



Planning Applications Sub-Committee

ADDENDUM PACK

Date: TUESDAY, 8 JULY 2025

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

4. **63 ST MARY AXE**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 3 - 56)

5. **85 GRACECHURCH STREET**

Report of the Chief Planning Officer and Development Director.

For Decision
(Pages 57 - 82)

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Agenda Item 4

Committee:	Date:
Planning Application Sub Committee	8 th July 2025
Subject: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.	Public
Ward: Bishopsgate	For Decision
Registered No: 25/00223/FULEIA	Registered on: 03/03/2025
Conservation Area: No	Listed Building: No

1. Amendments to Cover Sheet

14. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS
	Upfront embodied carbon: 87,391 tonnes CO2e / 861 kgCO2e per square meter GLA Standard Benchmark = 950 kgCO2e per square meter GLA Aspirational Benchmark = 600 kgCO2e per square meter Life-cycle Embodied carbon: 130,537 tonnes CO2e / 1,287 kgCO2e per square meter GLA Standard Benchmark = 1400 kgCO2e per square meter GLA Aspirational Benchmark = 600 kgCO2e per square meter
15. WHOLE LIFE-CYCLE CARBON EMISSIONS	Total WLC (embodied and operational): 262,782 tonnes CO2e
	Total WLC (embodied and operational) per square meter: 2,589 kgCO2e/m2

2. Additional Representations

3. Eight additional representations have been received:

- EC BID
- New Diorama Theatre
- Historic England – GLAAS
- London Borough of Camden
- City of London Archaeological Trust (CoLAT)
- ICOMOS
- London Borough of Islington
- London and Middlesex Archaeological Society

4. Copies of the letters are appended to this addendum. The content of the letters are summarised as follows:

5. EC BID

6. The letter from EC BID raises positive comments about the scheme including:

- Extensive opening up of the public realm and enhanced ground floor public amenity. We specifically welcome the enhanced outlook onto Camomile Street, and the vision for enhanced public realm which aligns with our own vision for traffic reduction, enhanced greening and activation of this space. The City-led London Wall Corridor study identified an opportunity for traffic reduction on this section of Camomile Street, and this was identified as a priority transformational scheme as part of our Public Realm Vision and Strategy, following engagement and consultation with our business occupier

members and property owner stakeholders. We would therefore be keen to continue our positive conversations with the developer for 63 St Mary Axe, and work closely with other private sector partners, as well as public sector authorities, to achieve this ambition.

- Significantly enhanced connectivity to neighbouring developments and nearby transport interchanges, specifically the north-south connecting route through to Liverpool Street Station, which has good alignment with the project family routes set out in our Vision.
- New inclusive cultural and leisure offer at lower levels, curated in partnership with local people and potential future operators, that provides a new hub in the City for diverse communities throughout the working day, evenings and weekends. Dedicated multi-use cultural facility with ground-floor activation.
- Providing extensive greening through the proposed 'Camomile Park' wrapping around the lower levels of the building.

7. Officer Response: These comments are noted.

8. New Diorama Theatre

9. A letter of support was received from New Diorama, key points from the letter are summarised below and the full letter of support is appended to this addendum.

- I am writing to express our wholehearted support for the 63 St Mary Axe development and our proposed cultural partnership with AXA IM. Having spent the past two years working closely with AXA IM, Fletcher Priest Architects, and Things Made Public, we believe this development represents a genuinely transformative opportunity for cultural provision in the City of London.
- Through our award-winning work at NDT Broadgate, we've seen the hunger that exists within the City for creative opportunities and the incredible response when such opportunities are provided thoughtfully and inclusively. We don't come to this partnership as outsiders hoping to understand the City's unique context, we've already demonstrated our ability to deliver exceptional cultural value within the Square Mile:
 - Nearly 9,000 artists used our free development complex in the City
 - +200 new shows developed, with many touring nationally and internationally
 - £40 million in additional revenue generated for the UK economy

- We see 63 St Mary Axe as more than just another venue - it's a significant and meaningful opportunity to contribute to the City's cultural ecosystem. Our long-standing experience of working with corporate partners like British Land has taught us how to create programming that serves both business objectives and community needs without compromising artistic integrity or social mission. We've spent two years building genuine relationships with the development team, contributing to co-design workshops, and developing detailed operational plans. This isn't a hastily conceived partnership - it's the result of careful collaboration and shared commitment to sustainable excellence through:

Cross-Sector Partnership

Complementary expertise exchange, where our cultural understanding enhances the business environment while corporate skills and resources strengthen our programming capacity and long -term sustainability that would otherwise be unachievable.

Community Integration

Building on our track record of engaging over 11,000 local residents annually to serve the City's unique mix of workers, residents, and visitors.

Artistic Excellence

Continuing our unique approach to developing new productions, will bring attention to cultural activity originating from the City, as more of our productions transfer to the West End and Broadway and win international acclaim.

Cultural Collaboration

Using our experience to work with cultural partners already in the City, and our wider networks will help smaller organisations find pathways into the City, to create a more diverse and vibrant cultural landscape.

10. Officer Response: These comments are noted.

11. Historic England – GLAAS

12. A full copy of the letter is appended to this addendum and the contents are summarised below.

13. Historic England (GLAAS) was consulted at both the pre- and post-application stages for the proposed development (see my letter of 8th April 2025). On both occasions, we advised that an archaeological evaluation should be carried out in order to establish the degree of survival medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich. This evaluation has not been carried out and therefore there is insufficient

information to make a fully informed planning decision regarding the significance of this heritage asset and the scale of harm.

14. As the City is minded to recommend consent for the application as it stands we have had to assume that the burial ground is largely intact and well preserved. The total loss of such an significant asset would cause a high degree of harm so we recommend planning conditions be attached in order to allow the archaeological remains to be fully investigated and researched and a programme of public benefit work to be undertaken. The archaeological remains will include the burial ground and also any remains of Roman or prehistoric date located beneath the burial ground and the existing lower impact basements.
15. The proposed development seeks to remove the burial ground in order to allow the building's fire escape requirements to operate safely. We have been provided with extensive information to illustrate the engineering issues associated with the provision of the fire escapes and hence why removal of the burial ground is necessary in order to be able to construct the building as currently proposed. When the burial ground is removed, it is proposed to reveal the south side of the Scheduled Roman wall within the new park area, allowing display and interpretation to the public.
16. Because this approach will cause the total loss of the burial ground we recommend that the developer should be required to realise as much as possible of the research potential of the human remains, including ensuring they are available to future researchers to revisit as techniques and research questions develop.
17. We therefore recommend that in addition to standard mitigation requirements funding for a PhD, to be carried out in association with an AHRC recognised body, be secured through the Section 106 agreement for the site. The PhD would seek to expand on the results of the excavation to give a bigger picture of burial assemblages in London and what they can tell us. The PhD could use the scientific dating and other information gained from the archaeological post-excavation assessment to identify how advances in scientific dating have changed the research landscapes. The research could potentially lead to new assessment techniques or research questions that could be used nationally. The project team and PhD student should liaise closely with the osteology department at the London Museum to ensure the project aligns with the research aspirations of the museum in regards to medieval and post-medieval burial grounds.
18. Prior to excavation, the London Museum should be approached to establish the principle of depositing the archive, including human skeletal material, in their collection. If that proves problematic, then an alternative accessible research archive location should be identified.

19. Conditions:

20. Condition 1:

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

Where heritage assets of archaeological interest are identified then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.

B. Details of a programme for delivering related positive public benefits to include community outreach and site visits during excavations.

C. Production of a programme of extensive scientific analysis of human remains formulated in association with the London Museum. The results of the scientific analysis should be included in part D and should include, but not be limited to, stable isotope analysis, aDNA, Carbon 14 dating, digital x-ray and calculus sampling carried out across a suitable sample of the cemetery population.

D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material (including retention of human remains in appropriate storage). This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

E. The results of the archaeological excavation should be used to inform the design of the former Churchyard garden required by condition 2.

21. Condition 2:

No development shall commence until details of an archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall has been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of the development.

22. Condition 3:

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and

approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

23. Officer Response: The suggested conditions and S106 obligation have been included and are set out in the main agenda pack.

24. London Borough of Camden

25. A letter was received raising no objection to the proposed development.

26. Officer Response: These comments are noted.

27. City of London Archaeological Trust (CoLAT)

28. An email was received setting out the following questions:

- Where is the proposal for a PHD student set out in the application documents.
- CoLAT does suggest that a funded post-doctoral research fellowship would be more appropriate and useful for this field of study. You can quote this at Committee. I believe that if you receive a letter about the redevelopment from the London & Middlesex Archaeological Society, they will say the same thing.

29. Officer Response: The proposal for a PhD was not originally proposed in the application documents but was instead negotiated by officers on the advice of GLAAS. In response to CoLAT's second point, officers consider that a post-doctoral research fellowship could be an effective alternative to a PhD, if the circumstances require it, and the wording of the original report has been amended in this addendum to that end.

30. ICOMOS

31. A summary of the points raised in the letter are set out below and the full letter is appended to this addendum.

- I understand that Historic England has formally objected to 63 St Mary Axe. Moreover, I note Historic England's identification of inconsistencies and gaps in the Heritage Impact Assessments and related documentation submitted. It is appreciated that these concerns align with observations previously made by ICOMOS through multiple Technical Reviews, particularly in relation to cumulative impacts.
- ICOMOS generally concurs with Historic England's assessment of the 63 St Mary Axe Development. However, it notes that the implications of cumulative impact remain insufficiently addressed. While the State

Party's 2024 state of conservation report reiterates its commitment to the clustering of tall buildings, an approach recommended by the World Heritage Committee in 2007 to mitigate potential harm to the property's OUV, Historic England's comments do not explicitly assess the extent to which this strategy has been upheld in the current proposals, nor do they reference the underlying policy framework that supports it. Additionally, ICOMOS observes the manner in which cumulative impact assessment to enhance the clarity and ensure coherence in evaluating developments proposals within the setting of the World Heritage property.

32. Appended to this letter was the ICOMOS Technical Review, the relevant paragraphs are set out below and full Technical Review is appended to this addendum.

- June 2025: 85 Gracechurch Street, 63 St Mary Axe and New London House
- ICOMOS has provided extensive and consistent advice to the project at Gracechurch Street in 2023, 2024 and 2025 that the proposal would harm the Outstanding Universal Value of the property. ICOMOS in June 2025 provided comments on the 85 Gracechurch Street and 63 St Mary Axe proposals concluding that it generally agrees with the concerns raised by Historic England. However, it noted that the implications of cumulative impact of the two projects on the property's OUV remain unclear.
- ICOMOS further noted that while the State Party reaffirms the 2007 World Heritage Committee recommendation to cluster tall buildings to mitigate cumulative impact, Historic England's comments on these proposals do not indicate whether this principle has been followed or where such guidance is defined.
- Moreover, ICOMOS considered that it was unclear how cumulative impact is addressed within the Planning Committees' remit. ICOMOS recommended that the State Party undertake a formal cumulative impact assessment to clarify responsibilities and ensure consistent application of heritage protection measures.

Officer Response: The representation is noted. The matters raised, including the cumulative effect of the proposal, are addressed in full detail in the Design and Heritage sections of the original committee report.

33. London Borough of Islington

34. A letter was received confirming that Islington have no comments to make.

35. Officer Response: This is noted.

36. London and Middlesex Archaeological Society

37. A letter was received from the London and Middlesex Archaeological Society and this summarised below, a full copy of the letter is appended to this addendum.

- We understand that the developers, in carrying out their plans, intend to excavate and provide visual access to the remains of the Roman City wall, as well as excavate and re-landscape the former churchyard of St Augustine Papey. However, we also understand that GLAAS, Historic England's 'Greater London Archaeological Advisory Service', considers that the developers current proposals remained insufficient for safeguarding the archaeological deposits on site.
- Evidence from a number of historical periods is likely to be found on the St Mary Axe site. Therefore, in the event of planning permission being granted, we would urge the Corporation to ensure that conditions are attached to the consent which ensure that archaeological deposits on the site from all periods are either fully protected from destruction, or alternatively, investigated as part of the development.
- LAMAS, which was founded in 1855, has a particular interest in this part of the City. In 1876 it funded and participated in the excavation of the nearby Camomile Street bastion, where architectural fragments had come to light during site clearance. The excavation of the bastion revealed that statues had been re - incorporated in the bastion. One of the statues was a Roman soldier, who might have served in London, another, represented by a large head, might have portrayed the mid-3rd century Emperor, Philip I.

38. Officer response: A series of conditions and S106 obligations would be attached to the planning permission. The conditions and S106 obligations are set out in the main agenda pack.

39. **Amendments and corrections to Committee Report**

40. Please note the following errata and clarification corrections:

41. The comments from the Suicide Prevention Officer in the consultations responses table in paragraph 33 is updated to read:

No objection following further discussions following the publication of the committee report.

A copy of this response is appended to this addendum.

42.Paragraph 26:

The proposed development is a **ground plus** 45-storey tower, massing composed of two main elements: a base podium rising to a shoulder height at level 27; and above this, an elegant tapering tower, which leans away to the west, and folds into backdrop of taller towers which form the City Cluster.

43.Paragraph 182:

The creation of additional public realm and green space in the form of Camomile Park is proposed on the set back southern elevation. Here, in addition to enhancements at ground level, the proposals would introduce a new vertical park, comprising a number of publicly accessible levels from ground to level **3 5**, providing a unique integration of nature within the urban environment. The southern elevation offers the greatest levels of natural sunlight to the ground, and as such, this location is the best suited on site for emblematic biophilic design, and new pedestrian dwell spaces.

44.Paragraph 217:

Whilst officers give the views of these stakeholders significant weight, officers reach a different conclusion to Historic England, Historic Royal Palaces, **the GLA** and LB Tower Hamlets on the proposal and conclude that there would be no harm to OUV as captured in views 4, 5, 6, 8a, 8b, 8c, 9, 10, 11, 12, 13, 14, 15, 16, and appendix views E, F, and G of the HTVIA March 2025, and the model video of the kinetic viewing experience over Tower Bridge, for the reasons set out below.

45.Paragraph 231:

The proposal, then, would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13 , emerging City Plan policy S11, HE1, HE3 and S12, **S13 (3)**, London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and the CoL Protected Views SPD.

46.Paragraph 233:

Thus, it is considered that the proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance 99 with Local Plan Policy CS12, CS13 (3) **Emerging City Plan 2040**~~Draft City Plan~~ Policy S11, **S13 (3)**, HE1, HE3, **and** London Plan Policy

HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and the CoL Protected Views SPD.

47. Paragraph 270:

As such, the proposal would not harm the setting or significance of the Tower of London, whether in relation to the WHS or any of the component heritage assets which comprise it. The proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and significance, authenticity and integrity of the WHS, in accordance with Local Plan policies CS12, CS13 (3), City Plan 2040 policies S11, **S13 (3)** HE1, HE3, London Plan policy HC2 and HC4 and the associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and CoL Protected Views SPD. ~~Although Officers conclude that the proposal would not harm the setting or the OUV of the WHS, for good practice, DCMS have been notified about the scheme (see paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention).~~

48. Paragraph 278:

In the baseline and cumulative scenarios the proposal would not harm and would make some positive contributions to the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks (St Pauls and ToL), in accordance with , London Plan Policy HC4, Local Plan Policy CS13 (1), emerging City Plan Policy 2040 S13, and guidance contained in the LVMF SPG.

49. Paragraph 486:

As part of the proposals, in the event of the burial ground being found to be intact, a PhD placement **or post doctoral research fellowship** would be funded by the applicant to participate in the aforementioned work of recording and carry out the excavation analysis, recording, publication and archiving. It is anticipated that this would be in partnership with the London Museum and/or another Arts and Humanities Research Council (AHRC) body. This would go beyond the usual archaeological requirements and would represent an enhancement of the usual archaeological processes required post-permission.

50. Paragraph 537 is amended to read:

The Proposed Development is expected to increase pedestrian activity during peak periods. A Pedestrian distribution has been modelled using data from London Underground and Rail stations to determine origin and destination flows in five key directions: North, East, South, Southwest, and West. This approach was agreed with the applicant and enabled a detailed assessment of pedestrian impacts on the surrounding footway network. All assessed footways are projected to achieve a Pedestrian Comfort Level (PCL) of A- or

higher. The development also introduces new pedestrian routes through the site, offering an alternative north-south connection between Devonshire Square and St Mary Axe, which is expected to alleviate pressure on nearby footways such as Houndsditch and Bevis Marks. With the inclusion of wider footways due to the additional space being created within the building, the scheme is expected to significantly enhance pedestrian comfort and deliver a positive impact on the local pedestrian environment.

51. Paragraph 544 is amended to read:

The short-stay cycle parking is proposed to be located at the B1 level to support office use. A total of 44 spaces will be provided at this level for visitors, who will gain access via a barcode issued by the facility management. An additional 30 cycle parking spaces will be distributed at ground level, offering convenient access from the street. This results in a shortfall of 27 spaces. However, due to limited availability within the public highway, the applicant has agreed to provide a Section 106 contribution toward cycle infrastructure improvements.

52. Paragraph 927 is amended to read:

Overall BRE Group conclude that the assessment is based on an appropriate number of road viewpoints near to the site, however they did say a more detailed calculation could be undertaken in respect of two viewpoints that have small areas within the 10° line of site. The applicant team clarified why further assessment is not considered necessary for these viewpoints. Officers consider this to be acceptable, and it is highlighted that the S106 agreement requires a solar glare assessment to be submitted post completion but prior to occupation which would include any details of mitigation measures (if considered necessary).

53. Paragraph 1127:

The scheme would comply with London Plan Policy HC4, Local Plan policy CS13, and emerging City Plan policy S13 and associated guidance in the LVMF SPG and Protected Views SPD and neighbouring local view policies and guidance. **There would be some minor enhancements to the London Panoramas through the proposal's consolidation of the northeastern edge of the City Cluster.**

54. Paragraph 1035:

WLCAs which follow RICS 2nd Edition guidance are typically more accurate and present higher carbon emissions than those following 1st Edition guidance due to the 15% contingency factor and ~~additional elements being reported~~ **changes in how elements are calculated.**

55. Paragraph 1036:

The WLCAs submitted for the Proposed Development follow the RICS 2nd Edition guidance meaning that the figures include a 15% contingency factor. **Since the application was submitted the applicant has retrospectively applied the RICS V1 methodology in alignment with the GLA guidance and provided these figures. Both sets of results are set out in the table below, against the GLA benchmarks. These GLA benchmarks were derived using RICS 1st Ed. and do not account for the 15% contingency factor, inclusion of pre-construction demolition and refrigerant leakages, or revisions in assessing transportation distances and certain elements are calculated differently. The figures following RICS 1st Edition methodology are the ones directly comparable against the GLA benchmarks. Therefore, comparison of the Proposed Development's embodied carbon performance against the GLAs current WLC benchmarks should be assessed with this in mind.**

56. Paragraph 1037 is amended to read:

Total WLC emissions of the proposed development over a 60-year period are estimated to be 272,322 tCO₂e (2,684 kgCO₂e/m² GIA) (inc. B6-B7, and sequestration). Operational carbon (B6-B7) accounts for 49%, lifecycle embodied carbon 51%, and upfront embodied carbon (A1-A5) 35% of total WLC emissions.

Stages	Development proposal (RICS 1 st Ed.)		Development proposal (RICS 2 nd Ed.)		Carbon Intensity (kgCO ₂ e/m ² GIA)	
	Life-cycle Carbon Emissions (tCO ₂ e)	Carbon Intensity (kgCO ₂ e/m ² GIA)	Life-cycle Carbon Emissions (tCO ₂ e)	Carbon Intensity (kgCO ₂ e/m ² GIA)	GLA standard benchmark	GLA aspirational benchmark
Upfront Embodied carbon (A1- A5)	87,391	861	95,883	945	950	600
In-use & End- of-Life Embodied carbon (B-C, exc. B6- B7)	43,146	426	45,088	444	450	370
In-use Operational carbon (B6- B7)	132,122	1302	132,122	1302	-	-
Life-cycle Embodied Carbon (A-C, excl. B6-B7, incl. sequestration)	130,537	1,287	140,120	1382	1400	970
Whole life- cycle carbon (A-C, incl. B6- B7 inc.	262,659	2,589	272,322	2,684	-	-

sequestration)						
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57. The last bullet point in paragraph 1109 should be read as:

Provision and funding of a PhD placement **or post doctoral research fellowship** in partnership with an appropriate Arts and Humanities Research Council or other partner

58. Background Papers

59. The additional Background Papers is added:

- Email from Planning Agent in respect of Solar Glare, dated 25 June 2025

60. Consultations and Representations

61. The additional Internal Consultees are added:

- Email, Suicide Prevention Officer, 4 July 2025

62. The additional External Consultees are added:

- Letter, Historic England- Glass, 27 June 2025
- Letter, London Borough of Camden, 3 July 2025
- Letter, London Borough of Islington, 7 July 2025

63. The additional Representations are added:

- Letter, EC BID, June 2025
- Letter, New Diorama Theatre, 23 June 2025
- Email, City of London Archaeological Trust (CoLAT), 4 July 2025
- Letter, ICOMOS including ICOMOS Technical Review, 4 July 2025
- Letter, London and Middlesex Archaeological Society, 6 July 2025

64. Amendments, corrections to Conditions and additional Conditions

65. Additional conditions:

78	Foundation Design – Archaeology No development, except demolition to basement slab shall take place details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing
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	<p>by the local planning authority. The development shall be carried out in accordance with the approved details.</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
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66. Replacement conditions:

67. The wording of Condition No. 4 is replaced to read:

4	<p>Music</p> <p>No live or recorded sound shall be played that it can be heard outside the premises or within any residential unit or other premises including the rest of the building, with the exception of the area of public realm within the site immediately outside of the Multi-function space. Live or recorded sound shall not be in excess of 65dBA at the edge of the public realm within the site immediately outside of the Multi-function space, between the hours of 10:00- 22:00 Monday to Saturday and 11:00 to 21:00 on Sundays and is not permitted at any other time.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7 and DM21.3.</p>
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68. Rewording of the following conditions, with the amended wording in red:

23	<p>Written Scheme of Investigation</p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>Where heritage assets of archaeological interest are identified then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no development, except demolition to basement slab, shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p>
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	<p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>B. Details of a programme for delivering related positive public benefits to include community outreach and site visits during excavations.</p> <p>C. Proposals of a programme of extensive scientific analysis of human remains should be included in the post-excavation assessment and undertaken during analysis required by part D. The results of the scientific analysis should be included in the publication and dissemination required by part D and should include, but not be limited to, stable isotope analysis, aDNA, Carbon 14 dating, digital x-ray and calculus sampling carried out across a suitable sample of the cemetery population, if these techniques can help address research questions and are reasonably available.</p> <p>D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material (including retention of human remains in appropriate storage if reasonably available). This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>E. The results of the archaeological excavation should be used to inform the design of the former Churchyard garden.</p> <p>The Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
24	<p>Archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall</p> <p>No development, except demolition to basement slab shall take place, until details of an archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall has been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the</p>

	<p>approved details and maintained for the duration of the development.</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
34	<p>Architectural Details</p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> a) Particulars and samples of the materials to be used on all external faces of the building including details of compliance with the approved Circular Economy Strategy, and inclusive access management plan; b) construction of 1:1 sample material and facade panels of agreed sections of the facades; c) detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays, including reference to materials, finishes, lighting, details of jointing, and drip details, and any necessary expansion/movement joints; d) Notwithstanding the approved drawings for floors 0-6, 1:20 detailed drawings in plan, section and elevation, in addition to material specification and finishes, including all entrances and door design, soffits, clear glazing, column face pattern and texture and integrated art panels, and information boards; shall be provided. e) Full details of all terraces, including all elevations, layouts, entrance design and location, fenestration, planters, seating, lighting, soffits, drainage, irrigation, balustrades and any other infrastructure required, demonstrating adequate microclimatic mitigation, , and suicide prevention methods have been considered where necessary; f) Details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site; g) Details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;

	<ul style="list-style-type: none"> h) details of the integration of M&E and building services into the external envelope, including but not limited to, details of external ducts, vents, louvres and extracts; i) details of all new service vehicle, fire escape and cycle store entrances; j) details of all external signage for all aspects of the building; k) details of access to the roof for cleaning and maintenance, including details of mansafe equipment; l) notwithstanding the approved drawings, full details of the rooftop including any plant equipment and the roofscape; <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM10.8, DM12.2 and emerging policies DE2, DE6 and HE1 of the Emerging City Plan 2040.</p>
39	<p>Landscaping details</p> <p>Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> a. details of all soft landscaping, including the position, size and types of plants, specifying their seasonal interest, in addition and their contribution to biodiversity and local habitat; b. Notwithstanding the approved drawings details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights, overall height, canopy size when installed and when mature; and details of tree pits/trenches , including underground root cell volumes, scope of interconnection; and aeration and drainage infrastructure; growing medium for soft and hard surfaces and their respective top and subsoil requirements as per British standards; c. details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation;

	<p>d. details of the method of irrigation and nutrient delivery systems for all soft landscaped areas;</p> <p>e. Notwithstanding the approved drawings, details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat structures;</p> <p>f. Details of Hostile Vehicle Mitigation measures</p> <p>g. details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual;</p> <p>h. details of the Landscape management and maintenance plan (LMMP) for all soft and hard landscaping, including ecological management, specialist tree management, and street furniture for all proposed landscaping</p> <p>All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM10.8, DM12.2 and policies DE2, DE3 DE8 and HE1 of the emerging City Plan 2040</p>
48	<p>Inclusive Access Management Plan</p> <p>Prior to the occupation of the development, and Access Management Plan shall be submitted to and approved in writing by the Local Planning.</p> <p>All development pursuant to this permission shall be carried out in accordance with the approved, which shall provide specific details on how the development will be constructed, operated and managed or for the lifetime of the development, to ensure that the highest standard of accessibility is provided. This Inclusive Access Management Plan shall include details of:</p>

	<p>1. Website content giving prior information to be hosted by the building operator including photos as relevant and an easy read version with information on:</p> <p>(a) Travel distance from the key step-free points of arrival including identification of resting points and distance of intermediate intervals.</p> <p>(b) Setting down points within the vicinity of the development including information on kerb heights and distance to controlled crossing points.</p> <p>(c) A protocol of users of the accessible parking bays for the disabled users of the development. This should include (but not limited to) prior information with photos on:</p> <ul style="list-style-type: none"> • Dimensions of the bays • Protocol for reserving/booking a space • Details of the onward journey and siting of controlled entry system • Any time limits on occupancy of the space <p>(d) A scenario-based assessment of while journey building use by cyclists using larger or adapted cyclists aligned with the information submitted for servicing and standard cycle bays.</p> <p>(e) Details of the Changing Places facility including information on key access and sling (as relevant).</p> <p>(f) Details of animal spend areas in reasonable proximity of the development including dimensions and type of surface.</p> <p>(g) Details of planting demonstrating how unwelcome touch and scent can be avoided.</p> <p>(h) A preview of the cycle parking (including access) and end of trip facilities</p> <p>(i) Wayfinding Strategy</p> <p>(j) Details of training frequency and issue of Personal Emergency Evacuation Plans.</p> <p>(k) Details of assistive technology within the development</p> <p>(l) Details of Rest and recovery facilities</p> <p>2. Management practices to deliver the Inclusive Entrance Strategy</p>
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	<p>3. Management practices to deliver the inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs).</p> <p>Reason: To ensure the development proposals provides and is managed as an accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.</p>
71	<p>Balustrade Details Suicide Prevention Measures and Risk Assessment</p> <p>Before any works thereby affected are begun, details of all balustrades, planting and any other measures identified by the risk assessment to prevent jumping or falling, to external terraces and balconies, together with an associated risk assessment, shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and retained for the life of the building.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied that there are appropriate safety measures in place in accordance with the guidance in the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) and the following policy of the Local Plan: CS3; and DM3.2.</p>
77	<p>Approved Plans</p> <p>The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:</p> <p>1864-FPA-XX-B2-DR-A-16060 1864-FPA-XX-B1-DR-A-16061 1864-FPA-XX-GF-DR-A-16062 1864-FPA-XX-01-DR-A-16063 1864-FPA-XX-02-DR-A-16064 1864-FPA-XX-03-DR-A-16065 1864-FPA-XX-04-DR-A-16066 1864-FPA-XX-05-DR-A-16067 1864-FPA-XX-06-DR-A-16068 1864-FPA-XX-07-DR-A-10007 (Demolition Scope Plan 07) 1864-FPA-XX-08-DR-A-16070 1864-FPA-XX-RF-DR-A-16071</p> <p>1864-FPA-XX-XX-DR-A-16080 1864-FPA-XX-XX-DR-A-16081 1864-FPA-XX-XX-DR-A-16082 1864-FPA-XX-XX-DR-A-16083</p>

1864-FPA-XX-L2-DR-A-16100
1864-FPA-XX-L1-DR-A-16101
1864-FPA-XX-B6-DR-A-16102
1864-FPA-XX-B5-DR-A-16103
1864-FPA-XX-B4-DR-A-16104
1864-FPA-XX-B3-DR-A-16105
1864-FPA-XX-B2-DR-A-16106
1864-FPA-XX-B1-DR-A-16107
1864-FPA-XX-GF-DR-A-16108
1864-FPA-XX-01-DR-A-16109
1864-FPA-XX-02-DR-A-16110
1864-FPA-XX-03-DR-A-16111
1864-FPA-XX-04-DR-A-16112
1864-FPA-XX-05-DR-A-16113
1864-FPA-XX-06-DR-A-16114
1864-FPA-XX-07-DR-A-16115
1864-FPA-XX-08-DR-A-16116
1864-FPA-XX-09-DR-A-16117
1864-FPA-XX-10-DR-A-16118
1864-FPA-XX-11-DR-A-16119
1864-FPA-XX-12-DR-A-16120
1864-FPA-XX-13-DR-A-16121
1864-FPA-XX-14-DR-A-16122
1864-FPA-XX-15-DR-A-16123
1864-FPA-XX-16-DR-A-16124
1864-FPA-XX-17-DR-A-16125
1864-FPA-XX-18-DR-A-16126
1864-FPA-XX-19-DR-A-16127
1864-FPA-XX-20-DR-A-16128
1864-FPA-XX-21-DR-A-16129
1864-FPA-XX-22-DR-A-16130
1864-FPA-XX-23-DR-A-16131
1864-FPA-XX-24-DR-A-16132
1864-FPA-XX-25-DR-A-16133
1864-FPA-XX-26-DR-A-16134
1864-FPA-XX-27-DR-A-16135
1864-FPA-XX-28-DR-A-16136
1864-FPA-XX-29-DR-A-16137
1864-FPA-XX-30-DR-A-16138
1864-FPA-XX-31-DR-A-16139
1864-FPA-XX-32-DR-A-16140
1864-FPA-XX-33-DR-A-16141
1864-FPA-XX-34-DR-A-16142
1864-FPA-XX-35-DR-A-16143
1864-FPA-XX-36-DR-A-16144
1864-FPA-XX-37-DR-A-16145
1864-FPA-XX-38-DR-A-16146
1864-FPA-XX-39-DR-A-16147
1864-FPA-XX-40-DR-A-16148

1864-FPA-XX-41-DR-A-16149
1864-FPA-XX-42-DR-A-16150
1864-FPA-XX-43-DR-A-16151
1864-FPA-XX-44-DR-A-16152
1864-FPA-XX-45-DR-A-16153
1864-FPA-XX-RF-DR-A-16154
1864-FPA-XX-XX-DR-A-16200
1864-FPA-XX-XX-DR-A-16201
1864-FPA-XX-XX-DR-A-16202
1864-FPA-XX-XX-DR-A-16203
1864-FPA-XX-XX-DR-A-16300
1864-FPA-XX-XX-DR-A-16301
1864-FPA-XX-XX-DR-A-16302
1864-FPA-XX-XX-DR-A-16303
1864-FPA-XX-XX-DR-A-16350 Proposed SLP
SKY-GPB-XX-ZZ-L-DR-0030 P02
SKY-GPB-XX-00-L-DR-1000 P02
SKY-GPB-XX-01-L-DR-1001 P01
SKY-GPB-XX-02-L-DR-1002 P01
SKY-GPB-XX-03-L-DR-1003 P01
SKY-GPB-XX-04-L-DR-1004 P01
SKY-GPB-XX-ZZ-L-DR-1006 P01
SKY-GPB-XX-ZZ-L-DR-1007 P01
SKY-GPB-XX-27-L-DR-1008 P01
SKY-GPB-XX-28-L-DR-1009 P01
SKY-GPB-XX-00-L-DR-2000 P01
2001 P01 (General Arrangement - Level 01-05 Section)
SKY-GPB-XX-27-L-DR-2002 P02
SKY-GPB-XX-28-L-DR-2003 P02
SKY-GPB-XX-ZZ-L-DR-2004 P01
SKY-GPB-XX-ZZ-L-DR-2005 P01
SKY-GPB-XX-ZZ-L-DR-3000 P01
SKY-GPB-XX-ZZ-L-DR-4400 P01
1864-FPA-XX-45-DR-A-20045 02
1864-FPA-XX-RF-DR-A-20046 02
22-166-T-039 Rev E Oversailing Plan
22-166-T-040 Rev C Stopping Up Plan
22-166-T-041 Rev B Initial 278 Proposal
22-166-T-042 Rev B Undersailing Plan
1864-FPA-XX-XX-DR-A-22100
1864-FPA-XX-XX-DR-A-22101
1864-FPA-XX-XX-DR-A-22102
1864-FPA-XX-XX-DR-A-22103

	<p>33158-HML-XX-B6-SK-N-011001 P01 33158-HML-XX-B1-SK-N-011001 P01 33158-HML-XX-44-SK-N-011001 P01 33158-HML-XX-45-SK-N-011001 P01 33158-HML-XX-ZZ-SK-M-111004 P02</p> <p>SKY-GPB-XX-00-DR-L-2007 SKY-GPB-XX-00-DR-L-2006 SKY-GPB-00-00-L-DR-1000</p> <p>REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.</p>
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Environment Department
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Submitted via email to PLNComments@cityoflondon.gov.uk

FAO: Georgia McBirney, Planning Case Officer

Planning Application Ref: 25/00223/FULEIA

Re: Planning Consultation for 63 St Mary Axe London EC3A 8AA

June 2025

Dear Georgia ,

The Eastern City is proud to be making a representation in relation to the above planning application. We are a Business Improvement District (BID) covering the tall building cluster in the City of London. Our investment partnership is made up of the businesses that call this part of the Square Mile home, primarily financial and professional services companies that make up around 40% of the businesses in this area.

We operate under a mandate from those paying member businesses to deliver our Business Plan (2022-2027), providing hyper local area wide projects and services to support business growth and vibrancy, working with occupiers, property owners and developers and our public sector partners.

Given our holistic and strategic approach, it is appropriate that we make representations on key planning applications, and in particular, those that have an impact on the wider area, public amenity provision and ground floor public realm.

For clarity, it is not the role of the BID to explicitly support or oppose any specific planning application and this is not the purpose of this letter. Rather, we view aspects of the above application in relation to our published evidence base – namely our [Public Realm Vision \(2024\)](#) – which is rooted in insight, data and consultation with our member businesses, key stakeholders and the public.

We are supportive of the significant development pipeline and projected growth in the area. We see this as a positive thing for the Eastern City, bringing benefits such as increased vibrancy and economic growth to this globally important area and unique part of the City. This is an area that has driven change for 2000 years, a hub of economic activity and the growing Destination City agenda. We are excited about the opportunities provided by the future growth of the area. In the context of this growth, our public realm and the ‘spaces between the buildings’ are ever more important.

We are grateful to the developer for their consultation and positive engagement with the BID through the planning process. We have shared our Public Realm Vision with them and drawn specific attention to the development’s strategic location in the Eastern City, aligned with the project family routes set out in the document. We would urge consideration of these priority

areas in relation to the proposed development's wider context. In addition, the Public Realm Vision outlines our seven key principles, which are:

Welcoming publicly accessible spaces – designing spaces that are inviting and accommodating;

Resilient trees and planting – ensuring the area is as green as possible;

Lively uses and activity – creating a dynamic and energetic place;

Intuitive navigation – making it easier to reach your destination;

Historic character and lighting – celebrating and improving the heritage features;

A mobility environment which is accessible to all – establishing environments where modes of movement can co-exist;

A safe and secure neighbourhood – promoting spaces where all users feel safe.

Considering the above scheme against these principles, we welcome a number of provisions in the application and look forward to working with the developer should the scheme receive approval.

Whilst the proposed project supports all of our principles outlined above, we specifically wish to draw attention to the following aspects of this application;

Extensive opening up of the public realm and enhanced ground floor public amenity. We specifically welcome the enhanced outlook onto Camomile Street, and the vision for enhanced public realm which aligns with our own vision for traffic reduction, enhanced greening and activation of this space. The City-led London Wall Corridor study identified an opportunity for traffic reduction on this section of Camomile Street, and this was identified as a priority transformational scheme as part of our Public Realm Vision and Strategy, following engagement and consultation with our business occupier members and property owner stakeholders. We would therefore be keen to continue our positive conversations with the developer for 63 St Mary Axe, and work closely with other private sector partners, as well as public sector authorities, to achieve this ambition.

Significantly enhanced connectivity to neighbouring developments and nearby transport interchanges, specifically the north-south connecting route through to Liverpool Street Station, which has good alignment with the project family routes set out in our Vision;

New inclusive cultural and leisure offer at lower levels, curated in partnership with local people and potential future operators, that provides a new hub in the City for diverse communities throughout the working day, evenings and weekends. Dedicated multi-use cultural facility with ground-floor activation;

Providing extensive greening through the proposed 'Camomile Park' wrapping around the lower levels of the building.

We hope this is a helpful contribution ahead of the committee meeting.

Yours sincerely



Nick Carty
Chair, Eastern City

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Monday 23 June 2025

Georgia McBirney
Environment Department
City of London Corporation
Guildhall
London EC2V 7HH

Planning Application Ref: 25/00223/FULEIA

New Diorama Theatre's Cultural Partnership with AXA IM

Dear Ms. McBirney

On behalf of the executive team at New Diorama, I am writing to express our wholehearted support for the 63 St Mary Axe development and our proposed cultural partnership with AXA IM. Having spent the past two years working closely with AXA IM, Fletcher Priest Architects, and Things Made Public, we believe this development represents a genuinely transformative opportunity for cultural provision in the City of London.

When we first began conversations with the 63 St Mary Axe team, we were struck by their genuine commitment to creating something different - not just another corporate development with culture as an afterthought, but a space where culture is woven into the fabric of the City. What excites us most about this partnership is the opportunity to pioneer a new model of cultural engagement, a place where:

Award-winning productions are conceived, created and premiered in the City
Programming responds dynamically to community needs and interests
City workers are active participants in cultural creation, not just observers

Our approach reflects everything we've learned about building sustainable culture with the communities we serve. It's about breaking down traditional barriers between producers and consumers of culture, creating a space and providing everyone the opportunity to be creative – in turn culture naturally flows into the public realm.

New Diorama is more than just a theatre - since opening in 2010, we have established an award-winning record of commissioning the most exciting, innovative new theatre (Operation Mincemeat) and as thought-leaders for meaningful artist support and sector development (NDT Broadgate). Our engagement work actively seeks to widen participation, remove barriers for under-represented groups and help ensure everyone, regardless of background or circumstance, can engage with and experience theatre.

Through our award-winning work at NDT Broadgate, we've seen the hunger that exists within the City for creative opportunities and the incredible response when such opportunities are provided thoughtfully and inclusively. We don't come to this partnership as outsiders hoping to understand the City's unique context, we've already demonstrated our ability to deliver exceptional cultural value within the Square Mile:

Nearly 9,000 artists used our free development complex in the City
+200 new shows developed, with many touring nationally and internationally
£40 million in additional revenue generated for the UK economy

More than just numbers, we learned invaluable lessons about how culture can thrive in the City's distinctive environment. We understand the working rhythms of the City, and the challenges and opportunities presented through the quieter periods.

Throughout our collaboration process, AXA IM has consistently demonstrated genuine commitment to social value, building meaningful relationships, and understanding that successful cultural partnerships require trust, transparency, and shared vision. Their willingness to invest in extensive industry-leading facilities, provide direct access to cultural spaces, and flexible programming areas shows they truly understand what's needed to make culture work effectively in a new development within the Square Mile - thoughtful, informed design that will enable us to deliver our very best work.

We see 63 St Mary Axe as more than just another venue - it's a significant and meaningful opportunity to contribute to the City's cultural ecosystem. Our long-standing experience of working with corporate partners like British Land has taught us how to create programming that serves both business objectives and community needs without compromising artistic integrity or social mission. We've spent two years building genuine relationships with the development team, contributing to co-design workshops, and developing detailed operational plans. This isn't a hastily conceived partnership - it's the result of careful collaboration and shared commitment to sustainable excellence through:

Cross-Sector Partnership

Complementary expertise exchange, where our cultural understanding enhances the business environment while corporate skills and resources strengthen our programming capacity and long-term sustainability that would otherwise be unachievable.

Community Integration

Building on our track record of engaging over 11,000 local residents annually to serve the City's unique mix of workers, residents, and visitors.

Artistic Excellence

Continuing our unique approach to developing new productions, will bring attention to cultural activity originating from the City, as more of our productions transfer to the West End and Broadway and win international acclaim.

Cultural Collaboration

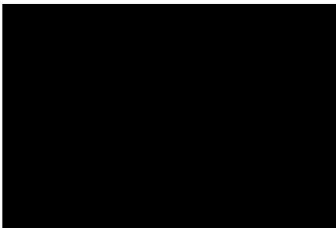
Using our experience to work with cultural partners already in the City, and our wider networks will help smaller organisations find pathways into the City, to create a more diverse and vibrant cultural landscape.

We're genuinely excited about what this partnership could achieve – as proven by NDT Broadgate, collaboration between City and culture has always been at its best when it embraces bold, forward-thinking initiatives. We respectfully request your support for the 63 St Mary Axe development and our cultural partnership with AXA IM. This represents exactly the kind of thoughtful, ambitious cultural development that can position the City of London as a leader in creating lasting cultural and social value.

If we can provide any further information or insight into 63 St Mary Axe or our partnership with AXA IM, or more generally what cultural operators need in the City, please do let us know.

Thank you for your consideration and for your continued support of cultural development in the City.

Yours sincerely,



Jonathan Maydew-Gale

Executive Director & Co-CEO, New Diorama Theatre

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Historic England

Ms Georgia McBirney
Planning Administration
Environment Department
City of London Corporation

Your Ref: 25/00223/FULEIA
Our Ref: 222257

Contact: Helen Hawkins



25 July 2024

Dear Ms McBirney,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2024**

63 St Mary Axe London EC3A 8AA

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application

Further Archaeological Advice and Conditions



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Historic England (GLAAS) was consulted at both the pre- and post-application stages for the proposed development (see my letter of 8th April 2025). On both occasions, we advised that an archaeological evaluation should be carried out in order to establish the degree of survival medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich. This evaluation has not been carried out and therefore there is insufficient information to make a fully informed planning decision regarding the significance of this heritage asset and the scale of harm.

As the City is minded to recommend consent for the application as it stands we have had to assume that the burial ground is largely intact and well preserved. The total loss of such a significant asset would cause a high degree of harm so we recommend planning conditions be attached in order to allow the archaeological remains to be fully investigated and researched and a programme of public benefit work to be undertaken. The archaeological remains will include the burial ground and also any remains of Roman or prehistoric date located beneath the burial ground and the existing lower impact basements.

Conditions relating specifically to the scheduled London Wall will be provided by the Inspector of Ancient Monuments once Scheduled Monument consent is applied for.

Significance, Impact and Mitigation

The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

The burial ground is believed to date to at least AD1215. It is bounded by the scheduled London Wall which formed its northern extent. At least 330 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown number buried there prior to that. The burial ground was closed in the 1850s and comprises a Non-Designated Heritage Asset (NDHA). It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site.



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The proposed development comprises a new tower which will cover the footprint of 23 Camomile Street (Camomile Court) and 63 St Mary Axe.

The proposed development seeks to remove the burial ground in order to allow the building's fire escape requirements to operate safely. We have been provided with extensive information to illustrate the engineering issues associated with the provision of the fire escapes and hence why removal of the burial ground is necessary in order to be able to construct the building as currently proposed. When the burial ground is removed, it is proposed to reveal the south side of the Scheduled Roman wall within the new park area, allowing display and interpretation to the public.

Because this approach will cause the total loss of the burial ground we recommend that the developer should be required to realise as much as possible of the research potential of the human remains, including ensuring they are available to future researchers to revisit as techniques and research questions develop.

We therefore recommend that in addition to standard mitigation requirements funding for a PhD, to be carried out in association with an AHRC recognised body, be secured through the Section 106 agreement for the site. The PhD would seek to expand on the results of the excavation to give a bigger picture of burial assemblages in London and what they can tell us. The PhD could use the scientific dating and other information gained from the archaeological post-excavation assessment to identify how advances in scientific dating have changed the research landscapes. The research could potentially lead to new assessment techniques or research questions that could be used nationally. The project team and PhD student should liaise closely with the osteology department at the London Museum to ensure the project aligns with the research aspirations of the museum in regards to medieval and post-medieval burial grounds.

Prior to excavation, the London Museum should be approached to establish the principle of depositing the archive, including human skeletal material, in their collection. If that proves problematic, then an alternative accessible research archive location should be identified.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.



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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

If the council is minded to grant consent, notwithstanding the harm that would be caused, then I recommend attaching three conditions as follows:

Condition 1

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

Where heritage assets of archaeological interest are identified then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Details of a programme for delivering related positive public benefits to include community outreach and site visits during excavations.
- C. Production of a programme of extensive scientific analysis of human remains formulated in association with the London Museum. The results of the scientific analysis should be included in part D and should include, but not be limited to, stable isotope analysis, aDNA, Carbon 14 dating, digital x-ray and calculus sampling carried out across a suitable sample of the cemetery population.
- D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material (including retention of human remains in appropriate storage). This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

E. The results of the archaeological excavation should be used to inform the design of the former Churchyard garden required by condition 2.

Informative

Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Condition 2

No development shall commence until details of an archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall has been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of the development.

Informative: The archaeological and historical interpretation strategy should be prepared in consultation with Historic England.

Condition 3 Foundation Design ...

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason Heritage assets of archaeological interest survive on the site. The planning authority wishes to ensure that significant remains are not disturbed or damaged by foundation works but are, where appropriate, preserved in situ.

Informative The development of this site is likely to damage heritage assets of archaeological interest. The applicant should therefore submit detailed foundation designs for approval.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 218.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

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Correspondence or information which you send us may therefore become publicly available.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

Full excavation of the burial ground will be required.

Public engagement

Where appropriate, local planning authorities and the developer are advised to make investigative works open to and interpreted for the public and to include that as part of the WSI. Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

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Application ref: 2025/2754/P
Contact: Elaine Quigley
Tel: 020 7974 5101
Email: [REDACTED]
Date: 3 July 2025

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE
Phone: 020 7974 4444
planning@camden.gov.uk
www.camden.gov.uk/planning

City of London
PO Box 270
Guildhall
London
EC2P 2ej

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
63 St Mary Axe
London
EC3A 8AA

Proposal:

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118
RE-CONSULTATION due to the submission of additional information

Drawing Nos: Refer to letter from the City of London dated 23/06/2025 (ref 25/00223/FULEIA)

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Conditions and Reasons:

Informative(s):

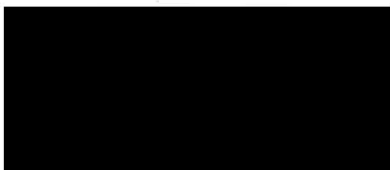
1 Reasons to raise no objections:

The proposal includes the demolition and subsequent redevelopment of the whole site as outlined in the description of development. The London Borough of Camden were consulted on the EIA Scoping Opinion on 16/07/2024 (Camden ref 2024/2945/P) and raised no objection to the Scoping Opinion. No objection is raised to the current proposal which Camden were notified about in March 2025 and reconsulted on in May 2025. The application site is a significant distance from the London Borough of Camden boundary (1.1 miles to the east of the closest point within the boundaries of Camden). The development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, or on transport, environmental, or ecological conditions.

In light of the above the London Borough of Camden raises no objections to the application.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully



Daniel Pope
Chief Planning Officer

From: [McBirney, Georgia](#)
To: [Carroll, Ray](#)
Subject: FW: 63 St Mary Axe 25/00223
Date: 07 July 2025 14:01:11
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)



Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[REDACTED]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:

From the 15th September returning on 29th September



From: John Schofield [REDACTED] >
Sent: 04 July 2025 11:34
To: McBirney, Georgia [REDACTED]
Cc: Tastsoglou, Anna [REDACTED]
[REDACTED]
Subject: RE: 63 St Mary Axe 25/00223

You don't often get email from [REDACTED] [Learn why this is important](#)

THIS IS AN EXTERNAL EMAIL

Dear Georgia

Many thanks for your reply about the PhD to be attached to the investigations at 63 St Mary Axe; I appreciate that you must be very busy.

We do have a question and a recommendation, if we may.

First, where is the proposal for a PhD student set out in the application documents?

Second, CoLAT does suggest that a funded post doctoral research fellowship would be more appropriate and useful for this field of study. You can quote this at Committee. I believe that if you receive a letter about the redevelopment from the London & Middlesex Archaeological Society, they will say the same thing.

All best wishes

John Schofield

CoLAT

From: McBirney, Georgia [REDACTED] >
Sent: 04 July 2025 10:44
To: John Schofield [REDACTED]
Cc: Tastsoglou, Anna [REDACTED]
[REDACTED]
Subject: FW: 63 St Mary Axe 25/00223

Good morning, John,

I have been forwarded your email below.

In respect of the PHD student, this has been secured through negotiations with the applicant team and was suggested by GLAAS. The full details of PHD student would be secured via the S106 obligation.

Kind regards



Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London
Corporation, Guildhall, London EC2V 7HH
[REDACTED]
Environment
www.cityoflondon.gov.uk

Katie Stewart – Executive Director Environment

Advance Leave Notice:

From the 15th September returning on 29th September



From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 04 July 2025 10:28
To: McBirney, Georgia [REDACTED] >
Subject: FW: 63 St Mary Axe 25/00223

Hi Georgia,

Please see the below re 63 SMA.

Kind regards,

Davis Watson
Planning Administrator

Environment Department
City of London Corporation



City of London Corporation| PO Box
270|London EC2P 2EJ|
www.cityoflondon.gov.uk

From: John Schofield [REDACTED] >
Sent: 02 July 2025 07:48
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Cc: John White [REDACTED] >; Kathryn Stubbs [REDACTED] >
Subject: 63 St Mary Axe 25/00223

THIS IS AN EXTERNAL EMAIL

Dear Ms McBirney

In response to your consultation request of 9 May about the development of 63 St Mary Axe, the City of London Archaeological Trust (CoLAT) sent in a brief response on 16 May, which we see has been included in the officer's report to Committee.

I would be grateful if I could ask one further question, for information. The officer's report mentions that the developer will, or has proposed to, fund a PhD student to study, if appropriate, the results of investigation of the medieval burial ground. It is a little difficult to find the details of this in the application papers.

Could you please tell me where this proposal originated, and where any further details of it in the application papers can be found?

Yours

John Schofield
Secretary, CoLAT

John Schofield
2 Carthew Villas
London W6 OBS, UK

<https://independent.academia.edu/JohnSchofield>

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H.E. Ms Anna Nsubuga
Ambassador
Permanent Delegate of the United
Kingdom of Great Britain and Northern
Ireland to UNESCO
35 rue du Faubourg St Honoré
75008 Paris

3 July 2025

**Culture Sector
World Heritage Centre**

Ref: CLT/WHC/ENA/25/15275

Dear Ambassador

I would like to acknowledge with thanks receipt of the three letters dated 7 May 2025 from the UK Department for Culture, Media and Sport (DCMS) regarding the World Heritage property '**Tower of London**', in particular with regard to the proposed developments at 63 St Mary Axe, 85 Gracechurch, and New London House developments, all located within the setting of the property.

I note that Historic England has raised heritage-related concerns in relation to all three proposals, indicating that they would adversely affect various attributes underlying the Outstanding Universal Value (OUV) of the property. On this basis, I understand that Historic England has formally objected to the proposals at 63 St Mary Axe and 85 Gracechurch Street, and advised that the New London House project should undergo design modifications to reduce its impact. Moreover, I note Historic England's identification of inconsistencies and gaps in the Heritage Impact Assessments and related documentation submitted for each of the projects. It is appreciated that these concerns align with observations previously made by ICOMOS through multiple Technical Reviews, particularly in relation to cumulative impacts.

ICOMOS has examined the documentation provided and wishes to share the following views, which should be considered alongside its Technical Review of the State Party's state of conservation report and associated information regarding ongoing and proposed developments affecting the property, submitted on 3 July, and transmitted separately.

ICOMOS generally concurs with Historic England's assessment of the 63 St Mary Axe and 85 Gracechurch developments. However, it notes that the implications of cumulative impact remain insufficiently addressed. While the State Party's 2024 state of conservation report reiterates its commitment to the clustering of tall buildings, an approach recommended by the World Heritage Committee in 2007 to mitigate potential harm to the property's OUV, Historic England's comments do not explicitly assess the extent to which this strategy has been upheld in the current proposals, nor do they reference the underlying policy framework that supports it. Additionally, ICOMOS observes that the manner in which cumulative impact is considered by Planning Committees remains unclear and therefore recommends that the State Party undertake a formal cumulative impact assessment to enhance clarity and ensure coherence in evaluating developments proposals within the setting of the World Heritage property.

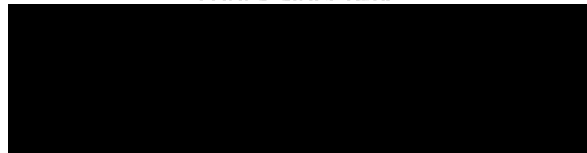
Finally, with regard to the New London House development, ICOMOS International supports the views of Historic England. ICOMOS, however, expressed some uncertainty

as to how Historic England's decision not to object to the proposal could lead to any further revisions to the scheme.

I would be grateful if you could share these comments with the relevant competent authorities for their consideration, and keep the World Heritage Centre informed of any pertinent developments, particularly through the state of conservation report due by 1 February 2026. As is customary, the World Heritage Centre and ICOMOS remain at their disposal for any further clarification or assistance that may be required.

I thank you for your continuous collaboration and support in the implementation of the World Heritage Convention and remain,

Yours sincerely



Lazare Eloundou Assomo
Director

cc: United Kingdom National Commission for UNESCO
National Focal Points for the implementation of the Convention
ICOMOS International

PLANNING DECISION NOTICE

Georgia McBirney
 Planning Officer
 Development Management
 Environment Department
 City of London Corporation
 Guildhall,
 London EC2V 7HH

Development Management Service
 Planning and Development
 Islington Town Hall
 London, N1 2UD
Planning@islington.gov.uk
 W www.islington.gov.uk

Case Officer: Robin Tulloch
 E: planning@islington.gov.uk

Issue Date: 7 June 2025
Application No: P2025/0999/OBS

(Please quote in all correspondence)

TOWN AND COUNTRY PLANNING ACTS

BOROUGH COUNCIL'S DECISION: Observations to Adjoining Borough – No comments

Notice is hereby given, in respect to the request for observation(s), of the above stated response of Islington Borough Council, the Local Planning Authority, in pursuance of its powers under the above mentioned Acts and Rules, Orders and Regulations made thereunder. The response relates to the application / development referred to below, at the location indicated.

The observations (if any) of the Borough Council are noted below.

Location:	63 St Mary Axe, London, EC3A 8AA
------------------	----------------------------------

Application Type:	Observations to Adjoining Borough	Application Received	
Application Valid:	22-Apr-2025	Application Target	16-Jun-2025

DEVELOPMENT:

Observations to adjoining borough on application ref: 25/00223/FULEIA for Demolition of the existing buildings (with part retention of the existing basemement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development

OBSERVATIONS:

London Borough of Islington has no comments.

Certified that this document contains a true record of a decision of the Council

Yours faithfully



**KAREN SULLIVAN
SERVICE DIRECTOR - PLANNING AND DEVELOPMENT
AND PROPER OFFICER**

From: [McBirney, Georgia](#)
To: [Carroll, Ray](#)
Subject: FW: 25/00223/FULEIA - 63 St Mary Axe - Suicide Prevention
Date: 07 July 2025 11:16:34
Attachments: [Outlook-jpb4xy4.png](#)
[Outlook-cy4b2b2v.png](#)
[Outlook-Denckwtdo.png](#)
[image002.png](#)

From: Claire Giraud <claire.giraud@hackney.gov.uk>
Sent: 04 July 2025 12:46
To: Grierson, John <John.Grierson@cityoflondon.gov.uk>
Cc: [McBirney, Georgia](#) <Georgia.McBirney@cityoflondon.gov.uk>
Subject: Re: Fw: 25/00223/FULEIA - 63 St Mary Axe - Suicide Prevention

THIS IS AN EXTERNAL EMAIL

no objection from me if it is indeed 2.1 meters from the top of the planter thanks

Kind Regards

Claire Giraud

Senior Public Health Practitioner



Disclaimers apply, for full details see: <https://hackney.gov.uk/email-disclaimer>

On Fri, 4 Jul 2025 at 12:29, Grierson, John <John.Grierson@cityoflondon.gov.uk> wrote:

Thanks for this Claire,

We can confirm that the balustrade will go from the top of the planter.

Please can you confirm you have no objection?

Kind regards,

John



John Grierson MRTPI | Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH
Email: john.grierson@cityoflondon.gov.uk | Mob: 07542 504415 | Website: www.cityoflondon.gov.uk



Katie Stewart – Executive Director Environment



Any advice given in this email is provided in good faith and represents the informal opinion of an officer and is not necessarily that of the City of London Corporation.

From: Claire Giraud <claire.giraud@hackney.gov.uk>
Sent: 04 July 2025 12:25
To: Grierson, John <John.Grierson@cityoflondon.gov.uk>
Cc: [McBirney, Georgia](#) <Georgia.McBirney@cityoflondon.gov.uk>
Subject: Re: Fw: 25/00223/FULEIA - 63 St Mary Axe - Suicide Prevention

THIS IS AN EXTERNAL EMAIL

Hello John

regarding the Level 27 communal terrace, the developer said that the balustrade 2.1 meters is from the soil level of the planter, what does that mean exactly? from the top of the planter?

I think if the balustrade starts from the top of the planter, it is absolutely fine, 2.1 meter is higher than the 1.8 meter i advise for non publicly accessible roof terraces, I have no objections.

hope this helps

Kind Regards

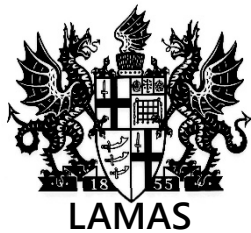
Claire Giraud

Senior Public Health Practitioner



Disclaimers apply, for full details see: <https://hackney.gov.uk/email-disclaimer>

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London and Middlesex Archaeological Society

Promoting London's unique heritage and historic environment



6 July 2025

Dear Ms McBirney,

We are writing to you as President and Chair of Council of the London and Middlesex Archaeological Society, (LAMAS), about the proposals for the 63, St Mary Axe redevelopment which includes the building of a 45 storey building.

We understand that the developers, in carrying out their plans, intend to excavate and provide visual access to the remains of the Roman City wall, as well as excavate and re-landscape the former churchyard of St Augustine Papey. However, we also understand that GLAAS, Historic England's 'Greater London Archaeological Advisory Service', considers that the developers current proposals remained insufficient for safeguarding the archaeological deposits on site.

Evidence from a number of historical periods is likely to be found on the St Mary Axe site. Therefore, in the event of planning permission being granted, we would urge the Corporation to ensure that conditions are attached to the consent which ensure that archaeological deposits on the site from all periods are either fully protected from destruction, or alternatively, investigated as part of the development.

LAMAS, which was founded in 1855, has a particular interest in this part of the City. In 1876 it funded and participated in the excavation of the nearby Camomile Street bastion, where architectural fragments had come to light during site clearance. The excavation of the bastion revealed that statues had been re - incorporated in the bastion. One of the statues was a Roman soldier, who might have served in London, another, represented by a large head, might have portrayed the mid-3rd century Emperor, Philip I.

We do hope that, in the event of the developers obtaining permission, the consent will be accompanied by conditions which provide safeguards for the archaeological deposits.'

Yours sincerely,

Vanessa Harding (President) and Harvey Sheldon (Chair of Council), LAMAS.

Please reply to:

H
M



Addendum to Agenda Item 5 – 85 Gracechurch Street, EC3V 0AA – Planning Application Sub-Committee, 8th July 2025

Committee:	Date:
Planning Applications Sub Committee	8 th July 2025
Subject: 85 Gracechurch Street, EC3V 0AA Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.	Public
Ward: Langbourn	For Decision
Registered No: 25/00433/FULEIA	Registered on: 27 th March 2025
Conservation Area: Leadenhall Market	Listed Building: No

Amendments to the Committee Report

1. Executive Summary

- 1.1 A paragraph on Page 7 of the report should read as follows:
- 1.2 It is the view of officers that as a matter of planning judgement, in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, as policy CS1 is complied with, as policies relating to office floor space delivery, would be complied with that, notwithstanding the conflicts with CS12 (Historic Environment), CS14(2) (Tall Buildings) DM12.1 (Managing Change affecting all heritage assets and spaces); ~~DM12.2 (Development in conservation areas)~~; Emerging City Plan Policies 2040 S11 (Historic Environment) **and S21 (5) (City Cluster)** ~~HE1 (Managing Change to Heritage Assets)~~, and London Plan HC1 (Heritage Conservation and Growth), the proposals would comply with the Development Plan when considered as a whole.

2. Cover Sheet

- 2.1 The proposed height at Item 01 should read 14.7.9m AOD (a reduction of 7.8m from consented scheme).
- 2.2 Item 08 should list servicing hours as 23:00 to 07:00 from Tuesday to Saturday, and 21:00 to 07:00 on Sunday and Monday.

3. Representations

- 3.1 Paragraph 43 should be prefaced by a subtitle "Other Matters", making clear that the representations discussed in that paragraph have not been raised in support. Paragraph 43 of the report should then read as follows:
- 3.2 "Not all the representations set out in the above table raise material planning considerations. Specifically, where the representations from neighbouring properties make references to freehold rights, boundary disputes and oversailing rights, the grant of planning permission does not confer any private rights and any such private right/s necessary to deliver a development (or comply with building control) would need to be gained by the applicant. It is not a requirement of planning that such rights be gained prior to the grant of planning permission. The responsibility for complying with building control, the Building Regulations and other statutory requirements lies with those delivering the development and the landowner. In this circumstance, the matter of maintenance and cleaning of the external façade of the building is not considered so fundamental to the planning permission that it would be appropriate as Local Planning Authority to delay the grant of planning permission nor necessary to attach a condition relating to any such requirements. Furthermore, the National Planning Practice Guidance sets out that "conditions requiring compliance with other regulatory regimes will not meet the test of necessity and may not be relevant to planning". In this context, national guidance is clear that a condition should not be attached which requires compliance with another regulatory regime. If a developer or owner fail to comply with the Building

Regulations a local authority has powers of enforcement which it may use in appropriate cases. Those matters that are material considerations have been dealt with in this report.”

3.3 Since the publishing of the original committee report a letter of representation has been received from Dr Chris Blatchely which is appended to this addendum. The matters raised within this representation are addressed in Paragraph 43 of the report, as amended above.

3.4 A letter in representation has also been submitted 4th July 2025 from ICOMOS. A summary of the points raised in the letter are set out below and the full letter is appended to this addendum.

- *I understand that Historic England has formally objected to 63 St Mary Axe. Moreover, I note Historic England’s identification of inconsistencies and gaps in the Heritage Impact Assessments and related documentation submitted. It is appreciated that these concerns align with observations previously made by ICOMOS through multiple Technical Reviews, particularly in relation to cumulative impacts.*
- *ICOMOS generally concurs with Historic England’s assessment of the 63 St Mary Axe Development. However, it notes that the implications of cumulative impact remain insufficiently addressed. While the State Party’s 2024 state of conservation report reiterates its commitment to the clustering of tall buildings, an approach recommended by the World Heritage Committee in 2007 to mitigate potential harm to the property’s OUV, Historic England’s comments do not explicitly assess the extent to which this strategy has been upheld in the current proposals, nor do they reference the underlying policy framework that supports it. Additionally, ICOMOS observes the manner in which cumulative impact assessment to enhance the clarity and ensure coherence in evaluating developments proposals within the setting of the World Heritage property.*

3.5 Appended to this letter was the ICOMOS Technical Review, the relevant paragraphs are set out below and full Technical Review is appended to this addendum.

June 2025: 85 Gracechurch Street, 63 St Mary Axe and New London House

- *ICOMOS has provided extensive and consistent advice to the project at Gracechurch Street in 2023, 2024 and 2025 that the proposal would harm the Outstanding Universal Value of the property. ICOMOS in June 2025 provided comments on the 85 Gracechurch Street and 63 St Mary Axe proposals concluding that it generally agrees with the concerns raised by Historic England. However, it noted that the implications of cumulative impact of the two projects on the property’s OUV remain unclear.*
- *ICOMOS further noted that while the State Party reaffirms the 2007 World Heritage Committee recommendation to cluster tall buildings to mitigate cumulative impact, Historic England’s comments on these proposals do not indicate whether this principle has been followed or where such guidance is defined.*

- *Moreover, ICOMOS considered that it was unclear how cumulative impact is addressed within the Planning Committees' remit. ICOMOS recommended that the State Party undertake a formal cumulative impact assessment to clarify responsibilities and ensure consistent application of heritage protection measures.*

3.6 Officer response: The representation is noted. The matters raised, including the cumulative effect of the proposal, are addressed in full detail in the Design and Heritage sections of the original committee report.

4. Cycle Parking

4.1 Paragraph 194 should list cycle parking figures as 399 long stay spaces and 43 short stay spaces.

5. Delivery and Servicing

5.1 Paragraph 530, 531, 533, Table 1.4 should refer to Unconsolidated delivery trips as 84-86 per day and Consolidated delivery trips as 42-43 per day. Reflecting this, Paragraph 846 should refer to an obligation as follows:

5.2 A restriction of no more than 43 two-way trips per day by goods vehicles.

6. Section 106 Contributions

6.1 The obligation concerning the construction impact fund should read as follows:

6.2 Bull's Head Passage Residential Construction Impact Fund (up to ~~£20,600~~, **£21,900** indexed, with provision to increase by up to 25% if required)

7. Design and Heritage

7.1 Paragraph 122 should read as follows:

7.2 It is considered that the proposal would deliver a compelling new cultural and exhibition offer for the City that would align with the Destination City agenda. The proposals would attract new audiences, alongside the provision of a new route through to Leadenhall Market. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place aligning with Destination City. Final details of the operation and management of the spaces would be secured through conditions and the S106 agreement through submission of the Viewing Deck Management Plan. The proposal would therefore accord with policy CS11, CS22, DM1.5, DM10.3, DM19.3 and DM22.1 of the Local Plan 2015 and policies **S21 (1-4)**, CV2, HL5, HL7 and DE4 of the emerging City Plan 2040

7.3 Paragraph 123 should read as follows:

7.4 The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), 75m AOD>). ~~With reference to the~~ **The application site is located within the 'Eastern Cluster' Policy Area in the adopted Local Plan (Policy CS7, fig. G) and in the revised 'City Cluster' Policy Area (emerging Policy S21, fig. 28) in the emerging City Plan 2040, the proposal is located in the City Cluster of tall buildings. and in the City Cluster Tall Building Area (S12 (2), fig. 14) and in the 'City Cluster' Policy Area (S21 fig. 28) of the emerging City Plan.**

7.5 Paragraph 124 should feature the additional text as below:

7.6 "Pursuant to emerging policy S12 (3), the proposal would comply with the City Cluster contour lines. The application site is crossed E-W, and is bounded to the W by the 140m and 160m lines; to the north, the next higher contour is the 180m line. The proposals would not breach these lines and would, in the language of S12 (3), 'mediate successfully' between them."

7.7 Amendments to Paragraph 136 are as follows:

- Undershaft: 309.6m (2024 consent)
- 20 Fenchurch Street: 177m
- 50 Fenchurch Street: 165m

7.8 Paragraph 147 should reads as follows:

7.9 "Overall, the proposed development would accord with London Plan policy D9 and the relevant provisions of Local Plan policy CS7 and emerging City Plan policy S12. The proposal would conflict with Local Plan policy CS14 (2) and, because of the limited harm found to heritage assets, emerging Plan policy S21 (5)."

7.10 Paragraph 200 should read as follows:

7.11 The architecture and urban design proposals therefore comply with Local Plan Policies 2015 CS10, DM10.1, DM10.2 DM10.3, DM10.4, DM10.8, CS16, DM16.2, CS19, DM 19.1 and DM19.2, emerging City Plan Policies 2040 HL1, S8, S1, S8, **S21**, DE1-3, DE4 (1-2) and DE5-8, S10, AT1, S14, OS1-OS3, OS5; and London Plan 2021 Policies Good Growth objectives GG1- GG3, GG5-GG6 D3, D4, D5 and D8; NPPF 2024 paras 131, 135, 137, 136 and 140 , National Design Guide and the City Public Realm SPD all which require high-quality public realm and increased urban greening.

7.12 Paragraph 204 and 207 reference comments raised by the GLA in their Stage 1 response. References within these paragraphs to the GLA response on impacts to the Tower of London World Heritage Site and St Peter Ad Vincula should be removed.

7.13 Paragraph 306 should be revised to read as follows:

7.14 “Overall, the proposal satisfies and draws support from London Plan policy HC4, Local Plan policy CS13 (1 & 3), emerging City Plan S13 (1, 3 & 4) and the associated guidance in the LVMF SPG and Protected Views SPD. At the same time, it would draw conflict with the parts of CS13 (2) and S13 (2) as they relate to City Landmarks and Skyline Features.”

7.15 Paragraph 354 should read as follows:

7.16 Historic ~~England~~ **England in** their representations consider the proposals would detract from the prominence of the market buildings through the addition of height. For reasons set out in the assessment above and below, officers consider this change in scale to be an established part of the of the building’s setting and this includes an immediacy to how this change is experienced.

7.17 Paragraph 499 should read as follows:

7.18 The scheme is design-led and has accounted for strategic heritage considerations, having been designed to accentuate the unique characteristics and spirit of the place, whilst preserving strategic views from Fleet Street and the river. It has been found that the proposal would result in minor enhancement of a number of strategic views. The benefits and harms will be considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the end of this report. Overall, in view of the heritage harm identified the proposal would draw conflict with Local Plan Policies CS12 (1), ~~CS14 (2)~~, DM 12.1 (1), DM 12., draft City Plan 2040 policies S11, **S21 (5)** and HE1, and London Plan HC1. Special regard is paid to the desirability of preserving the listed buildings, their settings or any features of special architectural or historic interest which they possesses, under the duty set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF 2025 policies.

7.19 Paragraph 764 should read “**An** Archaeological Exhibition Space Management Plan...”

7.20 Paragraph 863 should read as follows:

7.21 A low level of less than substantial harm is also found to the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I). **In view of the harm identified, there is resulting conflict with adopted Policies CS12 (1& 2), CS13 (2) and, DM 12.1 (1), emerging City Plan 2040 policies S11 (2), S13 (2), S21 (5) and HE1, and London Plan HC1.**

7.22 Paragraph 864 should read as follows:

7.23 The proposal would optimise the use of land, delivering high quality office space, and a substantial proportion of publicly accessible space which includes public access and exhibition of what is a nationally significant archaeological find in the Roman forum-basilica remains. The proposals would constitute thoroughly Good Growth by design and be in accordance with Local Plan Policies relating to design, including, DM3.3, CS7, CS10, ~~CS14~~, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, ~~S24~~, OS1, S14, London Plan D3,

D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.

8. Conditions

- 8.1 The following conditions should be removed given the details are secured through other conditions, or as not relevant to the development - Condition 4, 15, 62, 73, 78, 82,
- 8.2 The trigger for submission of details under Conditions 12 and 13 should be amended for clarity, so that these construction details are required prior to the commencement of Phase 1 of the development.
- 8.3 Condition 87 has been amended to refer to the submitted Phasing Plans as below:
- 8.4 The proposed development must be carried out in accordance with the approved phasing plans, with drawing numbers P1212 Rev. 1 (Phase 0) and P-2201 Rev. P01 (Phase 1).
- 8.5 REASON: To ensure that the development is carried out in a satisfactory manner, is phased for the purposes of the Community Infrastructure Levy (2010, as amended) and to ensure that the planning benefits of the scheme are delivered in accordance with the approved development.
- 8.6 References in conditions 61, 63 and 70 should read “Viewing Deck” where references are made to the Heritage Walkway, and “Archaeological Exhibition Space” where they refer to Museum use, to align with other sections of the Committee Report and the s106.
- 8.7 A reference to vehicle lifts is removed from Condition 61.
- 8.8 Condition 86 should read as follows:
- 8.9 The areas within the development marked as cultural floorspace at basement level, and at level 05, as well as the Public Hall, as indicated on the floorplans hereby approved, shall be used only for ~~the~~ **these** purposes ~~below~~ and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.
- 8.10 A matching amendment is then necessary to Appendix A, Condition 3.

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H.E. Ms Anna Nsubuga
Ambassador
Permanent Delegate of the United
Kingdom of Great Britain and Northern
Ireland to UNESCO
35 rue du Faubourg St Honoré
75008 Paris

3 July 2025

**Culture Sector
World Heritage Centre**

Ref: CLT/WHC/ENA/25/15275

Dear Ambassador

I would like to acknowledge with thanks receipt of the three letters dated 7 May 2025 from the UK Department for Culture, Media and Sport (DCMS) regarding the World Heritage property '**Tower of London**', in particular with regard to the proposed developments at 63 St Mary Axe, 85 Gracechurch, and New London House developments, all located within the setting of the property.

I note that Historic England has raised heritage-related concerns in relation to all three proposals, indicating that they would adversely affect various attributes underlying the Outstanding Universal Value (OUV) of the property. On this basis, I understand that Historic England has formally objected to the proposals at 63 St Mary Axe and 85 Gracechurch Street, and advised that the New London House project should undergo design modifications to reduce its impact. Moreover, I note Historic England's identification of inconsistencies and gaps in the Heritage Impact Assessments and related documentation submitted for each of the projects. It is appreciated that these concerns align with observations previously made by ICOMOS through multiple Technical Reviews, particularly in relation to cumulative impacts.

ICOMOS has examined the documentation provided and wishes to share the following views, which should be considered alongside its Technical Review of the State Party's state of conservation report and associated information regarding ongoing and proposed developments affecting the property, submitted on 3 July, and transmitted separately.

ICOMOS generally concurs with Historic England's assessment of the 63 St Mary Axe and 85 Gracechurch developments. However, it notes that the implications of cumulative impact remain insufficiently addressed. While the State Party's 2024 state of conservation report reiterates its commitment to the clustering of tall buildings, an approach recommended by the World Heritage Committee in 2007 to mitigate potential harm to the property's OUV, Historic England's comments do not explicitly assess the extent to which this strategy has been upheld in the current proposals, nor do they reference the underlying policy framework that supports it. Additionally, ICOMOS observes that the manner in which cumulative impact is considered by Planning Committees remains unclear and therefore recommends that the State Party undertake a formal cumulative impact assessment to enhance clarity and ensure coherence in evaluating developments proposals within the setting of the World Heritage property.

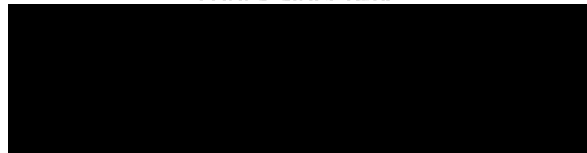
Finally, with regard to the New London House development, ICOMOS International supports the views of Historic England. ICOMOS, however, expressed some uncertainty

as to how Historic England's decision not to object to the proposal could lead to any further revisions to the scheme.

I would be grateful if you could share these comments with the relevant competent authorities for their consideration, and keep the World Heritage Centre informed of any pertinent developments, particularly through the state of conservation report due by 1 February 2026. As is customary, the World Heritage Centre and ICOMOS remain at their disposal for any further clarification or assistance that may be required.

I thank you for your continuous collaboration and support in the implementation of the World Heritage Convention and remain,

Yours sincerely



Lazare Eloundou Assomo
Director

cc: United Kingdom National Commission for UNESCO
National Focal Points for the implementation of the Convention
ICOMOS International

ICOMOS Technical Review

Property	Tower of London
State Party	United Kingdom of Great Britain and Northern Ireland
Property Ref	488
Date of Inscription	1988
Criteria	(ii) (iv)
Subject	State Party's state of conservation report and information about various development projects in the property

I. Introduction

On 19 December 2024, ICOMOS received, via the World Heritage Centre, the State Party's state of conservation report for the World Heritage property "Tower of London". Further information regarding various development projects at the property was then submitted on 28 February 2025, 1 April 2025 and 15 May 2025.

The Advisory Body provides its analysis on the submitted documentation below.

II. Background

Since the property's inscription in 1988, ICOMOS has cautioned that development in the setting of the Tower of London World Heritage property can be detrimental to the maintenance of its Outstanding Universal Value (OUV). The ICOMOS evaluation report of the property's nomination file of the property namely reports the following:

ICOMOS draws the Committee's attention to the inconsistent value of the surroundings of the Tower of London. Alongside certain remarkable and historically valuable elements, such as Tower Bridge, oversized buildings have increasingly been built in the Docks area.

The most regrettable one is the Tower Hotel, which seriously modifies the urban landscape in the St. Katherine's dock area and diminishes the monumental value of the Tower of London. ICOMOS expresses the wish that the Committee recommend that the United Kingdom authorities make strenuous efforts to protect the surroundings of the Tower of London in order to prevent any further abuse of this nature.¹

The World Heritage Committee Decision **12 COM XIV.A** recording the inscription also records that "*The Committee has expressed its regrets regarding the building of the Tower Hotel, which would have best been avoided, and took note of the assurances of the United Kingdom authorities as to protection henceforth to be granted to the environment of the Tower of London*".

ICOMOS' analysis of the proposed construction of the Minerva Tower and the London Bridge Tower in the setting of the property led the World Heritage Committee to recommend in 2003 that the State Party "*avoid any construction in the immediate vicinity of the property that could harm the setting and integrity of the property*" (Decision **27 COM 7B.83**), a request repeated in 2004 (Decision **28COM 15B.103**). In 2005, ICOMOS advised that "*the setting of the Tower needs to be defined and protected as a matter of urgency, given the pressure for new development in this part of London*".² The World Heritage Committee consequently recalled: "*the commitment of the State Party of the United Kingdom at the time of the inscription of the property in the World Heritage List, to enforce policies aiming at protecting the environment of the Tower and to apply restrictive covenants on new developments*" (Decision **29 COM 7B.89**).

¹ Advisory Body Evaluation, ICOMOS (1988): <https://whc.unesco.org/document/153569>.

² State of conservation report (2005), <https://whc.unesco.org/en/soc/1349>

The State Party's report on the state of conservation of the property, submitted to the World Heritage Centre in 2006, reported the approval of the 306-metre Shard (then referred to as 'Shard of Glass') at London Bridge Station and the 217-metre Minerva Tower,³ as well as new applications for the 324-metre Bishopsgate Tower, and the 209-metre 20 Fenchurch Street projects. In their analysis, presented in the state of conservation report tabled before the World Heritage Committee at its 30th session, the World Heritage Centre and ICOMOS concluded that they:

consider that the impacts of the tall buildings already given approval and those subsequently submitted will have far greater than a "small adverse impact" on the Tower of London. If built, these buildings could confuse what remains of the Tower's silhouette.

In order to determine more precisely the impacts on views, both of the Tower and outwards from within its Inner Ward, a thorough skyline study should be commissioned to assess and document the setting of the Tower and the key views connected to its World Heritage status.

Any new development within London should aim to maintain or enhance the setting and critical views associated with the Tower, as well as the World Heritage property of Westminster Palace, Westminster Abbey and Saint Margaret's Church.⁴

The World Heritage Committee expressed its "great concern that proposed new developments around the Tower of London and Westminster Palace, Westminster Abbey and Saint Margaret's Church World Heritage properties, appear not to respect the significance of either World Heritage property, their settings and related vistas", and requested that in-depth skyline survey be undertaken "as soon as possible to provide a qualitative framework for assessing the impact of new development on views and setting that contribute to the outstanding universal value of the Tower". The World Heritage Committee also requested that the State Party invite a joint World Heritage Centre/ICOMOS Reactive Monitoring mission to the property, including "to review the possibility of inclusion of the property in the List of World Heritage in Danger" (Decision **30 COM 7B.74**).

The conclusions of the mission, as presented in the state of conservation report tabled before the World Heritage Committee at its 31st session (2007), included a recommendation that:

The Greater London Authority should adopt a policy of concentration of tall buildings in the City, thereby limiting the impact on the Tower of London's surrounding urban landscape. The mission was of the firm view that establishing a statutory protection for the iconic view from the South Bank, in order to keep the last remaining visual axis unobstructed, was key to the conservation of the visual integrity of the Tower. The proposal currently put forward in the London Plan (London View Management Framework – Draft SPG, April 2005), to identify three limited circles from a viewpoint from City Hall to the Tower of London, improves the situation, but should be widened considerably to include a buffer zone extending up to 1km from the Tower of London over the eastern section of the City of London into the Borough of Tower Hamlets.

³ Cancelled the following year.

⁴ <https://whc.unesco.org/en/soc/1193/>

The mission also concluded that:

[...] the property would meet criteria for Danger Listing (according to Paragraphs 178-182 of the Operational Guidelines) if either a statutory protection for the iconic view from the South Bank towards the Tower, which is key to the conservation of the visual integrity of the Tower, has not been established by the time the World Heritage Committee meets for its 31st session, or the Management Plan, including a protection of the immediate surrounding of the Tower through an adequate and commonly agreed buffer zone, has not been finalized by the time the World Heritage Committee meets for its 31st session. The statutory protection of the iconic view and the management plan could be considered the benchmarks also for a potential removal of the property from the List of World Heritage in Danger.⁵

Furthermore, the mission report records that “On 16 March 2007 the State Party responded to the mission report and assured the World Heritage Centre of the UK’s commitment to the protection of the World Heritage property. A substantive response to the issues raised in the mission report will be available in time for the 31st session of the World Heritage Committee”. Consequently, this contributed to the World Heritage Committee’s taking note “that the State Party has demonstrated its commitment to comply with the requests of the Committee (Decision **30 COM 7B.74**) to protect the World Heritage property, its setting and its vistas”. (Decision **31 COM 7B.90**).

Subsequent Committee Decisions in 2008 (Decision **32 COM 7B.112**), 2009 (Decision **33 COM 7B.127**) and 2011 (Decision **35 COM 7B.114**), focussed, amongst others, on the protection of the view of the property from the South Bank, developing and strengthening the legislative and regulatory environment as well as tools to assess and control high-rise development in the immediate setting and wider setting of the property. With Decision **33 COM 7B.127** (2009), the World Heritage Committee noted that, if the development control of the setting of the property was not improved, it would consider the possible inscription of the property on the List of World Heritage in Danger at its 35th session (2011).

Furthermore, in all its decisions between 2007 and 2009, the World Heritage Committee consistently requested that the State Party develop, define and submit a proposal for a buffer zone for the property.

A Reactive Monitoring mission visited the property again in 2011, upon the request of the World Heritage Committee’s Decision **35 COM 7B.114**. Its conclusions, as reported in the 2012 state of conservation report, informed the Committee’s Decision **36 COM 7B.91**, which encourages the State Party to, amongst others:

b) Define specific measures, based on the definition of the setting of the property, to ensure the protection of the property and minimize its vulnerability to potential threats to its Outstanding Universal Value,

c) Regulate further build-up of the area surrounding the Shard of Glass building, ensuring that approved heights do not exceed a height whereby they would become visible above the on-site historic buildings.

In its 2014 summary of the state of conservation report, the State Party noted that “the immediate setting of the property is considered to be well defined through the 2010 Tower of London Local Setting Study”, and that national frameworks require Environmental Impact Assessments (EIAs) for larger scale projects in sensitive areas. This mechanism will ensure the wider setting of the property.

⁵ <https://whc.unesco.org/en/soc/1031>

Recall of the retrospective Statement of Outstanding Universal Value (RSOUV)

A retrospective Statement of Outstanding Universal Value (RSOUV) was submitted by the State Party and adopted by the Committee in Decision **37 COM 8E** (2013). The RSOUV clearly sets out the importance of the Tower's setting in supporting the OUV of the property, as shown in the extract below:

Criterion (ii): *A monument symbolic of royal power since the time of William the Conqueror, the Tower of London has served as an outstanding model throughout the kingdom since the end of the 11th century. Like it, many keeps were built in stone, e.g. Colchester, Rochester, Hedingham, Norwich or Carisbrooke Castle on the Isle of Wight.*

Criterion (iv): *The White Tower is the example par excellence of the royal Norman castle from the late 11th century. The ensemble of the Tower of London is a major reference for the history of medieval military architecture.*

Integrity

All the key Norman and later buildings, surrounded by their defensive wall and moat, are within the property boundary. There are few threats to the property itself, but the areas immediately beyond the moat and the wider setting of the Tower, an ensemble that was created to dominate its surroundings, have been eroded.

The Tower's landmark siting and visual dominance on the edge of the River Thames, and the impression of great height it once gave, all key aspects of its significance, have to some extent been eroded by tall new buildings in the eastern part of the City of London, some of which predate inscription. Some of these have, to a degree, had an adverse impact on the views into, within and out of the property [emphasis added by ICOMOS].

The Tower's physical relationship to both the River Thames and the City of London, as fortress and gateway to the capital, and its immediate and wider setting, including long views, will continue to be threatened by proposals for new development that is inappropriate to the context. Such development could limit the ability to perceive the Tower as being slightly apart from the City, or have an adverse impact on its skyline as viewed from the river.

Recall of recent ICOMOS recommendations contained in Technical Reviews of high-rise project proposals and related planning documents

ICOMOS has in the recent past provided numerous Technical Reviews of individual project proposals that have been brought forward for high-rise buildings in the setting of the Tower of London World Heritage property and communicated to the World Heritage Centre since 2018 by the State Party, specifically:

March 2019: Land adjacent to 20 Bury Street, London EC3 5AX, Planning application ref: 18/01213/FULEIA ('The Tulip', located in the City of London)

ICOMOS's analysis contested the outcomes of the Heritage Impact Assessment (HIA) submitted for the project and highlighted that:

the cumulative effect of new developments, in relation to the possible negative visual impact on the integrity of the property in question, should not be diminished. The integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact, and it is clear from the visual project documentation that there is no room for additional challenges to it. Neither is it an acceptable approach to allow further negative visual impact on the property's integrity when it is already threatened.

The Technical Review concluded that:

On the basis of the analysis set out above, ICOMOS considers that the proposed development project ... is not compatible with the preservation of the integrity of the World Heritage property of the Tower of London, and would therefore advise that the State Party:

- *Abandon the Tulip development project;*
- *Adopt a stricter and more appropriate evaluation of proposed constructions that could have an impact on World Heritage properties, giving priority to the preservation of OUV, in line with previous mission recommendations.*

The project was denied by the State Party.

July 2020: High-rise development project at 100-107 Leadenhall Street, London, EC3A 3BP - Application No. 18/00152/FULEIA ('The Diamond', located in the City of London)

The reviewed material was submitted by the State Party in response to a paragraph 174 request from the World Heritage Centre, following receipt of third-party submissions after the project was granted planning approval in 2018.

In its review, ICOMOS noted that: *"First of all, it is necessary to underline that the current situation in the setting of the property is already not satisfactory (and might be considered to be rather alarming) without the proposed new building, and, even more importantly, without the completion of other high-rise buildings already licensed or under construction in the close neighbourhood of the Tower of London".*

ICOMOS also questioned the conclusions of the submitted HIA, which stated, as quoted in the aforementioned technical review, that: *"Although there would be change to the setting of the WHS there would be no harm to the relevant attributes of its OUV, and the change to the setting of the WHS is therefore judged overall to be, neither harmful nor beneficial, but neutral".* The HIA also included the conclusions that the new development would result in the consolidation of the skyline of the City's Eastern Cluster, which would result in it having *"its own distinct identity as a compact well composed form seen beyond the WHS and to the right of Tower Bridge. Although the magnitude of the effect would be increased the significance of the effect would not change in comparison to the Proposed Development assessed in isolation".*

ICOMOS waylaid this conclusion, asserting that *"Due to the proximity of the proposed construction to the World Heritage property, its height, and not least its mass form, it would certainly have a high negative visual impact",* and that *"Any further changes (additions) to the already existing setting of the Tower would only aggravate the current situation".*

ICOMOS thus advised the State Party to consider the following recommendations:

- *To make use of the findings and recommendations of previous Reactive Monitoring missions in connection with development in the setting of this World Heritage property;*
- *To reconsider this development project to ensure it does not impact on OUV and with the planning parameters;*
- *To undertake a stricter and more appropriate evaluations of any proposed development which could have the potential to impact on World Heritage and for these to be based on the priority being given to preserve OUV;*
- *To foster a more appropriate use of the HIA methodology;*
- *To reconsider the possibility to establish well-designed parameters for development within the setting of the property so that the same difficulties are not faced over and over again.*

June 2022: High-rise development project at 4–26 St. Thomas Street, Southwark, London SE1 ('New City Court', south bank of the River Thames)

Two applications for the redevelopment of New City Court were reviewed. The first (2018) proposed a 37-storey tower of 144 m height, while the second (2021) proposed a reduced-height 26-storey version at 108 m. In its Technical Review, ICOMOS stated that the 2018 proposal *"would be visible from within the Inner Ward of the Tower of London, above the roofline of the Grade I listed Queen's House,"* and *would create a significant cumulative effect that would further encroach on the Tower of London... harming the setting of the Queen's House and the Outstanding Universal Value (OUV) of the World Heritage property"*. ICOMOS determined that the project *"would generate an unacceptable impact on OUV"*.

Although the second, reduced scheme sought to address concerns raised by the local planning authority and Historic England, ICOMOS observed that it *"would nevertheless have considerable adverse impacts on assets of national importance and, overall, on the urban neighbourhood within which it is to be constructed"*. Critically, *"neither application was subject to a Heritage Impact Assessment (HIA) following the 2011 ICOMOS Guidance on HIAs for Cultural World Heritage Properties"*.

ICOMOS therefore recommended that the first (2018) proposal should not be approved and that the second proposal, though reduced in visual intrusion, remained of concern and should be evaluated in compliance with national and local policy frameworks, particularly concerning heritage.

June 2022: High-rise development project at 31 Bury Street, London EC3A ('Bury House')

The planning application proposed the demolition of the existing Bury House and the construction of a 48-storey tower (197.94m AOD) for mixed commercial use.

ICOMOS reviewed the application and concluded that the project *"would result in harm to the authenticity and integrity of the Outstanding Universal Value (OUV) of the Tower of London World Heritage property"*. The cumulative visual impact, together with existing and consented developments, was considered already *"severe"*, with the proposed development *"contrary to the Visual Management Guidance in the LVMF"* (London View Management Framework, adopted in 2012).

ICOMOS noted that *"the Tower must remain the dominant building, separated from the City and respected by new developments"*, but this project would further breach *"the clear view of the sky in the backdrop of the White Tower"*, an *"important attribute"* identified in the LVMF. Submissions from Historic Royal Palaces (HRP) and Historic England supported this view, the latter warning that the proposal *"would diminish the visual dominance of the Tower [...] and erode the appreciation of the Tower of London's strategic siting on the river set apart from the mercantile city."*

ICOMOS found that the proposal was *"not in accord with the Management Plan,"* and that *"public benefits from the proposal would not justify the granting of planning permission when weighed against the harm that would be caused to the setting of the Tower"*. ICOMOS reiterated the position it had taken in 2019 in relation to similar projects, affirming that *"the integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact [...] there is no room for additional challenges to it."*

Finally, ICOMOS advised that the State Party:

- Reconsider the development to ensure it does not impact OUV;
- Utilize findings of past Reactive Monitoring missions and prior Technical Reviews;
- Apply advanced visual tools to better assess kinetic impacts and spatial dynamics of development on the Tower's setting.

August 2024: Revised high-rise development project at Bury Street ('Bury House resubmission')

Following the refusal of the earlier application, a revised proposal was submitted in mid-2024 for a slightly shorter (44-storey) tower with a larger footprint. ICOMOS confirmed that the new scheme *"remains similar to that from the previous scheme"*, and as such, *"comments in its Technical Review of the previous scheme for the site remain relevant"*. In particular, ICOMOS stated that *"ICOMOS fully supports Historic England's analysis of the potential impact on OUV of the revised Bury House scheme and recommends that it should also be refused permission"*.

ICOMOS expressed concern that the recurring re-submission of tall building proposals at this location highlights *"the urgent need for a more clearly defined framework to protect the setting of the property – which itself also needs defining"*. The Technical Review cited the World Heritage Committee's long-standing concern, stating that *"there is no agreed methodology for defining the extent of the wider setting [...] and no visual parameters to assess impact"*. Without such mechanisms, *"there appears to be no means of halting the submission or re-submission of proposals for tall buildings that will have a highly negative impact on OUV"*.

ICOMOS concluded that the application should be refused and emphasized the importance of recognizing *"the highly negative impacts on Outstanding Universal Value of the revised Bury House scheme [...] in the planning processes"*.

These planning applications were refused.

October 2024: Strategic planning review of City Plan 2040

In May 2024, ICOMOS was notified of the draft City Plan 2040 by the State Party. This plan envisions delivering a minimum of 1.2 million square meters of new office floorspace in the form of tall buildings, primarily in designated clusters, including the area adjacent to the Tower of London. In its Technical Review of October 2024, ICOMOS raised serious concerns that the Plan *"appears to be lessening constraints on the setting of the property rather than respecting the need for its protection"*.

ICOMOS found that *"heritage is only included in one of its 15 stated policies"*, and even then, it shares a chapter with tall buildings, while offices receive a separate and prioritized chapter. It observed that the HIA undertaken for the plan was 'post hoc justification' and not a proactive tool to mitigate harm. The HIA's conclusion that development *"would raise no concerns"* was rejected by ICOMOS. The principle included in the HIA's conclusion that *"the consolidation of the existing and emerging form into the Proposed City Cluster is beneficial"* had already been rejected by ICOMOS in its 2020 Technical Review of the project for 100-107 Leadenhall Street, London ('The Diamond').

ICOMOS also noted that the City Plan 2040 failed to reflect the repeated recommendations of the World Heritage Committee concerning cumulative visual harm.

In line with concerns raised by Historic England, ICOMOS emphasized that the Plan *"would entail severe harm to the Outstanding Universal Value of the Tower of London World Heritage Site"*, and that its implementation *"would have the capacity to present a clear potential danger to the property"*.

ICOMOS therefore concluded stating that it considers that:

- *A drastic revision of the draft City Plan is required that considers other development alternatives which respect the setting of the Tower of London in relation to its support for Outstanding Universal Value.*
- *To this end, it remains essential for an appropriate and sustainable buffer zone/definitive setting to be defined, including enhancement of associated views to and from the Tower, for adoption by the World Heritage Committee, and for this to form an integral part of the City Plan.*

June 2025: 85 Gracechurch Street, 63 St Mary Axe and New London House

ICOMOS has provided extensive and consistent advice to the project at Gracechurch Street in 2023, 2024 and 2025 that the proposal would harm the Outstanding Universal Value of the property. ICOMOS in June 2025 provided comments on the 85 Gracechurch Street and 63 St Mary Axe proposals concluding that it generally agrees with the concerns raised by Historic England. However, it noted that the implications of cumulative impact of the two projects on the property's OUV remain unclear.

ICOMOS further noted that while the State Party reaffirms the 2007 World Heritage Committee recommendation to cluster tall buildings to mitigate cumulative impact, Historic England's comments on these proposals do not indicate whether this principle has been followed or where such guidance is defined.

Moreover, ICOMOS considered that it was unclear how cumulative impact is addressed within the Planning Committees' remit. ICOMOS recommended that the State Party undertake a formal cumulative impact assessment to clarify responsibilities and ensure consistent application of heritage protection measures.

On the New London House project, ICOMOS supports Historic England's position on this proposal that *the proposals would cause some harm to the ability to appreciate the significance of the Tower of London World Heritage Site, including attributes of its Outstanding Universal Value (OUV) but that this harm could be minimised through relatively minor design changes, particularly by reviewing the proposed cladding so that the building would appear closer in character to existing cluster buildings.*

ICOMOS however questioned how Historic England's position of not objecting to the proposal could be expected to prompt revisions to the scheme. Further clarity on this mechanism would be welcome.

State Party submission and request for review

The State Party's 2024 state of conservation report included notification of the following:

1. Moat Landscape Project

Historic Royal Palaces (HRP) is progressing with a project to improve the moat landscape surrounding the Tower. This forms part of wider conservation-led enhancements intended to reinforce the Outstanding Universal Value of the property by improving visitor experience and the physical setting of the Tower. The project is aligned with the WHS Management objectives and reflects a strategic approach to setting-based interventions.

2. Tower Entry Project

Historic Royal Palaces is also developing a Tower Entry Project aimed at enhancing access, orientation, and visitor management at the principal entrance to the Tower. This initiative aims to reduce congestion and enhance legibility of the property's historic layout.

3. World Heritage Site Management Plan (Spring/Summer 2025)

A comprehensive review and update of the Tower of London WHS Management Plan is underway, led by Historic Royal Palaces. The revised Plan is scheduled for completion in spring/summer 2025. It will integrate updated guidance, including UNESCO's 2022 *Guidance and Toolkit for Impact Assessments in a World Heritage Context*, and provide new frameworks for assessing cumulative impacts and managing change in the setting of the property.

4. London View Management Framework (Spring 2025)

The Greater London Authority (GLA) is currently reviewing the existing London View Management Framework (LVMF), which informs visual impact assessments for strategic views of the Tower. The revised LVMF - anticipated for consultation in spring/summer 2025 - will re-examine the protection of the Tower's silhouette and views, including potential enhancements to visual management policies and assessment parameters.

5. London Plan (2025)

A new London Plan is under development, expected for adoption by 2027. Early consultation has commenced, and the State Party affirms that Historic England is engaged to ensure the positive heritage protections of the current Plan are retained or strengthened in the new version.

6. Tower Hamlets Council Draft Local Plan

The London Borough of Tower Hamlets is reviewing its Local Plan, with a Regulation 19 draft consulted upon in October 2024. Historic England has raised concerns about the absence of a HIA and has questioned the draft plan's soundness. However, constructive dialogue is ongoing, and Tower Hamlets has engaged Historic England to develop a brief for the required HIA, which will address potential impacts on the Tower's OUV.

On 28 February 2025, the State Party submitted a Paragraph 172 Notification in which it provides an update on the status of the applications for:

- The Mark, for which the ICOMOS Technical Review was shared with the local planning authority;
- 70 Grace Church Street project was approved before the receipt of the ICOMOS Technical Review, subject, amongst others, the final decision of the Mayor of London and the possibility for the Secretary of State to call in the application for review;⁶
- Bury House, which the Sub-Committee have decided to deny;
- 1 Undershaft (309.6m tall), for which planning permission was granted on 13 December 2024, conditional to the final decision of the Mayor of London and the possibility for the Secretary of State to call in the application for review;⁷
- 60 Grace Church Street, for which planning permission was granted;
- Royal Mint Court, for which the Public Inquiry had already closed.

On 1 April 2025, the State Party submitted a Paragraph 172 Notification to the World Heritage Centre regarding the City Plan 2040, City of London. This update followed the initial State Party's submission made on 21 May 2024 and subsequent ICOMOS Technical Review in October 2024. The State Party confirmed that the Planning Inspectorate has commenced Examination in Public hearings as of 25 March 2025, and that Historic England and other stakeholders have submitted statements on the key matters under review. The City of London Corporation was preparing addenda to the Strategic Views and Heritage Impact Assessments, addressing proposed changes to tall building contour lines within the City Cluster. The State Party communicated that it expected publication of the agenda in mid-April 2025, and that the related hearings would be scheduled for 10–11 June 2025. The State Party reiterated its commitment to keep the World Heritage Centre informed, but stated that it was not at the time requesting any comment from the World Heritage Centre or the Advisory Bodies.

⁶ Planning Applications Sub-Committee, hearing date 11 February 2025, <https://democracy.cityoflondon.gov.uk/documents/s215596/70%20Gracechurch%20Street%20Committee%20Report%203%201%201.pdf>

⁷ Planning Applications Sub-Committee, hearing date 13 December 2024, <https://democracy.cityoflondon.gov.uk/documents/s214500/PASC%20Draft%20Minutes%2013-12-2024%20-%20Confirmed%20Final%20Version.pdf>

Subsequently, on 15 May 2025, the State Party submitted a further Paragraph 172 Notification to the World Heritage Centre regarding the City Plan 2040, City of London, following its previous communication of 1 April 2025. This update concerned the publication of additional documentation submitted for consideration during the Examination in Public, specifically an addendum to the previously submitted Strategic Views Assessment and Heritage Impact Assessment. The new material includes Revised Policies Maps C and E and a four-part evidence base addendum related to the City's Tall Buildings Policy. The State Party invited any additional comments from ICOMOS by 1 June 2025 to help inform the Planning Inspectorate's Examination, ahead of the scheduled Heritage and Tall Buildings hearing sessions on 10–12 June 2025.⁸ It also noted that Historic England is currently reviewing the new documentation. In its letter, the State Party provided web-links to an extensive number of documents made public on the City of London's website, which include the May 2025 Historic England hearing Statement Addendum (uploaded on 3 June 2025).⁹ This website also indicates that the dates for the hearing sessions referred to in the letter from the State Party were already made public on 22 January 2025.

III. Analysis

City Plan 2040, City of London

ICOMOS has already communicated its review of the draft City Plan 2040, City of London in its Technical Review of October 2024, advising that a drastic revision of the draft City Plan is required if further irreparable damage to the setting of the Tower of London, and therefore to its OUV, is to be avoided.

In response to the further additional/revised documents that were submitted on 15 May 2025 in response to submissions made in 2024, ICOMOS provides the following advisory points, responding in particular to the Addendum on the Strategic Views Assessment and Heritage Impact Assessment:

- The submitted material does not provide any further evidence of a meaningful attempt to avoid or reduce the severity or scale of the potential damage to the setting of the Tower of London World Heritage property.
- The submitted annex continues the erroneous perspective that the harm of the existing increase in tall buildings can be reduced, by building more tall building to 'filling out' (referred to as 'consolidation' in the HIA for the 100-107 Leadenhall Street project) the contour line' of their profile, including by providing so-called 'foothills' in deference of the World Heritage property (p. 6). This argument is also based on an acceptance of the status quo as baseline, including already granted, but not constructed tall buildings in the City Cluster, with at its peak the 1 Undershaft project, approved on 13 December 2024. This approach results in a skewed assessment, that does not include the cumulative negative impacts of tall building constructions in the cluster since the time of inscription.
- The World Heritage Committee in Decision **36 COM 7B.91** specifically took the view that it was necessary to ensure that *"approved heights do not exceed a height whereby they would become visible above the on-site historic buildings"*. It is therefore entirely inappropriate to the maintenance of the OUV of the property to allow for the further development of the cluster as illustrated in View 36 (p. 95 of the submitted Addendum).

⁸ The Committee in Decision **38 Com 7B. 35** specifically requested that the State Party ensure 'that adequate time be allowed for thorough review of each project by the Advisory Bodies before any decision is taken' with regards to paragraph 172 Notifications.

⁹ The document is available at : <https://www.cityoflondon.gov.uk/assets/Services-Environment/MM7-R006-Historic-England-Hearing-Statement-Addendum.pdf>.

ICOMOS is in full agreement with Historic England's May 2025 submission to the Public Hearing, which considers the four new documents detailing proposed amendments to the City Corporation's tall buildings policy and contour lines as set out at Regulation 19 stage. Historic England concludes that these do not meet the City Corporation's objective to "*minimise the possibility of harm to the settings and OUV/significance of the three Strategic Landmarks; the Tower of London, St Paul's Cathedral and the Monument*".

ICOMOS notes that the City's quoted intention in Historic England's response is to 'minimise the possibility of harm',¹⁰ which is not the same as to avoid the possible harm.¹¹ Therefore, this stated aim cannot be seen as aligned with the State Party's commitments under Articles 4 and 5 of the World Heritage Convention.

Moreover, the lack of precision in assessing measures to minimize the possibility of harm in the absence of policies that commit to protecting World Heritage properties and their settings, and of defined settings, is only too clearly reflected in the difficulties that Historic England has in ensuring their views are respected by Planning Committees. Unfortunately, the need for these fundamental tools has not been considered.

In summary, ICOMOS considers that the individual and cumulative impacts of the building volumes presented in the Strategic Views Assessment and Heritage Impact Assessment/City Plan 2040 have not yet been adequately assessed with regard to their impact on the Outstanding Universal Value of the Tower of London World Heritage property. The already extant high-rise buildings have already resulted in negative impacts on the property's OUV, and those accommodated in this plan, if executed, will result in substantial harm to the Outstanding Universal Value of the property.

IV. Recommendations

ICOMOS, reiterating its consideration contained in the October 2024 Technical Review of the London City Plan 2040, would advise that:

- The draft City Plan 2040 undergo a drastic revision to consider other development alternatives that respect the setting of the Tower of London in relation to its support of the Outstanding Universal Value;
- To this end, it remains essential for an appropriate and sustainable buffer zone/definitive setting to be defined, including enhancement of associated views to and from the Tower, for adoption by the World Heritage Committee, and for this to form an integral part of the City Plan.

ICOMOS further advises that the State Party call in the approvals of the 1 Undershaft, and 70 Gracechurch Street project as provided for under Section 77 of the Town and Country Planning Act 1990 for reconsideration with regard to their potential negative impact on the Outstanding Universal Value of the World Heritage property, also in light of Section 102 of the Levelling Up and Regeneration Bill, which establishes a statutory duty to give special regard to the desirability of preserving or enhancing a World Heritage property or its setting when exercising planning functions.

In this regard, the reference in the Levelling Up and Regeneration Act to the 'desirability of preserving or enhancing' World Heritage properties or their settings, while helpful, may fall short of the obligation under Article 4 of the World Heritage Convention to protect such properties to the utmost of the State Party's resources. There is a need for greater clarity on how domestic planning processes incorporate

¹⁰ Historic England, 2025 (May), *Examination of City of London Local Plan Historic England, Hearing Statement Addendum*, p. 2. Retrieved from <https://www.cityoflondon.gov.uk/services/planning/planning-policy/city-plan-2040-examination-in-public/city-plan-2040-examination-documents>.

¹¹ City of London Tall Buildings Policy, Evidence Based Addendum (ED-HTB36), para 1.6.

the Committee's determination of potential impact on OUV, as recent decisions suggest these are not always respected. The increasing number of high-rise buildings in the setting of several World Heritage properties in London continues to raise concern. This trend poses a potential threat to their OUV, including that of the Tower of London, and appears to reflect persistent challenges in effectively managing and controlling such developments under current legal and planning frameworks.

ICOMOS reiterates its position that the approvals of 1 Undershaft and 70 Gracechurch Street, as well as the polices of the City Plan 2040, are in direct contradiction with the need to sustain the Outstanding Universal Value of the Tower of London World Heritage property, and, if implemented, would have the capacity to present a clear potential danger to the property.¹² ICOMOS reiterates its conclusion that, although it understands the need for economic development, it considers that the current draft City Plan 2040 cannot be said to fully respect sustainable development.

ICOMOS further advises that appropriate and timely notification to the World Heritage Centre would be appropriate for the following:

- Moat Landscape Project;
- Tower Entry Project;
- World Heritage Site Management Plan (spring/summer 2025);
- London View Management Framework (spring 2025);
- London Plan (2025);
- Tower Hamlets Council draft Local Plan.

Notification should be done once the State Party has progressed with these proposals and draft plans and polices to a level where the review of their consequence for the protection and maintenance of the Outstanding Universal Value of the property would be useful.

Such notifications should take place well before any formal time-limited decision-making processes are initiated, to ensure that: "adequate time be allowed for thorough review of each project by the Advisory Bodies before any decision is taken" as requested by the World Heritage Committee in Decision **38 COM 7B.35** (2014).

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.

ICOMOS, Charenton-le-Pont
June 2025

¹² Refer to Paragraph 179 of the *Operational Guidelines*.

Re Full Application Ref. No: 25/00433/FULEIA – 85 Gracechurch Street - additional info

I have two objections outstanding. I am happy to accept the assurances of Ashley Patience RICS, for the Developers for Objection 1 (3/6/25).

Objection 2 (16/6/25)– Present design is fundamentally flawed and cannot be fulfilled without trespassing on our Freehold property. This is far more serious, and may yet end up in court.

I am having difficulty in trusting the Developers' intentions, and am concerned that they could use spaces in the Planning Process to build right to the boundary with the potential of being prepared to commit trespass in the future once built, and then sort out the consequences in court later.

If this occurred, it would, in my opinion, be against the spirit of openness that underpins the Planning Process. However it is easily avoidable:-

1. I am asking that the Planning Committee to add a practical Planning Condition that makes clear what is required, and that the Building Regs to be adhered to, both in spirit and deed.
2. This clarity will be of benefit to all, including the Developer, and enable this important project to be completed without delays, which would be inevitable if we were forced to take pre-emptive court action

.....

We have owned and traded from the Freehold of 2-4 Bulls Head Passage for many years, and I very much support the wider aims of both this development and the City of London's long term Planning Policy for the area. However I am having to object to this Planning Application on a fundamental level because the Developer's submitted design requires Trespass of our Freehold.

Here, I want to explain a) the senior legal advice (see below) underpinning my Objection, b) how the Objection can be resolved, and c) how I can support the development to ensure it is completed on time and without legal problems, which are entirely of the Developers' own making:-

1. While I appreciate that, generally, the Planning Process does not usually take account of Building Regulations, in this special and particular case the Developers cannot fulfil the design in their submitted Application on a very basic level. This is due to a major flaw in their fundamental design assumptions, which cannot be met without trespassing on our freehold rights
2. I have asserted my freehold rights to the Developers not to be trespassed. I have also asked the Developers to provide a Solicitors Undertaking that they will not trespass on our property, but they have not given any such Undertaking
3. The City of London quite rightly requires that developers comply with Building Regulations. To help this complicated Application to proceed without delay, I ask the Committee to attach a Condition to any Planning Approval that enables the early phases of demolition and foundation piling (approx duration 1 year), but requires the Developers to show they can meet Building Regulations without trespass, before continuing with construction above foundations level (I append a suggested wording for this Condition)
4. This would give them approx 1 year to sort out a problem of their own making, and ensure there is no future delay to their project timetable

It is hard to see how the Developers could object to such a Condition, if they have no intention of committing trespass on our property. Indeed, the Condition is designed to help all parties by adding clarity that will help ensure the smooth running of the project

In summary, the legal situation behind their future trespass is:-

1. The Developers have chosen to build up to the limits of their freehold boundary. This requires overflight of our property with their crane which is trespass. I have only recently become aware in the last month or so of this proposed trespass.
2. Building up to the boundary is a purely financial decision. They could have chosen to set back their development and keep their crane within their freehold, but they have not, preferring to attempt to maximise their profit.
3. The Developers are attempting to rely upon the Access to Neighbouring Land Act 1992 ("ANLA") to gain access for window cleaning once the development is complete.
4. However, I have received advice from John de Waal KC of Gatehouse Chambers and Bryan Johnston of Dentons solicitors that ANLA does not allow this. They are specialists in this area of law, and have taken the only case involving ANLA before the High Court, with a 2022 ruling which they won
5. I append an email from Mr de Waal, confirming ANLA cannot be used to circumnavigate their future trespass

If you have any questions on my email, then you are very welcome to contact me by phone or email

Dr Chris Blatchley
London Migraine Clinic
4 Bulls Head Passage EC3V 1LU
07957 353 020

NOTES

1. A Suggestion for the wording of the proposed Condition

The Developer may commence the demolition and piling for foundations phase of this development, but, prior to commencing building above foundation level, they must clearly show that they will be able to meet Building Regulations K 5.4 without trespassing on adjoining land

2. Email from Mr de Waal KC (30/6/25)

Dear Chris

You have asked me to confirm the position in law on the question of whether the Access to Neighbouring Land Act 1992 (ANLA) permits a developer to 'oversail' your property by installation of a crane on the side of its building in the airspace about your building.

The short answer is that it does not.

An 'access order' can be applied for by the owner of the dominant land (your neighbour) against the owner of the servient land (you) in the following circumstances under s1(2) ANLA:

(2) On an application under this section, the court shall make an access order if, and only if, it is satisfied—

(a) that the works are reasonably necessary for the preservation of the whole or any part of the dominant land; and

(b) that they cannot be carried out, or would be substantially more difficult to carry out, without entry upon the servient land;

Anything more, such as what is contemplated here, is a trespass and can be restrained by the grant of an injunction.

The position is confirmed by the decision of the High Court, Chancery Division in Prime London Holdings 11 Ltd v Thurloe Lodge [2022] Ch. 289

I hope this helps.

Kind regards

John

*John de Waal KC
Barrister and Mediator*

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