



## **Planning Applications Sub-Committee**

### **ADDENDUM TWO**

**Date:** TUESDAY, 11 FEBRUARY 2025

**Time:** 9.00 am

**Venue:** LIVERY HALL - GUILDHALL

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

Report of the Director of Planning & Development.

**For Decision**  
(Pages 3 - 16)

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<b>Committee</b>	<b>Date:</b>
Planning Applications Sub-Committee	11 February 2025
<b>Subject:</b> Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR  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.  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.	<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:</b> 11 March 2024

<b>Conservation Area: Creechurch Conservation Area</b>	<b>Listed Building: Holland House – grade II*</b>
<b>Report of:</b> The Chief Planning Officer and Development Director and Comptroller and City Solicitor	<b>For Decision</b>

## Consultations

### Letters of representation

1. Although re-consultation was not required and has not been carried out, since the publication of the PASC Committee Agenda two representations have been received, raising the comments contained in the table below.

<b>Comments</b>	<b>Officers Response to Comments</b>
<p><b>Historic Royal Palaces – commented received 07.02.2025</b></p> <p>We write in relation to the recent consideration of the above referenced planning and listed building consent applications at LBTH’s Planning Applications Sub-Committee on 13th December 2024. At that meeting, Members resolved not to grant planning permission and listed building consent, with the precise Reasons for Refusal to be formulated by Officers and returned to Members for endorsement. These Reasons are to be considered by Members at a further Committee meeting on 11th February 2025.</p> <p>HRP has consistently objected to the proposals for redevelopment at Bury House on the basis of its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS). HRP made representations to the City of London (CoL) in respect of this application during consultation periods in May and November 2024. We do</p>	<p>Comments are noted.</p> <p>It is noted that the Reasons for Refusal as they have been formulated by officers based on a rigorous assessment of the debate of the 13<sup>th</sup> December 2024, and the concerns that reflected the opinion of the majority of the Committee. As stated in the main report to Committee, other concerns have been raised by Members, but they did not appear to be the subject of a consensus and therefore, they were not included within the Reasons for Refusal. The impact of the development on Outstanding Universal Value (OUV) of the Tower of London World Heritage Site was one of those concerns.</p>

not repeat the detail of those representations here but simply re-state that HRP remains strongly of the belief that the proposed development would significantly harm the Outstanding Universal Value (OUV) of the ToL WHS by virtue of the position and height of the proposed buildings and their impact on key views from and of the ToL.

HRP attended the Planning Applications Sub-Committee meeting on 13th December 2024 to object to the applications and fully supported Members' resolution to not grant planning permission or listed building consent.

Officers have now prepared a report for Members' consideration at the Planning Applications Sub-Committee taking place on 11th February 2025. This includes a summary of Members' considerations during the debate at the December 2024 Committee meeting and two proposed sets of Reasons for Refusal to be cited on the decision notices for the planning and listed building consent applications, respectively. HRP has reviewed this report and wishes to express its concern that none of the reasons for refusal listed include the impact of the proposed scheme on the OUV of the ToL WHS. This is in contrast to the reasons for refusing the 2020 scheme (ref: 20/00848/FULEIA), which related to the impact on both the synagogue and the ToL WHS. HRP is strongly of the view that the impact on the ToL WHS remains and therefore that the refusal of the current applications must include reference to the impact of the proposals on the ToL WHS, as set out in all of HRP's objections to date.

The minutes of the Committee meeting of the 13th December 2024 are clear that the issue of the impact on the OUV on the ToL WHS was

A comparison to the Reasons of the Refusal of the previous application at 31 Bury Street (20/00848/FULEIA) is drawn by the HRP. It is accepted that the previous application constitutes a material planning consideration, and for that reason it was taken into consideration at the assessment of the current application, as it was presented at the committee on the 13<sup>th</sup> of December 2024. Officers maintain their views in that regard. The purpose of the current report is not to provide for another assessment of the impacts of the proposed development, but rather to present the Reasons of Refusal as reflected by the majority of the Committee on the 13<sup>th</sup> of December 2024.

raised during the discussion, and several Members appear to have referred to it in explaining their intention to vote for refusing to grant permission. However, the minutes also state that because not all Members were in agreement about the impact on the ToL, Officers concluded it should not constitute a reason for refusal, despite confirming it was a material consideration when asked for clarification by Members.

HRP wishes to reiterate that it does not agree with the Officer's statement at the Committee, included in the minutes, that: '... when comparing the scheme to that previously refused, it was considered the amendments incorporated to the tower element to reduce its height and massing, would be sufficient to overcome the previous reason for refusal in terms of the impact on to the World Heritage Site.'

### **Conclusion**

HRP considers that the refusal of the current applications must include reference to the impact of the proposals on the ToL WHS, as set out in all of HRP's objections to date. Members raised this as a concern and a consideration in their decision to vote against the scheme in their responses at the Committee meeting in December 2024 and therefore it is imperative that this concern is properly reflected in the reasons for refusal. HRP proposes that the wording of reason No.2 of the 2020 (20/00848/FULEIA) decision notice is replicated on the decision notices for the current applications, as follows:

The development would adversely affect the setting of the Tower of London World Heritage

<p>Site by reason of the less than substantial harm caused to LVMF view 10A.1 from the Tower Bridge North Bastion and the resulting harm to the Outstanding Universal Value of the World Heritage Site (which harms would not be outweighed by the public benefits of the proposal) contrary to Local Plan Policy CS12 (conserving or enhancing the significance of the City's heritage assets and their settings and providing an attractive environment to the City's heritage assets and their settings and providing an attractive environment to the City's communities); Local Plan Policy CS13 (protecting and enhancing significant views of important buildings); London Plan Policies D9e; HC2, and HC3 (protecting the significance of the Tower of London).</p>	
<p><b>SAVE – comments received 10.02.2025</b></p> <p>SAVE Britain's Heritage welcomes Members of the Planning Applications Sub-Committees' resolution to refuse permission for planning application 24/00021/FULEIA and listed building consent 24/00011/LBC on 13th December 2024. We wish to reiterate our strong objection to the above applications, and support a refusal on the following grounds:</p> <ul style="list-style-type: none"> <li>• Substantial harm to Bevis Marks Synagogue</li> </ul> <p>The height, scale and massing of the proposed ground plus 43-storey tower at No. 31 Bury Street would cause substantial harm to the setting of the Grade I listed Bevis Marks Synagogue. The Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. We consider this development would contravene national and local policy including para 213</p>	<p>Comments are noted.</p> <p>As stated above, the Reasons for Refusal are based on a rigorous assessment of the debate of the 13<sup>th</sup> December 2024, and the concerns that reflected the opinion of the majority of the Committee. Other concerns have been raised by Members, but they did not appear to be the subject of a consensus and therefore, they were not included as Reasons for Refusal. The impact of the development on Outstanding Universal Value (OUV) of the Tower of London World Heritage Site, the harm to the Creechurch Conservation Area and the harm to the Grade II *Holland House listed building were some of those concerns.</p>

<p>NPPF (2024) which provides that any harm to, or loss of, the significance of a designated heritage asset requires clear and convincing justification. Policy CS12(1) City of London Local Plan (adopted 2015) requires that development should safeguard the City's listed buildings and their settings. Policy DM 12.1 sets out that development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and their setting.</p> <ul style="list-style-type: none"> <li>• Substantial harm to the Creechurch Conservation Area (CCA)</li> </ul> <p>The proposed development would cause substantial harm in heritage terms to the special character and appearance of the Creechurch Conservation Area. This harm would fail to meet the duty to preserve the CCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. We consider this proposal would contravene Policy CS12(2) of the City of London Local Plan (2015) which sets out a duty to preserve and enhance the character of conservation areas. Policy CS14(2) states that planning permission will be refused for tall buildings within inappropriate areas, such as conservation areas.</p> <ul style="list-style-type: none"> <li>• Substantial Harm to Holland House and Renown House</li> </ul> <p>The rooftop extensions proposed for Renown House and the Grade II* listed Holland house and realignment of the floor plates to connect the two buildings would cause substantial harm to these heritage assets. We do not consider the purported public benefits from this development can outweigh the cumulative harm caused by these radical rooftop extensions, a harm which is further compounded by the proposed tower at No. 31</p>	<p>It is noted that the sustainability of the development in terms of its embodied carbon was not a matter that was raised during the debate and therefore, it has not been carried as a Reason for Refusal.</p>
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Bury Street. This contravenes para 214 NPPF (2024).

- Views of the Tower of London

The development would adversely affect the setting of the Tower of London World Heritage Site by causing less than substantial harm to LVMF view 10A.1. Policy HC4 of the London Plan (2021) notes that proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of strategic views and their landmark elements.

- Unsustainable development

The demolition of No. 31 Bury Street (Bury House) would generate an embodied carbon footprint on a scale that runs counter to Para 161 NPPF (2024) and Policy CS15 of the City of London Local Plan (2015). This development would contradict the Planning for Sustainability Supplementary Planning Document (SPD) approved on 21 January by the City's Planning and Transportation Committee which supports a retrofit first approach and the reuse of existing buildings in order to meet the UK's net zero carbon target.

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Environment Department (Planning)/Development  
Management  
City of London  
PO Box 270  
Guildhall  
London EC2P 2EJ

FAO Ms Anna Tastsoglou / Chief Planning Officer  
By email to [REDACTED]

7 February 2025

Bury House, Bury Street, London EC3A 5AR  
Planning Ref: 24/00021/FULEIA and 24/00011/LBC

Dear Ms Tastsoglou,

We write in relation to the recent consideration of the above referenced planning and listed building consent applications at LBTH's Planning Applications Sub-Committee on 13th December 2024. At that meeting, Members resolved not to grant planning permission and listed building consent, with the precise Reasons for Refusal to be formulated by Officers and returned to Members for endorsement. These Reasons are to be considered by Members at a further Committee meeting on 11th February 2025.

HRP has consistently objected to the proposals for redevelopment at Bury House on the basis of its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS). HRP made representations to the City of London (CoL) in respect of this application during consultation periods in May and November 2024. We do not repeat the detail of those representations here but simply re-state that **HRP remains strongly of the belief that the proposed development would significantly harm the Outstanding Universal Value (OUV) of the ToL WHS** by virtue of the position and height of the proposed buildings and their impact on key views from and of the ToL.

HRP attended the Planning Applications Sub-Committee meeting on 13th December 2024 to object to the applications and fully supported Members' resolution to not grant planning permission or listed building consent.

**Historic Royal Palaces**

Tel +44(0)20 3166 6000 [www.hrp.org.uk](http://www.hrp.org.uk)

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The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU

Officers have now prepared a report for Members' consideration at the Planning Applications Sub-Committee taking place on 11th February 2025. This includes a summary of Members' considerations during the debate at the December 2024 Committee meeting and two proposed sets of Reasons for Refusal to be cited on the decision notices for the planning and listed building consent applications, respectively. HRP has reviewed this report and wishes to express its concern that none of the reasons for refusal listed include the impact of the proposed scheme on the OUV of the ToL WHS. This is in contrast to the reasons for refusing the 2020 scheme (ref: 20/00848/FULEIA), which related to the impact on both the synagogue and the ToL WHS. HRP is strongly of the view that the impact on the ToL WHS remains and therefore that the refusal of the current applications must include reference to the impact of the proposals on the ToL WHS, as set out in all of HRP's objections to date.

The minutes of the Committee meeting of the 13th December 2024 are clear that the issue of the impact on the OUV on the ToL WHS was raised during the discussion, and several Members appear to have referred to it in explaining their intention to vote for refusing to grant permission. However, the minutes also state that because not all Members were in agreement about the impact on the ToL, Officers concluded it should not constitute a reason for refusal, despite confirming it was a material consideration when asked for clarification by Members.

HRP wishes to reiterate that it does not agree with the Officer's statement at the Committee, included in the minutes, that: '... when comparing the scheme to that previously refused, it was considered the amendments incorporated to the tower element to reduce its height and massing, would be sufficient to overcome the previous reason for refusal in terms of the impact on to the World Heritage Site.'

## Conclusion

HRP considers that the refusal of the current applications must include reference to the impact of the proposals on the ToL WHS, as set out in all of HRP's objections to date. Members raised this as a concern and a consideration in their decision to vote against the scheme in their responses at the Committee meeting in December 2024 and therefore it is imperative that this concern is properly reflected in the reasons for refusal. HRP proposes that the wording of reason No.2 of the 2020 (20/00848/FULEIA) decision notice is replicated on the decision notices for the current applications, as follows:

The development would adversely affect the setting of the Tower of London World Heritage Site by reason of the less than substantial harm caused to



## HISTORIC ROYAL PALACES

LVMF view 10A.1 from the Tower Bridge North Bastion and the resulting harm to the Outstanding Universal Value of the World Heritage Site (which harms would not be outweighed by the public benefits of the proposal) contrary to Local Plan Policy CS12 (conserving or enhancing the significance of the City's heritage assets and their settings and providing an attractive environment to the City's heritage assets and their settings and providing an attractive environment to the City's communities); Local Plan Policy CS13 (protecting and enhancing significant views of important buildings); London Plan Policies D9e; HC2, and HC3 (protecting the significance of the Tower of London).

Please do not hesitate to get in touch with me should you wish to discuss the issues raised here further. I would be grateful for confirmation that this letter of representation will be communicated to Members either in advance of or at the Committee meeting on the 11th February 2025.

Yours Sincerely



**Adrian Phillips**  
Palaces & Collections Director

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### Historic Royal Palaces

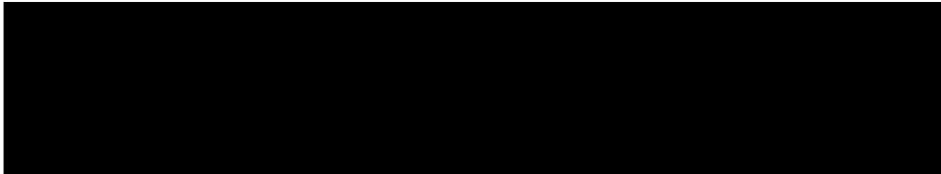
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The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU

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City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

By email to:



10<sup>th</sup> February 2025

Dear Officers,

**24/00021/FULEIA & 24/00011/LBC | Bury House 1 - 4, 31 - 34 Bury Street London EC3A 5AR**

SAVE Britain's Heritage welcomes Members of the Planning Applications Sub-Committees' resolution to refuse permission for planning application 24/00021/FULEIA and listed building consent 24/00011/LBC on 13th December 2024. We wish to reiterate our strong objection to the above applications, and support a refusal on the following grounds:

- **Substantial harm to Bevis Marks Synagogue**

The height, scale and massing of the proposed ground plus 43-storey tower at No. 31 Bury Street would cause substantial harm to the setting of the Grade I listed Bevis Marks Synagogue. The Local Planning Authority is under a legal duty to preserve and enhance listed buildings and their settings under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. We consider this development would contravene national and local policy including para 213 NPPF (2024) which provides that any harm to, or loss of, the significance of a designated heritage asset requires clear and convincing justification. Policy CS12(1) City of London Local Plan (adopted 2015) requires that development should safeguard the City's listed buildings and their settings. Policy DM 12.1 sets out that development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and their setting.

- **Substantial harm to the Creechurch Conservation Area (CCA)**

The proposed development would cause substantial harm in heritage terms to the special character and appearance of the Creechurch Conservation Area. This harm would fail to meet the duty to preserve the CCA under Sections 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. We consider this proposal would contravene Policy CS12(2) of the City of London Local Plan (2015) which sets out a duty to preserve and enhance the character of conservation areas. Policy CS14(2) states that planning permission will be refused for tall buildings within inappropriate areas, such as conservation areas.

- **Substantial Harm to Holland House and Renown House**

The rooftop extensions proposed for Renown House and the Grade II\* listed Holland house and realignment of the floor plates to connect the two buildings would cause substantial harm to these heritage assets. We do not consider the purported public benefits from this development can outweigh

the cumulative harm caused by these radical rooftop extensions, a harm which is further compounded by the proposed tower at No. 31 Bury Street. This contravenes para 214 NPPF (2024).

- **Views of the Tower of London**

The development would adversely affect the setting of the Tower of London World Heritage Site by causing less than substantial harm to LVMF view 10A.1. Policy HC4 of the London Plan (2021) notes that proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of strategic views and their landmark elements.

- **Unsustainable development**

The demolition of No. 31 Bury Street (Bury House) would generate an embodied carbon footprint on a scale that runs counter to Para 161 NPPF (2024) and Policy CS15 of the City of London Local Plan (2015). This development would contradict the Planning for Sustainability Supplementary Planning Document (SPD) approved on 21 January by the City's Planning and Transportation Committee which supports a retrofit first approach and the reuse of existing buildings in order to meet the UK's net zero carbon target.

Yours sincerely,



**Lydia Franklin**  
Conservation Officer