this marks, I'm now going to share with you several additional points about the synagogue in Judaism that you must understand to reach a fully informed conclusion.

00:25:18.200 --> 00:25:48.920

Rabbi Shalom Morris

From 1290 to 1656, Jews were not permitted to live in England. Indeed, even when Jews were given the nod by Oliver Cromwell that they could return, it was never official. For this reason, they were forced to keep a low profile. This explains why Bevis Marks Synagogue was built in a private courtyard. Something historians referred to as private worship, as opposed to the public worship of churches or synagogues on main thoroughfares. This is the reason that until this day.

00:25:48.980 --> 00:26:03.290

Rabbi Shalom Morris

When one enters the courtyard, Bevis marks from off the main road. One feels as though they have left the City of London and entered another world. If not the 18th century and and entered another world. If not the 18th century itself.

00:26:04.330 --> 00:26:34.480

Rabbi Shalom Morris

It is this historic character which is threatened most directly by the tower at 31 Bury St. While London is famous for its mix of new and old's. The setting of Bevis Marks is not the same. It is meant to be secluded and separate. If a 48 Storey tower looms over it and sets the backdrop to it, this is

historic character and setting will have been destroyed. It is only through the preservation of this original setting. The one is most able to understand.

00:26:34.540 --> 00:26:51.990

Rabbi Shalom Morris

And experience the history and nature, Bevis Marks and the life of Jews in the 18th century London. For those of you who came to the site visit, I believe you understand what I mean. This is what local plans intend to protect when they call for the protection of heritage sites and their settings.

00:26:53.140 --> 00:27:23.110

Rabbi Shalom Morris

Oddly, the officers report claims quote the proposed building would replace some clear sky with slender massing. This is patently untrue, unless one is standing very close to the synagogue and arching your neck straight up. However, when looking towards the synagogue when just entering the courtyard, the entire mass of the building will be in full view and overpower the space the applicant has tried the same trick in their fly view video that you may have seen.

00:27:23.310 --> 00:27:54.800

Rabbi Shalom Morris

Showing the backdrop of 31 Bury St from a vantage point which is extremely close to the synagogue itself, making it seem that only a narrow portion of the building would be visible while in truth the entire southern side of the synagogue will be overshadowed by 31 Bury St. Even more crucially, the Clearview skies around Bevis Marks Synagogue are also important for religious reasons, as Judaism requires views of the sky for the performance of its rituals. It is upon seeing three stars and the Saturday night Sky.

00:27:54.880 --> 00:28:07.700

Rabbi Shalom Morris

Did you know that the Sabbath has concluded? Additionally, each month only wait to witness the Crescent of the newly emerging moon and the early night sky that they can thank God for the new Hebrew month?

00:28:08.330 --> 00:28:41.280

Rabbi Shalom Morris

And according to the Biblical Book of Daniel, A Jew is supposed to see the sky when they pray to be reminded of having all of these points were made in the community impact study that we submitted. And yet the planning report didn't even address them, despite the legislative requirement for you to conduct a Community impact study. In fact, you should have seen a letter just today from Doctor Joseph Spitzer. It might have seemed a bit strange, but in it he explains the current synagogue light levels are just barely enough to conduct Jewish religious circumcision safely.

00:28:41.750 --> 00:29:12.460

Rabbi Shalom Morris

This is something of grave concern to us as per their light loss would prevent the Jews of Bevis Marks Synagogue from carrying out one of Judaism's most sacred duties. This is what we mean when we say that approval means the closing of the synagogue. It isn't hyperbole or theatrics. If we can no longer carry out our rituals as required, Bevis Marks Synagogue ceases to function as a living place of worship, but becomes a museum a relic of the past. This is an infringement on our religious rights.



00:29:12.750 --> 00:29:14.560

Rabbi Shalom Morris

He protected religious minority.

00:29:15.580 --> 00:29:37.850

Rabbi Shalom Morris

With the officers report does say on page 140 is that quote the impact on daylight to the interior of the synagogue will not compromise their religious user activities therein. Unquote I ask you then what specialists advice? Have the officers received to support that assertion? This goes against the assessment of the Chief Rabbi. The Board of Deputies and the local worshipping community.

00:29:38.510 --> 00:30:08.680

Rabbi Shalom Morris

What I can tell you is that the daily lived experience of worshippers at Bevis, including myself, is that when light reflects off the surrounding buildings, it illuminates the interior creating brightness, beauty and spirituality, and it becomes easier to read our prayer books and carry out our faith. If we become overshadowed. This will be harmed, creating a situation of perpetual cloud cover and gloom. The planning report profoundly misses the point about the role and impact of light in a religious space.

00:30:08.990 --> 00:30:17.980

Rabbi Shalom Morris

Consenting to this building would rob us of that, and that is unacceptable harm to a Community that is worshipped in this space, unfettered for over 300 years.

00:30:18.030 --> 00:30:49.520

Rabbi Shalom Morris

Yes indeed, the independent DRA light study concluded that cumulative effects of the already approved buildings, and though is if you have to be contented, would be major adverse. You must understand that 31 Berry St then cannot be evaluated on its own terms as one Cree church to the synagogue. East has already been built 100 Len Hall to the synagogue. South has already been approved, 31 Berry St in the middle of them, then is commute cumulative impact already? It is no longer possible to consider it.

00:30:49.560 --> 00:31:06.330

Rabbi Shalom Morris

On its own it's approval would it's approval would be permitting the major adverse cumulative impact to be a common reality according to historic England, past harm is not a justification for further harm. Quite the opposite. This would be death by 1000 cuts.

00:31:07.390 --> 00:31:09.320

Rabbi Shalom Morris

Allow me to conclude then by saying.

00:31:10.250 --> 00:31:42.510

Rabbi Shalom Morris

That there has been a lot of talk about minor, adverse, moderate, major, etc. What is clear and everyone agrees is that approval of 31 Bury St means consenting to harm costed Bevis Marks Synagogue. Now the argument to cause such harm hinges on the position. The greater public benefit is caused for BI approval. So let me ask what is the public benefit that would permit you causing

harm to British juries? Most sacred religious sites because they will allow community groups to use the bottom floors of their building.

00:31:43.010 --> 00:31:44.580

Rabbi Shalom Morris

That's clearly a fig leaf.

00:31:45.480 --> 00:32:06.700

Rabbi Shalom Morris

And a transparent one at that. They could build a 15 story building and still make the 1st floor public. It is no justification whatsoever to build a 50 story one and there is certainly no justification to cause harm to a pre existing historic community to Createspace for the possible one day random use of some outside community group.

00:32:07.570 --> 00:32:27.180

Rabbi Shalom Morris

So let's be honest here, this decision ultimately comes down to how much you value Bevis marks. Synagogue, This is why there was such outrage coming from the public, both Jews and non Jews alike. What the right decision is here is playing for nearly everyone to see, except for perhaps you're planning officer.

00:32:27.810 --> 00:32:37.140

Rabbi Shalom Morris

This is why such decisions are not made by planning officers, but by public servants. Because you are meant to see the bigger picture and having broader perspective.

00:32:38.030 --> 00:33:02.330

Rabbi Shalom Morris

This is not an assault on tall buildings, the eastern cluster, or even on tall buildings in the area. Bevis Marks, but against ones to our South and southeast that will cause serious detriment to our historic faith community where there for asking you to do the right thing and preserve one of the most important living Jewish sites in the world by not consenting to a tower that would so clearly cause harm to it. Thank you.

00:33:03.310 --> 00:33:09.500

Sir Michael Bear (Guest)

Thank you, thank you very much. Shalom and Stewart were a little bit over time. Do you want to?

00:33:09.110 --> 00:33:10.290

stuart (Guest)

I should be very quick.

00:33:10.550 --> 00:33:10.980

Sir Michael Bear (Guest)

OK.

00:33:10.840 --> 00:33:28.170

stuart (Guest)

Uh, thank you. You've heard a lot about the synagogue history today. I'm going to very quickly show you something about the Corporation's history, and this is a report of the city architect and Planning Officer 19th of June 1978.



00:33:29.050 --> 00:33:35.640

stuart (Guest)

And it concerns the building that is currently on 33 creechurch and you recommend that.

00:33:36.680 --> 00:34:06.470

stuart (Guest)

Committee recommended the granting of it with conditions and if you read quickly this, but it's been highlighted the points which were raised in these letters mainly concerned the possible infringement of day lighting. The revised drawing shows that the 4th floor is to be set back from the edge of the building. An oven. The Henry David Henige Lane frontage, opposite number 2 and the synagogue and the plant room will have a sloped.

00:34:06.770 --> 00:34:22.660

stuart (Guest)

Mansard roof these measurements with in fact slightly improved the existing situation that the synagogue. So I ask you what's changed? Sunlight hasn't changed. The synagogue hasn't changed, but you are going to.

00:34:23.970 --> 00:34:27.390

stuart (Guest)

Sorry, can we get back to that? One of the building quickly please.

00:34:31.950 --> 00:34:42.010

stuart (Guest)

Yeah, that's an aerial view of the current building that 33 creechurch which has got a slope and a cut out to preserve the light.

00:34:42.830 --> 00:34:46.870

stuart (Guest)

Being reflected into the synagogue so.

00:34:47.880 --> 00:34:51.260

stuart (Guest)

What's changed is your attitude to our synagogue.

00:34:52.090 --> 00:34:53.630

stuart (Guest)

Because your predecessors.

00:34:54.220 --> 00:34:57.650

stuart (Guest)

Protected it and we ask you to do the same.

00:34:58.610 --> 00:34:59.130

stuart (Guest)

Thank you.

00:34:59.540 --> 00:35:23.430

Sir Michael Bear (Guest)

Thank you very much. Do the the the application is 31 Bury St but the principles that Stuart has mentioned are the ones that we that that that we are so keen for you to to understand. OK if you

just hang on to that slide this is the one that you couldn't see when I was making my presentation you will have a copy of this which are the reasons for refusal that our professional team had drafted.

00:35:24.020 --> 00:35:43.030

Sir Michael Bear (Guest)

Uhm, uh, to give you chapter and verse on each clause that is in contravention in the London plan, the City of London local plan and the National Planning framework. So that's our presentation over at Gwyn, over to your Members. Now we're 5 minutes over, but you have plenty of time to ask your questions. Thank you very much.

00:35:51.560 --> 00:35:53.270

Sir Michael Bear (Guest)

Do any Members have questions?

00:35:54.900 --> 00:35:58.280

Sir Michael Bear (Guest)

Who is chairing, uh, do you want me to take questions or?

00:35:59.040 --> 00:35:59.740

Sir Michael Bear (Guest)

Ask the question.

00:36:00.320 --> 00:36:03.160

Richards, Gwyn

I'm waiting for any Members who may have questions too.

00:36:00.790 --> 00:36:01.040

Sir Michael Bear (Guest)

Like

00:36:02.870 --> 00:36:06.640

Sir Michael Bear (Guest)

uh, OK, yeah. Thank you Glenn date they understand that, uh, it's Henry yeah.

00:36:04.250 --> 00:36:04.830

Richards, Gwyn

Like this?

00:36:05.670 --> 00:36:05.910

stuart (Guest)

So.

00:36:09.970 --> 00:36:11.820

Pollard, Henry

Thank you Michael. Henry Pollard.

00:36:11.900 --> 00:36:14.520

Pollard, Henry

Yeah, I'm am I right in saying that?

00:36:15.790 --> 00:36:23.340

Pollard, Henry



This the this if the building was a similar height to the existing building, there would be no problem with that building being built.

00:36:24.650 --> 00:36:53.800

Sir Michael Bear (Guest)

I I mean that is correct. I mean we are where we are. There's the synagogue has lived with the with the height and massing that's there at the moment, and I think that that is normally under planning guidance. There should be alternatives which the planning officer would would would go through with the developer in order to come up with the right height and massing. I don't believe that's taken place. I think the the the adherence to the tall building policy has missed that step.

00:36:54.350 --> 00:36:55.710

Sir Michael Bear (Guest)

But in order to your question, yes.

00:36:57.280 --> 00:36:57.650

Pollard, Henry

Yep.

00:37:04.870 --> 00:37:22.390

Sir Michael Bear (Guest)

But we obviously did a really good presentation. Questions, which is fine. I mean we we you know we, we spent a lot of time trying to second guess what the questions were being would be and have come up with this presentation. So so Gwyn, if there aren't any questions, we quite happy to rest on.

00:37:23.040 --> 00:37:32.890

Sir Michael Bear (Guest)

The evidence that we presented to you and and and and move on to tomorrow, which is a hugely important.

00:37:32.940 --> 00:37:34.950

Sir Michael Bear (Guest)

UHM committee meeting.

00:37:35.930 --> 00:37:39.300

Sir Michael Bear (Guest)

And do any of my colleagues have anything to say?

00:37:40.040 --> 00:37:43.520

Sir Michael Bear (Guest)

Yep, OK Gwyn. I think we are. We are where we are rather than.

00:37:44.170 --> 00:37:47.470

Richards, Gwyn

Thank you very much and thank you for being prompt. Thank you.

00:37:47.780 --> 00:37:51.240

Sir Michael Bear (Guest)

That's alright, OK, do we get points for that? Do we get points for them? I like pointed.

00:37:52.260 --> 00:37:57.270

Sir Michael Bear (Guest)

Great, thank you very much and could again. I thank you for the opportunity to allow us to put our case.

00:37:57.600 --> 00:37:58.230

stuart (Guest)

Thank you.

00:37:58.230 --> 00:37:58.650

Sir Michael Bear (Guest)

OK.

00:37:58.260 --> 00:37:59.240

Rabbi Shalom Morris

I guess.

00:37:58.710 --> 00:37:59.250

Abigail Green

Thank you.

00:37:59.360 --> 00:38:03.880

Sir Michael Bear (Guest)

Thank you, thank you very much. OK, we're gonna we're gonna go off now. Thank you bye.



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## **Planning & Transportation Committee – 5 October 2021**

### **Further Addendum for Agenda item 4.**

#### **Planning application 20/00848/FULEIA – 31 Bury Street**

##### **1. Corrections in the Report**

Paragraph 339 should read:

“A visually striking landscaping feature is proposed in the form of a 3- 9 storey tall green wall in the pocket park area at ground level.”

Paragraph 342 should read:

“Substantial greening has been incorporated at ground floor level within the new public realm areas by landscaping and trees as well as an 8 9 storey green wall (approx. 32m in height and over 200sq.m in terms of surface area).”

##### **2. Amended moving flythrough provided by applicants**

An amended moving flythrough which was provided within the Townscape Built Heritage Visual Impact Assessment addendum report on Page 3 has been amended to include 33 Creechurch Lane.

Link – (If the link does not work – please copy and paste the link into a Google Chrome web Browser)

##### **3. Additional Condition**

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

*REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.*

##### **4. Letters of Representation**



Since the committee report has been published additional representations have been received.

The representations which raise new issues are summarised in the table below, along with officer responses to the comments raised. A full list of all late representations are attached to this addendum report and they have been made available to view on the public website.

Representations (objections)	
Cannon Brookes Lighting and Design and Daylight- Experts On behalf of the Bevis Marks Synagogue	<p><b>Summary of the Representation:</b></p> <p>Given the now substantial dependence on reflected light from the surrounding buildings, any assessment of daylighting within the Synagogue must include the reflected contribution of both sunlight and (non-overcast) skylight to accurately represent both existing conditions and proposed changes. The daylight assessments submitted with the current development proposals fail to include sunlight's contribution, rendering the findings incomplete and leading to severe underestimation of negative impact on the Synagogue. Applied to the Synagogue, these (routinely employed) daylight assessment methods are being used outside of their domain of applicability, and cannot therefore reveal the true extent in the reduction of functional daylight that the users of this unique space will be subject to.</p> <p><b>Details of the Representation:</b></p> <p>The Synagogue was designed to be well daylit with large windows on all four sides to meet spiritual and functional aspects of worship. Members of the congregation expect to be able to read during services using daylight, which as of tradition plays a role in the timing of services. This helps to explain why the generous number of original chandeliers were not electrified during the 20th century, since, as was the case in the early 18th century, appropriate candles are expensive and their use is reserved for special services.</p> <p>It is the minimal level of material change since the 18th century that earned the current Grade 1 listing of the building, its fabric and its furnishings.</p> <p>Whilst the building and its use remain largely unchanged, the same cannot be said for its surroundings and this has had a substantial effect on the daylighting of the interior. The narrow surrounding courtyard has maintained a perimeter of space though, one increasingly shaded from the sky by the rising height of adjacent buildings. One of the consequences of this is evidenced in the interior where there are redundant boxes above the upper level windows on the SE and SW walls. In the past, these were used to house blinds to diffuse sunlight, now <i>permanently</i> blocked by adjacent buildings.</p>

Change has been incremental, but always in the direction of lower daylight levels as the height of the surrounding buildings increased.

GIA's reports present the current conditions showing how little direct view of the sky remains from the Synagogue's windows. Their assessment of the resulting low daylight levels under a single, worst case overcast sky condition would appear to reflect the experience of the congregation, who already find during some daylight hours that reading is no longer easy, especially under the balconies. However, a worst case evaluation under a single sky condition provides only a limited insight into the actual daylighting performance of the Synagogue. Site measurements of light levels indicate that the interior is on the cusp of losing useable levels of daylight under most sky conditions.

Review of existing conditions and schematic computer modelling indicates that the daylighting in the Synagogue is now dependent on reflected light from the surfaces of the buildings surrounding the courtyard.

This is most obvious during periods of sunlight, the absence of which is easily perceived since light levels are considerably lower when sky is overcast. At these times, the current and relatively sparse electric lighting is utilised and it was learnt that members of the congregation tend to cluster around the columns where the brackets are mounted.

From the reports received, the light levels from the fittings are insufficient for them to be regarded as an alternative means of illumination and in practice they serve to distort the use of seating during services.

Both of the two projected developments represent substantial increments in shading above that existing. The critical factor that is not addressed by GIA's employment of orthodox overcast sky metrics for daylighting is the presence of sunlight, either from clear or partially overcast skies. The two new buildings would substantially reduce sunlight cast onto the walls of the courtyard surrounding the Synagogue and this will have a greater effect than suggested in GIA's analysis, which does not include either reflected sunlight or reflected non-overcast skylight as a source of illumination within the Synagogue.

In addressing only one component of the actual daylight reaching the interior, they underestimate both what is currently present, and the effect of the changes caused by greatly increasing shading of the Synagogue's surroundings from the southern part of the sky. Given the already precariously low light levels, this would be to greatly increase the portion of the year when daylight levels will



	<p>drop below those currently experienced as adequate by the congregation.</p> <p>We believe that the basis of the daylight assessment methods used by GIA and the BRE, their suitability for the particular case of determining daylight loss to the Synagogue, and more realistic alternatives should be more clearly delineated in order for the Committee to make an informed decision for this unique case.</p> <p>The vertical sky component (VSC) at the window is used as a proxy for the daylighting potential of directly visible sky (and only strictly for the single 'standard' overcast sky condition). This proxy measure has some utility for relatively shallow-plan, single aspect spaces, e.g. small perimeter spaces such as living rooms or office units. For typical planning applications, these are the types of rooms that overwhelmingly comprise the majority of spaces evaluated.</p> <p>Any reduction in VSC should be understood as an indicator of the reduced 'view' of the sky (at the window) which, crucially for the Synagogue, is not a reliable measure of reduction of the "diffuse daylighting entering" the building since that depends on the totality of reflected skylight and sunlight. It is important to appreciate therefore that the standard daylight assessment methods described in the reports we have reviewed were not conceived to be applied to distinctive/unique buildings such as the Synagogue where the functional daylight experienced by the users depends almost entirely on reflected light from both the sun and the sky.</p> <p>We agree with the BRE recommendation against using the "average daylight factor to assess loss of light to existing buildings."</p> <p>The BRE report also notes that "British Standard Code of Practice for daylight, BS 8206 Part 2. BS 8206 Part 2 was superseded in 2019 by [the new European standard] BS EN 17037." [BRE 2.2.7] The European standard requires the determination of absolute levels of daylight illumination, i.e. lux values (as measured by a light meter) rather than idealised proxy measures such as the average daylight factor. This is the first major upgrade in daylighting standards in over half a century.</p> <p>The 17037 Standard has been adopted by all 34 CEN member states and has encouraged the widespread uptake of climate-based daylight modelling (CBDM). In large part this is because CBDM offers a holistic evaluation of daylight in a space, i.e. the combined effect of sunlight and skylight (reflected and directly received) predicted using realistic sun and sky conditions appropriate for the locale. Also, the evaluation period is full year at an hourly increment. Thus the daily and seasonal patterns of daylight illumination in spaces (i.e. those experienced by the occupants) are realistically depicted.</p>
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	<p>Although practitioners now use computers rather than diagrams/tables to predict quantities such as the ADF, VSC and sunlight hours, the underlying methodology for these techniques is essentially the same. And so the intrinsic limitations of these techniques are the same as they were fifty or a hundred years ago.</p> <p>Our preliminary review and analysis was informed by CBDM simulations of a schematic/approximate scenario based on the Synagogue and its surroundings. Elements of the geometry necessarily had to be assumed since we had not been given access to the detailed 3D model shown in the various reports. Nevertheless, the CBDM simulations confirmed our expectations and revealed that daylight in the core of the Synagogue comprised almost entirely of reflected sunlight and reflected skylight. Furthermore, we believe that a failure to account for this will deny the Committee the opportunity to make an informed decision. Our analysis indicates that the daylighting of the Synagogue is at risk of being irredeemably impaired, not just in terms of historic appearance, but more crucially from the perspective of the congregation who are both reliant on the limited levels at present, and understandably wish to retain daylight's spiritual presence within the building. The Synagogue was conceived as a coherently designed space for the congregation to worship within. To substantially reduce the internal daylight from its current slight levels would sever the links that make it such a place, and thus undermine the rationale for its protection.</p> <p>In these circumstances, we recommend that the full implications for daylight reduction from the two developments are more rigorously assessed. To derive a realistic understanding of the shading effects, such an assessment should involve both the application of climate-based daylight modelling and engagement with the congregation to calibrate the quantitative output.</p> <p><b>Officers Response to Comments:</b></p> <p>The daylight and sunlight impact have been assessed using BRE Guidelines which is the identified methodology recognised within the Local Plan, Draft Local Plan 2036 and this is the methodology which has been relied on.</p> <p>Climate based daylight modelling is that it generates a lot of data which can be difficult to interpret and compare with standards. As the full results of the Climate Based Daylight Modelling (CDBM) has not been provided by the Synagogue, officers are not able to make a full assessment of these results.</p> <p>The details of this representation have been independently reviewed by Dr Paul Littlefair (BRE).</p>
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	<p>It is acknowledged that the synagogue does benefit from reflected light from the other buildings nearby, and the vertical sky component does not include this. GIA's radiance-based daylight model does include reflected light, but only under an overcast sky and may have underestimated external reflectances.</p> <p>It is considered that including reflected light over the whole year would not make much difference to the overall conclusions about the impact to the synagogue. Most of the reflected light comes from the offices to the north east (on Bevis Marks) which are further away from 31 Bury Street and less affected by it; or the offices to the north west (on Bury Street) which do not directly face the proposed 31 Bury Street. The proposed development would be expected to have similar relative impact on reflected light entering the synagogue as it would on direct light coming from the sky.</p> <p>There are recommendations in BS EN17037, but the synagogue would be below them both currently and with the new development in place.</p>
Rehman Chishti MP	<p>Writing as the Member of Parliament for Gillingham &amp; Rainham and the former UK Prime Minister's Special Envoy for Freedom of Religion or Belief.</p> <p>Expresses total opposition to and serious concerns regarding the planning applications 20/00848/FULEIA and 18/00305/FULMAJ and their negative impact on Bevis Marks Synagogue, the oldest synagogue in the UK and the longest continually operating synagogue in the world. As a Grade I listed building which houses a living community with continuity of worship and tradition for over 320 years, these two proposed developments now threaten its natural light, historic setting, and structural integrity.</p> <p>Historic England, in its response dated 18th February in relation to 18/00305/FULMAJ raises concerns about the impact of the proposed development on heritage grounds, and notes that the consideration of harm in respect of Bevis Marks, <i>"should be particularly great in this case because the designated heritage is listed at Grade I and therefore of the highest importance."</i></p> <p>The cumulative impact, with other buildings built or agreed, will mean sunlight, apart from one hour during the day, will be completely blocked out, severely compromising the functioning of the synagogue, and overshadowing the entire site. As Dr Paul Littlefair of the BRE concludes in his report of 20th September 'Review of daylight and sunlight, Bury House, London EC3 – P119483-1000:</p>

	<p><i>“The cumulative effect of all the proposed developments would be to stop all sunlight reaching the centres of the windows at any time of year. This would be a major adverse impact.”</i></p> <p>The conclusions of this report, which was commissioned by the City of London Corporation itself, should in my view be more than enough justification for refusal of both planning applications.</p> <p>These proposed developments fail to consider the importance and extreme sensitivity of British Jewry’s cathedral synagogue.</p> <p>Over 1,000 letters of objection have been received against both planning applications. It is clear that there is serious concern from a wide range of stakeholders about the potentially devastating impact that these developments could have on the future of Bevis Marks.</p> <p>Call on the City of London to take these voices into account when considering these applications and I reiterate my serious concerns about the impact of these developments which threaten the future of Bevis Marks Synagogue and the implication for freedom of religion or belief should the developments go ahead.</p> <p><b>Officers Response to Comments:</b></p> <p>Whilst Historic England have raised concerns in their letter for the application at 33 Creechurch Lane (18/00305/FULMAJ) about the impact of the development at 33 Creechurch Lane and its impact on the Synagogue, this application is not for the consideration of 33 Creechurch Lane. This application will be considered at future committee.</p> <p>In their response to the application at 31 Bury Street (20/00848/FULEIA), Historic England state that “The building is also located very close to the Grade I Bevis Marks Synagogue (1699-1701) which is the oldest synagogue in England in continuous use. The synagogue is located at the eastern fringe of the City of London near Aldgate, and accessed via a secluded courtyard. The deliberately enclosed surroundings contribute to the setting and therefore significance of the listed building. However, the courtyard has been encroached upon by recent tall building development in the area which has caused some harm to the significance of Bevis Marks through development within its setting. However, the cumulative wireline assessment indicates that consented tall buildings within the Eastern Cluster already present a significant impact on the setting of Bevis Marks, and the proposed scheme will appear as part of that cluster in this view. Nonetheless, the proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building in our opinion.”</p>
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	<p>Consideration of the heritage impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. There is no harm identified to the Synagogue.</p> <p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.</p> <p>Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).</p> <p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC (recorded between 1.7%-1.8%. ) which would be minimally noticeable in the Synagogue at ground floor level and slightly more noticeable but to a limited area only on the south side at mezzanine.</p> <p>Dr Littlefair advises that the magnitude of the loss of daylight attributable to the proposal can be classified as 'minor adverse'. He further advises that the overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal.</p> <p>The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The impact on sunlight would be more marked in the cumulative scenarios, described by Dr Littlefair as a major adverse impact, particularly in the Future Baseline 2 scenario (which assumes all the schemes would be constructed including the unconsented schemes the Tulip and 33 Creechurch Lane).</p>
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	<p>With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight.</p> <p>Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and it's Courtyard is of such significance that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.</p> <p>The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.</p> <p>The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact. The proposal complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.</p>
Twentieth Century Society	<p>The Society objects to the application due to the harm caused to the attached Grade II* listed Holland House.</p> <p>The proposed development will have an impact on both the fabric and setting of the Grade II* listed Holland House. Only 5.8% of</p>



	<p>listed buildings are Grade II* which makes the conservation of Holland House of the utmost importance.</p> <p>The Society agrees with Historic England's assessment of the significance of Holland House and its setting. The building is listed in part for the outstanding architectural quality of its elevations so it is important the exteriors, and views of the exteriors, are preserved. From the west, Holland House is viewed against a clear skyline. Owing to the considerable height of the proposed development, it will be highly visible in this view, rising up behind Holland House (view 43). We agree with Historic England that the proposed building will have a detrimental impact on the listed building's setting.</p> <p>In their response to Historic England's feedback, the applicant refers to nearby developments like 30 St Mary Axe and claims that 'Change is part of the DNA of the City of London' and that 'Holland House remains an exceptional piece of architecture that [has] managed to retain its qualities in the ever-changing context of the City.' We appreciate that Holland House is located in an urban environment and place of change, but disagree with the suggestion that the significance of Holland House cannot be harmed by development within its immediate setting. Historic England's 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' considers 'cumulative change' and states that 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting [...] consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.' We maintain that the proposed 49-storey tower to the rear of Holland House will have a harmful impact on its significance.</p> <p>For these reasons, the Society objects to the current application and encourages the applicant to revise the design to reduce the height of the proposed development and limit its impact on the Grade II* Holland House. The Society defer to Historic England and the Georgian Group for comment on the impact on the Grade I listed 18th-century Bevis Marks Synagogue.</p> <p><b>Officers Response to Comments:</b></p> <p>Consideration of the impacts identified in the Twentieth Century Society's response are contained within paras 216 to 219 of the main report.</p> <p>Impact on Holland House: the dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly</p>
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	<p>inspired by that of Holland House and which would read as complementary. The views of the listed building across the Gherkin plaza do not contribute materially to the significance or appreciation of the listed building, where the setting is in any case defined by a contrast with tall buildings. The proposed building would not adversely impact upon light levels to the fine tiled interiors at the lower levels of the listed building. Accordingly, it is considered that the proposed building would not cause harm to the setting or significance of the listed building.</p>
Westminster City Council	No Objections
Mr Fred Rodgers	<p>How do the estimated total annual carbon emissions from the proposed development compare to those from the existing one.</p> <p>As far as the above application is concerned, officers are misleading committee unless they can back up:</p> <p><i>Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.</i></p> <p>With evidence that the total estimated annual carbon emissions from the proposed development will be less than the total annual emissions from the existing one. The apparent failure to take this into account is only one of a number of issues revealing a lack of objectivity in his report and reason enough for rejecting his recommendation.</p> <p><b>Officers Response to Comments:</b></p> <p>The proposed development would achieve a 39.2% reduction in operational carbon emissions beyond Building Regulations and offset the remaining 60.8% carbon emissions to reach net zero-carbon as per London Plan Policy <i>SI 2 Minimising greenhouse gas emissions.</i></p>
Sian Berry AM	<p>Been contacted by constituents from the Jewish community in London about these two planning applications and their potential impact on the Bevis Marks synagogue. One resident writes: "Bevis Marks has totemic importance for the UK Jewish Community – as an Islington Jew I sometimes attend myself – but in any case I have an emotional attachment due to its place in the community's history."</p>

	<p>While it is appreciated that neither the synagogue or the proposed buildings are in conservation areas, the synagogue itself is a Grade 1 listed building and as such should be protected from harm. Among the many representations and objections to both applications, is one from Historic England, which states: “The proposed 20 storey tower at 33 Creechurch Lane will cause further harm to the significance of the Grade I listed synagogue through development within its setting. [...] This harm should be given ‘great weight’ as part of the planning balance in determining this application.”</p> <p>Urge you to give due weight and regard to the many objections to both these applications and recommend that you do not approve them.</p> <p><b>Officers Response to Comments:</b></p> <p>Whilst Historic England have raised concerns in their letter for the application at 33 Creechurch Lane (18/00305/FULMAJ) about the impact of the development at 33 Creechurch Lane and its impact on the Synagogue, this application is not for the consideration of 33 Creechurch Lane. This application will be considered at future committee.</p> <p>In their response to the application at 31 Bury Street (20/00848/FULEIA), Historic England state that “The building is also located very close to the Grade I Bevis Marks Synagogue (1699-1701) which is the oldest synagogue in England in continuous use. The synagogue is located at the eastern fringe of the City of London near Aldgate, and accessed via a secluded courtyard. The deliberately enclosed surroundings contribute to the setting and therefore significance of the listed building. However, the courtyard has been encroached upon by recent tall building development in the area which has caused some harm to the significance of Bevis Marks through development within its setting. However, the cumulative wireline assessment indicates that consented tall buildings within the Eastern Cluster already present a significant impact on the setting of Bevis Marks, and the proposed scheme will appear as part of that cluster in this view. Nonetheless, the proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building in our opinion.”</p> <p>Consideration of the impacts on Bevis Marks Synagogue is set out in the ‘Impact on significance and setting of listed buildings’ section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the</p>
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	<p>synagogue and its setting. There is no harm identified to the Synagogue.</p>
<p>DP9 on Behalf of Merchant Land (33 Creechurch Lane)</p>	<p>Within the published Planning and Transportation Committee Report, there are a number of instances where Officers have attributed impacts on adjacent buildings to the Proposed Development at 33 Creechurch Lane, specifically in relation to daylight, sunlight and overshadowing, and heritage under the Future Baseline 2 Cumulative Scenario. Firstly, disagree with the level of impacts attributed to the Proposed Development at 33 Creechurch Lane and the report inaccurately places the onus on it. This is an error that is repeated throughout the Committee Report. Secondly, do not believe that the alleged impacts of the Proposed Development at 33 Creechurch Lane should be set out within the published Committee Report relating to Bury House without our client first having a chance to respond; the assessment is based on a report that has not been shared with Applicant for the Creechurch Lane scheme.</p> <p>The applicants are currently in discussions with Officers regarding the Proposed Development at Creechurch, we had submitted further/amended details in July 2021 to address previous concerns raised by adjacent landowners and Officers in relation to: impacts on the Grade I Listed Bevis Marks Synagogue and its setting; wind; daylight, sunlight and overshadowing; cumulative impacts; delivery and servicing; cycle parking and construction and buildability.</p> <p>It is worth highlighting that prior to submission of these further details for the Proposed Development at 33 Creechurch Lane, the October 2020 daylight, sunlight and overshadowing assessment (prepared by GIA) had been independently reviewed by the City's external daylight and sunlight consultant (Delva Patman Redler), with the latter concluding that the Proposed Development at 33 Creechurch Lane will create minor adverse impacts in terms of daylight and for sunlight it was deemed that the impacts were major adverse, however this is due to the already low levels of sunlight in the existing conditions. The most important conclusion from both reports was that internal daylighting changes would be imperceptible. For overshadowing, there has been deemed a moderate adverse impact only for the courtyard.</p> <p>In conclusion, whilst the applicant supports the Proposed Development at Bury House, they do not believe that the Proposed Development at 33 Creechurch Lane has been properly represented and do not agree with the level of impact attributed to the Proposed Development of 33 Creechurch Lane throughout the Bury House Planning and Transportation Committee Report. We are concerned that the consideration and determination of our</p>

	<p>client's application would be prejudiced if the "record is not corrected".</p> <p>Ask that when introducing the Bury House item at Committee next week, the officer withdraw and/or appropriately caveat the comments about Creechurch that were included in the Committee Report so as to address our concerns as detailed in this letter.</p> <p><b>Officers Response to Comments:</b> All information is available on the public register available for all parties to comment on.</p> <p>The results of the EIA and subsequent daylight and sunlight studies submitted by the applicant along with the independent reviews undertaken by City of London have been published on the planning register and has been available for all parties to comment on.</p> <p>The daylight and sunlight information submitted has been reviewed by 5 leading experts and they broadly concur with the conclusions within the submission documents and the report.</p>
Dr J Spitzer	<p>Circumcision is one of the most widely observed Jewish practices, even for the otherwise religiously unobservant. The procedure is usually performed in a synagogue.</p> <p>Raises concerns about the proposed development. Numerous studies have shown that it will have a detrimental impact on light levels within the synagogue. <i>Any further reduction in light</i> in Bevis Marks Synagogue will put the performance of religious circumcision at risk.</p> <p>The Dr conducted a circumcision at the Synagogue on Sunday 3 October 2021, and found that current light levels to be the <i>bare minimum</i> to safely carry out this highly specialised medical religious procedure, which obviously requires sufficient light to be performed correctly and safely.</p> <p>If any further development take place which causes light levels to drop further in the synagogue, even minimally, let alone more significantly, the observance of this essential Jewish practice will be put in peril. Approving such a development could therefore be considered an infringement of the religious rights of our Jewish community, a protected minority. You are therefore duty bound to ensure that lighting in the synagogue is not further reduced <i>at all</i>, as a matter of freedom of religion.</p> <p><b>Officers Response to Comments:</b> It would be reasonable to assume that the carrying out of medical religious procedures such as circumcisions would be undertaken with supplementary artificial lighting at a high level of illumination in place.</p>

	<p>The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration.</p> <p>Your officers commissioned Dr Paul Littlefair of the Building Research Establishment (BRE) to undertake a review of daylight and sunlight impacts of the proposed development. That review includes an assessment of impact on the Bevis Marks Synagogue. BRE consider the Synagogue to have a high sensitivity to loss of light.</p> <p>The Synagogue lies to the north of the application site and has windows on all four sides. The loss of VSC to the upper windows on the south side would be outside BRE guidelines (i.e. be at a level where occupants of an existing building will notice a reduction in the amount of skylight).</p> <p>The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC (recorded between 1.7%-1.8%. ) which would be minimally noticeable in the Synagogue at ground floor level and slightly more noticeable but to a limited area only on the south side at mezzanine.</p> <p>Dr Littlefair advises that the magnitude of the loss of daylight attributable to the proposal can be classified as 'minor adverse'. He further advises that the overall cumulative effect of the proposal together with other developments on daylight would be classified as a major adverse impact, but that most of the reduction is due to other developments and not the application proposal.</p> <p>The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The impact on sunlight would be more marked in the cumulative scenarios, described by Dr Littlefair as a major adverse impact, particularly in the Future Baseline 2 scenario (which assumes all the schemes would be constructed including the unconsented schemes the Tulip and 33 Creechurch Lane).</p> <p>With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight.</p> <p>Officers do not consider that the limited impact of daylight, sunlight and overshadowing to the Synagogue and it's Courtyard is of such significance that it would be unacceptable. It would not be considered to diminish the visual appreciation of the internal</p>
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	<p>features such as the Bimah, Ark or other interior features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.</p> <p>The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenarios (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.</p> <p>The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not reduce noticeably daylight and sunlight in the synagogue and courtyard to unacceptable levels. It is also considered that the daylight and sunlight available to the Synagogue and courtyard is appropriate for its context and would not harm the visual appreciation of the internal features of religious, architectural and historic significance and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. The daylight, sunlight and overshadowing assessments have been reviewed independently by two external consultants and they concur with the level of impact. The proposal complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.</p>
Charlotte Green	<p>“On 27<sup>th</sup> September 2021 I sent an email requesting the Committee to postpone the Planning meeting for Tuesday 25<sup>th</sup> September 2021.</p> <p>The fact that the planning agent for the synagogue may have indicated his contentment with the meeting going ahead misses my point.</p> <p>A consultation exercise was fixed in the period of the Jewish High Holidays. The notification of the Committee date was sent out on the Sabbath and a response regarding a request to speak required on a Jewish Holiday.</p> <p>The approach adopted is contrary to the City of London’s Equality Objectives (increasing community engagement, understanding and</p>

	<p>listening to communities) and Public Sector Equality Duty. There has been unsatisfactory customer service which has failed to recognise different needs thereby leading to exclusion and discrimination.</p> <p>Please treat this communication as making a formal complaint and provide it to any designated Equality Officer and the Equality and Inclusion Board from whom I wish to have a response setting out their observations and proposals.”</p> <p><b>Officers Response to Comments:</b> The statutory consultation period was for 30 days from November 2020 however all responses from November 2020 to date have been taken into consideration. The Development Control Service of the Department of the Built Environment considers that in accepting representations over an eleven-month period the impacts of religious holidays on the ability of any interested party to make comments has been addressed. Following the deferral of the original committee date on 13 April 2021, to allow opportunity for a site visit, including to the Synagogue, a new committee date was agreed at the P&amp;T committee on 13 April 2021 in consultation with the Synagogue and their representatives taking into consideration the dates when a visit to the Synagogue would be appropriate having regard to religious holidays.</p> <p>The letters regarding speaking at committee were sent on Friday 24<sup>th</sup> September 2021 and the deadline for this was on Tuesday 28<sup>th</sup> September.</p> <p>There has been an unprecedented number of representations received and a good level of participation from a range of stakeholders including local communities from diverse backgrounds.</p> <p>If the above clarification does not address the equalities concern complaints may be made via the feedback link (below) which will be provided to the correspondent.</p> <p><a href="https://www.cityoflondon.gov.uk/footer/feedback">https://www.cityoflondon.gov.uk/footer/feedback</a></p>
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## **Bury Street - Representations from 22.09.2021**

### **Public Access Comments**

#### **Objections:**

Gillian Howard	22.09.2021
Miss Hannah Nathan	22.09.2021
Dr Noemie Duhaut	22.09.2021
Mr Sid Levine	22.09.2021
Mr Tobias Nathan	22.09.2021
Mr Edward Eric Marcus	23.09.2021
Mrs Hilary Davidson	23.09.2021
Jack Lynes	23.09.2021
Mrs Judith Alexzander	23.09.2021
Misty Jackson	23.09.2021
Patricia Black	23.09.2021
Sheila Rosen	23.09.2021
Cannon Brookes Lighting and Design and Daylight-Experts On behalf of the Bevis Marks Synagogue	24.09.2021
Mr Ray McCall	24.09.2021
Virginia Dean	25.09.2021
Ms Donna Nathan	26.09.2021
Mrs Helen Radcliffe	26.09.2021
Mr Jerry Bond	26.09.2021
Mr Moshe Mankoff	26.09.2021
Stephen Jon Saady	26.09.2021
Ms Kate Samuelson	27.09.2021
Mrs Agnes Grunwald-Spier	27.09.2021
Sian Berry	27.09.2021
Twentieth Century Society	27.09.2021
Rehman Chishti MP	28.09.2021
Mrs Anne Page	30.09.2021
E-J Kurtz	30.09.2021
Mr James Portugal	30.09.2021



Mr Otis Reed	30.09.2021	
Valerie Bello	30.09.2021	
Vanessa Jane Bohan	30.09.2021	
Eve Swabe	30.09.2021	
Westminster City Council	30.09.2021	
DP9 on Behalf of Merchant Land (33 Creechurch Lane)		30.09.2021
Alejandro V Benchoa	01.10.2021	
Mrs Elaine Rubin	01.10.2021	
Mr Fred Rodgers	01.10.2021	
Mr Iain Phillips	01.10.2021	
Irina Rohvarger	01.10.2021	
Joann S Girsh	01.10.2021	
Joel Ezra	01.10.2021	
Marlene Gumbiner	01.10.2021	
Michael Varon	01.10.2021	
Dr Thomas Marks	02.10.2021	
Ronald Beharehar	01.10.2021	
Shoshana Slutske	01.10.2021	
Arlette Levy Harris	02.10.2021	
Christa Fabritius	02.10.2021	
Irene Shomberg	02.10.2021	
Thomas Marks	02.10.2021	
Dr J Spitzer	03.10.2021	
Eileen Hauptman	03.10.2021	
Howard Goldsmith	03.10.2021	
Robert Friedman	03.10.2021	
Susan Sciama	03.10.2021	
Charlotte Green	03.10.2021	
Anna Braddeley	04.10.2021	
Anna Harris-Noble	04.10.2021	
Anthony Ostrin	04.10.2021	
Victor Todd Moses Montefiore	04.10.2021	

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**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 22 September 2021 15:02:03

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THIS IS AN EXTERNAL EMAIL

From: Gillia Howard < <

Address:  
5 Gun Wharf  
130 Wapping High Street

Postcode: E1W 2NH

Message Body:

I utterly oppose the proposed development of high-rise buildings adjacent to Bevis Marks.

This Grade 1 listed building is a National Treasure. It is the only synagogue in Europe to hold services continually for 300 years. It would be a tragedy to allow two immense high rise buildings to be built so close that the synagogue loses its light and is effectively rendered useless. Not to mention the danger to the fragile foundations that will be caused by this irresponsible construction. There are more than enough high rise buildings in the city already and we are in danger of destroying our precious heritage.

There seems to be an almost anti racist element to the misguided proposal for this development. No-one would ever consider building high rise office blocks within 4 meters of St Paul's Cathedral so how can this possibly be allowed?

Gillian Howard

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This e-mail was sent via the Save Bevis Marks website.



# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Miss Hannah Nathan

Address: 15 kidderpore ave London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This skyscraper will flank Bevis Marks Synagogue - operating since 1701.

The Synagogue is a Grade I listed building and is the only synagogue in Europe that has held regular services continuously for over 300 years.

If this goes ahead, it will take away all natural light from the shul.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.  
(30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Dr Noemie Duhaut

Address: Alte Universitätsstrasse 19 Rheinland-Pfalz - Mainz

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: It doesn't bode well for society when business and profit are privileged over spirituality and heritage.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Sid Levine

Address: 17 Wolmer Gdns Edgware

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This proposal is akin to erecting a similar structure adjacent to the City of London Guildhall.

Bevis Marks Synagogue should be considered as a World Heritage Site just like the Guildhall



# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Tobias Nathan

Address: Cantara Lodge, Austell Gardens London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The construction of this building would represent a real blow to the local environment and in particular the historic (and still in use) Bevis Marks Synagogue.

The proposed construction on this site will be out of keeping with the heritage of the surroundings. Importantly, it will also lead to a severe loss of light to the Synagogue which would threaten the very continuation of services that have been ongoing for 300+ years.

Similarly, the site demolition and construction will have an impact and could cause damage to the existing site and structures which given their history would be devastating. For these reasons I strongly object to this application.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Edward Eric Marcus

Address: 140 Limes Rd Hardwick

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This proposed development will destroy the character and the utility of this historic building. This synagogue has served London's Jewish community for centuries and deserves to be maintained as such.

Thank you,

Eric Marcus

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

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Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Hilary Davidson

Address: 6 Grantham Close Edgware

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: Bevis Marks synagogue has been on the existing site since 1701 and is a very important building and is used to this day. The proposed building would completely block out the light sending it into total darkness and making it difficult for congregants to use the synagogue as it should be used and making it difficult to access the building.

I feel sure that you would take a different stance if it was a church, Mosque or Hindu Temple.



**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 23 September 2021 18:48:26

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THIS IS AN EXTERNAL EMAIL

From: Jack Lynes [REDACTED]  
[REDACTED]

Address:

163 Albury Drive, London, HA5 3RH  
163 Albury Drive

Postcode: HA5 3RH

Message Body:

when construction of the new means destruction of the old, and the 'old' is of historic interest, then the new must not be allowed. So please stop it now. Bevis Marks represents a unique London landmark and must be preserved.

--

This e-mail was sent via the Save Bevis Marks website.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Judith Alexzander

Address: 20 Wellington Place Belfast

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Bevis Marks Synagogue is a Grade I listed building and is the only synagogue in Europe that has held regular services continuously for over 300 years. This building work will completely remove any natural light from the shul. Development in the city is inevitable but must be done in sympathy & with consideration for historic buildings and the surroundings. Would you get away with overshadowing St Pauls? It is completely unacceptable.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 23 September 2021 16:47:54

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THIS IS AN EXTERNAL EMAIL

From: Misty Jackson [REDACTED]  
[REDACTED]

Address:  
214 S Main Street  
Leslie, Michigan, 49251  
United States

Postcode: 49251

Message Body:

Dear City of London Corporation,  
Please respect the historic integrity and the wishes of the Jewish and historic preservation community world wide and refrain from construction of the proposed building adjacent to the Bevis Marks Synagogue.

Thank you.  
Misty Jackson, Ph.D.

--



This e-mail was sent via the Save Bevis Marks website.



**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 23 September 2021 12:24:02

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THIS IS AN EXTERNAL EMAIL

From: Patricia Black < <

Address:  
Flat 9  
Compass Court  
39 Shad Thames

Postcode: SE1 2NJ

Message Body:

The development being planned is totally inappropriate for the site. Bevis Marks is a unique building. It is important for its history but, even more important, as a place of worship. The City may need more office space, which is debateable given changing working patterns, but this site is not the place for buildings of this scale.


--

This e-mail was sent via the Save Bevis Marks website.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 23 September 2021 12:05:59

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THIS IS AN EXTERNAL EMAIL

From: Sheila Rosen <

Address:  
130 REPTON ROAD  
WEST BRIDGFORD

Postcode: NG2 7EL

Message Body:

We strongly object to the proposal to build two office blocks in such close proximity to a Grade 1 listed building. Is there anyone on the Council with an ounce of pride in the heritage of our capital city? Why is it that money always rules? Surely there are other sites to place these proposed ugly buildings?

--

This e-mail was sent via the Save Bevis Marks website.

Chris Maltby  
Edgeplan  
16 Upper Woburn Place  
London  
WC1H 0BS

CM2/1542  
24th September 2021

Dear Chris

**Daylighting in the Bevis Marks Synagogue**  
**Observations on projected adjacent developments, as of 24th September 2021**

As invited, we have reviewed the current documents on the daylighting in the Synagogue associated with the projected developments at 33 Creechurch and 31 Bury St. The reports prepared by GIA (Gordon Ingram Associates) include the customary documents expected within a routine planning application, and additionally 'radiance' evaluations giving some supplementary detail on the effects on daylighting within the Synagogue. On the 26th August we made a site visit and have subsequently undertaken schematic computer modelling analysis, allowing us to make an initial set of observations on the effect these developments would have on the daylighting of the Synagogue's interior, including the report prepared by the Building Research Establishment (BRE) for the City of London Corporation (dated 20/09/21).

To set the picture, the Synagogue was designed to be well daylit with large windows on all four sides to meet spiritual and functional aspects of worship. That the latter has always involved the congregation reading during services is confirmed by the presence of lockers beneath every seat, some of which predate the Synagogue and that are still in use. Members of the congregation expect to be able to read during services using daylight, which as of tradition plays a role in the timing of services. This helps to explain why the generous number of original chandeliers were not electrified during the 20th century, since, as was the case in the early 18th century, appropriate candles are expensive and their use is reserved for special services. Furthermore, it is the minimal level of material change since the 18th century that earned the current Grade 1 listing of the building, its fabric and its furnishings.

Whilst the building and its use remain largely unchanged, the same cannot be said for its surroundings and this has had a substantial effect on the daylighting of the interior. The narrow surrounding



courtyard has maintained a perimeter of space though, one increasingly shaded from the sky by the rising height of adjacent buildings. One of the consequences of this is evidenced in the interior where there are redundant boxes above the upper level windows on the SE and SW walls. In the past, these were used to house blinds to diffuse sunlight, now *permanently* blocked by adjacent buildings. Change has been incremental, but always in the direction of lower daylight levels as the height of the surrounding buildings increased. GIA's reports present the current conditions showing how little direct view of the sky remains from the Synagogue's windows. Their assessment of the resulting low daylight levels under a single, worst case overcast sky condition would appear to reflect the experience of the congregation, who already find during some daylight hours that reading is no longer easy, especially under the balconies. However, a worst case evaluation under a single sky condition provides only a limited insight into the actual daylighting performance of the Synagogue. Site measurements of light levels indicate that the interior is on the cusp of losing useable levels of daylight under most sky conditions. Review of existing conditions and schematic computer modelling indicates that the daylighting in the Synagogue is now overwhelmingly dependent on reflected light from the surfaces of the buildings surrounding the courtyard. This is most obvious during periods of sunlight, the absence of which is easily perceived since light levels are considerably lower when sky is overcast. At these times, the current and relatively sparse electric lighting is utilised and it was learnt that members of the congregation tend to cluster around the columns where the brackets are mounted. From the reports received, the light levels from the fittings are insufficient for them to be regarded as an alternative means of illumination and in practice they serve to distort the use of seating during services.

Both of the two projected developments represent substantial increments in shading above that existing. The critical factor that is not addressed by GIA's employment of orthodox overcast sky metrics for daylighting is the presence of sunlight, either from clear or partially overcast skies. The two new buildings would substantially reduce sunlight cast onto the walls of the courtyard surrounding the Synagogue and this will have a greater effect than suggested in GIA's analysis, which does not include either reflected sunlight or reflected non-overcast skylight as a source of illumination within the Synagogue. In addressing only one component of the actual daylight reaching the interior, they underestimate both what is currently present, and the effect of the changes caused by greatly increasing shading of the Synagogue's surroundings from the southern part of the sky. Given the already precariously low light levels, this would be to greatly increase the portion of the year when daylight levels will drop below those currently experienced as adequate by the congregation. This needs to be understood in the context of a highly protected historic building, where it is not the case that an augmented electric lighting system could be deployed.

We believe that the basis of the daylight assessment methods used by GIA and the BRE, their suitability for the particular case of determining daylight loss to the Synagogue, and more realistic alternatives should be more clearly delineated in order for the Committee to make an informed decision for this unique case. The vertical sky component (VSC) at the window is used as a proxy for the daylighting potential of directly visible sky (and only strictly for the single 'standard' overcast sky condition). This proxy measure has some utility for relatively shallow-plan, single aspect spaces, e.g. small perimeter spaces such as living rooms or office units. For typical planning applications, these are the types of rooms that overwhelmingly comprise the majority of spaces evaluated. Note, in the BRE report it refers to the use of the VSC to "assess the impact on the amount of diffuse daylighting entering existing buildings" [BRE 2.2.1]. However, any reduction in VSC should be understood as an indicator of the

reduced 'view' of the sky (at the window) which, crucially for the Synagogue, is not a reliable measure of reduction of the "diffuse daylighting entering" the building since that depends on the totality of reflected skylight and sunlight. It is important to appreciate therefore that the standard daylight assessment methods described in the reports we have reviewed were not conceived to be applied to distinctive/unique buildings such as the Synagogue where the functional daylight experienced by the users depends almost entirely on reflected light from both the sun and the sky.

We agree with the BRE recommendation against using the "average daylight factor to assess loss of light to existing buildings." [BRE 2.2.8] The BRE report also notes that "British Standard Code of Practice for daylight, BS 8206 Part 2. BS 8206 Part 2 was superseded in 2019 by [the new European standard] BS EN 17037." [BRE 2.2.7] The European standard requires the determination of absolute levels of daylight illumination, i.e. lux values (as measured by a light meter) rather than idealised proxy measures such as the average daylight factor. This is the first major upgrade in daylighting standards in over half a century.<sup>1</sup> The 17037 Standard has been adopted by all 34 CEN member states and has encouraged the widespread uptake of climate-based daylight modelling (CBDM). In large part this is because CBDM offers a holistic evaluation of daylight in a space, i.e. the combined effect of sunlight and skylight (reflected and directly received) predicted using realistic sun and sky conditions appropriate for the locale. Also, the evaluation period is full year at an hourly increment. Thus the daily and seasonal patterns of daylight illumination in spaces (i.e. those experienced by the occupants) are realistically depicted. Until the advent of CBDM, the only truly quantitative measure of daylight in spaces that could be predicted was for an idealised single-case overcast sky condition (i.e. the daylight factor). Sunlight could only be evaluated crudely in terms of the potential for (direct) visibility using purely line-of-sight geometrical methods. However, the actual illumination effect of the sun could not be determined. The basis of the daylight factor can be traced back to 1895<sup>2</sup>, and the line-of-sight sunlight method is almost as old. Although practitioners now use computers rather than diagrams/tables to predict quantities such as the ADF, VSC and sunlight hours, the underlying methodology for these techniques is essentially the same. And so the intrinsic limitations of these techniques are the same as they were fifty or a hundred years ago.

Our preliminary review and analysis was informed by CBDM simulations of a schematic/approximate scenario based on the Synagogue and its surroundings. Elements of the geometry necessarily had to be assumed since we had not been given access to the detailed 3D model shown in the various reports. Nevertheless, the CBDM simulations confirmed our expectations and revealed that daylight in the core of the Synagogue comprised almost entirely of reflected sunlight and reflected skylight. Furthermore, we believe that a failure to account for this will deny the Committee the opportunity to make an informed decision. Our analysis indicates that the daylighting of the Synagogue is at risk of being irredeemably impaired, not just in terms of historic appearance, but more crucially from the perspective of the congregation who are both reliant on the limited levels at present, and understandably wish to retain daylight's spiritual presence within the building. The Synagogue was conceived as a coherently designed space for the congregation to worship within. To substantially reduce the internal daylight from its current slight levels would sever the links that make it such a place, and thus undermine the rationale for its protection.

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<sup>1</sup> Dr Mardaljevic served as 'UK Principal Expert' (2011-19) on the European Committee for Standardisation panel CEN/TC 169 WG11 which delivered the new standard.

<sup>2</sup> It was first proposed by Alexander Pelham Trotter.

In these circumstances, we recommend that the full implications for daylight reduction from the two developments are more rigorously assessed. To derive a realistic understanding of the shading effects, such an assessment should involve both the application of climate based daylight modelling and engagement with the congregation to calibrate the quantitative output.

In summary

*Given the now substantial dependence on reflected light from the surrounding buildings, any assessment of daylighting within the Synagogue must include the reflected contribution of both sunlight and (non-overcast) skylight to accurately represent both existing conditions and proposed changes. The daylight assessments submitted with the current development proposals fail to include sunlight's contribution, rendering the findings incomplete and leading to severe underestimation of negative impact on the Synagogue. Applied to the Synagogue, these (routinely employed) daylight assessment methods are being used outside of their domain of applicability, and cannot therefore reveal the true extent in the reduction of functional daylight that the users of this unique space will be subject to.*

If there are any queries regarding our observations, please do make contact.

Yours sincerely

Dr Stephen Cannon-Brookes  
Cannon-Brookes Lighting & Design  
+44 (0) 7950 306485  
[stephen@cblighting.com](mailto:stephen@cblighting.com)

Dr John Mardaljevic  
Daylight Experts Ltd.  
+44 (0) 7977 539889  
[john@daylight-experts.com](mailto:john@daylight-experts.com)



# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Ray McCauley

Address: 34a Powell Street Joondanna WA

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Consider that any proposed building should respect the integrity and historical value of nearby buildings and should not detract from their existing cultural and heritage positions

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 25 September 2021 21:14:12

---

THIS IS AN EXTERNAL EMAIL

From: Virginia Dean [REDACTED]  
[REDACTED]

Address:  
3west rd

Ip33 3eh

Postcode: Ip33 3eh

Message Body:  
Please respect the context of this building

The scale of adjacent development proposed is not appropriate

Thank you

--

This e-mail was sent via the Save Bevis Marks website.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

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Address: Bury House 31 Bury Street London EC3A 5AR

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Case Officer: Bhakti Depala

## Customer Details

Name: Ms Donna Nathan

Address: 36 Holmdale Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This is the oldest synagogue in the country. Furthermore, it represents the return of the Jewish community had officially expelled in 1290. Please protect this historic, beautiful and important place of worship.



# Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Helen Radcliffe

Address: 48 Sunnybank Road Port Talbot

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: It will block out the light of U. K. oldest synagogue, which would result in its' closure. I object that it is morally & ethically wrong. It impacts on a community and its' place of worship which has roots going back hundreds of years.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

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Case Officer: Bhakti Depala

## Customer Details

Name: Mr Jerry Bond

Address: Pontceiliog House Llanllwni Llanybydder

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Destroying by stealth and important historical and cultural building should not be allowed

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

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Case Officer: Bhakti Depala

## Customer Details

Name: Mr Moshe Mankoff

Address: 8 Ashgrove Terrace Gateshead

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Destruction and erasure of the most important synagogue in British Jewish history is an affront to the UK and a vandalism of everything Britain believes in.



**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 26 September 2021 16:09:00

---

THIS IS AN EXTERNAL EMAIL

From: STEPHEN JON SAADY < <

Address:  
Symal House, Suite C2, 423 Edgware Road London

Postcode: NW9 0HU

Message Body:

I wish to register my full support for BEVIS MARKS and to formally object to planning application being granted to BOTH 31 Bury Street and 33 Creechurch Lane proposed office developments

--

This e-mail was sent via the Save Bevis Marks website.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.  
(30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Ms Kate Samuelson

Address: Flat 1 54 Tollington Park London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I strongly object to these plans - Bevis Marks synagogue is the oldest in the UK which is still in use and therefore historically significant.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Agnes Grunwald-Spier

Address: Flat 25, Osprey Court 256-258a Finchley Road London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am writing as a Jew to object to this plan because of the impact it will have on the Bevis Marks Synagogue. I understand it will lose all its light and I know from my time dealing with planning that this is a serious issue in granting applications.

It will be sheer vandalism to allow such a significant religious building to be desecrated in this manner. I understand this is the oldest synagogue still in regular use in the world and it cannot be allowed to be treated in this way. Far too many synagogues were destroyed in the Holocaust, surely we have a duty to protect this one. I remember attending a service to mark the 350th anniversary of Jews returning to England and it was a most emotional experience especially with the building lit only by candles. Do take care of this precious building.



Sian Berry AM  
City Hall  
The Queen's Walk  
LONDON SE1 2AA

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

Sent via email to: [PLNcomments@cityoflondon.gov.uk](mailto:PLNcomments@cityoflondon.gov.uk)

27 September 2021

Dear Ms Depala,

**Re: 21-storey tower, 33 Creechurch Lane, London EC3A 5EB, Ref 18/00305/FULMAJ; and  
48-storey tower, Bury House, 31 Bury Street, London EC3A 5AR, Ref 20/00848/FULEIA**

I have been contacted by constituents from the Jewish community in London about these two planning applications and their potential impact on the Bevis Marks synagogue. One resident writes: "Bevis Marks has totemic importance for the UK Jewish Community – as an Islington Jew I sometimes attend myself – but in any case I have an emotional attachment due to its place in the community's history."

While I appreciate that neither the synagogue or the proposed buildings are in conservation areas, the synagogue itself is a Grade 1 listed building and as such should be protected from harm. Among the many representations and objections to both applications, is one from Historic England, which states: "The proposed 20 storey tower at 33 Creechurch Lane will cause further harm to the significance of the Grade I listed synagogue through development within its setting. [...] This harm should be given 'great weight' as part of the planning balance in determining this application."



I urge you to give due weight and regard to the many objections to both these applications and recommend that you do not approve them.

Yours sincerely,

**Sian Berry**  
**Green Party Member of the London Assembly**





Twentieth  
Century  
Society

Bhakti Depala  
City of London Corporation  
Guildhall  
London EC2P 2EJ

27 September 2021

Dear Bhakti Depala

**20/00848/FULEIA - Bury House, 31 Bury Street, City of London, EC31 5AR**

The Twentieth Century Society has been notified of the above application for Full Planning Permission with EIA for the demolition of 31 Bury Street and construction of a new building for office and retail/café use at 49 storeys in height (197.94 metres AOD). We have only recently been made aware of the application and so have not responded to the earlier consultation. The Society objects to the application due to the harm caused to the attached Grade II\* listed Holland House.

**Background**

Nos. 1-4 and 32 Bury Street, better known as Holland House, was built in 1914-16 by the Dutch architect Hendrik Petrus Berlage for the Kroller-Mullers, Dutch shipping magnates and patrons of the arts. It is described in the *London 1: The City of London* (1997) volume of Nikolaus Pevsner's *Buildings of England* series as 'a remarkable design, very idiosyncratic, and very alien to the London of its date'. It is a pioneering steel-framed structure clad in white-jointed faience coloured grey-green. No. 31 ('Bury House') is a later extension of Holland House and is physically attached to it.

**Policy**

The City of London's Local Plan (2015) includes Core Strategic Policy CS12: 'Historic Environment' and Policy DM 12.1: 'Managing change affecting all heritage assets and spaces' which outline the local authority's commitment 'To sustain and enhance heritage assets, their settings and significance'.

Paragraph 199 of the National Planning Policy Framework (NPPF, 2021) should be considered: 'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'





Paragraph 200 of the NPPF is also relevant here: 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'. Paragraph 202 of the NPPF states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal'.

## Comments

The proposed development will have an impact on both the fabric and setting of the Grade II\* listed Holland House. Only 5.8% of listed buildings are Grade II\* which makes the conservation of Holland House of the utmost importance.

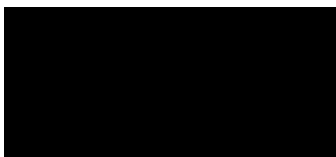
The Society agrees with Historic England's assessment of the significance of Holland House and its setting. The building is listed in part for the outstanding architectural quality of its elevations so it is important the exteriors, and views of the exteriors, are preserved. From the west, Holland House is viewed against a clear skyline. Owing to the considerable height of the proposed development, it will be highly visible in this view, rising up behind Holland House (we refer to view 43). We agree with Historic England that the proposed building will have a detrimental impact on the listed building's setting.

In their response to Historic England's feedback, the applicant refers to nearby developments like 30 St Mary Axe and claims that 'Change is part of the DNA of the City of London' and that 'Holland House remains an exceptional piece of architecture that [has] managed to retain its qualities in the ever-changing context of the City.' We appreciate that Holland House is located in an urban environment and place of change, but disagree with the suggestion that the significance of Holland House cannot be harmed by development within its immediate setting. Historic England's 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)' considers 'cumulative change' and states that 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting [...] consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.' We maintain that the proposed 49-storey tower to the rear of Holland House will have a harmful impact on its significance.

For these reasons, the Society objects to the current application and encourages the applicant to revise the design to reduce the height of the proposed development and limit its impact on the Grade II\* Holland House. We defer to Historic England and the Georgian Group for comment on the impact on the Grade I listed 18<sup>th</sup>-century Bevis Marks Synagogue.

I hope these comments are of use to you. Please do not hesitate to contact me if you have any questions.

Yours sincerely,



**The Twentieth Century Society**  
70 Cowcross Street, London EC1M 6EJ



**Coco Whittaker**

Caseworker

Twentieth Century Society

**Remit:** The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.



Rehman Chishti MP  
*Member of Parliament for Gillingham and Rainham*

House of Commons  
London SW1A 0AA

Department of the Built Environment  
City of London  
PO Box 27  
Guildhall  
London  
EC2P 2EJ

28<sup>th</sup> September 2021

To whom it may concern,

**Re: Rehman Chishti MP representations objecting to planning applications  
20/00848/FULEIA and 18/00305/FULMAJ**

I am writing to you as the Member of Parliament for Gillingham & Rainham and the former UK Prime Minister's Special Envoy for Freedom of Religion or Belief. During my time in office as the Special Envoy from September 2019 to September 2020, I worked with colleagues across Parliament and with international partners around the world to champion the fundamental human right to freedom of religion or belief for all.

I am writing to express my total opposition to and serious concerns regarding the planning applications 20/00848/FULEIA and 18/00305/FULMAJ and their negative impact on Bevis Marks Synagogue, the oldest synagogue in the UK and the longest continually operating synagogue in the world. As a Grade I listed building which houses a living community with continuity of worship and tradition for over 320 years, these two proposed developments now threaten its natural light, historic setting, and structural integrity.

Historic England, in its response dated 18<sup>th</sup> February in relation to 18/00305/FULMAJ raises concerns about the impact of the proposed development on heritage grounds, and notes that the consideration of harm in respect of Bevis Marks, *"should be particularly great in this case because the designated heritage is listed at Grade I and therefore of the highest importance."*

The cumulative impact, with other buildings built or agreed, will mean sunlight, apart from one hour during the day, will be completely blocked out, severely compromising the functioning of the synagogue, and overshadowing the entire site. As Dr Paul Littlefair of the BRE concludes in his report of 20<sup>th</sup> September *'Review of daylight and sunlight, Bury House, London EC3 – P119483-1000:*

*"The cumulative effect of all the proposed developments would be to stop all sunlight reaching the centres of the windows at any time of year. This would be a major adverse impact."*





The conclusions of this report, which was commissioned by the City of London Corporation itself, should in my view be more than enough justification for refusal of both planning applications.

These proposed developments fail to consider the importance and extreme sensitivity of British Jewry's cathedral synagogue. Bevis Marks was built by the first Jews to be readmitted to England in 1656 after their expulsion in 1290, and as such, it represents the unique historic connection between the Jewish community and Britain and is a vital symbol of the United Kingdom's commitment to religious freedom and diversity. As a country, we simply cannot champion the right to religious freedom throughout the world while undermining that right within our own communities.

I understand that over 1,000 letters of objection have been received against both planning applications. It is clear that there is serious concern from a wide range of stakeholders about the potentially devastating impact that these developments could have on the future of Bevis Marks.

I call on the City of London to take these voices into account when considering these applications and I reiterate my serious concerns about the impact of these developments which threaten the future of Bevis Marks Synagogue and the implication for freedom of religion or belief should the developments go ahead.

Yours sincerely,

A large black rectangular box redacting the signature of the Member of Parliament.

Rehman Chishti MP

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Anne Page

Address: 191 Cromwell tower London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: I am a happy resident of the City, and in one of the City's great glories, the Barbican Estate. I am an admirer of much of the new building in the Square Mile, though am anxious that too much office space in this Covid world will remain empty. With attendant impact on London's macro-and micro-economies. I find it hard to believe that you might even consider giving planning permission for yet more office towers, when it is obvious that more housing is needed, to attract people to live here. And especially when, in this case, the proposal will deleteriously affect one of the oldest and most important sites of religious worship not only in the City but in London and the country.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 30 September 2021 17:42:53

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THIS IS AN EXTERNAL EMAIL

From: E-J Kurtz [REDACTED]  
[REDACTED]

Address:  
27 Blackwater Way  
Didcot

Postcode: OX11 7RL

Message Body:

I object to the proposed application at 31 Bury Street and 33 Creechurch Lane for the following reasons:

1. Size and Scale

The size and scale of the proposed development, one of which is only 3.5 meters from Bevis Marks, will have a substantial negative impact on the heritage significance of the Synagogue.

The foundations of the Synagogue are also highly sensitive and vulnerable. Should development of these office buildings progress there is a potential for significant damage occurring to the building. No assurances have been given by the applicants that the foundations of Bevis Marks will not be put at risk.

2. Light

Construction of the office buildings will block light to the Synagogue, making it impossible to continue holding services and events there.

The Grade I listed nature of the Synagogue limits the provision of additional electrical lighting, meaning that without daylight, the ability to pray in the Synagogue is severely impacted.

While the impact of each individual proposal produces an unacceptable detriment, the cumulative impact would be catastrophic.

33 Creechurch Lane will block the sun from 9am-12pm and 31 Bury Street will block light from 12.30pm-2.30pm. The already consented and existing buildings will then block the light from 3pm-onwards/remainder of the day.

3. National Significance

Bevis Marks is not just an asset for the Jewish community, but for the whole of the United Kingdom as a building of incredible national significance.

The City of London Corporation must decide between allowing consent for new office blocks or maintaining the future of the oldest Synagogue in the UK in continual use.

4. Religious Expression

The right to freedom of religious expression is enshrined in law, and the Jewish community has the right to be treated with respect. These proposed developments not only threaten the Jewish community, but people of every faith.

Should these developments be allowed, it would set a national precedent for development in the vicinity of



nationally significant religious buildings.

High-rise office buildings would never be considered 4m away from St Paul's Cathedral  
So why should it be acceptable here?

Historically significant buildings such as Bevis Marks must be protected . The proposed office buildings can be sited elsewhere but if Bevis Marks is lost, it can never be replaced.

--

This e-mail was sent via the Save Bevis Marks website.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mr James Portugal

Address: 24 Lyncroft Avenue Pinner

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The Bevis Marks Synagogue has the deepest historical and cultural significance, not just for England's Jewish community but for Britain's history and it would be a desecration to cast it under a shadow of the proposed high rise development.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.  
(30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Otis Reed

Address: 9 North Terrace Hexham

## Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

- Other

Comment: Nice mixture of materials and good to see a more slender spire to balance out the overweight mess that is 22 Bishopsgate.



**From:** [REDACTED]  
**To:** [PLN - Comments](#)  
**Cc:** [REDACTED]  
**Subject:** The proposed Tower Blocks to be built in the vicinity of Bevis Marks Synagogue  
**Date:** 30 September 2021 19:14:11

---

THIS IS AN EXTERNAL EMAIL

I am writing to protest against the proposal to built tower blocks in the vicinity of Bevis Marks Synagogue. Bevis Marks, opened in 1701, is the oldest and one of the most beautiful synagogues in this country. It stands in the City as a beacon of Judaism, and welcomes hundreds of visitors from all over the world every year.

To build tower blocks in its vicinity, which will undoubtedly obscure its natural light, is a travesty. To cast a shadow on such a building demonstrates a complete lack of understanding of the importance of our common heritage.

I would therefore urgently request that the plans are revised and modified so that Bevis Marks will not be in the shadow of tower blocks and will still be able to enjoy the natural light as they have done for the past 300 years.

I write not only as an individual but also as the Chairman of the Heritage Committee of B'nai B'rith UK, a constituent of B'nai B'rith International, a world-wide Jewish humanitarian organisation, one of whose aims is the preservation and promotion of Jewish Heritage. We organise the European Days of Jewish Culture and Heritage in the UK and are affiliated to the European Association for the Preservation and Promotion of Jewish Culture and Heritage; we are also affiliated to The Heritage Alliance. By opening our doors we endeavour to further mutual understanding and to create goodwill amongst our diverse communities.

I trust that the issues raised in this email will be given due consideration.

Regards,  
Valerie Bello

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 30 September 2021 08:02:16

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THIS IS AN EXTERNAL EMAIL

From: Vanessa Jane Bohan [REDACTED]  
[REDACTED]

Address:  
25 Rooke Way Greenwich  
greenwich

Postcode: SE10 0JB

Message Body:  
do not build these monsters. We have more than enough horrible high rise buldings already!!!!

--

This e-mail was sent via the Save Bevis Marks website.



# Contact the City

## Customer details

First Name	Eve
Last Name	Swabe
Customer Email Address	
Telephone	

## Enquiry

Service Area	Planning
Enquiry	Consultation/Public objection
Enquiry type	Consultation/Public objection
statictext2	
Address	



#### Details Of Enquiry

I am a private individual, but belong to B'nai B'rith UK. Each year we take part in the European Days of Jewish Culture and Heritage and Bevis Marks Synagogue usually opens its doors for us as well as for the National Heritage Open Days and London Open House Weekend.

The building of yet two more tower blocks, in my view is totally unnecessary, but to allow the ones proposed that will over-shadow Bevis Marks Synagogue would be a gross error of judgement should you allow the planning applications to proceed. Having a Grade 1 listed historic building such as this should be preserved and celebrated, not condemned to the detrimental darkness these towers would create.

---

**End of email**



Your ref:  
My ref: 21/05845/OBS

**Please reply to:** Nikki Mitchell  
Tel No: 07866037846  
Email: southplanningteam@westminster.gov.uk

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

**Development Planning**  
Westminster City Council  
PO Box 732  
Redhill, RH1 9FL

30 September 2021

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING ACT 1990**

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

**SCHEDULE**

<b>Application No.:</b>	21/05845/OBS	<b>Application Date:</b>	
<b>Date Received:</b>	23.08.2021	<b>Date Amended:</b>	23.08.2021

**Plan Nos:** Letter from City of London Corporation dated 23 August 2021

**Address:** Bury House, 31 Bury Street, City Of London, EC3A 5AR

**Proposal:** Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (SuiGeneris) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including;

Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact

Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Yours faithfully

**Deirdra Armsby**  
**Director of Place Shaping and Town Planning**

30 September 2021

FAO Mr Gwyn Richards  
Department of Built Environment  
City of London Corporation  
PO Box 270  
Guildhall  
London EC2P 2EJ

DP9 Ltd  
100 Pall Mall  
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700  
facsimile 020 7004 1790

[www.dp9.co.uk](http://www.dp9.co.uk)

**BY EMAIL**

Dear Mr Richards,

**33 CREECHURCH LANE (Ref. 18/00305/FULMAJ)  
RESPONSE TO THE OFFICER'S REPORT TO PLANNING AND TRANSPORTATION COMMITTEE ON 5  
OCTOBER IN RELATION TO BURY HOUSE, 31 BURY STREET (Ref. 20/00848/FULEIA)**

On behalf of our client, Merchant Land Investments Limited (the 'Applicant'), owners of 33 Creechurch Lane, we are writing in response to the recently published Planning and Transportation Committee Report for the Proposed Development at Bury House (ref. 20/00848/FULEIA). As you are aware, Merchant Land is in detailed discussions with the City and other key stakeholders regarding the Proposed Development of their Site (ref. 18/00305/FULMAJ).

Within the published Planning and Transportation Committee Report, there are a number of instances where Officers have attributed impacts on adjacent buildings to the Proposed Development at 33 Creechurch Lane, specifically in relation to daylight, sunlight and overshadowing, and heritage under the Future Baseline 2 Cumulative Scenario. Firstly, we disagree with the level of impacts attributed to the Proposed Development at 33 Creechurch Lane and the report inaccurately places the onus on it. This is an error that is repeated throughout the Committee Report. Secondly, we do not believe that the alleged impacts of the Proposed Development at 33 Creechurch Lane should be set out within the published Committee Report relating to Bury House without our client first having a chance to respond; the assessment is based on a report that has not been shared with Applicant for the Creechurch Lane scheme.

As you will appreciate, we are currently in discussions with Officers regarding the Proposed Development at Creechurch, we had submitted further/amended details in July 2021 to address previous concerns raised by adjacent landowners and Officers in relation to: impacts on the Grade I Listed Bevis Marks Synagogue and its setting; wind; daylight, sunlight and overshadowing; cumulative impacts; delivery and servicing; cycle parking and construction and buildability.

It is worth highlighting that prior to submission of these further details for the Proposed Development at 33 Creechurch Lane, the October 2020 daylight, sunlight and overshadowing assessment (prepared by GIA) had been independently reviewed by the City's external daylight and sunlight consultant (Delva Patman Redler), with the latter concluding that the Proposed Development at 33 Creechurch Lane will create minor adverse impacts in terms of daylight and for sunlight it was deemed that the impacts were major adverse, however this is due to the already low levels of sunlight in the existing conditions. The most important conclusion from both reports was that internal daylighting changes would be



imperceptible. For overshadowing, there has been deemed a moderate adverse impact only for the courtyard.

In conclusion, whilst we support the Proposed Development at Bury House, we do not believe that the Proposed Development at 33 Creechurch Lane has been properly represented and do not agree with the level of impact attributed to the Proposed Development of 33 Creechurch Lane throughout the Bury House Planning and Transportation Committee Report. We are concerned that the consideration and determination of our client's application would be prejudiced if the "record is not corrected".

We ask that when introducing the Bury House item at Committee next week, the officer withdraw and/or appropriately caveat the comments about Creechurch that were included in the Committee Report so as to address our concerns as detailed in this letter.

Should you require any further information, please do not hesitate to contact Tom Horne or Mark Knibbs of this office.

Yours sincerely,

A handwritten signature in black ink that reads "DP9 Ltd". The letters are written in a casual, slightly slanted style.

**DP9 Ltd.**

**Cc     Alastair Moss  
         Beverley Bush  
         Jess Robinson**

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 01 October 2021 15:23:28

---

THIS IS AN EXTERNAL EMAIL

From: Alejandro V Benchoa [REDACTED]  
[REDACTED]

Address:

55 nagle ave.apt 6H new york new yok

Postcode: 10040

Message Body:

As a sephardic jews I write to ask the london city to reconsider the plan to built the two buildings .That will be terrible for our historic heritage and jouse of worship .

thank you for your consideration

Alex Benchoa

--

This e-mail was sent via the Save Bevis Marks website.

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mrs Elaine Rubin

Address: 1701 NW Sandpiper Drive Waldport

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: As the only synagogue in London, as well as being an historical building, the Bevis Marks Synagogue needs your help. If the proposed building is allowed to be constructed, it will forever change the beautiful and historic interior of the synagogue by forcing the congregation to install modern artificial lights. With events around the world aimed at eliminating Jews, London should protect the one place Jews can pray and congregate safely.



**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: 20/00848/FULEIA - 31 Bury Street - carbon emissions query  
**Date:** 04 October 2021 11:07:51

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** Frederick Rodgers [REDACTED]  
**Sent:** Friday, October 1, 2021 9:59:40 AM  
**To:** Moss, Alastair <[Alastair.Moss@cityoflondon.gov.uk](mailto:Alastair.Moss@cityoflondon.gov.uk)>  
**Cc:** Sells, Oliver <[Oliver.Sells@cityoflondon.gov.uk](mailto:Oliver.Sells@cityoflondon.gov.uk)>  
**Subject:** 20/00848/FULEIA - 31 Bury Street

THIS IS AN EXTERNAL EMAIL

Alastair,

One simple question applicants should be asked on every application coming before your Committee - how do the estimated total annual carbon emissions from the proposed development compare to those from the existing one.

As far as the above application is concerned, Gwyn Richards seems to be misleading your Committee in his report, unless he can back up:

*Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', **reduce carbon emissions**, and reduce waste.*

with evidence that the total estimated annual carbon emissions from the proposed development will be less than the total annual emissions from the existing one. The apparent failure to take this into account is only one of a number of issues revealing a lack of objectivity in his report and reason enough for rejecting his recommendation.

Best regards,

Fred

Fred Rodgers  
100 Breton House  
Barbican  
London  
EC2Y 8PQ  
UK



# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Mr Iain Phillips

Address: 49 Alexandra Road Richmond

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment: Bevis Marks Synagogue is a place of immense religious and historical significance and this development would be far too overbearing and cut out the light, leading to the possible closure of the Synagogue for worship.



Planning Department  
City of London Guildhall  
London  
EC2P 2EJ  
1<sup>st</sup> October 2021

Planning application ref: 20/00848/FULEIA - Bury House 31 Bury Street London EC3A 5AR

To: City of London, Planning Department.

Dear Sir or Madam,

We the undersigned, wish to support and second objections by Rabbi Morris and the administrators of the Bevis Marks Synagogue, the eminent writer Simon Schama, the LAMAS Historic Buildings Committee, Mr. Harry Robson, and many others, who have provided valid objections to the proposed development, on the basis of the threat to the Synagogue. Historic England has declared draft plans for future land use in the City of London as unsound, and has raised concerns about these current proposals, citing Bevis Marks as “one of the country’s most important heritage assets”.

The most essential and obvious point regarding the historic Bevis Marks Synagogue is that it may be forced to close as a result of almost total loss of sunlight, loss of privacy as a result of overlooking offices and the additional risk of physical damage to the fragile 1701 building by the excavations and enormous build in such close proximity. Noise and access disruption will occur not just during construction but will be permanent thereafter. The ‘right to light’ is highly significant in this situation. The observance of the Sabbath forbids the use of electricity, thus the large windows are vital each week for the readings of the Torah from the scrolls and the prayers from the prayer books. Quite simply no light would mean no services, and no services would mean no Synagogue.

Additionally, we the undersigned question and dispute the economic premise for this additional building in the area, after the changes brought about by Covid 19 and Brexit. According to recent reports the City of London is already planning to turn 1500 empty offices into homes. What certainty is there that this office space won’t be obsolete before it is built and thus become an enormous white elephant? Local development policy must reflect changes of conditions and proceed especially carefully to preserve at least some remaining historic character of London.

Most importantly, we wish to second the objections on the planning portal and highlight that the Listed Synagogue of 1701 has rare and special value not just as a Grade 1 listed quality building in virtually unaltered condition for 320 years, and as the heart of British Jewry as the oldest continually functioning Synagogue in Britain, but is recognised worldwide as a symbol of the survival of the Jewish people through The Shoah and previous persecutions. This is a fact of great magnitude and cannot be overlooked in order to quickly pass an unnecessary and architecturally insensitive build.

Bevis Marks Synagogue is one of the very few pre-WWII Synagogues in the world still in use for the original purpose of Jewish worship, and was preserved by the Jewish community in Britain through the German Nazi genocide. We state unequivocally that the Christian, Muslim and all other faith communities in Britain would not expect to have a place of worship, let alone a place of worship of this symbolic importance, and also a symbol of Britain's religious diversity, to be brought under the risk of closure by untenable changes of conditions brought forth by an unnecessary new adjacent development, and that the Jewish community in London, Britain and internationally does not wish to be singled out, slighted and prejudiced in this way by the local authority of the City of London.

We urge you to refuse the proposed application, so as to maintain not only the cultural integrity of this historical house of worship, but also the historic character of London. The Grade 1 status of the Bevis Marks Synagogue indicates it is a national treasure, not just a Jewish one.

Yours faithfully,

Irina Rohvarger, Elizabeth Halliday, Ruth Sheridan, Karen Shaf

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 01 October 2021 15:19:41

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THIS IS AN EXTERNAL EMAIL

From: Joann S Girsh [REDACTED]  
[REDACTED]

Address:  
400 East 56 St Apt 221  
New York, NY, 10022

Postcode: United States

Message Body:

Historic structures should be protected. They are an important part of a country's past. Cities are no place for tall buildings, I know I live in one. My apartment is extremely cold because of all the "Higher Buildings" around it and we are 40 stories high and I am on the 22nd floor.

sincerely,  
Joann S Girsh

--

This e-mail was sent via the Save Bevis Marks website.



**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 01 October 2021 23:58:11

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THIS IS AN EXTERNAL EMAIL

From: Joel Ezra [REDACTED]  
[REDACTED]

Address:  
95 Seaman Ave.

Rockville Center, New York USA

Postcode: 11570

Message Body:

I think that this is a dangerous and slippery slope with disastrous potential results for religious institutions seeking to sustain historic buildings. What comes next?

--

This e-mail was sent via the Save Bevis Marks website.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 01 October 2021 19:19:00

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THIS IS AN EXTERNAL EMAIL

From: Marlene Gumbiner [REDACTED]  
[REDACTED]

Address:  
9525 E Arbor Place  
Englewood, CO

Postcode: 80111

Message Body:

During this time of increasing anti-semitism in the world, this is not the time to diminish the light surrounding your Jewish landmark which has stood forever 320 years. Stop the building of the high rises surrounding it.

--

This e-mail was sent via the Save Bevis Marks website.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 01 October 2021 14:20:45

---

THIS IS AN EXTERNAL EMAIL

From: Michael Varon [REDACTED]  
[REDACTED]

Address:  
1905 NW 18th Street Unit 101  
Delray Beach, Florida 33445

Postcode: 33445

Message Body:

It is both a religious and historic imperative that both the 31 Bury street and the 33 Cheechurch lane projects be denied. The impact on the Bevis Marks synagogue would be devastating. The Bevis Marks synagogue should be considered of historic value. (Here in the states we would designate it a national historic landmark, I don't know if Britain has such a designation, but would hope that it would be given such consideration).

--

This e-mail was sent via the Save Bevis Marks website.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 01 October 2021 18:38:13

---

THIS IS AN EXTERNAL EMAIL

From: RONALD BEHAR [REDACTED]  
[REDACTED]

Address:  
3428 67TH AVE SE

Postcode: 98040 USA

Message Body:

It is a very sad day when an historic building such as this be jeopardized by such encroachments.  
In 1919 my Mother and Father were married in Bevis Marks. It was also the place of worship for Benjamin Disraeli , Queen Victoria's favorite Prime Minister.  
Please do whatever is necessary to save the environment surrounding this historic landmark.

--

This e-mail was sent via the Save Bevis Marks website.



**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 01 October 2021 20:59:05

---

THIS IS AN EXTERNAL EMAIL

From: Shoshana Slutske [REDACTED]  
[REDACTED]

Address:  
8201 E. Harry St. #801  
Wichita, KS, USA

Postcode: 67207

Message Body:  
A historic landmark deserves to be preserved!

--

This e-mail was sent via the Save Bevis Marks website.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 02 October 2021 09:00:57

---

THIS IS AN EXTERNAL EMAIL

From: Arlette Levy Harris [REDACTED]  
[REDACTED]

Address:  
1, rue Giovanni Gambini  
Geneva  
Switzerland

Postcode: 1206

Message Body:  
Please don't build skyscrapers around Bevis Marks historic synagogue!


--

This e-mail was sent via the Save Bevis Marks website.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 02 October 2021 12:59:26

---

THIS IS AN EXTERNAL EMAIL

From: Christa Fabritius < >  


Address:  
Aachenerstr. 3

Postcode: D-45145 Essen

Message Body:

Dear members of the City of London corporation,

as a non-jewish german woman I want to please you with all my heart not to build such a big Skyscraper just in front of the 1701 build beautiful Synagoge Bevis Marks in London.

Could you imagine what an impression it will be in the eyes of foreigners, when they visit your beautiful city and when they see a very little beautiful house in the middle of very huge skyscraper around this wellknown Synagoge? People will ask, if it is a symbol how english people will handle with jewish people. They will ask, if England will press down jewish people in their country.

Please don't give this impression to the world. This house should stay in its original flavour, it is build for. This Synagoge needs the sun to exist. Please show the world, that great britain is not antisemitic and likes to press down jewish people in its country, that english people like to take away the light from these precious people.

May god bless you for your understanding and your help to the jewish people in the time of holocaust. YOU have helped, that so many jewish people could stay alive in that time. A reason to be proud. Don't distroy this picture over your country. Thank you very, very much.

God bless you

Sincerely yours Christa Fabritius

From germany, a country hasn't been as good to jewish people than you...

--

This e-mail was sent via the Save Bevis Marks website.

**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 02 October 2021 16:08:32

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THIS IS AN EXTERNAL EMAIL

From: irene shomberg [REDACTED]  
[REDACTED]

Address:  
430 N. Krocks Rd, apt 120  
Allentown, PA

Postcode: 18106

Message Body:

The Bevis Marks Synagogue has both emotional and historical value and should be protected at all costs

Among other things, this was the place where many refugees of the Spanish and Portuguese Inquisition found a home and safe place

Please do not destroy such a landmark just to accommodate office buildings

Respectfully

Irene Shomberg  
USA

--

This e-mail was sent via the Save Bevis Marks website.



# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Dr Thomas Marks

Address: 262 Highbury New Park London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:

The proposed development will have an adverse, if not ruinous effect on the future of Bevis Marks Synagogue, among the most significant religious buildings in the United Kingdom and one of the most resonant heritage sites in the City of London. The inability of the synagogue to function as a place of worship - should this application and a further application at 33 Creechurch Lane (18/00305/FULMAJ) be approved - has been clearly stated by the Save Bevis Marks campaign: from this 48-storey building alone, light levels will be deleteriously reduced from 12.30-2.30pm.

I urge the City of London to reject this proposal: to avoid obscuring a historic building of national and international importance, as well as obscuring the living history that the synagogue fosters and represents.

Dr J. Spitzer  
MB BS FRCGP DCCH DRCOG

13 Sneath Avenue  
London NW11 9AJ



03/10/21

By email [william.russell@cityoflondon.gov.uk](mailto:william.russell@cityoflondon.gov.uk)

Dear Lord Mayor Russell,

I am writing to you as a matter of urgency in anticipation of City of London's Planning Committee meeting on 5 October when you will decide on the proposal to redevelop 31 Bury St (Ref: 20/00848/FULEIA).

By way of introduction, I am a general medical practitioner (GP) and am the Medical Officer of the Initiation Society. The Initiation Society is the oldest Anglo-Jewish organisation. Founded in 1745, it exists to ensure the highest standards, both medical and religious, for the performance of Bris Milah (Jewish religious circumcision) are adhered to by our Mohelim (practitioners). I have also been personally working as a Mohel for forty years. I am the leading expert on Jewish religious circumcision in the UK.

Circumcision is one of the most important of Jewish religious practices, dating back to biblical times. Through circumcision a Jewish baby boy officially becomes a member of the Jewish community. That is to say, without circumcision, over time a Jewish community would cease to exist. For that reason, circumcision remains one of the most widely observed Jewish practices, even for the otherwise religiously unobservant. The procedure is usually performed in a synagogue.

It is therefore with great concern that I hear of the proposed 48 storey tower at 31 Bury Street which sits to the south of Bevis Marks Synagogue. Numerous studies have shown that it will have a detrimental impact on light levels within the synagogue. Whilst there have been conflicting reports as to the extent of this loss, I am of the opinion that *any further reduction in light* in Bevis Marks Synagogue will put the performance of religious circumcision at risk. I can say this with confidence, as I conducted a circumcision at the synagogue this Sunday 3 October 2021, and found that current light levels to be the *bare minimum* to safely carry out this highly specialised medical religious procedure, which obviously requires sufficient light to be performed correctly and safely.

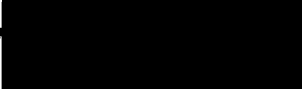
I am therefore writing to inform you that if any further development take pace which causes light levels to drop further in the synagogue, even minimally, let alone more significantly, the observance of this essential Jewish practice will be put in peril. Approving such a development could therefore be considered an infringement of the religious rights of our Jewish community, a protected minority. You are therefore duty bound to ensure that lighting in the synagogue is not further reduced *at all*, as a matter of freedom of religion.

The non-observance of religious circumcision is considered the greatest infringement of Judaism, as it essentially bars a Jewish baby from the Jewish community. Should this ritual be put in peril in Bevis Marks Synagogue, it would both prevent the synagogue from fulfilling its religious function, and leave its very future as a viable Jewish community at risk.

I therefore urge you, in the strongest terms, to protect the religious rights and heritage of Bevis Marks Synagogue, and turn down this proposal.

Please note, I am also sharing this report with the Chief Rabbi and the Board of Deputies, as they represent the UK Jewish community in protecting Jewish rights.

Yours sincerely,

  
Dr. J. Spitzer MB BS FRCGP DCCH DRCOG  
Medical Officer Initiation Society


CC


John Barradell - Town Clerk and Chief Executive - [john.barradell@cityoflondon.gov.uk](mailto:john.barradell@cityoflondon.gov.uk)

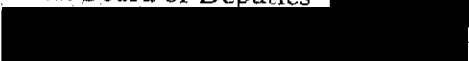
Gwynn Richards- Head of planning - [Gwyn.Richards@cityoflondon.gov.uk](mailto:Gwyn.Richards@cityoflondon.gov.uk)

Alister Moss -City's Chairman of Planning & Transportation Committee  
- [alastair.moss@cityoflondon.gov.uk](mailto:alastair.moss@cityoflondon.gov.uk)

Catherine McGuinness - Chairman of Policy - [catherine.mcguinness@cityoflondon.org.uk](mailto:catherine.mcguinness@cityoflondon.org.uk)

Chief Rabbi Mirvis - 

Marie van der Zyl - President Board of Deputies- 

Rabbi Shalom Morris - 

**From:** [REDACTED]  
**To:** [Gwynn.richards@cityoflondon.gov.uk](mailto:Gwynn.richards@cityoflondon.gov.uk)  
**Cc:** [PLN - Comments](#)  
**Subject:** Application Consultation 20/00848/FULEIA The Bevis Marks Synagogue.  
**Date:** 03 October 2021 22:45:54

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THIS IS AN EXTERNAL EMAIL

Dear Sir,

I write to you in your capacity as Planning and Development Director for The City of London. I am bewildered and shocked. 1978 I remember so well when The City of London showed the greatest consideration, consultation and sensitivity to The Bevis Marks Synagogue by the manner in which The City went out of its way when necessary building works were being proposed to include not exclude The Bevis Marks.

I have been given to understand and that you support the above application. This is very distressing and deeply concerning. We all realise that during this Pandemic and subsequently so many are desperate for money but not so desperate to destroy an important part of the fabric of The history and part of The City of London and to tread over a small group whose wish is to maintain their worship and the beauty of this religious site. The British regard for our history which is so admired together with our historic regard for places of worship will and is not being taken lightly. What is seen as an injustice and creating such disharmony to an indigenous part of the community. This does not bode well for the public image of The City of London and future investment.

I wonder Mr Richards if you had remembered that The Jewish Community is less than half a per cent of the whole British Community? My questions are:

You playing fair?

Would you behave like this if this was a Church or a Mosque that had been standing for over 300 years and within The City of London and been regarded as World Heritage Site?

This wicked intentional deprivation of light will reduce the attendance of this charming old synagogue - Darkness together with our present and increasing grey climate will discourage visitors. Deep concern is expressed



that you are ignoring a basic fundamental right of a tiny group to worship and maintain our oldest synagogue. A synagogue constructed and used since 1702 for the same purpose as when it was founded for Jewish Prayer. I am sure that you are well aware that the building relies heavily on daylight and must only be lit by candles. That these must be lit in accord with Jewish Law prior to The Sabbath and prior to commencement of Festivals. How are worshippers able to read The Good Book?

There is no excuse - This country has a rich plethora of wonderful architects who are very capable of taking all into consideration very successfully without this very nasty story resounding and creating vicious unwanted publicity for The City of London which will of course detract business. Who wants to trust A City who has no regard for its religious places of worship. People may not be as religious as they were but they like to know these sites are treated with respect.

Purposely allowing the obstructing of daylight will be viewed as intentionally to deny access, with all the nasty insinuations. Destroying a section of our Jewish Community so that their religious needs are not to be regarded nor treated with respectful consideration. This smacks of nasty intent, the likes of which The Jewish Community has not seen since prior to the building of The Synagogue in 1702.

I hope that you will allow yourself to reconsider. I look forward to your speedy response.

Yours

Eileen Hauptman

(My details are on file with your colleague Ms Bhakti Depala)

**From:** [REDACTED]  
**To:** [Pln - CC - Development Dc](#)  
**Subject:** Bevis Marks Synagogue  
**Date:** 03 October 2021 20:17:22

---

THIS IS AN EXTERNAL EMAIL

I wish to support and second objections by Rabbi Morris and the administrators of the Bevis Marks Synagogue, the eminent writer Simon Schama, the LAMAS Historic Buildings Committee, Mr. Harry Robson, and many others, who have provided valid objections to the proposed development, on the basis of the threat to the Synagogue.

Historic England has declared draft plans for future land use in the City of London as unsound, and has raised concerns about these current proposals, citing Bevis Marks as “one of the country’s most important heritage assets”.

The most essential and obvious point regarding the historic Bevis Marks Synagogue is that it may be forced to close as a result of almost total loss of sunlight, loss of privacy as a result of overlooking offices and the additional risk of physical damage to the fragile 1701 building by the excavations and enormous build in such close proximity.

The ‘right to light’ is highly significant in this situation. The observance of the Sabbath forbids the use of electricity, thus the large windows are vital each week for the readings of the Torah from the scrolls and the prayers from the prayer books.

**Quite simply no light would mean no services, and no services would mean no Synagogue.**

Additionally, I question and dispute the economic premise for this additional building in the area, after the changes brought about by Covid 19 and Brexit.

According to recent reports the City of London is already planning to turn 1500 empty offices into homes. What certainty is there that this office space won’t be obsolete before it is built and thus

become an enormous white elephant?

Local development policy must reflect changes of conditions and proceed especially carefully to preserve at least some remaining historic character of London.

Most importantly, I wish to second the objections on the planning portal and highlight that the Listed Synagogue of 1701 has rare and special value not just as a Grade 1 listed quality building in virtually unaltered condition for 320 years, and as the heart of British Jewry as the oldest continually functioning Synagogue in Britain, but is recognised worldwide as a symbol of the survival of the Jewish people through The Shoah and previous persecutions.

This is a fact of great magnitude and cannot be overlooked in order to quickly pass an unnecessary and architecturally insensitive build.

Bevis Marks Synagogue is one of the very few pre-WWII Synagogues in the world still in use for the original purpose of Jewish worship, and was preserved by the Jewish community in Britain through the German Nazi genocide.

**I state unequivocally that the Christian, Muslim and all other faith communities in Britain would not expect to have a place of worship, let alone a place of worship of this symbolic importance, and also a symbol of Britain's religious diversity, to be brought under the risk of closure by untenable changes of conditions brought forth by an unnecessary new adjacent development, and that the Jewish community in London, Britain and internationally does not wish to be singled out, slighted and prejudiced in this way by the local authority of the City of London.**

I urge you to refuse the proposed application, so as to maintain not only the cultural integrity of this historical house of worship, but also the historic character of London. The Grade 1 status of the Bevis Marks Synagogue indicates it is a national treasure, not just a Jewish one.

---

Kind Regards,

Un Saludo,

Howard Goldsmith



C/ Historiador Bernardo Herrero, 7, Local 1,

Sax (03630),

Alicante.



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**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 03 October 2021 15:20:31

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THIS IS AN EXTERNAL EMAIL

From: Robert Friedman [REDACTED]  
[REDACTED]

Address:  
60 Plaza Street East  
Brooklyn, NY  
USA

Postcode: 11238

Message Body:

Please do not let this proposal go forward. Bevis Marks Synagogue must not be surrounded by hi-rises that destroy the milieu in which this landmark has existed for centuries. It would be a historical and cultural disaster and completely disrespectful to the UK's Jewish community. Thank you for considering my views.

--

This e-mail was sent via the Save Bevis Marks website.



**Subject:**  
**Date:**



FW: Building near Bevis Marks Synagogue  
04 October 2021 09:24:49

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FYI

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

From: Susan Sciamia [REDACTED]  
Sent: 03 October 2021 12:07  
To: DBE - Local Plan <LocalPlan@cityoflondon.gov.uk>  
Subject: Building near Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Good morning

I'm writing to object to the building of a tower block next to Bevis Marks Synagogue - a totally inappropriate project given the heritage value of this ancient and beautiful place of worship.

Kind regards  
Susan Sciamia  
Sent from my iPhone

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** FW: Planning Application 20/00848/FULEIA  
**Date:** 04 October 2021 17:09:20

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**From:** charlotte green [REDACTED]  
**Sent:** 03 October 2021 04:57  
**To:** Depala, Bhakti <[Bhakti.Depala@cityoflondon.gov.uk](mailto:Bhakti.Depala@cityoflondon.gov.uk)>  
**Subject:** Planning Application 20/00848/FULEIA

THIS IS AN EXTERNAL EMAIL

Dear Planning Committee of the City of London,

-  
Re: Complaint arising out of Planning Application 20/00848/FULEIA

On 27<sup>th</sup> September 2021 I sent an email requesting the Committee to postpone the Planning meeting for Tuesday 25<sup>th</sup> September 2021.

The fact that the planning agent for the synagogue may have indicated his contentment with the meeting going ahead misses my point.

A consultation exercise was fixed in the period of the Jewish High Holidays. The notification of the Committee date was sent out on the Sabbath and a response regarding a request to speak required on a Jewish Holiday.

The approach adopted is contrary to the City of London's Equality Objectives (increasing community engagement, understanding and listening to communities) and Public Sector Equality Duty. There has been unsatisfactory customer service which has failed to recognise different needs thereby leading to exclusion and discrimination.

Please treat this communication as making a formal complaint and provide it to any designated Equality Officer and the Equality and Inclusion Board from whom I wish to have a response setting out their observations and proposals.

Yours sincerely  
Charlotte Green

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

Application Number: 20/00848/FULEIA

Address: Bury House 31 Bury Street London EC3A 5AR

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94m AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (30 day Re-consultation following submission of additional supporting documents including; Radiance Study for Bevis Marks Synagogue and Daylight, Sunlight and Overshadowing Review (prepared by GIA), Radiance Based Daylight Study of 10-12, 14-16 and 18-22 Creechurch Lane (prepared by GIA), Townscape, Built Heritage and Visual Impact Assessment Addendum 2 (prepared by Montague Evans), Environmental Clarifications and Additional information Letter (prepared by Trium) and Statement of Community Involvement Update (August 2021) and Eastern Cluster CGIs)

Case Officer: Bhakti Depala

## Customer Details

Name: Ms Anna Baddeley

Address: 262 Highbury New Park London

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: This development will have an adverse effect on Bevis Marks Synagogue, one of the most significant religious buildings in the country. As the Save Bevis Marks campaign has stated, light levels in the synagogue will be severely reduced from 12.30-2.30pm, making the building unable to function as a place of worship. At present, there is insufficient evidence that the fabric of the synagogue, particularly its foundations, will be protected by the proposed construction.

If this development is approved by the City of London, it risks obscuring a historic building of national and international importance and undermining the synagogue's vital role in the community.



**From:** [Save Bevis Marks](#)  
**To:** [PLN - Comments](#); [bevismarksmedia@secnewgate.co.uk](mailto:bevismarksmedia@secnewgate.co.uk)  
**Subject:** Objection to 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA)  
**Date:** 04 October 2021 13:52:56

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THIS IS AN EXTERNAL EMAIL

From: Anna Harris-Noble [REDACTED]  
[REDACTED]

Address:  
Rose Cottage  
Sandy Lane, Little Bealings

Postcode: IP13 6LW

Message Body:

I object to the building of high-rise buildings that could damage and eliminate natural light to a building of great religious and historical significance to London and the UK.

Like many people with parents and grandparents born in London, some of my ancestors came to the city from overseas. In my case, at the end of the 18th century from Constantinople, where as members of the Sephardic Jewish community they had lived since their expulsion from Spain in 1492. London welcomed them and the Spanish and Portuguese Jewish community to establish the UK's first synagogue - Bevis Marks. Several of my ancestors' births, deaths and marriages are recorded in its records.

Although not a practising Jew, I feel this building is of great historic significance both on a personal level and to the UK as a whole as it represents the long-held British values of religious freedom and cultural tolerance.

--

This e-mail was sent via the Save Bevis Marks website.



**Subject:**  
**Date:**



FW: Bevis Marks Synagogue  
04 October 2021 12:18:51

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**From:** Anthony Ostrin <[REDACTED]>  
**Sent:** Monday, October 4, 2021 12:12 pm  
**To:** Richards, Gwyn  
**Subject:** Fw: Bevis Marks Synagogue

THIS IS AN EXTERNAL EMAIL

Dear Sir.

I understand that there is currently a planning application lodged with the City of London which, if granted, will blight the 250 + years old Bevis Marks Synagogue. I further understand that you as planning officer for the City of London support this plan. For reasons that have already been made clear to you by numerous objectors this plan must not be accepted by the City. May I now hear from you that in view of all these objections the proposed permission will not be granted. I am one who objects strongly to buildings being erected so near to the Synagogue as is proposed. They are not necessary.

I wait to hear from you.

***Anthony Ostrin***

**Member of Hampstead Synagogue  
Member of Camden Council Faith Leaders Forum  
Member of WHAT ( West Hampstead Amenity and Transport Group)**

# Comments for Planning Application 20/00848/FULEIA

## Application Summary

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Case Officer: Bhakti Depala

## Customer Details

Name: Mr Victor Todd Moses Montefiore

Address: 7 Bittacy Park Avenue Mill Hill LONDON

## Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: Background, from Twitter:

Tom Holland @holland\_tom Oct 1

Bevis Marks is not just the only synagogue in Europe to have held services continuously for over 3 centuries - it is also a living link to the return of the Jews to England in the 17th century. It is hard to think of a more totemic symbol of London's multiculturalism.

Anonymous Reply part 1

What better reason to tear it down brick by brick

Anonymous Reply part 2

Because it's a living link to the return of the Jews to England in the 17th century and a totemic symbol of London's multiculturalism

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When someone anonymous - whose account is seemingly connected with 1930s material - declares that they want to harm Bevis Marks Synagogue, IT SHOULD MAKE ALL OF THE COMMITTEE MEMBERS SIT UP AND THINK REALLY HARD ABOUT THIER BROADER SOCIETAL RESPONSIBILITIES.

The committee must also think of the reputational damage to the City of London - in terms of it's aspirations to 'stay on top' in international finance - and what people overseas will think of the Corporation and the City if it signals that it is no longer respectful towards its ethnic minorities (Jews are an ethnoreligious group and as such are protected by UK Race Relations laws).

It's clear from the INDEPENDENT report that the synagogue's light will be badly affected.

It's clear from the applicant's agent's report that that they simply don't have a clue that the synagogue's congregants - who don't stand in the centre of the synagogue - need light THEMSELVES IN THE REST OF THE SYNAGOGUE to read the texts which they are supposed to read in order to participate in rites. Otherwise, what is the point of attending Synagogue?