



## Planning Applications Sub-Committee

### ADDENDUM THREE

**Date:** FRIDAY, 13 DECEMBER 2024

**Time:** 10.00 am

**Venue:** LIVERY HALL - GUILDHALL

3. **1 UNDERSHAFT, LONDON, EC3A 8EE**

Report of the Planning & Development Director.

**For Decision**  
(Pages 3 - 8)

4. **BURY HOUSE 1 - 4, 31 - 34 BURY STREET, LONDON, EC3A 5AR**

Report of the Director of Planning & Development.

**For Decision**  
(Pages 9 - 26)

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## Planning Applications Sub Committee 13 December 2024

### Addendum Report for Agenda Item 3 (1 Undershaft, reference 201423LEIA)

#### 1. NPPF (12 December 2024)

The Government has published a new version of the National Planning Policy Framework on 12<sup>th</sup> December 2024.

This new version is valid immediately and should be applied to the determination of planning applications (where relevant) upon publication. The development plan remains the statutory basis for the determination of planning applications, although the policies within the NPPF are (where relevant) a material consideration.

The changes to the NPPF do not alter the recommendation being made by officers for the determination of this application, and officers are of the view that these changes do not substantially alter the assessment of the application against the NPPF, the weight to be given to the policies in the NPPF or the issues set out in the main report.

The new version of the NPPF can be found here: [National Planning Policy Framework](#). This addendum sets out the main changes and updates to Agenda item 3 in relation changes to the wording of the NPPF.

Officers will provide members with a full briefing on the new NPPF at the January 2025 Planning and Transportation Committee.

The primary amendments that are most relevant to the determination of this application are as follows:

#### **The presumption in favour of sustainable development**

Paragraph 11 of the NPPF has been updated and now provides:

Plans and decisions should apply a presumption in favour of sustainable development...

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

The changes to this paragraph do not impact on the assessment of the application before members.

#### **Building a Strong, Competitive Economy**

Paragraph 87 of the updated NPPF adds a new requirement for planning decisions to “recognise and address the specific locational requirements of different sectors. This includes making provision for ... the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.”

Paragraphs 115 to 127 set out the economic considerations in relation to this application and recognise the contribution to the provision of floorspace for that could be occupied by sectors for which the Square Mile plays a leading role, including banking, insurance, maritime, legal, accountancy and other professional services, as well as a growing cluster of technology, media and communications businesses.

**Promoting Sustainable Transport**

Paragraph 109 of the amended NPPF sets out a vision-led approach to transport solutions. Paragraph 115 has been amended to give greater emphasis to the need to prioritise sustainable transport modes. The requirements of these paragraphs align with the approach taken by the City of London Corporation on applications.

Paragraphs 1060 to 1163 in the main report address matters relating to highways and sustainable transport.

**Making effective use of land**

Paragraph 125c of the NPPF has been amended to give greater emphasis to giving substantial weight to the value of using suitable brownfield land within settlements for meeting identified needs, proposals for which should be approved unless substantial harm would be caused. This proposed development would deliver substantial development on brownfield land. The use of land is considered in the report in paragraphs 128 to 162 of the main report.

**Meeting the challenge of climate change, flooding and coastal change**

Paragraph 161 of the NPPF has been amended to make specific reference to the need to transition to net zero by 2050 (the national target; the City Corporation’s Climate Action Strategy aims for a net zero Square Mile by 2040, which is reflected in the emerging City Plan 2040) and for climate impacts including overheating, water scarcity, storm and flood risk to be taken into account. Specific reference to sustainable drainage systems has been added to paragraph 164 of the NPPF. Paragraph 166 has been added to the NPPF, setting out requirements for an expectation that development should comply with development plan policies on decentralised energy, and to take account of design issues to minimise energy consumption.

Paragraphs 1639 to 1722 set out how the proposed development would address issues of environmental sustainability including carbon emissions and climate resilience.

**Other more minor amendments**

The following table sets out more minor amendments to the NPPF which have potential implications for decision-making but which are not considered to be significant in the determination of this application.

Chapter or paragraph	Change
Paragraph 24	Highlights the importance of effective strategic planning and the duty to cooperate on cross-boundary strategic matters.

Paragraphs 96	Some minor amendments to place additional focus upon the importance of role of health and wellbeing and reducing health inequalities.
Paragraph 100	Additional references to early years and post-16 education in relation to meeting the infrastructure needs of the community
Paragraph 101	Expands the terms for public service infrastructure and places significant weight on the importance of new or upgraded infrastructure.
Paragraph 102	Additional considerations for safety and security in particularly that of children in planning policies and decisions.
Paragraph 125	Makes some minor amendments in relation to the imposition of conditions on upwards residential and commercial extensions
Chapter 12: Achieving well-designed places	Although the title to this section has removed reference to 'beautiful' places, reference to this within the text remains.
Paragraph 137	Reference to the National Model Design Code has been refocussed as the primary means for preparation of local design codes.
Paragraph 187	Includes an addition to incorporate biodiversity measures and features
Paragraph 206	Requiring information relating to the historic environment gathered through policy-making or decision-making to be made publicly available.
Glossary	Reasonable Future Scenarios- a definition of this has been included for assessing potential highways impacts and promote sustainable transport modes. Sustainable Drainage System- definition of this has been included to incorporate a mix of built and nature-based techniques. Transport assessments- insertion of accessibility and safety into the definition. Travel plan- insertion of objectives into the definition. Vision-led approach- definition inserted to set outcomes and measures to achieve these outcomes.

The below table sets out where the report makes reference to the 2023 NPPF, highlighting any changes to paragraph numbering, or where a change has been made to that paragraph. All other paragraph numbers references within the report are unchanged.

<b>Officers' Report</b>	<b>NPPF 2023</b>	<b>Change</b>
75, 106, 1026, 1749, 1751, 1760, 1761, 1803, 1804	Paragraph 208	Paragraph 208 is now paragraph 215
Paragraph 86	Paragraph 11	Update to part di) and dii), to read as follows:  For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date , granting permission unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the

		benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
Paragraphs 90 and 91	Paragraphs 96 and 97	Part c) Now refers to 'healthy lives' rather than 'healthy lifestyles', and as follows:  c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling  Paragraph 97 is now 98
Paragraph 93	Paragraph 109	Additional wording at bullets a) to c) to read as follows:  Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.
Paragraph 92, 323	Paragraph 103	Now paragraph 104
Paragraph 100, 1679, 1687	Paragraph 157	Now paragraph 161. This has been rewritten to include reference to 2050 net zero targets and taking full account of the impacts of climate change.  Now reads:

		161. The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure
Paragraph 101, 1687	Paragraph 159	Now paragraph 164. Substantially redrafted to include reference to SUDS in part a) and insertion of reference to plans in part b) to read:  164. New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards.
Paragraph 102	Paragraph 201	Now Paragraph 208
Paragraph 103	Paragraph 203	Now Paragraph 210
Paragraph 104, 1748	Paragraph 205	Now Paragraph 212
Paragraph 105, 1748	Paragraph 206	Now Paragraph 213
Paragraph 107	Paragraph 209	Now Paragraph 216
Paragraph 108	Paragraph 212	Now Paragraph 219
Paragraph 1027	Paragraph 200	Now Paragraph 207
Paragraph 1035	Paragraph 96	Now reads: Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: (a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-

		designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
Paragraph 1504	Paragraph 129	Now Paragraph 130
Paragraph 1645	Paragraph 8	Makes reference to 2023 NPPF which should be amended to 2024

## 2. Amended Report Wording

The following wording in bold is to be added in the section of the report which considers the impact of the proposal to the church of St Andrew Undershaft.

- Page 254, Paragraph 655; The small surviving churchyard to the north, including its walls and railings, contributes to the building’s setting and significance **and is considered a non-designated heritage asset**. A group of small and medium sized 19th and 20th century buildings adjacent to the church on Undershaft and Leadenhall Street provide an appropriate townscape setting, with tall buildings of the City Cluster in close proximity to the north, south and west. These elements make a neutral contribution to the asset’s significance.
- Page 257, Paragraph 673; Overall, in both baseline and cumulative scenarios, while the proposed development would introduce changes to the Church’s setting, it would clearly preserve the setting and significance of the church and the ability to appreciate it, **as well as the significance of the churchyard as a non-designated heritage asset**. The proposal would be the latest addition to the now arguably iconic setting of modern high-rise buildings which frame the church, and its medieval charisma would remain undimmed.



**From:** Alex Ferguson [REDACTED]  
**Sent:** 12 December 2024 12:08  
**To:** Tastsoglou, Anna [REDACTED]  
**Subject:** In support of Holland House - from Fuel

You don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

Dear Anna,

I am writing in support of the future development of Holland House, London EC3A 5AR to become a new shining beacon of community, collaboration and culture in the heart of the city of London. Planning Application Number: 24/00021/FULEIA. The valuable scoping work down by the team behind the development shows thoughtfulness and consideration for the local community.

At Fuel we are planning an artist residency and engagement programme with Holland House, bringing first class artists and educators into the space to make new shows in research and development, and run creative workshops with local schools and communities.

Fuel leads the field in independent producing in the UK's live performance sector, working with brilliant artists to explore urgent questions, to shine light on how we relate to each other and the world around us, and to tell untold stories by underrepresented voices. Fuel produces high quality new theatre that reaches diverse audiences through tours to venues in the UK and internationally, collaborating with outstanding theatre makers with fresh perspectives and approaches who produce shows, performances or experiences which have direct and playful relationships with their audiences. Fuel leads the sector in terms of co-creation and depth of engagement to build audiences and bring people together.

Fuel was founded in 2004 and is led by Kate McGrath. Since its story began, Fuel has produced shows, festivals, films, installations, podcasts, apps and books. In doing so, Fuel has supported the artistic development of over 120 lead artists or companies and reached more than a 1.5 million people live and digitally, hosted over a hundred internships and been recognised with awards for its work.

Fuel is currently working with artists and companies including Travis Alabanza, Common Wealth, Inua Ellams, Keisha Thompson, Alan Lane, Hannah Lavery, Racheal Ofori, and Toby Olié.

We believe Holland House will be vital for ensuring an accessible and adaptable hub for the arts in the centre of London - from rehearsal space to flexible workspaces, social enterprise areas, and being a host for public facing arts exhibitions and events - it is much needed and beneficial to business and communities alike.

All the best,

**Alex Ferguson** (He/Him)

**Development Producer**



Fuel is 20! [Click here](#) to find out about our 20th anniversary season – we hope you can join us!

Tel: +44 (0) 207 228 6688

Somerset House, Strand, London, WC2R 1LA

[www.fueltheatre.com](http://www.fueltheatre.com)

(Please note: Fuel operates a hybrid working policy, with staff members working partly from Somerset House, and on remote)

Fuel is the trading name for Fuel Productions Limited (Registered in England Company No. 7935786, Charity No. 1149680, Registered Office: Somerset House, South Wing, Strand, London, WC2R 1LA, VAT registration no: 863 3068 21)

Pennycrest Consultancy Ltd  
Highgate  
N6 5EE

Anna Tastsoglou  
Planning Team  
Environment Dept  
City of London  
P.O.Box 270  
Guildhall  
London  
EC2P 2EJ

11<sup>th</sup> December 2024  
Ref: Bevis Marks

Dear Ms Tastsoglou

**Planning Application Ref 24/00021/FUL/EIA**  
**1-4, 31 and 33-34 Bury Street London EC3A 5AR**

I am a Chartered Surveyor, founder and former senior partner of Delva Patman Redler LLP, specialists in rights to light, daylight and sunlight and neighbourly matters. I am a director of Pennycrest Consultancy Ltd.

I have been asked by representatives of the Bevis Marks Synagogue to provide an overview on the various studies and reports commissioned to assess the potential impact on daylight, sunlight, overshadowing and lunar transit on the Synagogue. I am a Chartered Surveyor, founder and former senior partner of Delva Patman Redler LLP, specialists in rights to light, daylight and sunlight and neighbourly matters.

To this end I have reviewed the following:-

- GIA Daylight & Sunlight Report Contained within Chapter 10 of the EIA for the planning application
- Bevis Marks Daylight Report 2024 dated 26<sup>th</sup> October 2024
- BRE Report P128053-1000 dated 16<sup>th</sup> August 2024 plus the BRE addendum letter P128053-1002 dated 7<sup>th</sup> October 2024 and BRE addendum letter 9<sup>th</sup> December 2024
- BRE Report P128053 -1001 dated 4<sup>th</sup> November 2024
- HPG objection letter dated 15<sup>th</sup> May 2024 and GIA response letter dated 23<sup>rd</sup> September 2024 together with DP9 response letter dated 27<sup>th</sup> September 2024

I have not undertaken any independent technical analysis and have relied on the data and results provided in the various studies and reports available in the public realm or made available to me together with other documents providing background information and context

The BR guide 'Site Layout Planning for Daylight and Sunlight' methodology used by GIA for the daylight, sunlight and overshadowing studies follow industry standard practice adopted by the City to assess development impact on existing buildings. It is primarily focused on safeguarding the impact on existing buildings in residential use and is not designed to assess the impact on unique buildings such as the Bevis Marks Synagogue. BS 8206 Code of Practice for Daylight should be used in conjunction with the BR guide but again the BS does not cover specific buildings such as the Synagogue.

There is no similar published guidance on assessing the impact of lunar transit which is acknowledged by the BRE in its commentary reports.

Therefore it is questionable as to whether the criteria applied and the results and conclusions generated by the GIA and BRE various reports are entirely relevant when considering the impact on the beneficial use of the Synagogue as a place of worship, religious ritual and community engagement.

If, for the purpose of discussion, the methodology adopted is accepted, a fundamental question arises as to the accuracy of the output data from the analysis where the source data used for the computer modelling is not based on actual geometric measurement. This means that the 3D modelling generated of the existing

site, the neighbouring buildings and the Synagogue is inherently flawed. This is then compounded by the 3D modelling of the proposed development when comparing cumulative impact on the Synagogue.

This must throw into question the reliability of the GIA studies and the conclusions reached. Even if these flaws are discounted and the results taken at face value, it does not change the conclusions that the development will significantly reduce the existing light levels within the Synagogue, cause greater overshadowing of the courtyard and severely compromise views of the sky and the moon. For example, despite GIA demonstrating that existing daylight and sunlight levels are low, and already below the absolute 27% target proposed in the BR 209 guide, they assert that further reduction would result in an acceptable 'minor adverse' category of impact. To quantify the degrees of 'adverse' impact is misleading and disingenuous. Something is either adverse or it is not and the results produced by the GIA studies demonstrate this. It is of merit to note that in its report dated 9<sup>th</sup> December 2024 page 5, BRE chose to make no comment on this conclusion.

Furthermore, the methodology applied to measure illuminance levels in the Bevis Marks Daylight Report, accepted by BRE as being a reasonable method of assessment even with the shortcomings identified, does demonstrate that, the impact will result in a loss of daylight at key times of the day throughout the year. The BRE Report supports the Bevis Marks conclusions that the development will cause a reduction to the daylight levels.

The BRE 209 Guide and related British Standard Codes of Practice were not designed to be used to assess the impact on unique buildings like the Bevis Marks Synagogue. The standards and criteria proposed within these documents are regarded as the minimum standards for daylight, sunlight and overshadowing. Where such standards are already demonstrably below in the existing condition, it is unacceptable to condone any further reduction that will affect the beneficial use of the affected building, in this case a Grade 1 place of worship and ritual, is not affected.

The City should refuse planning on these grounds alone.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Delva Patman FRICS ACI Arb  
Director





DATE / REF

12/12/2024

SP/17821

ADDRESS

THE WHITEHOUSE  
BELVEDERE ROAD  
LONDON SE1 8GA

**By Email**

anna.tastsoglou@cityoflondon.gov.uk

Anna Tastsoglou  
Principal Planning Officer (Development Management)  
Environment Department  
City of London  
Guildhall  
London EC2V 7HH

CONTACT

TEL 020 7202 1400

MAIL@GIA.UK.COM

WWW.GIA.UK.COM

Dear Ms. Tastsoglou,

**Re: Planning Application Reference: 24/00021/FULEIA, 1-4, 31 and 33-34 Bury Street, London, EC3A 5AR**

This note has been prepared by GIA in response to the letter dated 11<sup>th</sup> December 2024 prepared by Delva Patman of Pennycrest Consultancy Ltd ('Pennycrest').

BRE Guidance does not specify, and as such does not exclude, the use of its methodologies to quantify daylight and sunlight changes to a place of worship. BRE's methodologies have been used to test places of worship many times before in the City of London as well as across London and the UK, and as such it is reasonable to assume that they would provide adequate guidance in this instance too.

The letter of objection prepared by Pennycrest questions the origin of the 3D model data used in GIA's assessments by stating that: *"a fundamental question arises as to the accuracy of the output data from the analysis where the source data used for the computer modelling is not based on actual geometric measurement."* The methodology section of GIA's reports however state that: *"The three dimensional representation of the proposed 31 Bury Street development and the Bevis Marks Synagogue been modelled based on the drawings and 3D model used for GIA's Rights of Light assessment. This has been placed in the context of its surrounding buildings which has been modelled from survey information, photogrammetry, OS and site photographs and allows for a precise model which in turn ensures that the analysis accurately represents the amount of daylight available to the building facades, internal and external spaces."* The Synagogue's courtyard and the immediate surrounding buildings have been laser scanned and point cloud data used to generate accurate window locations.

It should also be noted that BRE has undertaken their independent measurements of material reflectance and glazing transmission of the Synagogue in particular, which closely matched the assumptions made in the daylight modelling undertaken by GIA. It would be fairer to state that the accuracy of the *"source data used for the computer modelling"* is greater than the industry standard and reflective of the sensitivities related to the context of this proposed building.

In relation to the interior daylight levels within the Synagogue and the Bevis Marks Daylight Report, Pennycrest agrees that BRE's report states that the development will cause a reduction to daylight levels. However, in assessing the significance and quantum of overall reduction, BRE concludes that *"the overall impact on daylight and sunlight would be assessed as minor adverse."* which aligns with GIA's conclusions.

In summary, GIA believes that BRE's guidance and the British Standards provide appropriate methodologies to consider daylight and sunlight impacts during the planning process, and that has been the case in the consideration of planning applications in the City of London and across the UK.

We trust that this note provides a helpful response to the points made by Pennycrest and their letter of objection.

Yours sincerely,  
GIA

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<b>Committee</b>	<b>Date:</b>
Planning Application Sub-Committee	13 December 2024
<p><b>Subject:</b> Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR</p> <p>24/00021/FULEIA: Demolition of Bury House and erection of a new building comprising of 4 basement levels, ground plus 43 storeys (178.7m AOD); partial demolition of Holland House and Renown House; restoration of existing and erection of four storey extension resulting in ground plus 8 storeys at Holland House (48.05m AOD) and three storey extension resulting in ground plus 5 storeys at Renown House (36.49m AOD); interconnection of the three buildings; use of the buildings for office (Class E(g)), flexible retail/café (Class E(a)/E(b)), and flexible community/education/ cultural/amenity (Class F2(b)/ F1(a)- (e)/ E(f)/ Sui Generis) uses; and provision of a new covered pedestrian route, cycle parking and facilities, landscaping and highway improvements, servicing and plant and all other ancillary and other associated works.</p> <p>24/00011/LBC: Restoration works to Holland House including removal and reinstatement of external faience together with the removal and replacement of existing concrete beam; partial demolition to facilitate interconnection with the neighbouring proposed new building and the construction of a four storey roof extension resulting in ground plus 8 storeys; together with internal alterations including truncation of the existing lightwell, reconfiguration of partitions, installation of a new staircase, servicing and all other ancillary and associated works.</p>	<b>Public</b>
<b>Ward:</b> Aldgate	<b>For Decision</b>
<b>Registered No:</b> 24/00021/FULEIA and 24/00011/LBC	<b>Registered on: 11 March 2024</b>
<b>Conservation Area:</b> Creechurch Conservation Area	<b>Listed Building: Holland House – grade II*</b>

## **1. NPPF (12 December 2024)**

- 1.1. The Government has published a new version of the National Planning Policy Framework on 12th December 2024.
- 1.2. This new version is valid immediately and should be applied to the determination of planning applications (where relevant) upon publication. The development plan remains the statutory basis for the determination of planning applications, although the policies within the NPPF are (where relevant) a material consideration.
- 1.3. The changes to the NPPF do not alter the recommendation being made by officers for the determination of these applications, and officers are of the view that these changes do not substantially alter the assessment of the application against the NPPF or the weight to be given to the policies in the NPPF or the issues set out in the main report.
- 1.4. The new version of the NPPF can be found here: National Planning Policy Framework. This addendum sets out the main changes and updates Agenda items 3 and 4 in relation changes to the wording of the NPPF.
- 1.5. Officers will provide members with a full briefing on the new NPPF at the January 2025 Planning and Transportation Committee.
- 1.6. The primary amendments that are most relevant to the determination of these applications are as follows:

### **1.7. The presumption in favour of sustainable development**

Paragraph 11 of the NPPF has been updated and now provides:  
Plans and decisions should apply a presumption in favour of sustainable development...

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
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The changes to this paragraph do not impact on the assessment of these applications before members.



## **1.8. Building a Strong, Competitive Economy**

Paragraph 87 of the updated NPPF adds a new requirement for planning decisions to “recognise and address the specific locational requirements of different sectors. This includes making provision for ... the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.”

Paragraphs 99 to 112 set out the economic considerations in relation to this application and recognise the contribution to the provision of floorspace for that could be occupied by sectors for which the Square Mile plays a leading role, including banking, insurance, maritime, legal, accountancy and other professional services, as well as a growing cluster of technology, media and communications businesses.

## **1.9. Promoting Sustainable Transport**

Paragraph 109 of the amended NPPF sets out a vision-led approach to transport solutions. Paragraph 115 has been amended to give greater emphasis to the need to prioritise sustainable transport modes. The requirements of these paragraphs align with the approach taken by the City of London Corporation on applications.

Paragraphs 629 to 730 in the main report address matters relating to highways and sustainable transport.

## **1.10. Making effective use of land**

Paragraph 125c of the NPPF has been amended to give greater emphasis to giving substantial weight to the value of using suitable brownfield land within settlements for meeting identified needs, proposals for which should be approved unless substantial harm would be caused. This proposed development would deliver substantial development on brownfield land. The use of land is considered in the report in paragraphs 113 to 168 of the main report.

## **1.11. Meeting the challenge of climate change, flooding and coastal change**

Paragraph 161 of the NPPF has been amended to make specific reference to the need to transition to net zero by 2050 (the national target; the City Corporation’s Climate Action Strategy aims for a net zero Square Mile by 2040, which is reflected in the emerging City Plan 2040) and for climate

impacts including overheating, water scarcity, storm and flood risk to be taken into account. Specific reference to sustainable drainage systems has been added to paragraph 164 of the NPPF. Paragraph 166 has been added to the NPPF, setting out requirements for an expectation that development should comply with development plan policies on decentralised energy, and to take account of design issues to minimise energy consumption.

Paragraphs 1202 to 1283 set out how the proposed development would address issues of environmental sustainability including carbon emissions and climate resilience.

### 1.12. Other more minor amendments

The following table sets out more minor amendments to the NPPF which have potential implications for decision-making but which are not considered to be significant in the determination of this application.

<b>Chapter or paragraph</b>	<b>Change</b>
Paragraph 24	Highlights the importance of effective strategic planning and the duty to cooperate on cross-boundary strategic matters.
Paragraphs 96	Some minor amendments to place additional focus upon the importance of role of health and wellbeing and reducing health inequalities.
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Paragraph 101	Expands the terms for public service infrastructure and places significant weight on the importance of new or upgraded infrastructure.
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Paragraph 125	Makes some minor amendments in relation to the imposition of conditions on upwards residential and commercial extensions
Chapter 12: Achieving well-designed places	Although the title to this section has removed reference to 'beautiful' places, reference to this within the text remains.
Paragraph 137	Reference to the National Model Design Code has been refocussed as the primary means for preparation of local design codes.
Paragraph 187	Includes an addition to incorporate biodiversity measures and features

Paragraph 206	Requiring information relating to the historic environment gathered through policy-making or decision-making to be made publicly available.
Glossary	<p>Reasonable Future Scenarios- a definition of this has been included for assessing potential highways impacts and promote sustainable transport modes.</p> <p>Sustainable Drainage System- definition of this has been included to incorporate a mix of built and nature-based techniques.</p> <p>Transport assessments- insertion of accessibility and safety into the definition.</p> <p>Travel plan- insertion of objectives into the definition.</p> <p>Vision-led approach- definition inserted to set outcomes and measures to achieve these outcomes.</p>

1.13. The below table sets out where the report makes reference to the 2023 NPPF, highlighting any changes to paragraph numbering, or where a change has been made to that paragraph. All other paragraph numbers references within the report are unchanged.

<b>Officers' Report</b>	<b>NPPF 2023</b>	<b>Change</b>
Paragraph 55, 57, 88, 202, 208, 591, 1309-1336, 1334, 1336, 1378, page 12	Paragraph 208	Paragraph 208 is now paragraph 215
Page 63	Paragraph 200	Now Paragraph 207
Page 100, Paragraph 87	Paragraph 206	Now Paragraph 213
Page 103	Paragraph 207	Refers to 2023 version, which will now be 2024.
Page 104, Paragraph 81, 1236, 1243	Paragraph 157	<p>Refers to 2023 version, which will now be 2024.</p> <p>Now paragraph 161. This has been rewritten to include reference to 2050 net zero targets and taking full account of the impacts of climate change.</p> <p>Now reads:</p> <p>161. The planning system should support the transition to net zero by 2050 and take full account of</p>

		all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure
Page 106	Paragraph 205	Now Paragraph 212
Page 134	n/a	Refers to 2023 version, which will now be 2024.
Paragraph 70, 605	Paragraph 96	Part c) Now refers to 'healthy lives' rather than 'healthy lifestyles', and as follows:  c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling
Paragraph 71	Paragraph 97	Paragraph 97 is now paragraph 98
Paragraph 72	Paragraph 103	Now paragraph 104
Paragraph 73	Paragraph 109	Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks;

		<p>d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;</p> <p>e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and</p> <p>f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.</p>
Paragraph 76	Paragraph 123	Now paragraph 124
Paragraph 82, 1250	Paragraph 159	<p>Now paragraph 164. Substantially redrafted to include reference to SUDS in part a) and insertion of reference to plans in part b) to read:</p> <p>164. New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government’s policy for national technical standards.</p>
Paragraph 83	Paragraph 180	Now paragraph 187
Paragraph 84	Paragraph 201	Now paragraph 208
Paragraph 85	Paragraph 203	Now paragraph 210
Paragraph 86, 1310	Paragraph 205	Now paragraph 212
Paragraph 89	Paragraph 209	Now paragraph 216
Paragraph 90	Paragraph 212	Now paragraph 219

Paragraph 99, 1206	Paragraph 8	Refers to 2023 version.
Paragraph 103	Paragraph 87	Rewritten as follows:  Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for: a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections); b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.
Paragraph 272	Paragraph 130	This paragraph has been removed from the 2024 version.
Paragraph 1044, 1046	Paragraph 129	Now paragraph 130
Paragraph 1310	Paragraph 206	Now paragraph 213

## 2. Application cover sheet amendments

2.1. The application factsheet has been updated in accordance with the amended figures above, and a graph for the comparison of the proposed embodied carbon results with the GLA's benchmarks has been added, see rows 14 and 15.

PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS																	
<b>14. EMBODIED CARBON EMISSIONS</b>	<p style="text-align: center;"><b>Embodied Carbon Comparison to Benchmarks</b></p> <table border="1"> <caption>Embodied Carbon Comparison to Benchmarks Data</caption> <thead> <tr> <th>Category</th> <th>A1-A5 (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</th> <th>B-C (Excl. B6 and B7) (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</th> <th>Total (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</th> </tr> </thead> <tbody> <tr> <td>1-4, 31 and 33-34 Bury Street Proposed Development</td> <td>812</td> <td>738</td> <td>1550</td> </tr> <tr> <td>GLA Office Benchmark</td> <td>950</td> <td>450</td> <td>1400</td> </tr> <tr> <td>GLA Office Aspirational</td> <td>600</td> <td>370</td> <td>970</td> </tr> </tbody> </table> <p>Upfront embodied carbon: 33,517 tonnes CO<sub>2</sub>e / 812 kgCO<sub>2</sub>e per sqm  In use embodied carbon: 30,475 tonnes CO<sub>2</sub>e / 738 kgCO<sub>2</sub>e per sqm</p>	Category	A1-A5 (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	B-C (Excl. B6 and B7) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	Total (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	1-4, 31 and 33-34 Bury Street Proposed Development	812	738	1550	GLA Office Benchmark	950	450	1400	GLA Office Aspirational	600	370	970
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<b>15. WHOLE LIFE - CYCLE CARBON EMISSIONS</b>	<p>Whole life-cycle carbon emissions: <b>97,062 tonnes CO<sub>2</sub></b>  Whole life-cycle carbon emissions per square meter: <b>2,351 tonnes CO<sub>2</sub>/sqm</b></p>																

### 3. Letters of Representation

3.1. Since the publication of the first Addendum, one letter objecting to the proposed development (from a Daylight/Sunlight consultant on behalf of the Bevis Marks Synagogue) one in support and a response from the Applicant to the objection letter have been received. All three letters are included in the background papers of this Addendum.

3.2. The points raised in the objection letter as summarised in the table below.

Representations from members of the public (Objections)	Officers Response to Comments
<p>The BRE guide follows industry standards, but it is not designed to assess the impact on the Synagogue.</p>	<p>The BRE guidance does not exclude the use of the methodologies for other than residential uses. It is also noted that the industry standards have been used to quantify impacts of daylight, sunlight and overshadowing in many places of worship, such as churches.</p>
<p>There is no similar published guidance assessing the impact of lunar transit. Therefore, the criteria applied and results are questionable.</p>	<p>Comment noted. It is acknowledged that there are no published guidance for assessing the lunar transit. However, the methodology used to assess the impacts was independently reviewed and found acceptable.</p>
<p>The accuracy of the output data from the analysis is questioned due to the use of computer modelling that is not based on actual geometric measurements. Even if the results are taken on face value, the development will significantly reduce the existing light levels within the Synagogue, cause greater overshadowing of the courtyard and severely compromise views of the sky and the moon. The existing daylight and sunlight levels are below the BRE guide. GIA consider that further reductions would result in an acceptable impact. This is misleading and disingenuous.</p>	<p>The methodology section of GIA's reports states that <i>"The three dimensional representation of the proposed 31 Bury Street development and the Bevis Marks Synagogue been modelled based on the drawings and 3D model used for GIA's Rights of Light assessment. This has been placed in the context of its surrounding buildings which has been modelled from survey information, photogrammetry, OS and site photographs and allows for a precise model which in turn ensures that the analysis accurately represents the amount of daylight available to the building facades, internal and external spaces."</i> With regard to the Synagogue's courtyard, it has been confirmed that the immediate surrounding buildings have been laser scanned and point cloud data used to generate accurate window locations.</p> <p>With regard to the impacts of the proposed development in terms daylight, sunlight and overshadowing these are assessed in the relevant sections of the report, similar to the impacts of the moon visibility. The assessment have been independently reviewed and the reviewer has come into similar conclusions.</p>
<p>The methodology used in the Bevis Marks Daylight report is accepted by BRE as being reasonable. BRE concludes</p>	<p>Although BRE accepts that the Bevis Marks Daylight report methodology is reasonable, they state that climate-based daylight modelling methodology based on a detailed massing model and appropriate</p>



that the development will cause a reduction to the daylight.	calculation parameters can be used to assess daylight impacts in the Bevis Marks Synagogue. <i>“The latter include actual surface reflectances and glazing transmittance as measured in situ for existing indoor and outdoor surfaces and Synagogue windows, alongside suitable calculation points and/or grids, weather data and modelling parameters. Most of these details are missing from the Bevis Marks daylight report.”</i>
The daylight impacts onto the Bevis Marks Synagogue would be unacceptable.	The daylight impacts to the Bevis Marks Synagogue are assessed in detail in the Daylight, Sunlight and Overshadowing section of the report.

3.3. The following points are raised in the support letters received:

- The proposed development at Holland House will become a new shining beacon of community, collaboration and culture in the heart of the city of London.
- We are planning an artist residency and engagement programme with Holland House, bringing first class artists and educators into the space to make new shows in research and development, and run creative workshops with local schools and communities.
- Holland House will be vital for ensuring an accessible and adaptable hub for the arts in the centre of London.

#### 4. Sustainability

4.1. An updated GLA whole life-cycle carbon spreadsheet has been submitted, following alignment with the previous RICS (Royal Institute of Chartered Surveyors) calculation methodology version 1 as per the GLA’s requirement, and some further minor adjustments.

4.2. Page 970 is amended as follows:

4.3. Paragraph 1240: table - figures (kg/CO2/m2) to be amended as follows:

A1-A5: **812**

A-C (excl. B6-B7): **1,529**

B6+B7: **822**

A-C (incl. B6-B7): **2,351**

4.4. Paragraph 1241 to be replaced with:

The proposed whole site development would result in overall whole life-cycle carbon emissions of **97,062,115 kgCO<sub>2</sub>** being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for **33,941,165 kgCO<sub>2</sub>** (35% of the building's whole life-cycle carbon), and the embodied carbon emissions for **63,120,950 kgCO<sub>2</sub>**, (65% of the building's whole life-cycle carbon).

## 5. Corrections – Main Report

5.1. Please note the further corrections:

5.2. Para 500 – amend first sentence to 'The small surviving churchyard to the north, including its walls and railings, contributes to the building's setting and significance and is considered to be a non-designated heritage asset'.

5.3. Para 504 – amend last sentence to: 'As such, it is considered that the proposed building would not harm the setting or significance of St Andrew Undershaft or its churchyard as a non-designated heritage asset'.

## 6. Corrections – Addendum 1

6.1. Please note the following corrections:

6.2. Officer response Pages 7-9 – to be amended as below (to remove typos which had crept into the text):

'Officers clarify that the point being made in the report is that, despite the strong language of CS14 (2) which provides for the refusal of tall buildings within conservation areas, conflict with this part of the policy does not impose an absolute presumption against granting planning permission or mean that it is mandatory to refuse all tall buildings in a conservation area; the decision maker must consider all the policies in the development plan and reach a conclusion as to whether or not the proposal complies with the development plan as a whole, and this requires the decision maker to assess the proposal against competing policies. There is nothing in the language of policy CS14 (2) that suggests it creates a tilted balance or that more weight has to be placed on it than other policies in the development plan, however it is for the decision maker to make a judgement as to whether the conflict with a particular policy or part thereof means that the proposal does or does not comply with the development plan as a whole, taking into account *inter alia* the extent of the conflict with policy, the relative importance of the policy and the language of the policy. Officers consider such an approach to be supported by case law including *Asda Stores Ltd, R (On the Application Of) v. Leeds City Council & Anor* ([2021] EWCA Civ 32). For completeness and as is set out in paragraph 91 of the officer report, regard must also be had to other material considerations and the application must be determined in accordance with the development plan unless material considerations indicate otherwise.'