Public Document Pack

Planning and Transportation Committee

Date: **TUESDAY, 13 APRIL 2021**

Time: **10.30 am**

Venue: **VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)**

Members:

Deputy Alastair Moss (Chairman)
Oliver Sells KC (Deputy Chairman)
Munsur Ali
Deputy Randall Anderson
Douglas Barrow
Peter Bennett
Deputy Mark Bostock
Sheriff & Deputy Keith Bottomley
Deputy Henry Colthurst
Deputy Peter Dunphy
Alderman Professor Emma Edhem
John Edwards
Helen Fentimen
Deputy Marianne Fredericks
Tracey Graham
Graeme Harrower
Deputy Christopher Hayward
Christopher Hill
Michael Hudson
Alderman Robert Hughes-Penney
Deputy Jamie Ingham Clark
Deputy Shravan Joshi
Alderwoman Susan Langley
Oliver Lodge
Deputy Natasha Maria Cabrera Lloyd-Owen
Andrew Mayer
Deputy Brian Mooney
Deputy Barbara Newman
Graham Packham
Alderwoman Susan Pearson
Judith Pleasance
Deputy Henry Pollard
James de Sausmarez
William Upton KC
Alderman Sir David Wootton

Enquiries: **Gemma Stokley**
gemma.stokley@cityoflondon.gov.uk

Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:
https://youtu.be/VE-KNtg0QFg

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**
To agree the public minutes and summary of the meeting held virtually on 30 March 2021.

For Decision

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

For Decision
(Pages 7 - 1134)

5. **RECOVERY TASKFORCE - FINAL REPORT**
Report of the Director of Innovation & Growth.

For Decision
(Pages 1135 - 1150)

6. **GATEWAY 6 REPORT - CITY STREETS: TRANSPORTATION RESPONSE TO SUPPORT COVID-19 RECOVERY (PHASE 1 AND 2)**
Report of the Director of the Built Environment.

For Decision
(Pages 1151 - 1184)

7. **GATEWAY 4C REPORT - TOWER BRIDGE HV SYSTEM REPLACEMENT AND INCREASING RESILIENCE**
Report of the City Surveyor.

For Decision
(Pages 1185 - 1210)

8. **BUILDING CONTROL CHARGES REPORT**
Report of the Director of the Built Environment.

For Decision

(Pages 1211 - 1254)

9. **DECLARATION OF 100 BISHOPSGATE CITY WALKWAY (CLERK'S PLACE AND WRESTLERS COURT)**
Report of the Director of the Built Environment.

For Decision
(Pages 1255 - 1270)

10. **DELEGATED DECISIONS OF THE CHIEF PLANNING OFFICER AND DEVELOPMENT DIRECTOR**
Report of the Interim Chief Planning Officer and Development Director.

For Information
(Pages 1271 - 1278)

11. **VALID PLANNING APPLICATIONS RECEIVED BY DEPARTMENT OF THE BUILT ENVIRONMENT**
Report of the Interim Chief Planning Officer and Development Director.

For Information
(Pages 1279 - 1282)

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

14. **EXCLUSION OF THE PUBLIC**
MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-public Agenda

15. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held virtually on 30 March 2021.

For Decision

16. **GATEWAY 5 REPORT - BLACKFRIARS BRIDGE PARAPET REFURBISHMENT AND BRIDGE RE-PAINTING**

Report of the Director of the Built Environment.

For Decision
(Pages 1283 - 1298)

17. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

18. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Committee:	**Date:**
Planning and Transportation	13 April 2021
Subject: Bury House 31 Bury Street London EC3A 5AR Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.	**Public**
Ward: Aldgate	**For Decision**
Registered No: 20/00848/FULEIA	**Registered on:** 28 October 2020
Conservation Area:	**Listed Building:** No

Summary

The proposed development includes the demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.

The scheme is an office led development that would provide a minimum of 25,460sq.m (GIA) of new flexible office floorspace (Class E) across Level 2 to level 45. The office floorplates would be circa 350sq.m - 500sq.m, to appeal to SME businesses who would not have a requirement for larger office floorplates. The office floor area would incorporate affordable workspace (642 sq.m) GIA at level 2, available at 50% market rent for 15 years.

A new pedestrian route (Heneage Arcade) running north to south through the site is proposed at ground level which would support enhanced activity and vibrancy across the site and facilitate increased permeability through the site. This route would re-introduce an historic connection linking Bevis Marks to Bury Street. Active ground floor frontages are proposed within Heneage Arcade through flexible commercial uses (Class E), including a minimum of 60sq.m of retail floorspace that would be secured by condition.

A new pocket Park (James' Court) is proposed at the southern end of the Site, off Bury Street, which would be partially covered and colonnaded. Janes' Court would comprise planting and trees including a 32m high green wall.

Alongside the new street level public realm, a mezzanine level (421sq.m GIA) provides for a generous internal public realm area accessible by the public between 7am - 11pm. There would be scope for local groups to book and use parts of this level, as part of an extension to the Community Space described below. The Mezzanine level would be accessible via a dedicated prominent staircase at the front end of the building, alongside dedicated lift access.

The development would include 507sq.m (GIA) of community space (Class Sui Generis), referred to as Creechurch Hall, located at Level 1 of the proposed development. The level 1 community space has the capacity to accommodate up to 480 people, with flexibility built in so that the space can be used to meet varying user needs from large gatherings to smaller meeting spaces. The community space would be available to pre-book, free of charge for community-based groups between 10am - 9pm on weekdays and 9am - 5pm on Saturdays. This space has been designed to encompass formal and informal flexible space that could be utilised by local communities and networks, as well as hosting a range of providers from local non-profit organisations, schools and other education uses, local community groups. Access to the first floor would be via a dedicated staircase and lift. The offer and programme for Creechurch Hall would be developed in consultation with potential operators, community partners, institutions, businesses and end users. The delivery and management of Creechurch Hall would be secured through the Section 106 Agreement.

A total of 443 long stay and 26 short stay cycle parking spaces (compliant with the London Plan) would be provided at basement level, along with associated cycling facilities including lockers and showers. Access for cyclists would be via a prominent cycle parking entrance at ground level off Creechurch Lane, or via a dedicated cycle lift in the same location. Short stay spaces would be located at basement level, with a concierge service provided at ground floor level.

The servicing of the building would take place within a dedicated off-street service area at ground level, accessed through Heneage Place. Servicing would be subject to offsite consolidation which would be secured via a S106 obligation.

The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, energy efficiency, targeting BREEAM 'Outstanding' and adopting Circular Economy principles.

The development requires an EIA assessment.

A number of objections have been received from Bevis Marks Synagogue and members and worshippers from Bevis Marks Synagogue regarding the impact to the historical and religious significance and the setting of Bevis Marks Synagogue, the loss of daylight and sunlight to the Synagogue and the Courtyard (and the impact on the ability to read prayers), loss of clear sky from within the Synagogue, the impact of noise and disturbance from construction and the increased number of pedestrian and cyclists as a result of the proposed development which will harm the amenity, use and the historical and religious significance of the Synagogue.

The representations received and the responses to the representations are set out in the report and are attached in a separate bundle of papers.

Consideration of the impacts on Bevis Marks Synagogue, it is considered that in visual, physical and environmental terms, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

In terms of daylight, the proposed development would result in no significant adverse effect on the majority of the properties assessed with the exception of 10-12 Creechurch Lane, 14-16 Creechurch Lane and 18-20 Creechurch Lane & 27-31 Mitre Street which would experience moderate adverse impacts.

The impact on daylight and sunlight to Bevis Marks Synagogue would minor adverse with very small absolute VSC changes which would be imperceptible to the occupants. Officers do not consider that the loss in daylight experienced within the Synagogue would impact on the ability of worshippers to read from prayer books or would materially reduce light to the raised platform where prayers are read (the Bimah). The losses experienced would be minimal with small absolute reductions recorded between 1.7%-1.8% for VSC and between 7-13% for APSH.

The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. The difference between the existing and proposed condition for daylight and sunlight is very small that it would be imperceptible to the human eye. Officers consider that such fractional light alterations in real terms would not alter the way the Synagogue could be used.

The Synagogue would experience a moderate adverse impact in terms of sunlight to the courtyard. In the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. Officers acknowledge that the reduction of sunlight may slightly reduce the amenity of the courtyard but are of the view that it would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance.

Officers do not consider that the impact of daylight and sunlight to the Synagogue would be unacceptable and is not considered to impact the existing use of the property nor would it change the pattern of use of the Synagogue. It is considered that the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the moderate adverse impact.

The development would lead to an increase in pedestrian numbers on Heneage Lane following the continuation of the north/south desire line through the site. The additional pedestrian trips on Heneage Lane would not be considered likely to unduly impact on the Synagogue. It is not anticipated that cyclists would use Heneage Lane following the redevelopment. Creechurch Lane runs parallel to Heneage Lane and forms a north south cycle link and is likely to be the chosen route of cyclists accessing the site. The land use of the proposed development is not expected to generate noise levels which would be unusual for a city centre location. Whilst this is an increase in the expected use of Heneage Lane, in the context of the sites location in the heart of the City Cluster, it is considered that the additional number of trips is unlikely to impact on the amenity of those travelling to and from the Synagogue or have a detrimental impact that religious services would not be able to be carried out.

To mitigate the impacts of noise and disturbance during construction, conditions are recommended which would need to include details of noise and vibration mitigation, control over working hours and types of equipment to be used to be submitted and approved by the local planning authority.

It is a shared view with HE and HRP that the proposal results in harm to the setting (and to the significance) of the World Heritage Site of the Tower of London. The world heritage site status and the Grade I listing places the Tower of London at the very highest heritage level and as a result greater weight should be given to the asset's conservation. The assessment of the degree of that harm is what is at variance.

It is considered that the proposed development would result in less than substantial harm to the significance of the Tower of London World Heritage Site as result of the impact on setting arising as a result of the impact of the proposal in the view from the north bastion of Tower Bridge and would be contrary to Local Plan Policy CS12, and D9(e) London Plan Policies HC2, HC3 and HC4.

The proposal is contrary to Local Plan Policy CS13 and London Plan Policy HC 4 due to non-compliance with the LVMF visual management guidance for view 10A1 from the north bastion of Tower Bridge.

In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting.

In considering the proposal, considerable importance and weight must be given to preserving the settings of listed buildings. As set out in paragraph 193 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 194, any harm should require clear and convincing justification. Paragraph 196 of the NPPF sets out that where development proposals will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. In this case, while the proposals are in compliance with a number of policies, they are not considered to be in compliance with the development plan as a whole due to non-compliance with heritage policies identified above. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

Additional material considerations are as follows:

- Securing a strategic mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster as a 24/7 world class business destination

- Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.

- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.

- Extended public realm improvements are also proposed outside the red line boundary at Bury Street and Creechurch Lane.

- The provision of generous community space that is intended to reach out to the wider community and provide a gateway into the City for the population in neighbouring boroughs to access

opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community.

- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.

- The proposed building would result in a significant aesthetic enhancement to the Creechurch locality, through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area.

- The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 and S278 Agreement. Together these would go some way to mitigate the impact of the proposal.

Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal nevertheless outweigh the priority given to the development plan and other material considerations against the proposals. As such that the application should be recommended to you subject to all the relevant conditions being applied and section 106 obligations being entered into in order to secure the public benefits and minimise the impact of the proposal.

Recommendation

(1) That the Chief Planning Officer be authorised to grant planning permission for the above proposal in accordance with the details set out in the attached schedule, subject to:

a) The Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);

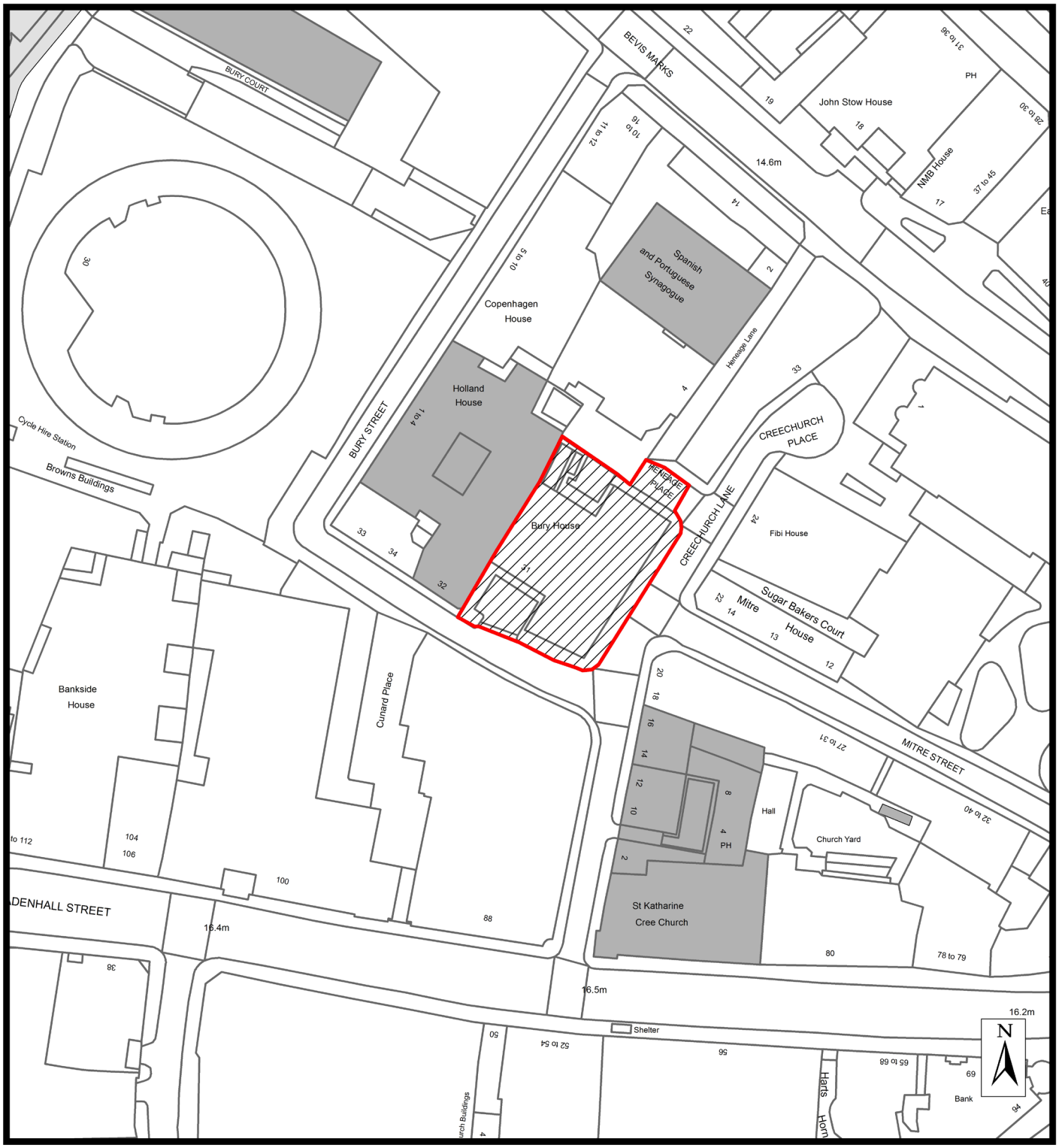
b) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highways Act 1980 in respect of those matters set out in the report, the decision notice not be issued until the Section 106 obligations have been executed;

(2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

(3) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

(4) The Secretary of State be informed that the Corporation intend to grant the planning application, and that the Secretary of State be given 21 days beginning with the date on which he tells the City that he received the consultation material sent to him by the Corporation to decide whether to make a direction restricting the grant of planning permission by the Corporation, or to decide to determine the application himself under section 77 of the Town and Country Planning Act 1990.

Site Location Plan



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ADDRESS:

31 Bury Street, London EC3A 5AR

CASE No.

20/00848/FULEIA

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

DEPARTMENT OF THE BUILT ENVIRONMENT



View from Bury Street



View from Creechurch lane



View 1 from Heneage lane



View 2 from Bury Street



View from Bury Street



View from Creechurch Ln

Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.

2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:

    a) To examine the environmental information;
    b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination;
    c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
    d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.

4. The local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to at paragraph 3(b) above is up to date.

5. The draft statement attached to this report at Appendix A sets out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions set out in the statement are up to date.

6. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also forms part of the environmental information before your Committee.

7. The Environmental Statement is available online together with the application, drawings, relevant policy documents and the representations received in respect of the application.

8. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information is also available online along with any further representations received in conjunction with the information.

Site and Surroundings

9. The Site comprises Bury House, 31 Bury Street, a 7-storey commercial building. The site is bound by Creechurch Lane to the east, Bury Street to the south and west, and built form to the north. Heneage Lane is located on the site's boundary to the north east. The building also contains an underground car park that can be accessed via a car lift to the north of the site from Heneage Place.

10. The building was constructed in the 1960s for use as commercial offices and has remained relatively unchanged since.

11. The existing building was built in 1967 and comprises office accommodation arranged over ground plus six upper storeys. A single storey basement provides some ancillary storage 10 cycle parking spaces and 18 car spaces.

12. Existing vehicular access to the site (and underground parking) is achieved from Heneage Place via a car lift located along the northern boundary of the Site. There are also 1 car parking space and 15 cycle parking spaces located at ground level.

13. Immediately to the west of the site is Holland House, a Grade II* Listed building and the Grade I listed Bevis Marks Synagogue is located approximately 30m north of the site. There are a number of other listed buildings in close proximity to the site. These include:

    - The Church of St Katherine Cree (Grade I)
    - Church of St Botolph (Grade I)
    - Church of St Andrew Undershaft (Grade I)
    - 2-6 Creechurch Lane (Grade II)
    - 38 St Mary Axe (Grade II)

14. The Tower or London World Heritage Site is located approximately 600m to the south-east of the Site.

15. The Site is not located within a Conservation Area. Lloyd's Avenue and St Helen's Conservation Area are located within 250m of the site.

16. The Site is within City of London's Eastern Cluster Zone (as identified in the Local Plan. Furthermore, within the draft new City Plan (2036), the Site lies within the 'The City Cluster Key Area of Change'. A key vision for this area according to the draft City Plan includes increasing the provision of world class buildings, delivering tall buildings on appropriate sites that make a positive contribution to the City's skyline.

Proposal

17. Planning Permission is sought for:
'Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.'

18. The proposed development would comprise a total of 30,170 sqm (GIA) incorporating the following land uses:

Use	Floor Level	Floor Area (GIA)
Office (Class E)	Level 02- Level 48	25,460 sq.m
Retail and Café Use (Class E)	Ground	60 sq.m
Publicly Accessible Amenity Use (Sui Generis)	Mezzanine	421 sq.m
Community Use (Sui Generis)	Level 01	507sq.m
Ancillary (Plant and BOH)	B01, BM01, B02, BM02	3,722 sq.m

19. The applicant is seeking a consent with a condition requiring that development commence within 5 years, so as to coincide with lease termination. Having regard to the expiry of the existing leases, a five year consent is considered reasonable to allow some flexibility for its implementation and in such circumstances is considered appropriate having regard to the development plan and other material considerations as considered in this report.

20. The scheme is an office led development that would provide a minimum of 25,460sq.m (GIA) of new flexible office floorspace (Class E) across Level 2 to level 45. The office floorplates would be circa 350sq.m - 500sq.m, to appeal to SME businesses who would not have a requirement for larger office floorplates. The office floor area would incorporate affordable workspace (642 sq.m) GIA at level 2, available at 50% market rent for 15 years. Part of the ground floor of the development would be allocated to provide lobby space and access to the upper office floors. Level access to the lobby space would be located off the proposed Heneage Arcade, a pedestrian route running north to south through the site. An office amenity area is proposed at level 20 and 21 accessible by all office tenants of the building.

21. A new pedestrian route (Heneage Arcade) running north to south through the site is proposed at ground level which would support enhanced activity and vibrancy across the site and facilitate increased permeability through the site. This route would re-introduce an historic connection linking Bevis Marks to Bury Street. Active ground floor frontages are proposed within Heneage Arcade through flexible commercial uses (Class E), including a minimum of 60sq.m of retail floorspace that would be secured by condition.

22. A new pocket Park (James' Court) is proposed at the southern end of the Site, off Bury Street, which would be partially covered and colonnaded. Janes' Court would comprise planting and trees including a 32m high green wall.

23. Alongside the new street level public realm, a mezzanine level (421sq.m GIA) provides for a generous internal public realm area accessible by the public between 7am – 11pm. There would be scope for local groups to book and use parts of this level, as part of an extension to the Community Space described below. The Mezzanine level would be accessible via a dedicated prominent staircase at the front end of the building, alongside dedicated lift access.

24. The development would include 507sq.m (GIA) of community space (Class Sui Generis), referred to as Creechurch Hall, located at Level 1 of the proposed development. The level 1 community space has the capacity to accommodate up to 480 people, with flexibility built in so that the space can be used to meet varying user needs from large gatherings to smaller meeting spaces. The community space would be available to pre-book, free of charge for community-based groups between 10am – 9pm on weekdays and 9am – 5pm on Saturdays. This space has been designed to encompass formal and informal flexible space that could be utilised by local communities and networks, as well as hosting a range of providers from local non-profit organisations, schools and other education uses, local community groups. Access to the first floor would be via a dedicated staircase and lift. The offer and programme for Creechurch Hall would be developed in consultation with potential operators, community partners, institutions, businesses and end users. The delivery and management of Creechurch Hall would be secured through the Section 106 Agreement.

25. A total of 443 long stay and 26 short stay cycle parking spaces would be provided at basement level, along with associated cycling facilities including lockers and showers. Access for cyclists would be via a prominent cycle parking entrance at ground level off Creechurch Lane, or via a dedicated cycle lift in the same location. Short stay spaces would be located at basement level, with a concierge service provided at ground floor level.

26. The servicing of the building would take place within a dedicated off-street service area at ground level, accessed through Heneage Place. Servicing would be subject to offsite consolidation which would be secured via a S106 obligation.

27. Dedicated areas of planting and greening would be incorporated into the development through a combination of green walls, green landscaping and new tree planting at ground level within the surrounding public realm.

Consultation

28. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders. Prior to the application being submitted the applicant has undertaken extensive pre-application consultation with key decision making authorities, key stakeholders and local community (including nearby residents). The applicants have ongoing engagement with Bevis Marks Synagogue from pre-application through the application process.

29. Two virtual Public Exhibitions were held between 1st July to 28th July 2020 and again between 25th September to 13th October. 1,553 newsletters were sent twice, first in June 2020 and the second in September 2020, advertising the consultation website and inviting feedback. The responses to the pre-application consultation included; the need for additional office space that can adapt to a post-covid world, high quality floorspace of a different scale, high quality public realm, the addition of new retail and community space, welcomed a new pocket park and the north south pedestrian route and the positive benefits of a new community space.

30. The applicants have directly engaged with The Aldgate School to discuss how the community spaces can be made relevant to the pupils at the school and provide outreach opportunities for the pupils and other local children.

31. The applicants have also directly engaged with Aldgate BID which welcomed the community space which would be valuable for holding training and skills workshops.

32. Following receipt of the applications they have been advertised on site and in the press and have been consulted upon twice, including under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letters and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.

33. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.

34. The applicants have provided a detailed response to matters raised in consultee and third-party responses which are available to view on the public website and are listed in the background papers list at the end of this report.

    Officers have informed the DCMS of the application and understand that they intend to send a notification to the World Heritage Centre

Consultation Response	
Historic England	The proposed development would be particularly noticeable in View 9: LVMF 10A.1 Tower Bridge: upstream. In this view the proposed tall building would diminish the visual dominance of the Tower by significantly exceeding the height of its corner turrets. The development would also erode the appreciation of the Tower of London's strategic siting on the River Thames set apart from the mercantile City of London by blocking part of the skyline between the Eastern Cluster and the White Tower. The proposed development would result in harm to an attribute of the Tower of London World Heritage Site's Outstanding Universal Value. The proposals would also appear also appear in cross-river views of the Tower of London, in particular LVMF 25A.1, 25A.2 and 25A.3 (Views 16-18, p142-153) from the Queens Walk at City Hall. In these views, the development's height and form would appear as a more coherent part of the developing Eastern Cluster in relation to the Tower of London. This harm is considered to be relatively minor. The proposed development would also be visible within the Tower of London Inner Ward. It would be particularly noticeable in the view towards the Grade I listed Chapel Royal of St. Peter ad Vincula as set out in View 23 of the submitted views assessment. In this view, the proposed development would appear above the roofline of the Chapel, adding to the modern visual intrusions of various tall building developments within the Eastern Cluster. The appearance of modern tall buildings above this roofline is undesirable. Further encroachment would contribute to a diminution of the impact of the sense of history and its separation from the modern city

	beyond. a degree of cumulative harm would result from these proposals. <u>Grade I listed Bevis Marks Synagogue (View 45)</u> View 45 illustrates a major juxtaposition in scale between Bevis Marks and the proposed development which encroaches on the secluded courtyard setting of the synagogue. The cumulative wireline assessment indicates that consented tall buildings within the Eastern Cluster already present a significant impact on the setting of Bevis Marks, and the proposed scheme will appear as part of that cluster in this view. The proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building. <u>Grade II* listed Holland House (View 42 from Bury Street and View 43 from Bury Court)</u> The proposed development would be highly visible in both views, and would rise up directly behind Holland House. HE consider that this would diminish the appreciation of the striking architectural form of the building, therefore causing some harm to its significance - this harm to be low due to the wider tall building context in the area. Overall, HE consider that the development would cause a high level of harm to a designation of outstanding significance, principally due to the impact on the Tower of London, particularly evident in LVMF View 10A.1. HE objects to this application, and continue to strongly recommend that a reduction in height of the proposed development is explored in order to avoid this harm. As HE have identified harm to a World Heritage Site, the Authority is required to notify State Parties (DCMS in this case) who will make a decision on whether to notify the World Heritage Centre. **Officer Response to Comments:** Consideration of the impacts identified in Historic England's response are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report.

	Officers have informed the DCMS of the application and understand that they intend to send a notification to the World Heritage Centre Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view. Paragraph 196 of the NPPF states "where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO. Impact on Holland House: The dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly inspired by that of Holland House and which would read as complementary. The views of the listed building across the Gherkin plaza do not contribute materially to the significance or appreciation of the listed building, where the setting is in any case defined by a contrast with tall buildings. The proposed building would not adversely impact upon light levels to the fine tiled interiors at the lower levels of the listed building. Accordingly, it is considered that the proposed building would not cause harm to the setting or significance of the listed building. Officers consider that the proposal would preserve the special interest and significance of the Bevis Marks Synagogue and all other relevant listed buildings, conservation areas and designated heritage assets (including within the Tower of

	London WHS) and non-designated heritage assets, causing no harm.
Greater London Authority	**Principle of development:** The redevelopment of the site for an office-led development within the CAZ, recognising its importance as an internationally and nationally significant office location is supported in principle. Further discussions are required regarding affordable workspace and how the proposed mezzanine space and pocket park would operate in synergy as a legible and functional public space. The applicant should also ensure that active frontages are achieved on Creechurch Lane and consider the height and proportions of the arcade, ensuring that the retail/café frontage is not perceived as an internalised lobby. **Historic Environment**: The development would compromise the ability to appreciate the Outstanding Universal Value and setting of the Tower of London World Heritage Site and would cause less than substantial harm to the significance of a number of Listed Buildings and Conservation Areas. The Heritage Impact Assessment does not include a number of heritage assets that will be impacted and the Townscape, Built Heritage and Visual Impact Assessment lacks sufficient detail to enable a comprehensive assessment of the heritage impacts of the proposal. Further information is required to enable GLA officers to consider the impact of the proposals upon the historic environment prior to Stage 2 and to carry out the required planning balance. **Design:** A tall building is acceptable in principle given the site is located within the Eastern Cluster but requires a sensitive design approach given its location in the setting of a number of heritage assets and the Tower of London WHS – in particular the materiality of the upper part of the building should be reconsidered to ensure the building reads as being familial to the Eastern Cluster and more different from the WHS. **Strategic views**: The height, scale and appearance of the proposed development within LVMF view 10A.1 would cause harm to this strategic view.

	Grade II* Listed Holland House: The proposed development would increase the sense of scale of development in the streetscape and though it is offset to the rear of the building, the proposed development would have an impact upon the ability to appreciate the heritage asset. From views adjacent to 30 St Mary Axe Holland House has a clear backdrop of open sky. GLA officers consider that it would clearly have an impact on the setting of the heritage asset and the contribution it currently makes to the ability to appreciate the architectural significance of Holland House. **Other Heritage Assets to Consider:** **Church of St. Botolph** - Whilst some views are already compromised by modern buildings, the proposed development is considered to cause harm to the setting of the Grade I Listed church. **Church of St Katharine Cree** – The proposed development would significantly alter the scale of built form and reduce the level of open sky on the street, causing harm to the setting of the Grade I Listed building. **Bevis Mark Synagogue** – The proposed development, together with the future proposed development of 1 Undershaft and 100 Leadenhall, would alter the setting of the synagogue and result in harm. Church of St Helen at Bishopsgate - in consideration of the future development of 1 Undershaft, it may be likely that the proposal would not constitute change such that it would further impact on the setting or the wider conservation area. **Trinity Square Gardens** – GLA officers consider there would potentially be some negative impact on the setting of the heritage asset and the conservation area. **Lloyd's Avenue** - The proposed development would be visible and dominant next to 30 St Mary Axe, rising significantly taller and impacting the views from the conservation area. Taking into consideration future proposed development, the proposals would further diminish the view and have a negative impact on the conservation area and its setting. An assessment on the impacts of the following heritage assets should be provided: Church of St Andrew Undershaft; Church of St Helen's Bishopsgate; Sir John Cass School Aldgate; 38 St

	Mary Axe; Bishopsgate Institute; Tower Bridge – views from Shad Thames; Church of All Hallows; 72-75 Fenchurch Street/1Lloyds Avenue; Bishopsgate Institute; and 2 Brushfield Street Grade II* **Officer Response to Comments:** Consideration of the impacts on the ToL WHS are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report. Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view. Paragraph 196 of the NPPF states "where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO. Impact on Holland House: The dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly inspired by that of Holland House and which would read as complementary. The views of the listed building across the Gherkin plaza do not contribute materially to the significance or appreciation of the listed building, where the setting is in any case defined by a contrast with tall buildings. The proposed building would not adversely impact upon light levels to the fine tiled interiors at the lower levels of the listed building. Accordingly, it is considered that the proposed building would not

	cause harm to the setting or significance of the listed building. Overall, it has been found that the proposal would preserve the special interest and significance of the Bevis Marks Synagogue and all other relevant listed buildings, conservation areas and other designated heritage assets (including Church of St Botolph, St Katherine Cree, Trinity Square Gardens, Lloyds Avenue CA) , including those within the Tower of London WHS, and non-designated heritage assets, including the additional heritage assets requested for assessment by the GLA (Church of St Andrew Undershaft; Church of St Helen's Bishopsgate; Sir John Cass School Aldgate; 38 St Mary Axe; Bishopsgate Institute; Tower Bridge – views from Shad Thames; Church of All Hallows; 72-75 Fenchurch Street/1Lloyds Avenue; Bishopsgate Institute; and 2 Brushfield Street Grade II*), causing no harm. **Transport:** Proposed car and cycle parking is acceptable. Future impacts on station capacity and crowding should be considered. Widening of footways should be secured via s278 or s106 agreement to ensure pedestrian comfort levels are acceptable. Access through the north -south pedestrian route should be conditioned. The applicant should consider how cyclists would be segregated from servicing vehicles using the same street. A contribution of £220,000 has been requested for a new Cycle Hire station. A full Travel Plan, Delivery and Servicing Plan and full Construction Logistics Plan should be secured by condition. **Officer Response to Comments:** Pedestrian priority would be delivered through the S278 agreement and the broad details of this are set out in the transport and highways section of the report. Servicing hours will be restricted during peak hours (Am, lunch and PM peaks) when there are likely to be more cyclists commuting to and from the building. The applicant has agreed to carry out an assessment of the cycle route between the site and Cycle Superhighway 2 (CS2) using TfL Cycle Route Quality

	Criteria prior to Stage 2, and provide a contribution toward cycling improvements, both to cycle hire and cycle routes, in the nearby area and this would be secured by planning obligations. Access through the north -south pedestrian route would be secured via planning obligations including the hours of access.
Historic Royal Palaces (HRP)	HRP recognise that the aim of the design approach is to cut back at the upper part of the proposed tower, in order to maintain some visual separation from the White Tower silhouette in the London View Management Framework (LVMF) view 10A.1 from the north bastion of Tower Bridge. Without the cut back from the 84m high 'base', the upper part of the tower would appear visually to 'touch' the western side of the White Tower in this view. With the cut back, there remains just a sliver of sky space to separate it, but, is not static: if you move a few metres north the proposal would appear to rise directly out of the White Tower. The LVMF guidance for view 10A.1 states that: 'The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued.' Regarding the background to the Tower, the LVMF guidance notes, *'Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site.'* HRP state that the LVMF was written in 2011-12, when the only existing tall buildings in the emerging Cluster were the Gherkin (30 St Mary Axe), the Willis Towers and Tower 42. The expansion of the Cluster since, in both scale and height, has been beyond anything that was envisaged when the LVMF was published. The proposal for Bury House, would now increase the existing compromise of the free space around the White Tower.

	HRP states that the attention given to LVMF view 10A.1, does not mitigate the damaging visual impacts that are evident in the dynamic journey across Tower Bridge and in the local views from within the inner ward and the northern ramparts of the Tower identified in our Local Setting Study 2010. These impacts would be particularly apparent in the view north-west from the centre of Tower Green over the roof of St Peter ad Vincula (TBHVIA view 22) and in the view from the northern wall walk east of the Devereux Tower (TBHVIA view 25), as well as from the causeway between the Byward and Middle Towers (TBHVIA view 28). In these views, the proposed building would rise like a narrow finger, standing apart from the existing and consented buildings of the Cluster and increasing the visual intrusion of the modern city skyline into the inner ward and important outward views. The intrusion would not be softened or screened when the trees are not in leaf. HRP states that a key impact of the proposed development would be that it would extend the eastern shoulder of the Cluster toward the Tower, further reducing the crucial separation between the Tower and the City. Although relatively modest in height, the proposal would be high enough to suggest a further continuation of the downward slope of the Cluster towards the White Tower - pushed increasingly up and out in the easterly direction from the consented 100 Leadenhall scheme. Historic Royal Palaces objects to the proposed development, which we believe would be harmful to the OUV of the Tower of London WHS. **Officer Response to Comments:** Consideration of the impacts identified in HRP's response are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report. Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's

	ability to appreciate its OUV, integrity, authenticity or significance in this view. Paragraph 196 of the NPPF states “where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO.
Transport for London	Stage 1 Road Safety Audits (RSAs) to be carried out prior to determination for all local highway works proposed. Contribution of Section 106 (S106) funding, Section 278 (S278) works or works in kind to the City Cluster Liveable Neighbourhood project, to mitigate poor expected Pedestrian Comfort Levels (PCLs) close to and partially caused by the proposed development. Pedestrian Comfort Levels (PCLs) close to and partially caused by the proposed development. Further discussions should take place between the applicant, TfL and the City Corporation to resolve this issue prior to determination. The covered pedestrian route is to be publicly accessible from 07:00-23:00 each day and the pocket park will be open to the public 24 hours a day, both of these should be secured by condition or in the S106 agreement. Investigation on the removal of general car parking on Creechurch Lane, to provide more space between cyclists and service vehicles would be supported. S106 contribution of £220,000 for a new Cycle Hire station.

	A full Active Travel Promotion Plan to be secured by condition. Delivery & Servicing Plan and Construction Logistics Plan to be submitted and secured by condition. **Officer Response to Comments:** Consideration of the impacts identified in Transport for London's response are contained in the following sections later in this report: Transport and Highways and CIL and S106 Agreement. Transport for London have confirmed that a stage 1 road safety audit is not required prior to determination following confirmation that delivery and servicing vehicles will be prohibited during peak pedestrian and cyclist hours, secured by planning obligation. The applicant has agreed to carry out an assessment of the cycle route between the site and Cycle Superhighway 2 (CS2) using TfL Cycle Route Quality Criteria prior to Stage 2, and provide a contribution toward cycling improvements, both to cycle hire and cycle routes, in the nearby area and this would be secured by planning obligations. A Delivery and Service Management Plan and Cycling Promotion Plan would be secured via planning obligations. A Construction Logistics Plan would be secured via a condition.
Heathrow Safeguarding	No objection.
London City Airport	No objection subject to condition.
NATS Safeguarding	No objection.
Civil Aviation Authority	No comments received.
Crossrail Ltd	No objection.
Network Rail	No objection.
Thames Water	No objection subject to conditions/informatives.
Environment Agency	No objection.
London Borough of Greenwich	No objection.
London Borough of Lambeth	No comments received.
London Borough of Camden	No objection.

London Borough of Islington	No comments received.
London Borough of Hackney	No objection.
London Borough of Southwark	No objection.
London Borough of Tower Hamlets	The London Borough of Tower Hamlets is of the view that the proposals would result in a significance adverse impact on the Grade I listed Tower of London WHS including its setting and townscape views. The proposals would diminish the ability to appreciate the OUV of the Tower of London WHS. As illustrated in LVMF views and views from within and around the WHS, the height and location of the proposed development in relation to the Tower of London WHS are considered to adversely affect the following attributes of the OUV; the physical prominence of the White Tower; the concentric defences; the site's strategic and landmark setting; and the site's status as an internationally famous monument. **Officer Response to Comments:** Consideration of the impacts on the ToL WHS are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report. Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view. Paragraph 196 of the NPPF states "where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of

	the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO.
City of Westminster	No objection.

Representations (objections)	
London Sephardi Trust (The Trust) And The Spanish & Portuguese	Representatives of the Trust have met with the Applicants and their team a number of times in the Spring and Summer of 2020 prior to the application being submitted and continue to be in correspondence. The Trust objects to the proposals due to the significant adverse impacts the proposed development will have on a) the impacts on the heritage significance of the synagogue; b) the daylight and sunlight impacts on the synagogue building and courtyard; c) sense of enclosure and encroachment on the Synagogue courtyard The impacts of the proposed development need to be viewed individually and also (whether approved or under consideration including the application for a further tall office building at 33 Creechurch Lane). In formulating its representations, the Trust is being advised by independent consultants Caroe Architecture Ltd (Heritage), Point2 Surveyors Ltd and Paragon Building Consultancy Ltd (the expert reports have been appended to the representation and is available to view online). **Harm to the heritage significance of the Grade I listed Synagogue complex and its setting** The Trust are concerned that the application documents do not present a full picture of the proposal's impacts on the Synagogue and its setting. The Caroe report highlights that more robust 3-dimensional modelling and CGI views are required in order for Officers and Members to appreciate the impact on the north and west facades of the Synagogue and Beadles House from within the courtyard.

	On the basis of what has been provided, the Trust's heritage experts conclude: • The proposed development will have a significant impact on the heritage significance of the Synagogue and its historic Courtyard setting as well as Beadle's House due to its proximity and scale. • The proposed building will significantly reduce the visible sky in the south-eastern view from inside the Courtyard and detract from the viewer's ability to clearly discern the historic character and aesthetic and architectural qualities of the Synagogue building. • Caroe's report considers that given the harm caused by existing development to the setting of the Synagogue, the Synagogue's setting cannot withstand further harm and the harm resulting from this proposal is incapable of being justified. • Caroe's view is that where the cumulative effects of consented and proposed developments are considered (including 33 Creechurch Lane) represents harm at the very upper end of the 'less than substantial harm' spectrum to Bevis Marks Synagogue. The Trust states that the Applicant has not provided a clear and convincing case to justify the harm to the heritage asset which is a key requirement of New London Plan policy D9 (Tall Buildings). The public benefits are not capable of outweighing the harm that will be caused. The public benefits promoted by the applicant are minor and are not unique to this development. The scale of development proposed is not necessary to secure public benefits of a similar magnitude. Whilst there is policy support for office space in the City there is already a significant pipeline of offices both under construction and with permission within the City of London. Other benefits of the scheme are private in nature and will only accrue to the developer. **Officer Response to Comments:**

	Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. There is no harm identified to the Synagogue, officers have undertaken an assessment of the public benefits of the scheme in respect of the harm to the ToL WHO (engaging NPPF para 196).The assessment of the public benefits is set out in the 'Public Benefits' Section of the report. **Daylight, Sunlight and Overshadowing** The Trust states that the Synagogue already experiences poor light levels. The most vulnerable part of the Synagogue is the Bimah – the raised platform from which prayers are led. This requires adequate light and the entrance to the courtyard which currently benefits from adequate sunlight levels which contribute greatly to its amenity. The natural lighting of the Synagogue has religious significance. The existing low levels of light within the Synagogue mean that the building cannot withstand further substantial losses of daylight. The Synagogue and its worshipers rely on natural daylight, which is how it was designed to be experienced. It is very difficult and intrusive to install electric lighting. Point2 (surveyors on behalf of the Synagogue) state that the proposed development would reduce the daylight and sunlight available to the Synagogue and the courtyard to levels significantly below BRE guidelines. **Daylight** • The windows in the south façade of the Synagogue which face Bury House will experience a noticeable alteration of vertical sky component (VSC)with reductions of VSC of up to circa 32%. In the cumulative scenario, where 33 Creechurch Lane is also developed

	the impacts will be even more severe resulting in VSC reductions of 45%. • These losses are exacerbated by the fact these windows already receive low levels of light. The existing light is so low that any further reduction in light has a large effect necessitating electric lighting at most times during the day. There is incremental loss and the synagogue cannot afford any further loss because the last bits of light are central to the Bimah (raised platform with a reading desk). • Further reductions will be seriously harmful to the overall light levels received and will force the Synagogue to rely on the use of artificial lighting (which is not easily retro fitted due to the Grade 1 listed nature of the Synagogue). **Overshadowing** The courtyard is integral to Synagogue's communal functions and religious significance and represents the only place where worshippers of all sexes can gather before and after worship and is used for rituals and functions. The Courtyard amenity space will experience significant overshadowing in the summer months when the space is most used. The Synagogue's existing courtyard is already poorly lit and receives low levels of sunlight due to the surrounding development. If the proposed development is approved it will suffer even greater reductions of direct sunlight which will harm its usability, its amenity value and its contribution to the setting of the synagogue. • Based on the overshadowing assessment, all direct sunlight to the Courtyard amenity space from 12:30 to 14:00 in the height of summer will be materially impacted and effectively lost as a result the proposed redevelopment of 31 Bury Street. This is further compounded in the cumulative scenarios. • The proposed development at 33 Creechurch Lane will result in over shadowing of the majority of the Courtyard from 09:00-11:30 • - The proposed development at 31 Bury Street will result in over shadowing of the majority of the Courtyard from 12:30-14:00

	• - The proposed development at 100 Leadenhall will result in over shadowing of the majority of the Courtyard from 14:00-15:00 • - Thereafter there remains no direct sunlight due to the remaining buildings in the eastern cluster lying to the Courtyards west. The impact this would have on the use of the Synagogue is significant and the Trust considers this unacceptable and in breach of development plan policies Policy DM10.7(1) of the *City of London Local Plan (2015) and D9 3) a) of the New London Plan.* The Trust asks that the City refuse the development on this ground alone. **Officer Response to Comments:** The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration. The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The absolute alterations in the level of daylight and sunlight experienced as a result of the proposed development is considered to be very low. in terms of VSC absolute reductions are recorded between 1.7%-1.8% and for APSH absolute reductions are recorded to be between 7-13% for annual sunlight. The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including when at the Bimah. The difference between the existing and proposed condition for daylight and sunlight is very small that it would be imperceptible to the human eye. Officers consider that such fractional light alterations in real terms would not alter the way the Synagogue could be used. The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Officers acknowledge that the reduction of sunlight

	may slightly reduce the amenity of the courtyard but would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance. The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development. **Servicing, Deliveries and Access** The proposed development will lead to a significant increase in pedestrian, cycle and vehicular movements along Heneage Lane that would cause noise disturbance to the Synagogue. These impacts, unless properly controlled, would have a detrimental impact on religious services and other activities within the Synagogue. The proposed layout of the scheme introduces a new pedestrian and cycle route through the application site connecting with Heneage Lane and Bevis Marks. This route is likely to significantly increase the number of pedestrians and cyclists using Heneage Lane. At present the Lane is a quiet passageway in keeping with the setting of Synagogue. **Officer Response to Comments:** The impact of noise and disturbance by pedestrians and cyclists is covered in the Transport and Noise and Vibration sections of the report. Heneage Lane is approximately 3.5m wide and has capacity to accommodate around 2,000 pedestrians per hour at a comfort level of B+. It is agreed that the development would lead to an increase in pedestrian numbers on Heneage Lane following the continuation of the north/south desire line through the site. The additional pedestrian trips on Heneage Lane would not be considered likely to unduly impact pedestrian comfort.

	It is not anticipated that cyclists would use Heneage Lane following the redevelopment. Creechurch Lane runs parallel to Heneage Lane and forms a north south cycle link and is likely to be the chosen route of cyclists accessing the site. The proposals would result in the removal of 18 car parking spaces and as such the number of car journeys to the site is expected to fall as part of the development. There is a modest increase in taxi and motorcycle journeys predicted, 6 each in the am and pm peak hours, the impact of which are not expected to be significant. **Access** Heneage Lane is not suitable for the proposed intensification and the increased use particularly by cyclists will cause a danger for members of the Community accessing the Synagogue and particularly those with mobility difficulties. **Officer Response to Comments:** The proposed development would not alter the access to the Synagogue for any visitors. **Servicing and Deliveries** The proposed development's Servicing Strategy relies on a proposed servicing bay located in the same location which currently serves the existing building. The Applicant relies on what they describe as a "legal right of way" which comprises of a vehicular route through an undercroft beneath Valiant House, known as Heneage Place. The Trust owns the freehold to Valiant House and in turn to the right of way to the service yard within the application site. The Trust objects to any intensification of this right of way as proposed by the scheme. **Officer Response to Comments:** This is considered to be a neighbourly matter and not a material planning consideration. Due to the significant proposed uplift in floor area the proposed servicing bay and access to it will be subject to a significant intensification of its use. The Transport Statement suggests that there will be 43

	servicing vehicle trips per day and will rely on consolidation. without details relating to how this would work in practice it is considered unrealistic to predict a reduction in the number of servicing vehicles. **Officer Response to Comments:** A cap limiting the number of deliveries per day to 22 would be secured through the S106 agreement. Off-site consolidation centres require deliveries to be routed to a site for consolidating onto fewer, fuller vehicles. The achievement of a 50% reduction in delivery and servicing vehicle numbers through the mandatory use of an off-site consolidation centre is considered realistic. The management of the loading bay would be detailed within the Delivery and Servicing Plan (DSP), (secured through the S106 agreement). The S106 agreement would prohibit deliveries during peak pedestrian hours of 0700 – 1000, 1200 – 1400 and 1600 – 1900. The DSP would detail measures to minimise the impact of deliveries and servicing vehicles, including the use of a booking system to ensure only one vehicle is servicing the site at any given time. Further details of this is discussed in detail in the Transport section of the report. **Construction Impacts** • **Ground heave and movement** - due to the delicate nature of the Synagogue there must be no construction activities carried out likely to cause ground movement. Real-time 24-hour monitoring will be required. **Officer Response to Comments:** consideration of these impacts are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report**.** A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns. • **Vibration** – there is some potential for damage and disturbance from vibration during the works. We would expect to, but have not

	seen a vibration strategy for keeping the levels to no higher than 1mm per second. • **Noise** – the submitted Construction Environmental Management Plan confirms the developers intention to work to approved statutory working hours. We will need to secure additional restrictions to ensure there is no noise and disturbance during prayer times and services including weekday mornings before 08.30. **Officer Response to Comments:** consideration of these impacts are set out in the Noise and Vibration section of the report**.** Details of noise and vibration mitigation, including control over working hours and types of equipment to be used would be included in the Scheme of Protective Works and Construction Environmental Management Plan which are to be secured by condition. • **Dust** – must be managed to ensure no penetration of the internal spaces and no health risk to users of the Courtyard. **Officer Response to Comments:** The applicant would be required to submit a Construction Environmental Management Plan which would need to include details of the management of construction dust. Consideration of these impacts are set out in the Noise and Vibration and Air Quality section of the report**.** • **De-watering** - Mace have set out the outline proposals for temporary works sequencing to form the 3 storeys of basements including extensive de-watering using large steel props spanning the complete width of the excavation (known as cross-site propping) and a secant piled perimeter wall. We will need to assess this impact specifically for the Synagogue's structure with such large scale de-watering of the ground on the Bury House site. **Officer Response to Comments:** consideration of these impacts are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report**.** A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited

	structural engineer to be submitted and approved to address these concerns. **Cumulative Impacts** Cumulative impacts of development are an issue particularly pertinent to the Synagogue given the magnitude of change which has occurred in the streets immediately surrounding the Synagogue in recent years. Para.28 of Historic England 'Managing Significance in decision-Taking in the Historic Environment both set out the importance of considering cumulative impacts stating that: '*"The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape"* **Officers Response to Comments:** Cumulative impacts have been taken into account when assessing the significance of the Synagogue. consideration of these impacts are set out in the 'Designated Heritage Assets' section of the report. The Environmental Statement makes the following comment in respect of cumulative impacts on the Synagogue: *'Permanent Adverse effect interactions in relation to daylight, sunlight and noise amenity to existing non-residential property (Bevis Marks Synagogue). The effect interaction is not considered significant on the basis that the individual daylight, sunlight and noise effects are not themselves significant and Operational Noise Management Plans can be implemented to achieve suitable rating noise limits'* The Trust states that it is questionable whether the proposal and others coming forward in the surrounding area would comply with the City of

	London's own Local Plan policy CS14: Tall Buildings. **Officer Response to Comments:** The Environmental Impacts of the proposed development have been thoroughly assessed taking into account cumulative assessments and the impacts are considered to be acceptable and mitigation measures have been proposed (via conditions and S106 obligations) where necessary. When assessed against the development plan, the environmental impacts would be compliant with the development. The proposal has been assessed against Local Plan Policy CS14 and this assessment is set out in the Design and Heritage section of the report. **Conclusion** The Trust states that the scale of the proposed development is such that it will have multiple significant adverse impacts on the Synagogue both individually and cumulatively. The uniqueness of the Synagogue as a heritage asset means that even modest impacts of the proposed office building are not acceptable in policy terms. The impacts on the setting, on the daylight and the sense of encroachment and loss of sunlight to the special entrance Courtyard would be overwhelmingly harmful. The balance to be struck is between the harm to a unique asset in the UK versus a serviceable but ordinary office building with limited public benefits. **Officer Response to Comments:** Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. Consideration of the impacts on the daylight and sunlight is set out in the 'Daylight, Sunlight and Overshadowing' section of the report.

	The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be imperceptible to the occupants. The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The losses are considered to be fractional and officers do not consider that the loss of light experienced within the Synagogue would materially impact on the ability of worshippers to read from prayer books or would significantly reduce light to the raised platform where prayers are read (the Bimah). With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. Officers do not consider that the impact of daylight, sunlight and overshadowing to the Synagogue would be unacceptable and is not considered to impact the existing use nor would it necessitate a change in the pattern of use of the Synagogue. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (including the proposed development under consideration at 33 Creechurch Lane). The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not cause unacceptable harm to the daylight and sunlight of surrounding land and buildings and complies with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. The assessment of the public benefits is set out in the ‘Assessment of the Public Benefits’ Section of the report.

Eversheds Sutherland (International) LLP on behalf of The Wardens And Society Of The Mistery Or Art Of The Leathersellers	Leathersellers owns a number of property holdings within the immediate vicinity of the application site: 3, 5, 6, 7, 15, 16 and 17 St Helen's Place; • 33 Great St Helens; • 52-68 and 88 Bishopsgate; • 12/20 Camomile Street; and • 25-51 and 61 St Mary Axe • **Impact on the St Helen's Place Conservation Area and The setting of nearby heritage sites and listed buildings** The proposed development has a direct impact upon the setting of a series of significant heritage assets within the immediate vicinity of the application site and, more particularly, in respect of the scheme's relationship with the Tower of London World Heritage Site (ToL WHS). The representation letters sets out the assessment and conclusion raised in Historic England's Consultation Response in respect if the impact to the TOLWHS. They state that they are unable to agree with the findings in the submitted Townscape, Built Heritage and Visual Impact Assessment and have concerns that the findings of the assessment cannot reasonably conclude that the application proposal *"would be at the low end of less than substantial harm under the terms of paragraph 196 of the NPPF"* **Officer Response to Comments:** Consideration of the impacts on the ToL WHS are contained in the following sections in this report: Design and Heritage – Tower of London World Heritage Site and Designated Heritage Assets and Assessment of the Public Benefits sections of the report. Considered overall, by reason of its height, form and proximity to the ToL WHS in the LVMF view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view. Paragraph 196 of the NPPF states "where a development proposal will lead to less than

	substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The assessment of the public benefits has been carried out. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal outweigh the harm caused to the WHO. **Daylight and Sunlight Impacts** The properties at 15 and 16 St Helen's Place, 12/20 Camomile Street and 61 St Mary Axe have been identified in the baseline for assessment. None of these properties are the subject of any detailed sensitivity assessment for daylight/sunlight impacts, overshadowing, solar glare or light intrusion. The objector states that the absence of any explanation leaves them in doubt that the assessment is complete. They state that they have yet to conclude our detailed impact assessment of the proposed development and reserves their position in relation to these issues. They do have concerns that 15 and 16 St Helen's Place, 12/20 Camomile Street and 61 St Mary Axe will experience a significant adverse impact as a result of the construction of another tall building in this area. **Officer Response to Comments:** Officers can confirm that the submitted daylight, sunlight, overshadowing, light intrusion and solar glare assessment does take into account the stated properties within the 'baseline conditions' These properties are considered to be further away approximately 135-190m away from the proposed development and none of the windows directly face the Site. Due to the distance of these properties, a detailed technical assessment was not carried out. The applicants have since confirmed in a letter that there would be no material impact to the properties identified. Your officers concur with these conclusions and do not consider that there would be a material impact to the properties identified.

Board of Deputies of British Jews	A letter has been received regarding the affect both the application scheme and adjacent scheme at 33 Creechurch Lane could have on the Bevis Marks synagogue. It raises the following concerns: • The proposed Bury House development would block out light. The synagogue was designed with natural light in mind and any severe restriction to that would be detrimental to worshippers. • Bevis Marks has significant importance as a living symbol of the place of British Jews in this country. It is also a symbol to wider society, of how diversity is integral to London. It has been in constant use for over 300 years. The potential risk to the Synagogue's foundations, loss of light or restricted disabled access is upsetting. Bevis Marks Synagogue is of such enormous significance that the City of London consider explicit long-term protection for the building and its surrounds so that they no longer have to fight each development individually. **Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing and Access and Inclusivity. Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be imperceptible to the occupants. The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The losses are considered to be fractional and officers do not consider that the loss of light experienced within the Synagogue would materially impact on the ability of worshippers to read or would

	significantly reduce light to the raised platform where prayers are read (the Bimah). With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. Officers do not consider that the impact of daylight, sunlight and overshadowing to the Synagogue would be unacceptable and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue. Consideration of the impacts to the Synagogue foundations are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report**.** A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns. The proposed development does not propose any alterations to the way visitors access the Synagogue.
Office of the Chief Rabbi	A letter has been received outlining the Synagogue's importance and raising the following concerns regarding the proposed development. • The potential to significantly affect the natural light that can reach the building and, in turn, disrupt prayers taking place inside. • This would have a notable impact on the atmosphere that Bevis Marks, to the detriment of those worshipping there, especially when coupled with a separate planned development on Creechurch Lane. • The Synagogue is considered to be a cherished landmark of the community, and a source of great spiritual sustenance to British Jews. It is essential that it be carefully protected, as any other place of worship so steeped in history would. • Necessary arrangements are made to ensure that this new development does

	not cause lasting damage to Bevis Marks Synagogue. **Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing. Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be imperceptible to the occupants. The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The losses are considered to be fractional and officers do not consider that the loss of light experienced within the Synagogue would impact on the ability of worshippers to read or would significantly reduce light to the raised platform where prayers are read (the Bimah). With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (including the proposed development under consideration at 33 Creechurch Lane). Officers do not consider that the impact of daylight, sunlight and overshadowing to the Synagogue would be unacceptable and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.

	Consideration of the impacts to the Synagogue foundations are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report**.** A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.
The Worshipful Company of Ironmongers	An objection has been received raising following concerns: • The synagogue is a building of huge historical significance and occupies an important place in the Jewish religion in this country. • The application for a 50-storey building at 31 Bury Street would massively reduce the light in the historic courtyard of the Synagogue. • The proposed building at 33 Creechurch Lane appears to have 22 storeys which will completely block all light from the window at that end of the Synagogue for most of the day. • Neither of the proposed developments appears to have taken any account of these issues. • Bevis Marks Synagogue is unique by virtue of its location, history, architecture and its cultural and religious significance. • If these developments proceeded, they would impact severely on the continuance of Bevis Marks as a functioning Synagogue. The Ironmongers' Company urges the Corporation and the Planning Committee to give due consideration to these factors when the proposed developments are discussed and brought forward for a decision. **Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing. Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance

	and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be imperceptible to the occupants. The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The losses are considered to be fractional and officers do not consider that the loss of light experienced within the Synagogue would impact on the ability of worshippers to read or would significantly reduce light to the raised platform where prayers are read (the Bimah). With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (including the proposed development under consideration at 33 Creechurch Lane). Officers do not consider that the impact of daylight, sunlight and overshadowing to the Synagogue would be unacceptable and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.
Drapers' Company	An objection has been received raising following concerns: • Bevis Marks Synagogue is not only an exquisite Grade 1 listed building but is also the only non-Christian place of worship in the City. It has been used continuously for worship longer than any other synagogue in the world and occupies a crucial place in the history of the Jewish religion in this country.

	• By any objective measure it is a building of huge historical significance. Given the Synagogue's importance for both the City and this country's Jewish community, the Drapers' Company is anxious that the building should be protected. • The proposed 50-storey development would have the effect of reducing light to the courtyard of the Synagogue. • The proposed 20-storey development in Creechurch Lane will result in loss of light into the synagogue. There will also be an adverse impact on levels of light in the courtyard of the Synagogue. • Neither development seems to take account of these issues. The Drapers' Company urges the City to give due consideration to these factors when the proposed development comes up for decision. **Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing. Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be imperceptible to the occupants. The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The losses are considered to be fractional and officers do not consider that the loss of light experienced within the Synagogue would impact on the ability of worshippers to read or would significantly reduce light to the raised platform where prayers are read (the Bimah).

	With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (including the proposed development under consideration at 33 Creechurch Lane). Officers do not consider that the impact of daylight, sunlight and overshadowing to the Synagogue would be unacceptable and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.
Ancient Monuments Society	A letter has been received to testify the synagogues outstanding significance and details the following: • It is historically the most significant synagogue in the country. In 1928 it was recognised as a scheduled monument, some twenty years before the concept of Listing was first introduced. • All established authorities, such as Dr Sharman Kadish, give it that first rank. It receives 5 pages, including full-page, illustrations in her “Jewish Heritage in Britain and Ireland” of 2015, published by Historic England. • It was the subject of one of the first ever individualised campaigns – the Bevis Marks Anti-Demolition League, set up in the 1880s. • Part of its emotive power is that it is such an obvious survivor, a diminutive surprise in its own internal courtyard, without a street frontage. It lies surrounded by the office blocks of the City, of which it could so easily have been a victim, had not the Jewish-led campaign, endorsed fifty years after that by the secular authorities, saved it a century and a half ago. It is remarkable, precious and of national, if not international, significance.

	Officers Response to Comments: The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.
The Georgian Group	Bevis Marks Synagogue of high communal value locally and nationally Considerable harm would be caused to the setting and potential fabric of the synagogue - scale and massing of the building would harm setting of building and courtyard, as well as potential to cause substantial harm to the historic fabric from construction and environmental conditions created by tall buildings in close proximity Cumulative impact must be taken into account Georgian Group objects to application on heritage grounds. **Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Impact to Synagogue Foundations and Ground Movement' and Environmental Impact of Proposals on Surrounding Area Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. Consideration of the impacts to the Synagogue foundations are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report**.** A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground

	movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns. The Environmental Impacts of the proposed development have been thoroughly assessed taking into account cumulative assessments and the impacts are considered to be acceptable and mitigation measures have been proposed (via conditions and S106 obligations) where necessary. When assessed against the development plan, the environmental impacts would be compliant with the development.
Rabbi of Bevis Marks Synagogue	One of the best surviving examples of an intact Wren style City church with original interior; The backdrop of the Synagogue would be changed from having views of the sky to being framed by a 50 storey building; windows peering down on Synagogue would erase the sense of escape and tranquillity of the courtyard; Increased noise from footfall and cycling down Heneage Lane alongside the Synagogue eastern wall would disrupt prayers; Loss of light from height of proposed building - inability to read prayers with natural light; Religious vandalism from blocking out sun as it determines times of prayers; Loss of privacy in garden courtyard of 2 Heneage Lane (Rabbi's House); National Lottery Heritage Fund Heritage Centre planned for Synagogue, bringing in 40k visitors a year. This would be impacted negatively by proposed development. **Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Design, Designated Heritage Assets; Daylight and Sunlight and Overshadowing; Transport and Noise and Vibration. Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would

	preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. Officers do not consider that there would be any more risk and loss of privacy than the existing situation as there are already a number of tall buildings which are in close proximity to the Synagogue. Heneage Lane is approximately 3.5m wide and has capacity to accommodate around 2,000 pedestrians per hour at a comfort level of B+. It is agreed that the development would lead to an increase in pedestrian numbers on Heneage Lane following the continuation of the north/south desire line through the site. The additional pedestrian trips on Heneage Lane would not be considered likely to unduly impact pedestrian comfort. It is not anticipated that cyclists would use Heneage Lane following the redevelopment. Creechurch Lane runs parallel to Heneage Lane and forms a north south cycle link and is likely to be the chosen route of cyclists accessing the site. The land use of the proposed development is not expected to generate noise levels which would be unusual for a city centre location. Whilst this is an increase in the expected use of Heneage Lane, in the context of the sites location in the heart of the City Cluster, it is considered that the additional number of trips is unlikely to impact on the amenity of those travelling to and from the Synagogue or have a detrimental impact that religious services would not be able to be carried out. The Synagogue already experiences fairly low levels of sunlight in the existing condition. The absolute alterations in the level of daylight and sunlight experienced as a result of the proposed development is considered to be very low. in terms of VSC absolute reductions are recorded between 1.7%-1.8% and for APSH absolute reductions are recorded to be between 7% and 13% for annual sunlight. The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including

	when at the Bimah. The difference between the existing and proposed condition for daylight and sunlight is very small that it would be imperceptible to the human eye. Officers consider that such fractional light alterations in real terms would not alter the way the Synagogue could be used. The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Officers acknowledge that the reduction of sunlight may slightly reduce the amenity of the courtyard but would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance. In terms of the contribution of setting to significance, the wider modern setting includes a number of tall and very tall office buildings, both existing and consented, some of which are at present clearly visible as prominent elements from the courtyard such as One Creechurch Place, No. 6 Bevis Marks and the Gherkin. All have visual impacts on upward views from within the courtyard and visually reinforce the appreciation the synagogue's secluded location in the heart of the modern City. Additional consented tall buildings, such as 100 Leadenhall Street, 40 Leadenhall and 1 Undershaft, will add to this backdrop. Otherwise, there is an open sky setting over the synagogue, courtyard and ancillary buildings. While the contrast between the scale and character of the synagogue and its taller modern setting is very noticeable when deliberately looking upwards, the established character of this part of the City is one of dramatic juxtapositions of old and new and of the visibility of taller buildings seen in the backdrop to historic buildings. The close, immediate setting of the synagogue preserved in the intimate courtyard in part resembles the setting at the time the synagogue was constructed and therefore makes a strong contribution to its significance but the wider setting has changed significantly and now has a fundamentally different modern character that makes no material contribution to the historic significance of the Synagogue.

	The Synagogue Courtyard, is not considered to be a private residential courtyard but is seen to be part of the Synagogue as a place of worship. The intensification of the cluster would be considered to be an benefit to attract more visitors to the new Heritage Centre.
Furniture History Society	The significance of light in the design of Bevis Marks synagogue, which has already been impaired by the development of high-rise buildings in the area, is fundamental both to the architecture and to the appreciation of its historic contents. The proposed structures at 33 Creechurch Lane and at 31 Bury Street will reduce the light considerably within the building and will dwarf both the synagogue and the Rabbi's House. . The changing light during the day is fundamental not only to the proper appreciation of its historic fittings but plays a part in the spiritual purpose of the building. **Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Designated Heritage Assets; Daylight and Sunlight and Overshadowing. Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The impact on daylight to Bevis Marks Synagogue would minor adverse with very small absolute VSC changes (recorded between 1.7%-1.8%.) which would be imperceptible to the occupants. The Synagogue would experience a moderate adverse impact in terms of sunlight (in the annual period absolute reductions range between 7% and 13%). The losses are considered to be fractional and officers do not consider that the loss of light experienced within the Synagogue would impact on the ability of worshippers to read or would significantly reduce light to the raised platform where prayers are read (the Bimah).

	With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (including the proposed development under consideration at 33 Creechurch Lane). Officers do not consider that the impact of daylight, sunlight and overshadowing to the Synagogue would be unacceptable and is not considered to impact the existing use nor would it change the pattern of use or religious or community significance of the Synagogue.
Conference of European Rabbis	Should the further development be allowed at 33 Creechurch Lane and 31 Bury Street, the Synagogue will come to be enveloped in shadow, it necessary light blocked, its privacy lost an its prayers disturbed by noise. These things will cause serious detriment to the functioning of this historical community, and in some respects make it impossible for them to carry out their religious duties. Causing harm to a Jewish Community's function is not only tantamount to bulldozing a synagogue building; it is worse. Any development on this site would be a profound desecration for the United Kingdom. **Officer Response to Comments:** Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented

	schemes and schemes which are currently under consideration. The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The absolute alterations in the level of daylight and sunlight experienced as a result of the proposed development is considered to be very low. in terms of VSC absolute reductions are recorded between 1.7%-1.8% and for APSH absolute reductions are recorded to be between 7% and 13% for annual sunlight. The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including when at the Bimah. The difference between the existing and proposed condition for daylight and sunlight is very small that it would be imperceptible to the human eye. Officers consider that such fractional light alterations in real terms would not alter the way the Synagogue could be used. The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Officers acknowledge that the reduction of sunlight may slightly reduce the amenity of the courtyard but would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance. The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development. The impact of noise and disturbance is covered in the Transport and Noise and Vibration sections of the report.

	Heneage Lane is approximately 3.5m wide and has capacity to accommodate around 2,000 pedestrians per hour at a comfort level of B+. It is agreed that the development would lead to an increase in pedestrian numbers on Heneage Lane following the continuation of the north/south desire line through the site. However, the land use of the proposed development is not expected to generate noise levels which would be unusual for a city centre location. It is not anticipated that cyclists would use Heneage Lane following the redevelopment. Creechurch Lane runs parallel to Heneage Lane and forms a north south cycle link and is likely to be the chosen route of cyclists accessing the site. Whilst this is an increase in the expected use of Heneage Lane, in the context of the sites location in the heart of the City Cluster, it is considered that the additional number of trips is unlikely to impact on the amenity of those travelling to and from the Synagogue or to have a materially detrimental impact on the use of the building to hold religious services.
Jewish Museum London	Bevis Marks Synagogue is a place of outstanding significance. It is much more than a Grade 1 listed building. It is the 'Cathedral' Synagogue to Anglo Jewry and should be protected in its cultural, historical and religious significance in the same vein that St Paul's Cathedral or Westminster Abbey could expect from its local and national government. This historically significant building does not exist within a vacuum and its relation to the proximity of other buildings and most importantly the light that fills the Synagogue, brings with it the symbolic meaning. The Synagogue deserves the protection that ought to be afforded to it in ensuring that the building and its community are able to exist as intended which includes streaming natural light through its beautiful windows and being a place of private reflection for worshipers. Jewish Museum London delivering the multi-million pound investment from the National Lottery Heritage Fund to both protect and preserve the heritage within this unique space and also build a centre for learning for people.

	By being able to see the Synagogue with natural light illumining the sanctuary through the windows and reflecting on the symbolism behind this message from the architect, students will understand the shared belief systems between faiths when it comes to our relationship with the natural world and how we create space that compliments and works with it even in urban areas. The Synagogue is a living, breathing community space that is readying to welcome more visitors than ever before and act as a place for interfaith and inter-community understanding. **Officer Response to Comments:** Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration. The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The absolute alterations in the level of daylight and sunlight experienced as a result of the proposed development is considered to be very low. In terms of VSC absolute reductions are recorded between 1.7%-1.8% and for APSH absolute reductions are recorded to be between 7% and-13% for annual sunlight. The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including when at the Bimah. The difference between the existing and proposed condition for daylight and sunlight is very small that it would be imperceptible to the human eye. Officers consider that such

	fractional light alterations in real terms would not alter the way the Synagogue could be used. The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Officers acknowledge that the reduction of sunlight may slightly reduce the amenity of the courtyard but would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance. The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development. The proposed development would be contributing to the intensification of the cluster which would be considered to be an benefit to attract more visitors to the new Heritage Centre.
Jonathan Djanogly MP	Bevis Marks Synagogue is a place of outstanding significance. It is much more than a Grade 1 listed building. It is the 'Cathedral' Synagogue to Anglo Jewry and should be protected in its cultural, historical and religious significance in the same vein that St Paul's Cathedral or Westminster Abbey could expect from its local and national government. This historically significant building does not exist within a vacuum and its relation to the proximity of other buildings and most importantly the light that fills the Synagogue, brings with it the symbolic meaning. The Synagogue deserves the protection that ought to be afforded to it in ensuring that the building and its community are able to exist as intended which includes streaming natural light through its beautiful

	windows and being a place of private reflection for worshipers. Jewish Museum London delivering the multi-million pound investment from the National Lottery Heritage Fund to both protect and preserve the heritage within this unique space and also build a centre for learning for people. By being able to see the Synagogue with natural light illumining the sanctuary through the windows and reflecting on the symbolism behind this message from the architect, students will understand the shared belief systems between faiths when it comes to our relationship with the natural world and how we create space that compliments and works with it even in urban areas. The Synagogue is a living, breathing community space that is readying to welcome more visitors than ever before and act as a place for interfaith and inter-community understanding. **Officer Response to Comments:** Consideration of the impacts on Bevis Marks Synagogue is set out in the 'Impact on significance and setting of listed buildings' section of the report. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting. The impact of the proposed development on daylight, sunlight and overshadowing is set out in the main body of the report including the impact of cumulative scenarios taking into account consented schemes and schemes which are currently under consideration. The Synagogue already experiences fairly low levels of daylight and sunlight in the existing condition. The absolute alterations in the level of daylight and sunlight experienced as a result of the proposed development is considered to be very low. In terms of VSC absolute reductions are recorded between 1.7%-1.8% and for APSH absolute reductions are recorded to be between 7% and13%.

	The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including when at the Bimah. The difference between the existing and proposed condition for daylight and sunlight is very small that it would be imperceptible to the human eye. Officers consider that such fractional light alterations in real terms would not alter the way the Synagogue could be used. The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. Officers acknowledge that the reduction of sunlight may slightly reduce the amenity of the courtyard but would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance. The impact of cumulative scenarios have been assessed including consented and unconsented schemes. In the cumulative scenario, the Synagogue would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development. The proposed development would be contributing to the intensification of the cluster which would be considered to be a benefit to attract more visitors to the new Heritage Centre.

Representations from members of the public (objections)	
Loss of light to the Synagogue	**Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Daylight and Sunlight and Overshadowing
Overshadowing to the Courtyard	**Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Daylight and Sunlight and Overshadowing
Comparison to Development Near St. Paul's	Though both Grade I listed, the architecture, setting, location and presence on the wider London skyline of St Paul's Cathedral and the Synagogue are markedly different and in this respect both listed buildings and their setting are not directly comparable.
Poor architectural design	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Design and Heritage.
Detrimental impact to the heritage significance of Synagogue	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Design and Heritage.
Height/bulk of the proposed building is unacceptable	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Design and Heritage.
Loss of privacy to the synagogue worshippers	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Privacy
Impact on the views out of the synagogue & the loss of sky	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Design and Heritage.
Damage to foundations of the Synagogue	**Officers Response to Comments:** consideration of these impacts are set out in the 'Impact to Synagogue Foundations and Ground Movement' section of the report**.** A condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.

Need for the consideration of cumulative impacts	**Officers Response to Comments:** The submitted Environmental Statement assesses the cumulative impacts. The assessment of the cumulative impacts is set out in the main report.
General objection to the scheme	**Officers Response to Comments:** a full assessment of the proposed development is set out in the report.
Questioning need for more offices	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Proposed uses and assessment of the public benefits.
Environment impacts	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Environmental Impact of Proposals on Surrounding Area, Daylight, Sunlight, Overshadowing, Solar Glare, Light Intrusion, Wind, Thermal Comfort, Air Quality and Noise and Vibration.
Pollution	**Officers Response to Comments:** The consideration of these impacts are contained in the following sections of the report: Air Quality, Noise and Vibration
Impact on evacuation from synagogue in an emergency	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Proposed uses and assessment of the public benefits.
Wheelchair access/disabled bays during construction on Creechurch Lane and Mitre Street	**Officers Response to Comments:** The proposed development does not propose any alterations to the way visitors access the Synagogue. Car Parking and impact on Disabled Car Parking Bays during construction is set out in the Transport section of the report. The outline construction management plan submitted with the application shows that at least one blue badge parking bay would need to be suspended during the works. Any application to suspend blue badge parking bays must be supported by an Equalities Analysis (EA). Through the EA the applicant would be required to consult with local stakeholders to understand the usage patterns of the bays in question, and to establish whether their re-provision in the nearby area would be required.
Fire risk	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Fire Safety

Security risk from the increased footfall in the area as a result of the development	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Transport and Security
Wind impacts from the proposed development	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Wind Microclimate
Pedestrians at peak times accessing Liverpool Street and Aldgate Stations which is already very crowded	**Officers Response to Comments:** consideration of these impacts are contained in the following sections of the report: Transport

Representations from members of the public (support)
Supports architecture of tower and proportions - details and use of facades is innovative
Proposed development will fit well with other consented tall buildings in City
Appropriate for location for a tower
Design and form of building complimentary to surroundings
Very attractive building and adds to skyline
Amenity space will add to area and office jobs support the local economy
Juxtaposition of religious building and neighbouring high-rises makes cities vibrant places to live and visit
Building looks high quality and would be a positive addition to city skyline

Policy Context

35. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

36. The City of London has prepared a draft plan which is a material consideration to be taken into account.

37. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020 and January 2021. The draft City Plan 2036 has been published for consultation under Regulation 19 of the

Town and Country Planning (Local Planning) (England) Regulations 2012. As such, the draft City Plan is a material consideration in the determination of applications.

38. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2019 and the Planning Practice Guidance (PPG) which is amended from time to time.

39. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014),Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019),Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

40. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, July 2014). Open Space Strategy (COL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Culture Mile Strategy (2018); Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.

Considerations

41. The Corporation, in determining the planning application has the following main statutory duties to perform:-
    - to have regard to the provisions of the development plan, so far as material to the application, local finance considerations so far as material to the application, and to any other material considerations. (Section 70 Town & Country Planning Act 1990);

    - to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

42. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of

special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);

43. The NPPF states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise".

44. Paragraph 10 states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:

    a. approving development proposals that accord with an up-to-date development plan without delay; or

    b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of date, granting permission unless:

    c. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

    d. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

45. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:

    a. the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);

    b. the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and

    c. the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

46. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

47. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 103 states that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health".

48. Paragraph 111 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

49. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 124 advises that “The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.

50. Paragraph 127 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.

51. Paragraph 131 sets out that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

52. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 151 states that new developments should increase the use and supply of renewable and low carbon energy and heat through measures including renewable and low carbon energy sources and identifying opportunities to draw energy supply from decentralised supply systems.

53. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 190 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.

54. Paragraph 192 of the NPPF advises, “In determining applications, local planning authorities should take account of:

    a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

    b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

    c. the desirability of new development making a positive contribution to local character and distinctiveness.”

55. Paragraph 193 of the NPPF advises “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”.

56. Paragraph 194 of the NPPF states “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

    a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

    b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”

57. Paragraph 196 of the NPPF states “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.” When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting..

58. Paragraph 197 states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Considerations in this case

59. In considering this planning application account has to be taken of the environmental information including the Environmental Statement, the

statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

60. There are policies in the Development Plan which support the proposal and others which do not including policies CS12 and CS13 of the Local Plan and policies D9(e) HC2, HC3 and HC4 of the London Plan. It is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

61. The principal over-arching issues in considering this application are:

- The extent to which the proposals comply with the Development Plan.
- The extent to which the proposals comply with the NPPF
- Economic issues
- The appropriateness of the proposed uses
- The impact of the development in design and heritage terms including impact on the designated and non-designated heritage assets.
- The impact of the proposal on Strategic Views.
- The impact of the proposal on The Tower of London World Heritage Site.
- The impact of the proposal on any archaeology beneath the site.
- The accessibility and inclusivity of the development.
- Transport, servicing, cycle parking provision and impact on highways
- The proposed public realm benefits and cultural/community offer
- The impact of the proposal in terms of energy and sustainability.
- The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight and light pollution.
- The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability.
- The requirement for financial contributions

Economic Issues

62. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's

output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.

63. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.

64. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

65. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

66. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will create the demand for more employment and for the space required to accommodate it.

67. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster

of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

68. The London Plan projects future employment growth across London, projecting an increase in City employment. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

69. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

70. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

71. The draft City Plan 2036 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

72. The application site is located within the area identified as the Eastern Cluster in the Local Plan 2015.

73. The areas to which the cluster policy applies is defined by illustrative diagrams in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on suitable (Local Plan) or appropriate (emerging City Plan) sites. As outlined at para 2.7 of the Local Plan and paras 3.55 and 7.13 of the draft City Plan 2036 the boundary as shown in the diagrams is indicative and not prescriptive. The application site lies within the Eastern Cluster area as shown in Figure G in the adopted Local Plan and within the City Cluster Key Area of Change as shown in Figure 33 of the emerging City Plan 2036.

74. Para 3.4.4 of the draft City Plan 2036 identifies the City Cluster as a key area of change where office and employment growth will be accommodated by a cluster of tall buildings, complemented by retail, leisure, cultural and educational facilities, ground floor animation, additional greening, high quality public realm and improved pedestrian movement and permeability.

75. Despite the short term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations.

Proposed Uses

76. The proposed development would be arranged over two basement levels, ground and 48 upper floors to provide an office-led, mixed use development comprising 25,460sq.m GIA of office floorspace (Class E); 60sq.m GIA of commercial, business and service uses (Class E); 923sq.m GIA of internal amenity space and community space (Class Sui Generis).

Proposed Office Accommodation

77. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036.

78. The existing site contains 3,258 sq.m (GIA) of office floorspace and a minimum total of 25,460sq.m (GIA) is proposed which would provide an additional 22,202sq.m (GIA). The office floorspace is considered to be well designed, flexible office accommodation in an attractive and sustainable building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan 2036 policy S4.

79. The proposed development would provide flexible floorplates of approximately 350sq.m - 500 s.qm. Space of this type is not usually found in the Eastern Cluster and would complement the existing offer. The proposed development would also provide a different option for potential SME office tenants who are looking for a smaller area, but do not want to occupy shared space in co-working environments. The

smaller office floorplates in the proposed development have the benefit of providing office tenants with their own private entrance and dedicated floor rather than sharing with other tenants.

80. An office amenity area is proposed at level 20 and 21 accessible by all office tenants of the building. This provides an informal area for occupiers of the building to come together for it to become a place where staff can meet, socialise, share and collaborate. This area is referred to as the 'Creechurch Hive'.

81. The main office reception is at ground floor level accessed off the proposed north south route through the building. From here double stacked lifts travel to the upper office floors.

82. The proposed office provision addresses the needs of international business in accordance with Local Plan policy DM1.2 and draft City Plan 2036 strategic policy S4 and policy OF1.

Proposed Affordable Workspace

83. Policy DM1.3 of the 2015 City of London Local Plan encourages the provision of accommodation for small and medium sized businesses or occupiers which is flexible and adaptable. Policy S4 of the draft City Plan 2036 seeks to ensure that new office floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SME's, start-up companies and those requiring move on accommodation.

84. The proposed development would include 642 sq.m of affordable workspace to be made available as incubator space intended for small and predominantly local start-ups. This would be offered for a period of 15 years and at 50% of market rents. The S106 agreement would include an obligation to make specific and identified provision within the development appropriate for such occupiers.

85. A letter of support has been received by Aldgate Connect BID acknowledging the need for and the benefits of such spaces. They state *'The economic benefits are significant, with the creation of smaller office floorplates helping to bridge a gap in the market and support a greater mix of businesses to locate in the Aldgate area and this part of the City of London Corporation. We believe that there may be ever greater demand for these types of floorplates in the future, as businesses consider their optimal space requirements post Covid-19… the applicant has engaged extensively with local groups to ensure that communities, CSR, employment, skills and new enterprises will benefit from the proposed redevelopment.'*

Proposed Retail

86. The site is not located in a Principal Shopping Centre (PSC) or Retail Link as identified in the Local Plan.

87. The development would provide 60 sq.m (GIA) of retail floorspace. The proposed north-south route through the site, referred to as Heneage Arcade, would be lined with retail units and spaces which are designed to be utilised as vitrines for a rolling programme of displays including artworks, local community information, reference to the important history of the site and products of local artisans. These spaces could also be utilised as small workshop and retail units for emerging local businesses and craft. The intention would be to help foster and support emerging local talent and provide space to create, make, display and sell their creations.

88. The increase in a diverse retail provision on the site, would enhance the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages. A condition is recommended to ensure that spaces proposed for retail use remain in that use and are not changed to any other use within Class E.

89. The proposed increase in retail provision on the site and variety in unit sizes accords with Local Plan polices CS20 and DM20.4, and draft City Plan 2036 policies S5 and RE2. The mix of uses would provide a complementary use to the offices on the upper floors in accordance with Policy DM1.5 as well as provision for other workers, visitors and residents of the City in accordance with draft City Plan 2036 Policy OF1.

Public Realm

90. Extensive public realm improvements are proposed providing 400 sq.m (GIA) of ground floor publicly accessible floorspace with the creation of a new pocket park and route through the building.

91. A north- south walking route through the site is proposed, which would re-introduce an historic connection between Heneage Lane and Bury Street. This route through is referred to as Heneage Arcade. It is proposed that Heneage Arcade is open 7am – 11pm daily. As described above this route would comprise retail units which would activate the route. The opening hours would be secured via a planning obligation.

92. The arcade would be enriched by a curated and flexible programme of permanent, bespoke architectural sculpture integrated into the structural members, portraying local and City-wide historical and contemporary themes. This would be developed in collaboration with craftspeople studying at the City & Guilds School and the Sculpture in the City initiative and would constitute not only a major new piece of public art but also make the Heneage Arcade a cultural destination in its own

right. The local cultural programme would be secured by a S106 obligation.

93. James' Court, a new pocket park is introduced which re-establishes an historic city court. It is intended to be available for access to the public 24 hours a day. The new James' Court would also increase the quantity of urban greening in this location, with a generous nine-storey high green wall rising above the pocket park on the proposed building creating a humane gentle environment conducive for the public to dwell.

94. The opening hours would be secured via planning obligations.

95. The application also proposes 421 sq.m (GIA) of internal publicly accessible amenity space (Sui Generis) at mezzanine level, as an extension to the proposed public realm. This would be located above Heneage Arcade and would have a dedicated entrance from ground floor level, off Creechurch Lane. This area is proposed to offer an area which is additional to the external public realm at ground floor level allowing all year round use. It is proposed that there will be scope for parts of this space to be booked by local groups as part of an extension to the Community Space offer.

96. Extended public realm improvements are also proposed outside the red line boundary, along Bury Street and Creechurch Lane. These would be secured via a section 278 agreement and details of this is discussed later on in the report.

Community Space – 'Creechurch Hall'

97. Policy S1 of the London Plan states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

98. At level 1 of the proposed building, the application proposes 507 sqm (GIA) of community space. The flexible community space is designed to be an inclusive dedicated space for the local community, charity, religious groups (including Bevis Marks Synagogue), cultural/art and education groups and organisations to hold events, gatherings and exhibitions such as careers events, micro workshops or gallery/rehearsal space for local artists. The community space is intended to provide a gateway for the population of the more economically deprived areas around the City fringe to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community. The space has the potential to serve a rich, diverse community from all backgrounds in a socially and economically inclusive manner. As part of this offer, the applicant has committed to a minimum of 8 hours a week for the use of this space an outreach, training and skills centre. It therefore offers the potential to make a contribution towards training and skills opportunities

for local communities. The details of the community space together with a management plan would be secured via S106 obligation to ensure that the facility is designed to be diverse and inclusive from the outset to provide services and facilities that benefit local communities and to be a welcoming and accessible place for those communities to visit.

99. The applicants have submitted a 'Building Ecosystem' document setting out what the vision for this new building. The vision *'to curate a unique and enriching environment…a regenerative ecosystem abundant in circular opportunity for the local community, visitors and businesses alike. Where skillsets, knowledge and amenity are shared. Where founders mentor budding entrepreneurs, makers inspire local students and residents, artworks entice visitors and a community hub provides a flexible platform for leaning, culture, collaboration and celebration.'*

100. The proposed development provides for smaller and flexible office spaces, affordable workspaces and incorporates internal and external, formal and informal spaces for all occupiers to convene and collaborate all of which helps to provide an innovation ecosystem which is key to support post-covid resurgence; an identified aspiration in the 'London Recharged: Our Vision for London in 2025 report.

Design and Heritage

Principle: Demolition of the existing building

101. The existing building is a twentieth century office block not considered to be of any architectural or historic interest. The principle of demolition is acceptable in heritage terms.

Height and bulk

102. The proposed building would be in the (Eastern) Cluster Policy Area in the adopted Local Plan (2015) and the City Plan 2036. Both policies identify the Cluster as the preferred location for siting tall buildings, where suitable or appropriate. The principle of a new tower here is acceptable in broad policy terms though its height and design, including the impact on strategic views and heritage, need to be considered in accordance with policy CS14 of the Local Plan.

103. The proposed building would rise to 197.94m AOD, stepping down from the apex at 22 Bishopsgate / 1 Undershaft towards the Tower of London in the east. As a comparison, the following list outlines the heights of existing, emerging and permitted towers in the City Cluster (in descending AOD height order, with the proposal in bold):

- 1 Undershaft: 305.9m
- 22 Bishopsgate: 294.94m
- 100 Leadenhall Street: 263.40m

- 122 Leadenhall Street: 239.40m
- 110 Bishopsgate (former Heron Tower): 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m
- **31 Bury Street: 197.94m**
- The Gherkin (30 St Mary Axe): 195m
- 6-8 Bishopsgate: 185.10m
- 1 Leadenhall Street: 182.70m
- 100 Bishopsgate: 184m
- 40 Leadenhall Street: 170m

104. The Planning and Transportation Committee were informed on 26 April 2016 that the Department of the Built Environment is undertaking three-dimensional (3D) digital modelling of the City Cluster to better understand the effect of existing planning policies for that area and its relationship to its environs and other parts of the City and in particular the Tower of London. This work is providing confidence that the Cluster can evolve while taking full account of views. The purpose of the modelling is to allow an appreciation of impacts arising from proposed development. The 3D modelling does not set policy or determine the future shape of the cluster.

105. Through this 3D modelling initiative, the City is aspiring to develop a Cluster of towers that step up in height form all directions towards an apex around 22 Bishopsgate/1 Undershaft. This was informed by the complex amalgamation of key views of the Tower of London, St Paul's Cathedral and other landmarks. In views from the south and south-east, the proposed building's height at its location would be broadly compliant with this modelled future shape and form of the City Cluster. The proposed building's height, form and high architectural quality would enhance and consolidate the dynamic profile of the Cluster on London's skyline. That said, due to its height, the proposed building would have a significant impact on London-wide and local townscape views.

Design approach

106. Architecturally, the proposed building would be a distinguished and sophisticated addition to the City Cluster. It would have excellent sustainability credentials, be aesthetically pleasing, contextual at several scales and would enhance existing and provide new high-quality public realm appropriate to the character of the City.

107. The proposed architecture distinguishes itself through the thoughtful, contextual articulation of base, middle and upper sections, delivering a coherent, well-proportioned building with a strong overall

sense of architectural integrity. The modelling, detailing and materials are accomplished, resulting in architecture of the highest quality as befitting the City skyline. On a challenging site it works successfully at various scales and is designed to read as three elements – the ground floor public levels, a mid-section block and the slenderer pencil tower.

108. The existing building forms an irregular, impermeable block with inactive frontages to Heneage Place, Creechurch Place and Bury Street. Between it and Holland House on Bury Street there is a small, recessed area of open space with some poor-quality planting. At ground floor level, the proposed building would replace the impenetrable site with a permeable ground floor plane with increased public realm, planting and active frontages.

109. Despite the relatively small site footprint, the proposed building would provide 322 sqm of new external public realm at ground floor level as compared with the existing 95 sqm. The chief feature would be a new public pedestrian route running north-east to south-west which would reinstate the lost south-western end of Heneage Lane. The 'Heneage Arcade' would be generous in scale, a maximum of 8m wide with a 7m high ceiling at its greatest extent, and would be paved in York stone to blend seamlessly into the City's existing public realm. The generous scale will draw the eye and attract the public from numerous vantages. The ceiling soffit would be eye-catching with a sense of rhythm created by the architectural 'ribs' that would further draw pedestrians through. The arcade would draw inspiration from the established tradition of covered walkways elsewhere in London and would be flanked internally by retail units, including a dedicated space for a changing cast of makers to display their wares and further spaces for public facing retail uses to create a new mixed-use arcade destination for the locality and the wider City. It would significantly raise the quantum of active frontages, making a strong contribution to the local character of the area and providing shelter in inclement weather and during hot summer days.

110. The arcade would be enriched by a curated and flexible programme of permanent, bespoke architectural sculpture integrated into the structural members, portraying local and City-wide historical and contemporary themes, including interpretation of the former Holy Trinity Priory which survives below the wider area. This would be developed in collaboration with craftspeople studying at the City & Guilds School and the Sculpture in the City initiative and would constitute not only a major new piece of public art but also make the Heneage Arcade a cultural destination in its own right. The details of this would be secured by S106 obligations.

111. At the southern exit of Heneage Arcade, a new pocket park, ‘James’ Court’, would be created to the south-west of the building. This would increase the area of public realm at the heart of the dense Cluster, opening up the entire ground floor plane on the south-west part of the site to pedestrians as well as creating a new amenity space for people in the locality. The new James’ Court would also increase the quantity of urban greening in this location, with a generous nine-storey high green wall rising above the pocket park on the proposed building creating a humane, gentle environment conducive to public use.

112. New areas of public space would also be created within the building. As well as the north-east and south-west entrances to Heneage Arcade, the middle bay of the proposed building’s Creechurch Place elevation would incorporate a focal entrance aligned on Mitre Street which would lead directly to the main office entrance for accessing the upper floors. The Creechurch Place entrance would also provide access, via staircase and lifts, to the ‘Creechurch Hall’, a new public space intended to be analogous to a village hall or community centre. It would provide an inclusive and free for all new space for public use, targeted at individuals, community groups and other organisations from the locality and beyond, including from those more economically disadvantaged areas around the City fringe. The space has the potential to serve a rich, diverse community from all backgrounds in a socially and economically inclusive manner. Access from the ground floor would lead first to the mezzanine ‘vestibule’ level of the Hall, which would then lead in turn to the Hall space proper, which would occupy the first floor of the proposed building with its own external terrace to the south-west. The total floorspace of the Creechurch Hall and its vestibule would be 928 sqm. A bespoke design treatment for the Creechurch Hall and its circulation spaces would be secured via condition and S106 agreement; the Creechurch Hall would amount to the provision of a significant new civic space for the Creechurch locality and the wider City.

113. The elevations to these floor areas would be treated differently from the rest of the building to reflect and celebrate their public status. They would take the form of a ‘triple order’ of faience columns wrapping around the building from the south-west to the north-east, rooted in a granite plinth and rising to a strong cornice line which would be a focal point for further public artwork. This ‘triple order’ device builds upon architectural precedent elsewhere in the locality and would relate the building appropriately to its townscape. The faience of these areas would be executed in a darker blue hue to further differentiate them from the upper storeys. Their colour tone, materiality and modelling would ensure the proposed building relates appropriately to its local

setting at street level; the Creechurch locality here is characterised by a number of unlisted brick and terracotta historic buildings and the sophisticated faience of the grade II* listed Holland House.

114. From the first-floor level to the twenty-second-floor level, the footprint of the building would be extruded upwards to provide office floorplates. From the twentieth to twenty-second floors there would be a double-height mezzanine space incorporating an external terrace. This would be the focal point of the 'Creechurch Hive', the mix of office floorspace and dedicated SME/incubator space that would characterise the floor levels of the proposed building above the public areas. This mezzanine level would be heavily planted and would read as an 'encore' of the public spaces provided at the lower levels. Above this level, the building's form would be stepped back to form a slenderer and elegant tower which would rise for the remaining twenty-four storeys to roof level. This has been sculpted in an integral and organic architectural manner whilst responding to strategic views of the Tower of London and other sensitive views.

115. The proposed building would be the first tower in the City to be clad entirely in faience, giving it a unique presence in the City Cluster. The Cluster of towers comprises a rich and eclectic collection of towers, each with its own unique architectural character, resulting in a dynamic collection of individuals which combine to create a coherent Cluster. The proposal complements this key characteristic of the City Cluster.

116. Above the ground floor 'triple order', the architectural treatment of the proposed building comprises a series of pale blue faience bays with scalloped, ribbed spandrels and smooth columns and mullions which would create refined articulation and architectural interest across the façades of the proposed building. The sides of the rectangular window openings would incorporate vertical natural ventilation louvres, successfully integrating sustainable and attractive passive systems. The pale blue hue of the faience has been selected to sympathise with but be distinct from the hues of other tall buildings within the City Cluster, ensuring that in views of the Tower of London World Heritage Site the proposed building is identified as a sophisticated new addition to the Cluster. Specifically, the colour was selected to appear distinct from the buff masonry of the World Heritage Site.

117. At the uppermost floor levels, the double order at mid-level would recur across the uppermost 'penthouse' office floors. Above these, the three-storey plant room is housed in a triple order echoing that of the ground floor but executed to a simpler patter, a successful visual termination of the design. The mirroring and echoing of these

architectural devices give the overall architectural design a cohesion which would further distinguish it on the skyline and in the local townscape. The parapets of both the mid-level 'shoulder' and the top of the building are subtly broken by the columns terminating above them to add further architectural modelling and interest. The location of plant and greening in the uppermost three storeys will cause minimal light spillage and appear restrained when seen in conjunction with the WHS.

118. The proposed building and its public realm would be step-free and inclusive for use by all without undue separation or hindrance. The management approach would be to allow inclusive access for all which would be secured via S106 obligations. The final detail of the high-quality design would be secured via condition.

119. Lighting, in accordance with the City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass. It would be contextual, building on the components of spatial character design guidance for the City Cluster in the adopted Strategy. The full details would be secured via condition.

Heritage assets

Tower of London World Heritage Site – Impact on Outstanding Universal Value (OUV)

120. The seven overarching attributes of Outstanding Universal Value are contained in the Statement of Outstanding Universal Value, itself contained in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: (i) an internationally famous monument, (ii) landmark siting and (iii) physical dominance of the White Tower.

121. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. The proposed building is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations, where relevant assessed here together.

122. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre, stating (at

para 2.4.25) 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. It is also acknowledged that the relationship between the ToL and the Cluster is long-established, having existed for over half a century. It acknowledges that the Cluster forms a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. The Management Plan, at para 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider (i) their effect on the established Cluster (ii) the space between it and the ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

123. Whilst being proportionate, the assessment uses the framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.

124. There are two views within the London View Management Framework which are critical in assessing the impact of the proposed building on the World Heritage Site, Tower Bridge (10A) and City Hall (25A) and these are considered in detail below.

Strategic Views

LVMF 10A.1 – River Prospect, Tower Bridge (Upstream, North Bastion)

125. This is also identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge).

126. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as the spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT Tower, Centre Point and the Tate Modern (para 182).

127. The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (para 187). The guidance also states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (para 185). The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).

128. From here the proposal would be appreciated at a significant distance to the north and west, providing an eastern 'bookend' to the baseline and cumulative Cluster form. The proposed building would be visible between 30 St Mary Axe (the Gherkin) and the White Tower against the backdrop of Heron Tower and Bishopsgate Plaza, which it would partially occlude.

129. The baseline and consented Cluster of towers steps downwards from the centre at 22 Bishopsgate/1 Undershaft in a deferential manner towards the Tower of London. This profile has been carefully negotiated through numerous planning decisions to mediate between the City Cluster and the Tower of London. Under both baseline and cumulative scenarios, the proposed building would rise beyond the gradual stepping down towards the White Tower, creating a somewhat abrupt and, to a degree, assertive eastern bookend hard up against the turrets of the White Tower, eroding some of the sky gap between it and the Cluster. The proposal would, to a limited degree, challenge the physical dominance of the Tower of London, its visual separateness from the City and its landmark siting on the River, undermining, again to a limited degree, those attributes of OUV in a strategic/representative view.

130. The proposal would not breach the skyline of the four towers of the White Tower or its castellations, in accordance with the relevant part of paragraph 186 of the visual management guidance, and would continue to pre-emanate over the foreground, the whole ToL ensemble with a commanding presence on the River. In addition, those wider landmarks, including the Monument, would not be obscured, and a relationship between these landmarks would remain undiluted, in accordance with paragraph 185 of the SPG. However, by reason of its proximity to the WHS, its height and vertical profile, the proposed building would appear, to a limited degree, to challenge the dominance of the Tower of London, albeit it is not considered that the Tower of

London would be dominated , in particular in the cumulative scenario, and so does not conflict with paragraph 183 of the SPG.

131. Paragraph 186 of the SPG seeks to retain 'some' visual separation between the upper parts of the White Tower and the Cluster and, whilst the proposal would do this, it would to a degree erode that visual separation and clear sky 'breathing space'. Whilst paragraph 187 anticipates the consolidation of the Cluster as a distinct urban form, which the proposal would contribute towards, it does state this must relate well to skyline features, in particular of course the WHS. This view is identified as view 9 in the Tower of London Local Setting Study. The guidance for this view seeks to ensure 'buildings behind or close to the White Tower should not diminish its perceived scale from this vantage point'. Due to its height, strong vertical form and proximity, it is considered that the proposal would, to a limited degree, diminish the perceived scale and pre-eminence of the ToL here, in conflict with this guidance.

132. It is considered that the simple, calm and seek architectural form and design, including high quality material detailing, would create an elegant and distinguished architecture. It would appear distinct from, rather than coalescing with, the ToL, whilst sharing a distinguishable but familial relationship with the Cluster. As such, it would reinforce the Cluster in the baseline and cumulative scenarios as having a coherent and separate identity on the skyline, separate of that of the ToL. Whilst this would take the edge of the impact, the height, form and proximity would drive the harm in this instance.

133. It is considered that under both baseline and cumulative scenarios the proposed building would make a contribution to the character and composition of the view, whilst allowing an identification and appreciation of identified landmarks, including St Paul's as a Strategically Important Landmark. However, due to its height, form and proximity, drawing the scale of the Cluster closer to the ToL, it would diminish, to a limited degree, an appreciation of the dominance and pre-eminence of the ToL as a Strategically Important Landmark, undermining an appreciation of the OUV, in particular the attributes an internationally famous monument, landmark siting and the physical dominance of the White Tower, its integrity and authenticity. In this regard, the proposed building would conflict with London Plan Policies D9 (e) and HC2, Local Plan Policy CS 13, draft City Plan Policy 2036 and guidance contained in the LVMF SPG and the LSS.

LVMF 25A.1-3 – Townscape View, Queen's Walk

134. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is

the ToL, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413).

135. The Protected Vista and Silhouette would remain unaffected.

136. Given the pre-eminence of the River Thames in the foreground and the openness of the ToL ensemble defining its north bank, the ToL and White Tower would remain the dominant feature towering above its immediate surroundings with a sky-etched silhouette, which is less vulnerable to wider visual influence from the emerging Cluster. The proposed building would appear at a significant distance away from the WHS at the eastern end of a consolidating Cluster in baseline and cumulative. At no point in the three Assessment viewpoints would the proposal appear near the White Tower and only in the most easterly viewpoint (25A.3) would it rise above the curtain walls, but the impact here would be minimal due to existing modern buildings in the backdrop of this part of the Tower. The proposal would not undermine the composition and characteristics of the view or those landmark elements. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it.

137. The attractive, sleek and slender profile would comprise a high-quality design, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 418-422) and guidance contained in the Local Setting Study.

London Bridge (11B.1 and 1B.2)

138. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically

Important Landmark, whilst Tower Bridge and HMS Belfast are identified amongst other landmarks.

139. In assessment points 11B.1 and 11B.2, the upper storeys of the proposed building would be visible directly east of 20 Fenchurch Street. The proposed building would appear as closely associated with the City Cluster and would read as a further high-quality augmentation and consolidation of the Cluster. It would consequently not harm the setting of the Tower of London World Heritage Site, which is to the extreme east of the view, nor would it harm the wider settings of the listed Adelaide House, Custom House, St Magnus the Martyr or Billingsgate Market.

140. The proposed building is considered to be in accordance with the guidance for this view (LVMF paras 202 to 205). The proposal would not affect the clear sky backdrop of the White Tower and would not impose itself on it, given the intervening distance and separation in the field of view, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, 'dominance' and silhouette of the White Tower.

Other World Heritage Site views

141. The Local Setting Study (Section 7) identifies Representative Views which are deemed to exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. In particular, the proposal would impact upon View 2 (Inner Curtain Wall, North) 4 (Inner Curtain Wall, South) and 5 (Main entrance to the Tower).

Inner Ward, Tower Green and the Scaffold Site

142. These views are deemed by the Local Setting Study to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place apart from the modern city outside the walls, where the relationship between the scale of the individual buildings can be appreciated. Under 'key issues' it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings – qualified in the associated 'Objectives and Guidance' development should (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.

143. The Local Setting Study acknowledges that there is a range of views in the Inner Ward. A more detailed and comprehensive assessment of the visual impact on the Inner Ward was required as part of the submission. Being entirely occluded behind the Chapel Royal of St Peter ad Vincula, the proposed building would not be visible from the Scaffold Site viewpoint (LSS view 1) in the Inner Ward. However, the Local Setting Study acknowledges that there is a range of views within the Inner Ward including LSS views 2 and 4. It is clear that the City Cluster of towers represent a prominent backdrop to views within the Inner Ward. From the centre of the Inner Ward the proposed building would appear prominently over the east end of the grade I listed Chapel Royal of St Peter ad Vincula. From the south side of the Inner Ward, the proposed building would be glimpsed above the roof of No. 2 Tower Green. Approaching the Chapel on the northern side of the Inner Ward, most of the existing towers are concealed by the Chapel. Stepping further forwards towards the Chapel, the proposed building and the rest of the Cluster are concealed from view.

144. In these dynamic viewing experiences from the Inner Ward, in both baseline and cumulative scenarios, the proposed building would be seen as part of the varied and eclectic Cluster of tall buildings located some distance from the WHS. The Inner Ward views are a kinetic experience in which the historic buildings of the Tower are seen in a variety of juxtapositions. As one approaches the Chapel Royal ad Vincula a short distance to the north of the scaffold site, the historic building can still be seen against open sky, free of sights of the modern City beyond. Given the dynamic and ever-changing nature of the Inner Ward viewing experience, with the modern Cluster as an established backdrop, the proposal is not considered to cause harm here.

145. Historic England, Historic Royal Palaces and the London Borough of Tower Hamlets have concluded that there is a degree of cumulative harm arising from the proposed building's impact on the Inner Ward.

146. However, in accordance with the guidance in the Local Setting Study, it is considered that the proposal would (i) respect the distinct sense of place and the pre-eminent stage in which those rich traditions would continue to take place and (ii) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is considered the iconic, strategic landmark siting and dominance of the White Tower would be unchanged in terms of the overarching attributes of OUV while the relationship between the ToL set away from the City beyond would be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct long-established backdrop entity.

Inner Curtain Wall (South)

147. Views from the Inner Curtain Wall were assessed where the guidance in the Local Setting Study recognises it is a 360 degree viewing experience where the aim is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River, whilst under the associated guidance seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.

148. From the identified viewpoints from the Inner Curtain Wall looking northwards, the proposed building would rise to the east of the consented 100 Leadenhall Street tower and its upper stages would be largely framed by open sky. The proposed building would introduce a slender, modern architectural form on the eastern side of the Cluster alongside the dynamic and eclectic designs of the City's towers. The proposed building is not considered to harm views out of the World Heritage Site, particularly when seen as part of the built and emerging Cluster. It would assist in consolidating the Cluster's distinct urban form and separate long-established identity. The White Tower, accentuated by its massive masonry fortifications, would remain the focus of the view from the Inner Curtain Wall. It would continue to dominate the scene while the relationship with the river and an appreciation of it as a historic gateway would remain undiluted. The LSS recognises that 'modern buildings provide a clear contrast between the historic tower and the contemporary city outside its walls' - an acknowledgment at ease with the concept of contrast between old and new reinforcing one another and contributing to the attribute 'landmark siting' and the component of this which is an established relationship between the ToL and the City beyond. Under both baseline and cumulative scenarios, it is considered that those identified relevant attributes and components of OUV would be preserved and the visual management guidance in the Local Setting Study complied with.

Inner Curtain Wall (North)

149. The Local Setting Study, in assessing views from the Inner Curtain Wall (north) acknowledges that this is a 360-degree experience and demonstrates a 'clear contrast between the historic Tower and the modern city outside its walls'. The identified aim is to (i) maintain views that reveal the relationship between the Tower and the City and (ii) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' it recognises that future tall buildings could reduce the perceived prominence of the Tower in its setting stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the Tower of

London and the City to the north and that clear views of the concentric curtain walls should be preserved.

150. The proposed building would appear directly alongside the Gherkin from this viewing point, reading as an elegant new addition to the established City Cluster. The concentric defences would remain pre-eminent and their appreciation undiluted in these views under the baseline and cumulative scenarios.

Main entrance to the Tower

151. The Local Setting Study acknowledges that this is a 360-degree experience which reveals the 'Tower's relationship to the River Thames and the City of London and emphasises the Tower's defensive architecture. The identified aims are (i) to maintain views which reveal the relationship between the Tower, the river to the south and the City to the North and (ii) enhance appreciation of the medieval military architecture of the Tower.

152. In the view from the Byward Tower (LSS view 5), the proposed building would consolidate and augment the profile of the Cluster rising directly to the east of the Gherkin and would not harm view out of the World Heritage Site from this point. In the baseline and cumulative scenarios both the Tower's relationship with the City and Thames and the emphasis of its defensive architecture would remain pre-eminent and their appreciation undiluted.

Dynamic Journey across Tower Bridge

153. Historic Royal Palaces have raised concerns about the impact of the proposed building in the sequence of views of the ToL as once proceeds northwards over Tower Bridge, approaching the WHS. It is the view of your officers that the proposed building would not cause harm to this viewing experience.

154. The experience is identified in the Local Setting Study as Route 14 of the Approaches and Arrivals (Section 5), which acknowledges the overlap between these local views and the River Prospect at LVMF 10A.1. The identified aim is 'to create views in which the Tower of London is perceived as a riverside gateway lying at the edge of the City rather than 'lost in the City'; in which the scale of the White Tower is perceived as more prominent as than the building surrounding it; and in which the military architecture of the Tower and its defences can be appreciated'.

155. Viewpoints corresponding to this experience have been assessed in the submitted TBHVIA and addendums and in the three-

dimensional digital model. From the sequence of viewpoints crossing Tower Bridge and onto the northern bridge approach the proposed building would appear as a new part of the Cluster behind the ToI WHS. At all points, in both baseline and cumulative scenarios, the White Tower is considered to retain its prominence and the presence of the military architecture and defences of the WHS remain undimmed by the proposed building.

Other Views

156. In other views and approaches to the Tower identified in the Local Setting Study, the proposal, though clearly visible, appears as a peripheral feature on the skyline some distance from the World Heritage Site. The emerging City Cluster of towers to the west of the Tower of London has become an integral part of the setting and views of the World Heritage Site.

Conclusion – Impact on Tower of London World Heritage Site:

157. Considered overall, by reason of its height, form and proximity to the ToL WHS in the important LVMF/representative view 10A.1 from Tower Bridge North Bastion, the proposal would cause a low level of less than substantial harm to the OUV of the ToL WHS, in particular the attributes an internationally famous monument, landmark siting and the physical dominance of the White Tower, causing a slight adverse impact on the World Heritage Site and the viewer's ability to appreciate its OUV, integrity, authenticity or significance in this view. This is in accordance with the views of Historic England and the GLA. The proposed building would therefore be contrary to London Plan Policies D9 (e), HC2 and HC3 and, in the manner which the proposed building would harm the significance of the Tower of London WHS, Policy HC4 which seeks to ensure the implementation of the LVMF. The proposed building's impact on LVMF 10A.1 would be contrary to policies CS12 and CS13 of the City of London Local Plan and draft City Plan 2036 policies S11, S13 and HE3.

158. Otherwise, in all other views including the additional views provided in response to GLA comments, the proposed building would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF. In all other views, including the relevant approach and representative views, it is considered in line with the WHS SPG that the scale of change in all instances is deemed to be between negligible and minor and where the magnitude of impact is considered small on those relevant attributes of OUV. Overall, it is considered that sufficient information has been submitted to assess the impact on the significance of the WHS. Apart from its impact on LVMF

10A.1, it is considered that the proposed building would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG the height, form and detailed design of the proposal has been amended to mitigate the impact, ensuring the proposal would read as part of the emerging coherent Cluster form, which it is established is intensifying and forms a long-term backdrop to the ToL ensemble.

Wider London View Management Framework Impact:

159. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the Capital's character and identity at a strategic level.

160. The site falls outside of Protected Vistas in the LVMF but impacts on a number of the identified Assessment Points. Designated London Panoramas at View 1 (Alexandra Palace), 2 (Parliament Hill), 4 (Primrose Hill), 5 (Greenwich Park) 6 (Blackheath Point) and 19 (Lambeth Bridge) are all assessed in the submission, as the proposal would be seen. The magnitude of change in these broad panoramas is considered negligible, and in all it would accord with the visual management guidance by consolidating the City Cluster, which is identified as a landmark in these compositions, preserving that composition and the viewers ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral. From the designated Townscape View LVMF 26A (St James Park) the proposal would not have an impact.

161. Particular attention is given to the River Prospects where the magnitude of potential impact is greater, here addressed in turn.

Waterloo Bridge (15B.1 and 15B.2)

162. The proposed building would be visible between the existing 122 Leadenhall Street (the Cheesegrater) and consented silhouette of Leadenhall Court when viewed from and between assessment points 15B.1 and 15B.2. It would be of high architectural quality and would assist in consolidating the coherent form of the emerging Cluster in accordance with paragraph 263 of the LVMF SPG.

163. The proposal would not draw tall buildings closer to St Paul's, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paragraphs 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified.

Gabriel's Wharf (16B.1 and 16B.2)

164. From assessment points 16B.1 and 16B.2 the proposed building would appear as a sliver between the Cheesegrater and the consented silhouette of Leadenhall Court; it would be wholly obscured by the consented silhouette of 100 Leadenhall Street. Consequently, it would not harm the appreciation, views or setting of St Paul's Cathedral.

165. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, preserving and enhancing the townscape setting of St Paul's whilst not detracting from wider landmarks in the view in accordance with the visual management guidance at paragraphs 280-283 of the LVMF SPG.

Hungerford Bridge (17B.1 and 17B.2)

166. The impact on the eastern views from Hungerford Bridge is very similar to that from Gabriel's Wharf. From assessment points 17B.1 and 17B.2, the proposed building would be almost wholly concealed behind the consented silhouette of Leadenhall Court, with only a sliver of it visible in the sky gap between that building and the Cheesegrater; it would be wholly obscured behind the consented silhouette of the 100 Leadenhall Street. It would not harm the appreciation, views or setting of St Paul's Cathedral.

167. Accordingly it would preserve a recognition and appreciation of St Paul's, strengthening the composition and coherent urban form of an existing tall building cluster and would not obscure or detract from a landmark feature, according with the visual management guidance in paragraphs 301-305 of the LVMF SPG.

Conclusion – Summary of LVMF Impacts

168. Aside from its impact on LVMF 10A.1 already discussed, the proposed building would not harm 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, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG.

<u>Other Strategic Views (Local)</u>

The Monument to the Great Fire of London

169. The proposed building would fall outside the identified viewing cones from the Monument and would not harm or conceal views of important heritage assets. The proposed building would be completely

obscured by 20 Fenchurch Street in views from the north of the Monument viewing gallery. The proposed building would not harm or obstruct important views of the Monument from afar or in local views.

170. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD, but it would be in its setting. It would be visible in i.) views from Tower Bridge (paragraph 4.22 of the SPD) and ii.) the Queen's Walk (western end) (paragraph 4.26). It would not be visible on the approach from Gracechurch Street (paragraphs 4.24 - 4.25), Princes/King William Street (4.19-4.21) or Monument Street (4.23) and would have no impact. The proposal would be set a significant distance from the Monument in views from i.) and ii.) and would have a negligible impact on its setting in baseline and cumulative scenarios, causing no conflict with the Protected Views SPD guidance.

Fleet Street/Ludgate Hill: The Processional Approach to St Paul's Cathedral

171. The proposed building would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street, Ludgate Circus or Ludgate Hill. It would leave this kinetic townscape experience unaffected, in accordance with Local Plan Policy CS13 and draft City Plan Policy S13 and in guidance contained within the Protected Views SPD.

St Paul's Cathedral

172. The proposed building would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral.

173. From here, the proposed building would be concealed behind the existing City Cluster and no harm to this view would arise.

Views from other publicly accessible elevated viewing areas

174. The City Cluster forms a key element in a number of elevated views from the upper storeys of buildings, which because they are freely available to the public have significant public benefits. Such areas are increasing in number and are proving to be highly popular and much-visited areas of elevated public realm, offering exceptional pan-city views. In particular, the City Cluster forms a dynamic element in views from the Skygarden at 20 Fenchurch Street and roof terraces at 120 Fenchurch Street and One New Change. The impact of the proposed building on the Skygarden has been assessed and it would

contribute positively to the dynamic qualities of these views from the northern terrace.

175. Due to its height and architectural approach, the proposed building would not harm views form other elevated public spaces at Tate Modern, One New Change, 120 Fenchurch Street, 1 Undershaft, 22 Bishopsgate, 100 Leadenhall Street or 6-8 Bishopsgate and where visible would appear as a positive architectural augmentation to the City Cluster.

Other Local views

176. Given the scale of the proposal, it would have an impact on other views in the City and in the wider area of London. These have been assessed. The proposed building has been appropriately designed in relation to its surroundings. Although the proposed building would be visible in many views, its high-quality design and appropriate massing would not detract from the visual amenity of the townscape views. The proposed building protects significant views of important buildings, townscape, riverscape and skylines and would not result in harm to the views identified in the Townscape, Built Heritage and Visual Impact Assessment except for that to LVMF 10A.1, already discussed. Otherwise, the settings and significance of the heritage assets and landmark buildings featured within these views would not be harmed by the proposals.

Impact on significance and setting of listed buildings

177. There are a number of listed buildings in close proximity to the site of the proposed building. Additionally, the scale and height of the proposed building would affect the settings of a number of other listed buildings further afield. These are discussed in turn:

Bevis Marks Synagogue (grade I): Impact on Special Interest/Significance and Setting

Significance and contribution of setting:

178. Synagogue of 1699-1701. This is the oldest synagogue in the country and survives to a remarkably little altered degree. It comprises an undemonstrative rectangular plan, of simple red brick with modest Portland stone classical dressings and tall pitched roof (originally clad in clay tile, now slate) behind a plain (rebuilt) parapet above cornice level. The principal elevation is off-street, the western elevation containing the main entrance and is symmetrically composed around a central axis door with good early Georgian door and architrave topped by an elliptical window. Otherwise the building has two registers of windows, with the upper tier being large, round-arched windows to

optimise daylight to the interior in what has always been a dense, built-up mid-block location. This completes an otherwise intentionally introvert building, where the interior ceremony and service is divorced from the world outside. The building was constructed by Joseph Avis, a carpenter with links to the office of Sir Christopher Wren. Architecturally the building reflects the simple vernacular of contemporaneous City churches and nonconformist chapels. Inside, the plan form, fixtures and fittings are in essence still of 1701, it is a single double-height volume, galleried on three sides, with a flat plaster ceiling from which hang seven original chandeliers, while much of the original woodwork interior and fittings are uniquely intact.

179. The site, particularly the interior, plays host to the unique and rich religious traditions of the Sephardi Jewish community in Britain, known as *Minhag*. Whilst practice here shares common worship and liturgical practice with other Jewish communities, for example reading from the Torah Scrolls, there are particular rituals unique here (the *Mitzvot*), such as the use of specific sung melodies in the reading of the Torah or reciting of prayers which make services at Bevis Marks distinctive and unique and have been passed from generation to generation. This rich and intricate manner of worship at Bevis Marks is something which cannot be experienced anywhere else, in particular the distinctive melodies used by the *Hazan* in reading the Torah and by congregants reading prayers and other texts and are deemed of an intangible inheritance of exceptional historical and communal significance. There is strong symbolic, spiritual and social significance in the interior as a site of continuous worship since 1701. The courtyard is seen as something of an extension of the Synagogue, as a place people can gather before and after service for social and religious discussions (and indeed the last place males and females can interact before entering), as well as a place of social events and so is an element of setting which makes a contribution to communal significance. The building is of outstanding architectural, artistic, historic, and archaeological significance.

180. The building is located in an undemonstrative off-street location in an enclosed private courtyard, a situation representative of the long and complex history of Anglo-Jewry from formal expulsion in 1290 to a semi-formal acceptance during the Commonwealth resulting in re-settlement. This results in a very high level of historic significance to subsequent layers of Jewish communities in Britain down to the present day. It is the oldest surviving synagogue in England in continuous use since its construction, including through the Second World War, and is thus considered the synagogue in longest continuous use in Europe.

181. The synagogue retains its setting in a courtyard discreetly located off the main thoroughfare of Bevis Marks. It has no street presence but for its south-east elevation to Heneage Lane, a plain brick elevation pierced with three prominent round-arched windows. This forms the centrepiece of a characterful ensemble of brickwork elevations including the Rabbi's House fronting the north side of Heneage Lane. Otherwise, the principal approach to the synagogue is through a gateway in a modern building fronting Bevis Marks which provides access to the courtyard, a chevron of paved area flanking the synagogue's north-east and north-west elevations. From here the synagogue is seen hemmed in by other buildings of a similar scale and mostly of the same brickwork materiality, including the Rabbi's House which directly adjoins it to the east. The sense of an architecturally reserved and deliberately secluded setting continues to be legible and consequently the ensemble of the synagogue, its neighbouring buildings and the courtyard has high architectural and historic significance. Because of its informal, secluded setting, there are no formal viewpoints of the synagogue but rather a series of informal vistas and closeups.

182. In terms of the contribution of setting to significance, the wider modern setting includes a number of tall and very tall office buildings, both existing and consented, some of which are at present clearly visible as prominent elements from the courtyard such as One Creechurch Place, No. 6 Bevis Marks and the Gherkin. All have visual impacts on upward views from within the courtyard and visually reinforce the appreciation the synagogue's secluded location in the heart of the modern City. Additional consented tall buildings, such as 100 Leadenhall Street, 40 Leadenhall and 1 Undershaft, will add to this backdrop. Otherwise, there is an open sky setting over the synagogue, courtyard and ancillary buildings.

183. While the contrast between the scale and character of the synagogue and its taller modern setting is very noticeable when deliberately looking upwards, the established character of this part of the City is one of dramatic juxtapositions of old and new and of the visibility of taller buildings seen in the backdrop to historic buildings. This is a defining characteristic of the Cluster and the positive frisson between the historic and modern City is unique in townscape terms. And in all courtyard views the synagogue holds the eye, is overwhelmingly prominent and is the defining focal point.

184. The close, immediate setting of the synagogue preserved in the intimate courtyard in part resembles the setting at the time the synagogue was constructed and therefore makes a strong and defining contribution to its significance but the wider setting beyond has

changed significantly and now has a fundamentally different modern character that makes no material contribution to the historic significance of the listed building.

185. The close, intimate setting of the narrow Heneage Lane creates an insular domestic human scale feel, divorced from the high-rise commercial City beyond. It retains the appearance of a historic City alley accentuated by the worn York Stone flagged floor and traditional Victorian Windsor lantern lighting columns. Here simple, secondary elevations draw subtle attention to the only incidents of note, the complementary eastern elevations of the Synagogue and the Rabbi's House, in a setting where there is a good sense of history and authenticity amplifying the architectural and historic significance of the Synagogue.

186. The principal elements of setting which contribute to and accentuate an appreciation of significance are the immediate courtyard visual setting, accessed off Bevis Marks, and the setting on Heneage Lane and relationship with the Rabbi's House.

Impact Assessment:

187. The impact of the proposal would be indirect, via change in its wider setting, rather than direct and physical. The core significance, architectural, evidential, historical and communal, which is drawn from the authentic and tangible physical fabric which has played host to the spirit of the place, in particular the interior, would be undiluted and are very self-contained. No fabric would be lost, obscured or de-contextualised, but the ever changing and dynamic wider townscape setting which provides the backdrop canvass to this, and which accentuates and makes even more remarkable that the survival of this heritage, would change a little, but would not prevent those rich traditions from continuing.

188. Given the secluded off-street siting of the Synagogue, there would be little to no interface between it and the proposal, or the Cluster of tall building in which it would be embedded, before the observer reaches the courtyard. At this point, to relative degrees, the arrival experience would make clear to the observer that they are in the heart of an area defined by tall buildings, where the *genius loci* is one of dynamic, striking contrasts between tall and small, old and new. For this reason, the felt presence of tall buildings in the courtyard is not shocking, or in principle, incongruous, but is understood as a part of the character of the place, another layer of history and change. The main impact is one of the qualities of the juxtaposition.

189. In views from the courtyard entrance, from where both the synagogue and the proposed building can be viewed to their fullest extent, the proposed building would rise strikingly above the principal north-west elevation. The most visible part of the proposed building would be the slenderer upper storeys, with only the upper storeys of the more fulsome lower half appearing in these views. The proposed building would replace some clear sky with slender massing and sophisticated pale blue faience elevations. In views further into the eastern and western arms of the courtyard, approaching the Rabbi's House and outside the synagogue's main entrance, the uppermost storeys of the proposed building would appear as a sliver of slender blue faience above the brick parapet of the synagogue, again seen in concert with the uppermost parts of an eclectic array of other modern tall buildings. Aside from the courtyard entrance viewpoints, these views of the proposed building within the courtyard would be glimpses caught when deliberately craning beyond a comfortable field of view, would be high level and in the oblique.

190. Historic England have identified a small degree of incremental harm arising from the proposed building as a result of the closeness of the proposed building to the synagogue which would 'further diminish the sense of seclusion in the courtyard'. The GLA consider that the proposed building, together with the consented proposals for 1 Undershaft and 100 Leadenhall, would 'alter the setting of the synagogue and cause harm'.

191. The London Sephardi Trust contend that the impact of the proposed building, due to its proximity and scale would result in less than substantial harm to the significance of the synagogue and its setting. The Trust considers that the proposed building would detract from the ability to clearly discern the historic character and aesthetic and architectural qualities of the synagogue building. The Trust considers that the proposed building with the cumulative effects of consented and proposed developments would all result in less than substantial harm 'at the very upper end' of the spectrum.

192. Your officers do not concur with these conclusions for the following reasons. In the clearest view of the proposed building and synagogue from the courtyard entrance, the proposed building would add another modern form into the backdrop. It would occupy a significant portion of currently clear sky space over the synagogue. However, as set out in the paragraphs above, a number of modern buildings are already visible in views from the courtyard, reflecting its location in the heart of a dynamic and continually evolving modern City. Architecturally, the rooflines of the synagogue and the surrounding courtyard are simple forms that do not depend on a clear sky backdrop

to be appreciated to the fullest extent; the architecture of the courtyard is prevailingly that of simple brickwork frontages of an informal character commensurate to their ‘backstreet’ location. It is not considered that the proposed building would mar the viewer’s ability to appreciate the powerfully simple architectures of the synagogue or the courtyard buildings. From within the courtyard the synagogue would remain the prominent building and focal point.

193. Historically, part of the significance of the synagogue’s setting is that it has always been a sanctuary of worship secluded within a densely developed urban area. It is not considered that the proposed building would fundamentally alter this perception, nor would it form an unexpected or incongruous backdrop to those viewing the synagogue from within the courtyard, given that the journey there must necessarily pass within sight of other towers in the City Cluster. The proposed building would be a sophisticated piece of architecture with slender massing and largely solid, well-modelled elevations of pale blue faience, all of which would mitigate the impact and provide a high-quality backdrop to the historic architecture of the synagogue and its courtyard.

194. Consequently, in views from within the courtyard, the proposed building is not considered to cause harm to the significance or setting of the synagogue or the courtyard complex and Rabbi’s House as non-designated heritage assets. The synagogue remains the dominant presence in all these views.

195. Despite the scale of the proposal terminating the southern axis on Heneage Lane, it is considered, given its particular spatial character, that experience of the Synagogue would remain undiluted. Given its intimate scale and historic features the authenticity and historic feel would still arrest the viewer, the modern tall buildings beyond being incidental and peripheral – it would remain a secondary and historic alley in character, the pre-eminence of the Synagogue and Rabbi’s House retained. The elegant dark blue hue of the proposed building’s ‘triple order’ base and the new sightlines created to Bury Street through the Heneage Arcade would provide a sophisticated and attractive bookend to the characterful ensemble of brickwork frontages of which the synagogue and Rabbi’s House are part.

196. The site of the proposed building does not directly neighbour or otherwise touch the site of the synagogue or its surrounding complex. Nevertheless, the Georgian Group and the London Sephardi Trust have raised concerns about the impact of the construction of the proposed building on the fabric of the synagogue.

197. The applicant has submitted a Structural Statement and Basement Impact Assessment which set out how the construction of the proposed building would not affect the fabric of the synagogue. This has independently reviewed by the City Corporation's Assistant District Surveyor who has confirmed that the construction of the proposed building would pose no risk to the fabric or structure of the synagogue. To further mitigate this risk, a condition is attached requiring the submission of a Demolition and Construction Method Statement prepared by a in part by a conservation-accredited structural engineer.

198. During daylight hours, the synagogue's capacious windows provide a level of ambient light which enables an appreciation of the exceptional interior and allows services and readings to take place. There are large windows on all four elevations, resulting in a multi-aspect interior receiving daylight throughout the day. Artificial light within the building is minimised and largely restricted to historic fittings. The London Sephardi Trust and a number of other objectors consider that the proposed building would cause harm to the heritage significance of the synagogue through a reduction of the natural light levels.

199. Furthermore, it has been said that there would be a detrimental impact on lighting levels at the *Bimah,* the raised platform from which prayers are led, which could affect the ability to read and consequently the ability to lead prayer.

200. As set out in preceding paragraphs, in daylight and sunlight terms the reduction in light levels to the synagogue would be fractional and imperceptible reductions. The absolute alterations experienced as a result of the proposed development for sunlight is considered to be very low (in the annual period reductions range between 7% and 13). However, the existing light levels experienced by the synagogue are already low so any diminishment, however fractional, is considered an adverse impact. The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including when at the Bimah. The difference between the existing and proposed condition for daylight and sunlight is very small that it would be imperceptible to the human eye. Officers consider that such fractional light alterations in real terms would not affect the ability to use the building for religious services therefore would not cause harm to the heritage significance of the Synagogue.

201. A number of objections have been received, including from the London Sephardi Trust, relating to the loss of light of the synagogue and the impact this would have specifically on the building's heritage

significance through an undermining of the appreciation of key components of the historic interior and the ability to use the building for worship and associated events.

202. Whilst acknowledging the impact in pure daylight and sunlight terms upon users of the building discussed in the daylight and sunlight section of the report, the fractional reduction in ambient light levels caused by the proposed building is not considered to have an impact on the building's heritage significance in the sense that the historic interior would be as appreciable to as before. This would be true both of the baseline and cumulative scenarios assessed. There are no prominent stained-glass windows or other internal fittings which rely specifically upon bright daylight/sunlight for their appreciation. Rather, the potential impact on the historic interior and ambiance would be general in nature, and the fractional reduction in ambient light levels would not hinder the ability to appreciate this interior to any serious degree.

203. It has been said that reductions in sunlight to the courtyard would harm the contribution this makes to the significance of the Synagogue. Officers have reviewed the submitted daylight and sunlight assessment (which has also been independently assessed) and consider that this impact would be very minor and would not be reduced to a noticeable degree so as to materially alter the current appreciation of the courtyard and synagogue in tandem, including during events and services which occupy the courtyard.

204. It has been said that further tall buildings surrounding the courtyard would reduce a sense of seclusion, escape, privacy and tranquillity as a consequence of additional overlooking. It is not considered that the proposal would materially increase a sense of encroachment or loss of privacy, given the significant amount of mutual overlooking which takes place in a dense tall building Cluster. Given the intimacy and containment provided by the building enclosing the courtyard, it is considered that sense of off-street retreat and seclusion would be preserved.

205. A number of other objections have been received relating to noise, additional activity and overlooking generated by the proposed building in both baseline and cumulative scenarios and how these would affect the use of the synagogue and the quiet character of Heneage Lane which contributes towards its significance. These have been addressed in Noise and Vibration and Transport sections of the report and are not considered to have a specific bearing on the heritage significance of the synagogue or its courtyard complex, notwithstanding the impacts identified upon amenity and other areas. It

is considered that there would be a negligible impact with regards to noise during the construction and operational stages of the development. It is acknowledged that there would be an increase in the number of pedestrians in the area as a result of the proposed development. However, noise levels are not expected to be such that it would affect the use of the building for holding religious services as a result of the use or operation of the proposed development. Conditions are recommended to control construction working hours around religious services to mitigate any heritage impact.

206. It has been said that the proposal would negatively affect the Heritage Lottery funded Heritage Centre which is currently being built, although this is not substantiated with any evidence. In general, the intensification of the Cluster, in particular out-of-hours, is not incompatible with visitor attractions, which could indeed benefit.

Conclusion:

207. It is considered that in visual, physical and environmental terms, under both baseline and cumulative scenarios, the proposed building would preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

Holland House: grade II*

208. Offices of 1914-16, a rare example of the work of Dutch architect H.P. Berlage in Britain. Built for a Dutch shipping company, the building is a striking landmark, particularly in its use of grey-green faience materials and subtle nautical theming. The building's grade II* listing reflects its very high degree of both architectural and historic significance. It is unique in the city as an example of a skilfully crafted, fully faience-fronted building by a highly regarded Dutch architect whose work is rare in Britain, constructed in the middle of the First World War when building work had virtually ceased, employing novel forms of design such as steel-framing, a proto-atrium and as such pointed to the future of the office building. As well as the principal frontage, high architectural interest is found in the tiled interiors of the building at basement and ground floor levels, which survive as designed by Berlage to a high degree of intactness.

209. Holland House has a principal frontage facing north-west onto Bury Street and a secondary frontage facing south-east onto a small open space off Bury Street. Both facades are seen as part of a dense urban townscape, closely neighboured by the tall buildings of the Cluster with the Gherkin, opposite, prominent in the foreground of views of the principal frontage and a prominent backdrop to the building's secondary elevation. The backdrop to the listed building's principal elevation is clear sky. The building remains part of a street

block of a comparable scale and density to when it was originally constructed, and this immediate setting contributes to the building's significance. It originally formed part of the frontage to one of the narrowest streets in the City located opposite the former Baltic Exchange. It was designed to address the narrow street and the lustrous, exquisite faience and projection of the closely spaced chamfered piers made the building appear solid in oblique views despite being highly glazed. Following damage caused by the 1992 IRA Bomb, the Baltic Exchange was demolished and replaced by the Gherkin in 2004, opening up longer views of Holland House across the north-east and south-east corners of the new Gherkin plaza – but this was not how the building was originally designed to be seen and these views do not contribute significantly to the significance or appreciation of the listed building.

210. In views of the principal north façade of the listed building, particularly from Bury Court, the proposed building would soar up dramatically behind Holland House, occupying much of the clear sky which presently exists as a backdrop to the north façade, introducing a very prominent new element above the listed building the view. Historic England consider that the proposed building would 'diminish the appreciation of the striking architectural form' of Holland House and have identified 'some harm' to the significance of the listed building, although they consider this harm 'to be low due to the wider tall building context in the area'.

211. Your officers do not concur with Historic England's conclusion in relation to Holland House. The dramatic juxtaposition of scale, materiality and architectural design is a characteristic of the City Cluster. The visual impact of the proposed building would be mitigated by the very high quality of the modelling and materiality of its pale blue faience elevations, architecture which has been directly inspired by that of Holland House and which would read as complementary. Moreover, as previously set out, these newer views of the listed building across the Gherkin plaza do not contribute materially to the significance or appreciation of the listed building, where the setting is in any case defined by a contrast with tall buildings. Additionally, the proposed building would not adversely impact upon light levels to the fine tiled interiors at the lower levels of the listed building. Accordingly, it is considered that the proposed building would not cause harm to the setting or significance of the listed building.

Church of St Katharine Cree: grade I

212. Church of 1631 with a tower of c.1504; a rare example of a 'Laudian' church of the Caroline period; an exceedingly rare example of the early use, internally, of classical architectural motifs alongside

perpendicular gothic features. The building is therefore of exceptional architectural and historic interest, with the enclosed churchyard to the north-east contributing to its significance.

213. The church is located on the south-west corner of the street block in a characterful immediate setting of masonry warehouse buildings and offices with terracotta decorative flourishes. These are prevailingly Victorian and Edwardian in date and form a cohesive townscape group. This immediate historic setting contributes to the special architectural and historic interest of the church; more widely, the church is seen in the context of larger modern buildings and the tall buildings of the City Cluster which do not contribute to the significance of the church but which create an established, contrasting modern setting. The church is not listed as one of the City Churches with a Skyline Presence in Figure 11 of the City of London Protected Views SPD (2012).

214. The proposed building would appear in views of the church. When looking from the south and south-east, the proposed building would appear over the body of the church as part of the City Cluster of towers. In views of the church looking north along Creechurch Lane, the graceful faience elevations of the proposed building would form a characterful new backdrop to the church. The GLA consider that the proposed building would, by altering the scale of the built form and reducing the level of open sky on the street, cause harm to the setting of the church.

215. One of the distinctive characteristics of the townscape of the City Cluster is the striking and dynamic contrast in scale between the historic buildings like this church and the new towers. In other townscapes in London, such a contrast might be uneasy in terms of the setting of historic buildings, whereas in this small part of the City the striking juxtaposition of old and new has become a defining characteristic. From most vantage points, the church is already seen against a backdrop of towers. Moreover, the materiality and architectural design of the proposed building has been conceived to relate it closely to the local context of which St Katherine Cree is such an important part. Your officers do not concur with the GLA's conclusion. Within this specific context, the proposed building is not considered to harm the setting or significance of the listed building. Moreover, the proposed building would not diminish daylight to the church to the point that appreciation of the historic interior or its use would be compromised.

Church of St Andrew Undershaft: grade I

216. Church dating to the 12th century, rebuilt in the 16th century with a 15th century tower. It has exceptional architectural and historic

significance as one of the City's few pre-Fire buildings to survive. The small churchyard to the north, including its walls and railings, contributes to the building's setting and significance. Otherwise the church's setting is defined immediately by mid-rise buildings of similar scale and more widely by the tall modern buildings of the City Cluster, which lie in close proximity to the north, south and west. The juxtaposition between the church at the Gherkin has become 'iconic' in the iconography of the City and London generally.

217. Under the baseline scenario, the proposed building would appear as a prominent feature on the skyline in views of the church. In perhaps the optimal view of the church from the south-west, the upper stages of the proposed building would rise above the neighbouring buildings to the east of the church and present a prominent new element in the view. However, under the cumulative scenario, the proposed building would be completely occluded by the consented form of 100 Leadenhall Street.

218. As with St Katherine Cree, the church is already seen in dynamic contrast to the taller buildings of the City Cluster. As such, it is considered that the proposed building would not harm the setting or significance of St Andrew Undershaft.

Church of St Helen Bishopsgate: grade I

219. Nunnery of the 13th century which became a parish church from the Reformation; many additions of fabric from the 14th to the 20th centuries and a building of the highest architectural and historic significance. It is one of the City's few surviving pre-Fire buildings. The churchyard to the west contributes to the significance of the listed building.

220. From the west, the church's immediate setting comprises a group of 19th and 20th century buildings, with the tall buildings of the City Cluster providing a long-established, dramatic contrast in scale and materiality immediately to the south and west. The Gherkin is prominent behind the church in views looking east. There is a narrow slice of clear sky above the church between the Gherkin and No. 1 Undershaft obscured by a prominent tree in the churchyard.

221. In the baseline scenario, the proposed building would infill the existing clear sky gap between the Gherkin and No. 1 Undershaft. It would be partially occluded by the churchyard tree when in leaf but would be more visible in the winter months. However, the setting of the church in this view is predominantly of taller modern forms and the proposed building would be an augmentation of this. Additionally, in the cumulative scenario, the proposed building would be occluded by the

consented 1 Undershaft and 100 Leadenhall Street. The proposed building is not considered to harm the setting or significance of St Helen Bishopsgate.

Church of St Botolph Aldgate: grade I (and associated grade II listed street furniture)

222. Church of 1744, of stock brick with classical stone detailing and a distinctive obelisk tower. The churchyard, railings and associated drinking fountain and police call box all contribute to the building's setting and significance. The church's setting is further enhanced by the open space of Aldgate Square to the west and the group relationship with the Aldgate School. The setting is otherwise characterised by modern commercial buildings of medium scale in the City and Tower Hamlets, with the tall buildings of the Cluster set some distance away to the west.

223. The proposed building would be seen in the backdrop of the church as part of the City Cluster. The GLA consider that the proposed building would cause harm to the setting of the church. Your officers do not concur with this conclusion. The proposed building would read as a distant element of the established City Cluster of modern towers in the backdrop to the church when see from the east. It would not be harmful to its setting or significance.

Church of All Hallows by the Tower (grade I)

224. Church of Saxon origins, medieval fabric, a brick tower of 1659 and extensive post-war rebuilding by Seely and Paget. The building is of very high historic and architectural significance as an ancient survivor whose myriad architectural phases testify to the phases of change that have characterised the City of London for the past thousand years. The building's setting is greatly changed, and it now draws only a modicum of significance from its setting.

225. Under both cumulative and baseline scenarios, the proposed building would be seen some way to the north, in the backdrop of the church as part of the City Cluster and would not be harmful to its setting or significance.

Lloyd's Building: grade I and grade II

226. Offices of 1986 by the Richard Rogers Partnership with a retained 1928 frontage of its predecessor separately listed at grade II. The building is of very high architectural significance for representing an acclaimed example of the 'High Tech' style employing high quality materials and innovative construction techniques, built as the latest home for an institution already centuries old. The building's setting has evolved since its completion and it sits comfortably amongst the taller

buildings of the City Cluster, whilst providing a mediation in scale to the lower rise buildings to the west.

227. The proposed building would be seen as a new skyline feature to the east of the Gherkin in views of Lloyd's from Leadenhall Street. It would appear as an elegant new addition to the existing Cluster of modern towers which already frame the setting of the listed building. In this respect, the proposed building would complement the setting of Lloyd's and would not harm the setting or significance of the listed building.

Trinity House: grade I

228. Offices and headquarters building of 1796 by Samuel Wyatt, gutted by bombs in 1940 and rebuilt internally by Albert Richardson. Predominantly Portland stone-faced in the classical style of the Georgian era, an important and rare example of this architectural expression in the City. It is the headquarters of Trinity House, the lighthouse authority for England, Wales and the Channel Islands; they have been based in the City since the Tudor period. The building possesses high architectural and historic significance and draws significance from its dignified setting of Trinity Square and the ensemble of seagoing structures and buildings surrounding.

229. The proposed building would be seen in views of the building's principal façade looking north to the west of the listed building, reading as part of the emerging, dynamic backdrop of modern tall buildings in the City Cluster. There would be no harm to the setting or the significance of the listed building which would remain pre-eminent in the immediate foreground setting

Tower Bridge: grade I

230. Bridge of 1894 designed by City Surveyor Sir Horace Jones and engineer Sir John Wole Barry. A bridge with French chateau influences in the twin masonry towers that forms, with the bridge bascule and structural members, one of the most famous skyline silhouettes in London. The building possesses high architectural and historic significance as an example of ambitious late Victorian civic engineering project in an exceedingly prominent situation. The listed building derives immense significance from the open, riverine setting which creates a plethora of upstream and downstream views of it.

231. In views of the bridge from the south-east, from Butlers' Wharf and other locations along the South Bank, the proposed building would be seen as a high-quality architectural addition to the established and consolidating City Cluster of modern towers to the north of the bridge,

which would remain the commanding foreground landmark guarding the Upper Pool of London. There would be no harm to the setting or the significance of the listed building.

Lloyd's Register of Shipping: grade II*

232. Offices of 1901 to designs by T.E. Colcutt, designed for the Lloyd's Register of shipping classifiers (as opposed to the related but separate insurance brokerage of the same name). The building is a superb example of the integration of architecture with sculpture and other arts and is of very high architectural significance. The building has in the past twenty years been integrated into a substantial redevelopment of the site by the Richard Rogers Partnership which includes a tall office block. Nevertheless, it retains a clearly legible setting with the Edwardian enclave of masonry offices along Lloyd's Avenue, which enhance its architectural and historic significance.

233. The proposed building would form a prominent new element in the backdrop of the building in northerly views from Lloyd's Avenue, but would not be harmful to its setting – already characterised by a backdrop of the tall modern office buildings of the City Cluster – or its significance.

Former Port of London Authority Building: grade II*

234. Offices of 1922 by Sir Edwin Cooper for the former Port of London Authority. Crowned by a distinctive tower incorporating allegorical sculpture, the building is a rich and robust essay in the Edwardian Baroque and possesses high architectural and historic significance. It draws much significance from its setting, too, with Trinity Square and its monuments in the foreground and the neighbouring Trinity House all coalescing to form a dignified group of buildings illustrating London's seagoing past.

235. In views from Trinity Square, the upper storeys of the proposed building would be visible to the right of the listed building. It would appear suitably divorced from the foreground ensemble of historic buildings and would read as part of the emerging City Cluster in the distance, as a subsidiary player to the consented silhouettes of 100 Leadenhall Street, 1 Undershaft and 40 Leadenhall Street. This character of a modern skyline context being so, the proposed building would not be harmful to the setting of significance of the listed building.

The Aldgate School (listed as Sir John Cass School): grade II*

236. School of 1908, of red brick with classical stone detailing in the 'neo-Wren' manner. The associated playground and railings all contribute to the building's setting and significance. To the east, the church's setting is further enhanced by the open space of Aldgate

Square and the group relationship with St Botolph's church; to the west, the school is framed by the finer grain and historic townscape of Mitre Street. The setting is otherwise characterised by modern commercial buildings of medium scale in the City, with the tall buildings of the Cluster located to the west.

237. The proposed building would be seen in the backdrop of the school as part of the City Cluster and would not be harmful to its setting or significance. In particular, the proposed building would form a dynamic new terminus to Mitre Street in the background of north-westerly views of the school's western frontage.

Bishopsgate Institute and Library: grade II*

238. Institute of 1895 by Charles Harrison Townsend in the unique stylistic fusion of that architect, incorporating free gothic elements and much terracotta detailing. The main frontage to Bishopsgate is most elaborate while the longer Brushfield Street elevation is more subdued. The building has high architectural significance and derives a degree of significance from its setting on the south side of Brushfield Street, where it forms a group with two eighteenth century grade II listed buildings.

239. The proposed building would be visible some distance away as part of the established backdrop of the City Cluster. There would be no harm to the setting or significance of the listed building.

38 St Mary Axe: grade II

240. Baltic Exchange of 1922 by Sir Edwin Cooper. The listed building has a grand, classically enriched stone frontage to St Mary Ave and a plainer stone elevation to Bury Court. The building possesses architectural and historic significance. The setting of the building contributes to its significance only to a limited degree as it has undergone substantial change.

241. In views looking east, the proposed building would be glimpsed between the listed building and the Gherkin. There would be no harm to the setting or significance of the listed building, where it would be viewed in the context of the established Cluster

Nos. 2-16 Creechurch Lane: grade II

242. Warehouses of 1885, of brick and stucco and exhibiting the light-industrial architectural characteristics that were once common to parts of the City, but which have nearly now all been lost. The building forms a group with the other warehouse buildings in the vicinity, of

similar age and materiality though unlisted and classed as non-designated heritage assets.

243. The proposed building would be visible in views to the north. However, the setting of this listed building and its unlisted neighbours is already characterised by the general proximity of the City Cluster and framed by specific modern buildings such as One Creechurch Place, the Gherkin and 100 Leadenhall Street. The proposed building would be a high-quality architectural addition to these which would in its materiality and modelling sympathise to a high degree with the brickwork and terracotta materiality of these historic buildings. In this context the proposal would not harm the listed building's setting or significance.

72-75 Fenchurch Street (Dixon House): grade II

244. Offices of 1900, of Portland stone in the Edwardian baroque style of its fellow buildings in the Lloyd's Avenue Conservation Area. The building has high architectural significance. It draws significance from its setting as part of the enclave of Edwardian buildings in the Lloyds Avenue Conservation Area.

245. The proposed building would form a prominent new element in the building's backdrop when viewed from Lloyd's Avenue. The building would be highly visible in the context of the listed building, but it would form part of an existing backdrop of modern office buildings in these views. As such, it would not be harmful to the setting or significance of the listed building.

The Setting of other Listed Buildings

246. There are three small-scale listed structures in the vicinity of the site which would not be impacted by the development. These are the Aldgate Pump (grade II), the former churchyard gateway to St Katherine Cree Churchyard (grade II) and the former archway between Nos. 39 and 40 and Nos. 72 and 73 Leadenhall Street (grade II).

Conservation Areas

Lloyd's Avenue

247. The conservation area lies to the south east of the site and comprises a significant group of Edwardian and later buildings. The area is focused on the Lloyd's Avenue thoroughfare, with the existing view north up this street terminated by 105 Fenchurch Street and flanked by Lloyd's Register (grade II*) and Dixon House (grade II). The Gherkin is a distinctive focal point in views along Lloyd's Avenue, which along with the consented 100 Leadenhall Street tower create a modern

termination to the view. The proposed building would introduce elegant faience architecture into this view as a counterpoint to the existing modern towers. Given the characteristic backdrop of tall buildings in this view and the enclosed character of the conservation area, the proposed building would not harm its significance.

Trinity Square

248. The conservation area lies to the south of the site and comprises a significant group of Georgian and later buildings with strong maritime associations, dominated by the grade II* listed former Port of London Authority building (see above). In views looking north from Trinity Square Gardens, located immediately to the south of the conservation area, the proposed building would appear as a new element of the City Cluster between the former PLA building and the grade I listed Trinity House. It would appear as an addition to the established City Cluster of modern tall buildings which already forms a prominent backdrop to this view. Given this characteristic backdrop, the proposed building would not cause harm to the significance of the conservation area.

Non-designated heritage assets

249. The Creechurch area harbours a number of unlisted historic buildings of merit, considered to be non-designated heritage assets, of which a number are located within the immediate setting of the proposed building.

250. The Rabbi's House adjoins Bevis Marks synagogue to the east and presents a simple frontage to the synagogue courtyard of stock brickwork and stone dressings. Its more architecturally significant elevation is that to Heneage Lane, of red brick and Mansfield stone dressings incorporating Tudor detailing. The building is considered to be a non-designated heritage asset.

251. 113-116 Leadenhall Street is a stone-built bank of 1891 with refined detailing. As the only surviving Victorian building on Leadenhall Street, the building is an important element of local townscape and reinforces and contributes to the setting of the church of St Andrew Undershaft.

252. 33-34 Bury Street is an office building of 1912, built for Messrs Burge, grain dealers. The building typifies the kind of diminutive, early 20th century office building once very common in the City and now hardly to be seen. It has high-quality stone carved stone detailing and makes a strong local townscape contribution, particularly as a group with Holland House.

253. To the east of Creechurch Lane are a characterful group of 19th century former warehouse buildings. Each is considered a non-designated heritage asset for the positive contribution it makes to the townscape and the setting of the church of St Katherine Cree. The buildings form a strong, cohesive group intrinsically and with the listed warehouses in this location, united by the shared use of brickwork and sophisticated terracotta detailing. Collectively they are a valuable survival of historic townscape at the eastern edge of the City Cluster and make a very strong local townscape contribution. The buildings are: 18-20 Creechurch Lane (Cree House), 24 Creechurch Lane (Fibi House), 12-14 Mitre Street (Mitre House) and 27-31 Mitre Street.

254. The proposed building would have a visual impact on the settings of the above non-designated heritage assets due to its scale and proximity, though this would not cause harm to their significance as the sophisticated faience materiality and architectural modelling which is inspired by careful study of these buildings will ensure that the proposed building is appropriate for the setting.. As such, it is not considered that the proposed building would be harmful to the setting or significance of these non-designated heritage assets.

Conclusion on Heritage Impact:

255. The proposed building would cause a low degree of less than substantial harm to the OUV/significance of the Tower of London World Heritage Site through its impact on the LVMF view 10A.1, in which it would affect the viewer's ability to appreciate the OUV, its authenticity and integrity and would be contrary to London Plan policies D9(e), HC2, HC3, HC4 and Local Plan policies CS12, CS13.

256. When addressing the balancing exercise, as considered below, this harm has been afforded considerable importance and weight, and account taken of the importance of this as a World Heritage Site in accordance with the advice given in paragraph 193 of the NPPF that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). The heritage balancing exercise alongside the public benefits is made in the preceding paragraphs.

257. Otherwise, it has been found that the proposal would preserve the special interest and significance of the Bevis Marks Synagogue and all other relevant listed buildings, conservation areas and non-designated heritage assets, causing no harm.

Archaeology

258. The site is in an area of archaeological potential located within the Roman and medieval City Wall, and within the precinct of the medieval Holy Trinity Priory, which was founded in the 11th century. An Archaeological Desk-Based Assessment has been submitted with the application and there is potential for remains of all periods to survive in this area.

259. There is high potential for Roman remains as evidence of several phases of buildings, ditches and other occupation such as quarrying and glassmaking has been recorded in the area. There is high potential for medieval remains including foundations of buildings of the Holy Trinity Priory, as the site is within its' precinct and close to the location of the south gate. In addition, there is evidence of burials, recorded in the vicinity, which pre-date the construction of the Priory.

260. The potential for remains to survive on the site has been affected by the construction of the existing building basement and foundations. Archaeological evaluation would be required to better understand the level of disturbance and additional information on the type, character and date of any surviving remains which may survive below the existing basement. The results of this evaluation would inform the design of an appropriate mitigation strategy.

261. The proposed building would have four levels of basement which would remove all surviving archaeological remains.

262. The proposals are acceptable subject to conditions to cover archaeological evaluation, a programme of archaeological work and foundations and piling design.

Transport and Highways

Public Transport

263. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B.

264. The site is located close to Fenchurch Street, Liverpool Street and Cannon Street Rail Stations, to Aldgate, Aldgate East, Liverpool Street, Tower Hill and Bank underground stations, to Tower Gateway DLR station and is also close to several bus routes with bus stops on St Katherine Cree, Dukes Place, Gracechurch Street/ Bishopsgate and Aldgate High Street.

265. The submitted Transport Assessment indicates that the overall increase in trips across all modes would have a negligible impact on the surrounding highway and public transport network capacities.

Car Parking

266. The proposed development would be car-free, in line with London Plan 2021 policy T6 and Draft City Plan 2036 Policy VT3-1, with the existing 18 car parking spaces on site removed.

A parking space is shown adjacent to the loading bay, within the application red line boundary. The parking space is provided for the neighbouring building at Holland House, who have a right to the space in perpetuity, and would not be available for use by the development.

267. Emerging City Plan 2026 policy VT3 -1 allows for, but does not require, the provision of parking for designated Blue Badge spaces. There are no Blue Badge parking bays proposed as part of the development. Three on-street Blue Badge parking bays are located within 20m on the development site, two on Creechurch Lane and Mitre Street.

Long Stay Cycle Parking

268. London Plan policy T5 requires cycle parking at least in accordance with the minimum requirements published in the plan. Policy T5 requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

269. London Plan 2021 standards require 432 long stay cycle parking spaces are provided. The applicant is proposing 443 long stay cycle parking spaces, in excess of the London Plan standards. 5% of the cycle parking would be able to accommodate larger cycles, including adapted cycles for disabled people, in line with London Cycle Design Standards guidance.

270. The long stay cycle parking is proposed at basement level 1 and basement mezzanine level 1 and would be accessed via two lifts from the pedestrian walkway and via a staircase access from Heneage Place. Cyclists would access for the lifts in the pedestrian walkway, off the public highway. The applicant has demonstrated that the lifts would provide enough capacity for access to and from the cycle parking during peak times to ensure queuing cyclists would not unduly obstruct the pedestrian walkway.

271. 46 showers, 443 lockers and a drying room are proposed alongside the cycle parking for active travel. The locker provision is in line with London Plan 2021 policy 10.5.7, which recommends a minimum of 2 lockers per 3 long-stay spaces. The shower provision is compliant with the London Plan 2021 policy 10.5.7, which is at least 1 shower per 10 long-stay spaces.

272. The applicant would be required to produce a Cycling Promotion Plan which is a cycling focused Travel Plan and this would be secured by a S106 obligation for approval in line with London Plan 2021 policy T4.

Short Stay Cycle Parking

273. London Plan 2021 standards require 26 short-stay cycle parking spaces. The applicant is proposing 26 short stay cycle parking spaces at basement level 1 and basement mezzanine level 1, next to the long stay cycle parking.

274. Access to the short stay cycle parking would be via the two lifts from the pedestrian walkway and the staircase from Heneage Place.

275. The cycling promotion plan would be expected to include a requirement for the development to clearly display signage highlighting the availability of free-to-use visitor cycle parking for members of the public.

Cycle Hire Docking Station and Improvements to Cycling

276. Transport for London have requested a financial contribution towards the provision of a cycle hire docking station and for the applicant to carry out an assessment of the cycle route between the site and Cycle Superhighway 2 (CS2) using TfL Cycle Route Quality Criteria prior to Stage 2, and to fund improvements identified by the assessment. The applicant has agreed to carry out the route assessment and provide a contribution toward cycling improvements, both to cycle hire and cycle routes, in the nearby area and this would be secured by planning obligations.

Servicing and deliveries

277. Policy DM16.5 of the Local Plan and draft City Plan 2036 Policy VT2 – 1 require developments to be designed to allow for on-site servicing. Policy VT2 – 2 requires major commercial development to provide for freight consolidation. Policy VT2 – 4 requires delivery to and servicing of new developments to take place outside peak hours (0700 – 1000, 1200 – 1400 and 1600 – 1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. London Plan policy T7 G requires development proposals to provide adequate space for off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

278. The building would be serviced from an off-street loading bay accessed from Heneage Place. The loading bay could accommodate a vehicle up to 8m in length. The loading bay will be equipped with an electric vehicle charging point. Vehicles would enter and exit Heneage Place in a forward gear.

279. The Transport Assessment estimates that the development would generate demand for 22 servicing vehicles per day. This figure would be included in the S106 agreement as a cap on the maximum number of deliveries permitted per day.

280. The development will be required to submit a delivery and servicing plan (DSP). The use of an off-site consolidation centre will be required, and no servicing would be permitted during the peak pedestrian hours of 0700 – 1000, 1200 – 1400 and 1600 – 1900. These would be secured as obligations in the S106 agreement.

281. Waste collection will take place in the same way as all other servicing vehicles and will be included in the daily cap of 22 vehicles.

282. The number of deliveries as a result of the proposed development would result in an increase of 12 additional vehicles throughout the day when compared to the existing situation. An additional 12 vehicles throughout the course of the day, would not be considered to unduly impact on the amenity or use of the Synagogue. It should be noted that 18 car parking spaces would be removed which would reduce the number of vehicle movements to and from the servicing area on Heneage Place.

Pedestrian Comfort

283. A Pedestrian Comfort Level (PCL) assessment has been conducted for the streets surrounding the development, including Creechurch Lane, Mitre Street, Bury Street, Cunard Place and Heneage Lane.

284. Trip generation estimates in the transport assessment demonstrate that the development would result in a net increase of 588 pedestrian movements in the AM peak and 582 pedestrian movements in the PM peak. This includes trips by all modes except cycling, as modes which require the final part of the journey to be completed on foot.

285. The applicant was unable to undertake pedestrian surveys on the streets surrounding the site due to the COVID-19 pandemic. Pedestrian count data has been taken from the transport assessments for nearby applications, including 100 Leadenhall Street and the Tulip. The future base flow (2041) used in the PCL assessment is based upon the one used for 100 Leadenhall Street and assumes a 26.6% increase in pedestrian numbers between 2016 and 2041.

286. The transport assessment has modelled the likely arrival routes for pedestrians based on the proximity of nearby transport links and the frequency of services to those links. 58% of pedestrian arrival are predicted from the west (Bank and Cannon Street)) via Cunard Place and Creechurch Lane, 22% of pedestrian arrivals are predicted from the north (Liverpool Street) via Bury Street and Heneage Lane, 15% from

the south (Fenchurch Street) via Cunard Place and Creechurch Lane and 5% from the east (Aldgate) via Mitre Street.

287. The streets immediately surrounding the site, Bury Street, Creechurch Lane and Mitre Street have narrow footways, several of which are below 2m wide. As a result, sections of these streets achieve a PCL of F both before and after the proposed development flows are added.

288. To achieve an acceptable level of pedestrian comfort following the increase in pedestrians generated by the development using these streets, pedestrian priority measures will be introduced, and this would be secured through a S278 agreement. Pedestrian priority means the streets would be designed so all vehicles, including cycles, will be expected to give way to people walking. Timed closures and access only restrictions will be explored through the S278 evaluation and design process.

289. The introduction of the proposed 5m wide pedestrian walkway through the site will provide an alternative north/south route through the area between 0700 and 2300, linking Heneage Lane to Cunard Place and Creechurch Lane to the south and will provide some relief to the parallel north/south route along Creechurch Lane.

290. Overall, the proposals would be considered to have a positive impact on pedestrians using the surrounding streets, through the introduction of pedestrian priority measures secured through the S278 agreement and through the provision of a new 5m wide north/south route through the site.

Section 278 Agreement

291. If planning permission were to be granted, the applicant would be required to enter into a Section 278 agreement to mitigate the impact of additional pedestrian flows in the surrounding area. The S278 agreement would contribute towards the delivery of the City Cluster and Fenchurch Street Healthy Streets Plan. The Transport Strategy identifies Creechurch Lane, Mitre Street and Bury Street as streets with pavements less than 2m wide and within the City Cluster focus area for delivery of pedestrian priority. The S278 works would contribute towards the delivery of pedestrian priority streets on Bury Street, Creechurch Lane, Heneage Place and Mitre Street, subject to further detailed design. The Transport Strategy details the approach to be taken for pedestrian priority streets;

Pedestrian priority streets will allow access for motor vehicles, with all vehicles, including cycles, expected to give way to people walking. In some instances, streets will be fully pedestrianised or not allow motor vehicle access at certain times. The access requirements for each

pedestrian priority, fully pedestrianised or timed pedestrianised street will be fully assessed as part of the project delivery process.

Stopping Up

292. Several small areas of stopping up would be required on Bury Street and Heneage Place, totalling 0.9sqm. The applicant is proposing to dedicate areas on Heneage Place, Creechurch Lane and Bury Street as public highway, totalling 8.7sqm. Overall, there is a net gain of 7.8sqm of public highway. There is also a gain, to be secured via 1 S106 obligation, of publicly accessible space within the development in the form of the new walkway which would be open to the public between 0700 and 2300, of approximately 215 sq.m.

293. The stopping up would not affect vehicular access to either street and overall the facilities for pedestrians would be improved through the Section 278 works and proposed building permeability.

Construction Logistics

294. The submission of a deconstruction logistics plan and construction logistics plan will be secured by condition. The logistics arrangements will be developed in consultation with the City's Highways Licensing and Traffic Management teams to minimise the disruption to neighbouring occupiers and other highway users.

295. The outline construction management plan submitted with the application shows that at least one blue badge parking bay would need to be suspended during the works. Any application to suspend blue badge parking bays must be supported by an Equalities Analysis (EA). Through the EA the applicant would be required to consult with local stakeholders to understand the usage patterns of the bays in question, and to establish whether their re-provision in the nearby area would be required.

Public Access and Inclusivity

296. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.

297. The building entrances from Creechurch Lane, Bury Street and Heneage Lane would be step free and would provide automated sliding doors and clear openings to ensure unencumbered access to all.

298. Vertical circulation to the office floors would be via 12 x 21-person passenger lifts in the main core. The 12 lift cars would work as twin lifts within six lift shafts for passenger movements to the office floors. Access to the upper cab entry lobby is via stair supported by a

life for users with mobility needs. Horizontal circulation would be step free through the officer floor areas.

299. The terraces at level 20 and 21 would be accessed via the lift bank from the ground floor and mezzanine level. The two terraces spaces are linked by an external stair which is designed to ambulant disabled standards.

300. The scheme introduces a step free publicly accessible route (Heneage Arcade) between Bury Street and Heneage Lane to improve the permeability of the site. The retail units would provide facilities which are designed for inclusive access in respect of entrance doors, counter height, seating and hearing difficulty.

301. The new pocket park James' Court as an extension of the public realm has been designed with level access throughout and provides inclusive seating areas.

302. The public mezzanine and first-floor community space are accessed via the feature stairs from the ground floor arcade and are also served by the separate northern lift bank.

303. A dedicated and prominent cyclist entrance from ground floor has been integrated into the design of the building. The entrance would be accessed via automated sliding doors to Creechurch Lane and internally into the arcade. A shallow stair with a 'cycle gutter' would provide access to the secure cycle parking at basement and basement mezzanine level. Alternative cycle access to the basement is provided via a lift within the north core.

304. Accessible sanitary facilities including unisex accessible and ambulant WCs would be provided at all office levels. It is intended that wherever WC facilities are located, an accessible cubicle will be provided. Accessible showers, WCs and changing facilities would be provided. Unisex and accessible toilets would also be provided for use by the public and visitors at ground floor, mezzanine and first floor level.

305. Representations have been received that the proposed development would restrict disabled access to the Synagogue. The proposed development does not propose any alterations to the way visitors access the Synagogue.

306. The outline construction management plan submitted with the application shows that at least one blue badge parking bay would need to be suspended during the works. Any application to suspend blue badge parking bays must be supported by an Equalities Analysis (EA). Through the EA the applicant would be required to consult with local stakeholders to understand the usage patterns of the bays in question,

and to establish whether their re-provision in the nearby area would be required.

307. The Access Officer welcomes the inclusive access to and within the building which would meet the requirements of Local Plan policy DM10.8 and London Plan policy D5. S106 obligations/conditions are recommended to ensure the facilities meet the requirements for the educational/community uses to ensure to ensure full accessibility and provision.

Security

308. Local Plan Policy DM3.2, draft City Plan 2036 Strategic Policy S2 (Safe and Secure City) and Policy SA3 (Designing in Security) sets out how appropriate security and safety provision must be incorporated into all development. Policy D11 of the London Plan states development proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.

309. Security proposals to protect the building and the new areas of public realm have been developed in consultation with the Designing out crime and the counter terrorism security officers within the City of London Police.

310. The building has been designed with an 'internal' structural solution to mitigate the impact of any vehicle borne attack. As part of the detailed design, a detailed Vehicle Dynamic Assessment will be carried out to better understand the threat and risks associated with all possible approach routes.

311. The new public realm would be designed with landscaping and planters which would double up as security mitigation measures for the new public realm.

312. Further details of security mitigation measures would be secured via a Section 278 Agreement. This would incorporate the requirements of vehicle mitigation measures, including traffic calming to protect pedestrians when entering and leaving the building.

313. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

Energy and Sustainability

Energy and C02 emissions

314. The Energy Statement accompanying the planning application demonstrates that the building has been designed to achieve an overall 39.2% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

315. The proposed energy demand reduction measures include a building envelope with an optimised glazing ratio of 40% glass to solid that balances daylight availability with reducing peak solar gain and associated cooling load. In addition, the inclusion of natural ventilation as part of a mixed mode system is proposed due to the opportunities of the relatively shallow floor plates and the consideration that 50% of the occupied office hours would have suitable external temperatures. The savings from energy demand reduction would achieve a 2% carbon emissions reduction overall. The applicants are committed to achieving further façade design optimisation through the detailed and technical design stages to significantly improve on the results of the lean energy strategy stage. This will be requested by a pre-commencement condition.

316. There are currently no opportunities to connect the development to an existing or planned district heating network. However, drawings demonstrating how the site is to be future-proofed for a potential connection to a district heating network have been provided.

317. It is proposed to use Air Source Heat Pump (ASHP) technology for space heating, cooling and hot water. Other renewable energy technologies are not proposed, most notably due to the lack of space on the roof for a PV panel installation. Overall, the carbon emissions savings due to ASHP amount to 37.9% compared to the lean design stage development.

318. This energy strategy demonstrates compliance with the London Plan carbon targets (London Plan Policy S12). A S106 clause is recommended requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

319. A BREEAM (New construction) pre-assessment for the building has been carried out, demonstrating that the development can achieve a score of 90.8%, in the excess of 85% threshold required to achieve an “Outstanding” rating. This includes high scores in the City’s four priority categories of Energy, Water, Materials and Pollution. Further relevant credits will be targeted through the detailed design stage.

320. A condition has been recommended requiring the submission of post-construction BREEAM assessments, demonstrating that the target rating of 'Outstanding' has been achieved.

Whole Life-Cycle carbon emissions

321. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building’s operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building’s life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tol to achieve the Mayor’s net-carbon city target.

322. A Whole Life-Cycle carbon assessment has been submitted. The re-use or recycling of existing materials is not accounted for in this statement – this will be considered as part of the detailed design development once a pre-demolition audit has been carried out. This audit will be required by condition.

323. The planning stage assessment of low carbon structural solutions includes an all-electric servicing strategy and material efficiency measures such as the use of lower carbon profiled façade materials (e.g. ceramic), the use of prefabricated structural and façade systems, the rationalisation of the structural grid to minimise concrete

and steel quantities and assessing different foundation options to minimise material use.

324. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage demonstrate emissions well below the Greater London Authority's benchmark emissions target, close to reaching the GLA's aspirational target. This performance could be attributed to the options appraisals of the embodied carbon of the structure and façade. The confirmation of the strategy including further improvements, and a confirmation of the post-construction results have been requested by conditions.

Circular Economy and Waste

325. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.

326. Due to the significant uplift in the number of storeys, the foundation and structure of the existing building cannot be retained, with the exception of the basement retaining walls. A pre-demolition audit will be undertaken, requested by pre-commencement condition, to investigate how recycling of construction, demolition and excavation material can be maximised.

327. The submitted Draft Circular Economy Statement highlights that the approach to Circular Economy will evolve as the design evolves and describes the following objectives for the detailed design phase:

- mart material choices (prioritisation of durable, biodegradable, recycled/recyclable materials and materials that can be reused or re-purposed, where possible)
- Incorporation of modular elements for higher levels of design flexibility and adaptability
- Procurement of products as a service - leasing access to a solution instead of buying it
- Product life extension through improved maintenance, remanufacturing, repairing and upgrading / upcycling
- Closed loop / Take back - working with manufacturers who take back used products to recover the value by using them to make new products.

328. A Detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy

Assessments to confirm full details and achievement of the aspirations have been requested by conditions. The detailed assessment will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Urban Greening and Biodiversity

329. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.

330. A visually striking landscaping feature is proposed in the form of a 3-storey tall green wall in the pocket park area at ground level. This would include artificial lighting when the daylight levels are not sufficient. Planters and tree planting are proposed at public realm level. The roof terraces at levels 20 and 21 would incorporate planters, including opportunities for small trees. The majority of the plantroom walls at roof level would be utilised for climbing plants growing from 47 sqm of planter around the perimeter of the roof, and 122 sqm of sedum blankets would be installed across the top of the plantroom.

331. A Biodiversity Net Gain calculation has been carried out, achieving a percentage increase of 416.71% (due to the existing low habitat value of the site), and therefore meets the propose net gain requirement of at least 10% increase in biodiversity value required by the draft Environment Bill. This is largely as a result of proposed green wall and the extensive green roof which will also include small log piles and bird feeders.

332. The proposed development would incorporate a variety of urban greening measures, which provides the following benefits: mitigating air and noise pollution, capturing CO2 while releasing O2, combating the heat island effect, improving biodiversity, rainwater run-off management as well as making a place healthier and more attractive, improving the wellbeing of people. The development achieves an Urban Greening Factor (UGF) of 0.39 which exceeds the draft City Plan 2036 (Policy OS2) minimum target of 0.3.

333. Substantial greening has been incorporated at ground floor level within the new public realm areas by landscaping and trees as well as an 8 storey green wall (approx. 32m in height and over 200sq.m in terms of surface area).

334. The siting, size and planting palette would ensure year-round seasonal diversity and richness whilst optimising the holistic benefits of greater biodiversity, cooling, noise attenuation, SuDs and general amenity, with well documented health and wellbeing benefits.

335. Details of the quality and maintenance of the proposed urban greening measures would be reserved by condition.

Flood Risk, Sustainable Urban Drainage

336. Local Plan 2015 policy CS18 seeks to "reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network". The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2036.

337. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk) as such it is at a low risk of fluvial and tidal flooding. The proposed drainage strategy includes capturing some runoff from the proposed building using green roof and wall to limit the overall volume of water run-off that needs to be discharged. An attenuation tank is proposed below ground level . Surface water (including stormwater) run off would be discharged into the public combined sewer system at an acceptable rate. The SuDS strategy has been developed to cope with potential changes in the climate allowing for a 30% increase in rainfall.

338. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, S15, CR2 and CR3 of the draft City Plan 2036 and policies SI12 of the London Plan.

339. The Lead Local Flood Authority and Thames Water have raised no objections to the proposals and have recommended conditions to be attached.

Climate Resilience

Heat Stress

340. The sustainability statement outlines the proposed sustainability targets to prevent overheating by including natural ventilation openings, as a mixed mode system that incorporates free cooling through the exposed slab, within an optimised façade with a ratio of 40% glazed to solid elements to manage solar gain and maximise daylight access. These measures will not only reduce the need for carbon intensive air conditioning but will help to make the building resilient to higher temperatures and urban heat island effects.

Water Resources

341. The development targets a minimum of 40% reduction in water consumption over baseline building water consumption and rainwater

harvesting for landscaping irrigation is suggested. These measures will enable the development to minimise the use of fresh potable water which will be under increasing pressure as we experience longer periods of drought.

Natural Capital and Pest & Diseases

342. Although constrained by its position this development will incorporate some greening that would improve significantly on the existing quantity and quality of urban greening on site, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases.

343. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and a condition is attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

Conclusion

344. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing.

345. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy overall meets current and new London Plan policies as well as Local Plan policies, and it is on track to achieve an “Outstanding” BREEAM assessment rating. The proposals indicate that Whole Life-Cycle Carbon emissions could reach the GLA’s aspirational targets and Circular Economy principles can be positively addressed through the forthcoming detailed design development. The building would achieve an appropriate degree of climate change mitigation through providing a connection to a potential new or extended renewable heat network while passive energy saving measures and low energy technologies would be

employed to significantly reduce carbon emissions. Furthermore, the development would improve urban greening of the public realm and on the building's top and also significantly increase the biodiversity on site that would contribute to improvements of the wider area.

Environmental Impact of Proposals on Surrounding Area

346. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires developments to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Daylight and Sunlight and Solar Glare and Overshadowing

347. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) guidelines and considered having regard to policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan. Policy D6D of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether harm is likely to occur. The approach indicated by planning policy is that daylight and sunlight should not be reduced to unacceptable levels, and that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate to its context. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. Both the London Plan and Local Plan policies require a judgement to be made as to whether daylight and sunlight levels will be sufficient, and whether the level will be unacceptable. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context.

348. The BRE guidelines consider a number of factors in measuring the impact of development on daylight and sunlight on existing dwellings:

- Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The

VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.

- Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

  The BRE Guide requires compliance with both the VSC and daylight distribution guidelines.

- Sunlight: sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and receives less than 0.8 times its former sunlight hours as result of a proposed development; and has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

349. It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

- Percentage change (10% reduced to 8% = 20% reduction); and
- Actual/Absolute change (10% reduced to 8% = 2% change)

350. Officers consider that the applicants have completed comprehensive daylight assessments of the potential impact on Bevis Marks Synagogue, as set out within Environmental Statement (ES) Volume 1, Chapter 10 and ES Volume 3, Appendix: Daylight, Sunlight and Overshadowing, Light Intrusion and Solar Glare. The daylight effects were assessed in accordance with BRE Report 209, *'Site layout planning for daylight and sunlight – A guide to good practice',* 2011 ('the BRE Guidelines). This is the principal reference document used by most local authorities in consideration of daylight and sunlight matters, throughout

the UK and including CoL, and is referenced in key planning policy. It is important to reiterate that the (BRE-recommended) assessments undertaken and submitted by the applicants show fractional and imperceptible daylight alterations in real terms overall and therefore further technical analysis is not required to conclude that the proposed development is acceptable with regard to the potential effect on light to the Bevis Marks Synagogue, and in line with BRE guidance and the intentions of key planning policy. As such a radiance analysis was not undertaken by the applicant and the overall assessment is considered to be in compliance with existing policy and guidance.

351. The main assessment for loss of daylight and sunlight considers the proposals in the context of the existing scenario, where the proposed scheme is the only change and consented buildings which are not yet constructed are not included in the assessment model. Where buildings are already under construction, they have been included in the existing scenario. This is referred to as the existing vs proposed scenario.

352. Paragraph 3.10.41 of the Local Plan and Policy HS3 of Draft City Plan 2036 states when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals on the amenity of existing residents.

353. The applicants have carried undertaken a daylight and sunlight assessment for a number of scenarios. These include:

- Baseline
- Baseline vs Proposed Development (referred to as proposed vs existing scenario)
- Future Baseline 1 Vs Proposed Development (the proposed development and other consented schemes)
- Future Baseline 2 Vs Proposed Development (the proposed development and other consented schemes and those under consideration including 33 Creechurch Lane and the Tulip)

354. The daylight, sunlight, overshadowing and solar glare assessment submitted by the applicant as part of the Environmental Statement, has been independently assessed by Delva Patman Redler (DPR) to review the scope, methodology and conclusions of the report. A copy of this report is provided in the background papers and is available to view online.

355. A representation has been received from Leathersellers stating that a number of properties they own, including; 15 and 16 St Helen's Place, 12/20 Camomile Street and 61 St Mary Axe have been identified

in the baseline assessment for daylight, sunlight, overshadowing, light intrusion and solar glare but none of these properties are subject to detailed sensitivity analysis. Officers can confirm that the submitted daylight, sunlight, overshadowing, light intrusion and solar glare assessment does take into account the stated properties within the 'baseline conditions' These properties are considered to be further away approximately 135-190m away from the proposed development and none of the windows directly face the Site. Due to the distance of these properties, a detailed technical assessment was not carried out. The applicants have since confirmed in a letter that there would be no material impact to the properties identified. Your officers concur with these conclusions and do not consider there would be a material impact to these properties.

356. Local Plan Strategic Policy CS10 seeks to ensure that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. The dense urban environment of the City, in particular in and around the cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, the proposed development provides a degree of separation such that it would not have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

Daylight

357. The residential buildings and open spaces to be considered include those at:

- 2 Creechurch Lane
- 4-8 Creechurch Lane
- 10-12 Creechurch Lane
- 14-16 Creechurch Lane
- 18-22 Creechurch Lane, 27-31 Mitre Street; and
- 2 Heneage Lane

358. Within the BRE Guidance, it states that the guidance can be applied to non-domestic buildings where the occupants have a reasonable expectation to light. It is considered that the impact on nearby places of the worship and school should be assessed. The three nearby places of worship and one school have been identified below as sensitive receptors and the impacts on these buildings have been assessed:

- Bevis Marks Synagogue;
- St Katherine Cree Church
- Parish Church of St Helen Bishopsgate; and
- Aldgate School

359. The daylight results (VSC and NSL) indicate the impact on The Aldgate School and the Parish Church of St Helen Bishopsgate would fully satisfy the BRE guidelines with the Proposed Development in place and are therefore considered to experience a negligible impact.

2 Creechurch Lane

Existing Vs Proposed

360. This property is located to the south the site and contains mixed use with commercial at ground floor and residential accommodation above. A total of 24 windows serving 12 rooms have been assessed for daylight.

361. For the VSC analysis, 5 of the 24 windows tested would meet the BRE criteria (i.e. experience no more than 20% reduction in existing VSC) and therefore the effect is considered to be negligible. Of the remaining 19 windows, 14 windows would experience reductions of between 20-30%, which would be considered to be a minor adverse impact. 5 windows would experience a greater relative reduction with alterations of between 30-40%. The absolute VSC changes are recorded between 1.3% -2.1% and these would be fractional and imperceptible alterations which translate into a higher percentage change due to very low existing values.

362. For NSL, 10 of the 12 rooms assessed would meet the BRE criteria and therefore experience a negligible impact. The 2 remaining rooms would experience alterations of between 20-30% and the impact would be considered to be minor adverse. The absolute deviations are recorded between 0.5% - 1% against the suggested 20% ‘noticeable reduction’ criterion.

363. The overall effect to daylight would be considered to be minor adverse and the overall effect to sunlight would be negligible in the existing vs proposed scenario.

Cumulative Impact – Future Baseline 1

364. In considering the cumulative impact (the proposed development and other consented schemes), out of 24 windows assessed 2 windows would experience a minor adverse impact, 16 windows would experience a moderate adverse impact and 6 windows would experience a major adverse impact.

365. The overall effect to daylight would be considered to be minor adverse and the overall effect to sunlight would be negligible in the future baseline 1 scenario.

Cumulative Impact – Future Baseline 2

366. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of the 24 windows assessed, 14 windows would experience a minor adverse impact, 9 windows would experience a moderate adverse impact and 1 window would experience a major adverse impact.

367. The overall effect to daylight would be considered to be minor adverse and the overall effect to sunlight would be negligible in the future baseline 2 scenario.

4-8 Creechurch Lane

Existing Vs Proposed

368. This property is located to the south of the site and contains mixed use with commercial at ground floor and residential accommodation above. A total of 32 windows serving 12 rooms have been assessed for daylight.

369. For the VSC analysis, 25 of the 32 windows assessed would meet the BRE criteria and therefore experience a negligible impact. The remaining 7 windows would experience reductions between 20-30% which would be considered to be a minor adverse impact. The alterations to these 7 windows would be fractional deviations (from the 20% BRE guideline reduction) being between 20.1%-21.3%. The absolute VSC changes to these 7 windows is also small ranging between 2.9%-3.6% loss, which would be fractional and imperceptible alterations which translate into a higher percentage change due to very low existing values. With the exception of one all of the 7 windows effected, relates to rooms with at least one additional window that does meet the BRE Guidelines for VSC. The one remaining window (representing a fractional BRE deviation at 21.27%) serves a bedroom and para 2.2.8 of the BRE guidelines states that ‘bedrooms should be analysed although they are less important’ and are therefore considered less sensitive than other uses.

370. For the NSL all of the 12 rooms assessed would meet the BRE guidelines and therefore experience a negligible effect.

371. The overall effect to daylight would be considered to be minor adverse and the overall effect to sunlight would be negligible in the existing vs proposed scenario.

Cumulative Impact – Future Baseline 1

372. In considering the cumulative impact (the proposed development and other consented schemes), out of the 32 windows assessed, 12 windows would experience a negligible impact, 7 windows would experience a minor adverse impact and 12 windows would experience a moderate adverse impact. The absolute VSC changes to these windows would be very small and would unlikely be perceptible in reality.

373. The overall effect to daylight would be considered to be minor adverse and the overall effect to sunlight would be negligible in the future baseline 1 scenario.

Cumulative Impact – Future Baseline 2

374. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of the 32 windows assessed, 18 windows would experience a negligible impact, 13 windows would experience a minor adverse impact and 1 would experience a moderate adverse impact.

375. The overall effect to daylight would be considered to be minor adverse and the overall effect to sunlight would be negligible in the future baseline 2 scenario.

10-12 Creechurch Lane

Existing Vs Proposed

376. This property is located to the south the site and contains mixed use with commercial at ground floor and residential accommodation above. A total of 32 windows serving 16 rooms have been assessed for daylight.

377. The existing daylight values are very low, meaning a high percentage change may arise in relation to small absolute reductions.

378. For the VSC analysis none of the 32 windows assessed would meet the BRE guidelines. 5 of the 32 windows would experience reductions of between 20-30% which would be considered to be a minor adverse impact. 13 windows of the 32 windows assessed would experience alterations of between 30-40% and which would be considered to be a moderate adverse impact. 14 of the remaining windows would experience alterations in excess of 40% which would

be considered to be a major adverse impact. It is worth noting that these windows have an oblique view of the site and the absolute VSC changes are between 1.8%-3.2% and the changes would likely to be imperceptible to the occupants.

379. For the NSL analysis, 8 of the 16 rooms assessed would meet the BRE guidelines which would be considered to be a negligible impact. Of the remaining 8 rooms, 2 would experience alterations between 20-30%, which is considered to be a minor adverse impact. 4 of the remaining 8 rooms would experience alterations between 30-40% which is considered to be a moderate adverse impact. The 2 remaining rooms would experience alterations in excess of 40% which is considered to be a major adverse impact. It is worth noting that all of these rooms have low existing NSL values (well below 50% of the total room areas) such that the large percentage reductions arise from only small absolute alterations.

380. The overall effect to daylight and sunlight would be considered to be moderate adverse in the existing vs proposed scenario.

Cumulative Impact – Future Baseline 1

381. In considering the cumulative impact (the proposed development and other consented schemes), out of the 32 windows assessed, 1 window would experience a moderate adverse impact and 31 windows would experience a major adverse impact. The absolute VSC alterations range between 2.3%-4% and such alterations would be unnoticeable.

382. The overall effect to daylight would be considered to be moderate adverse in the future baseline 1 scenario. It should be noted however, that these windows experience absolute VSC alterations between 2.3%-4% and when expressed as a percentage results in a high percentage. The alterations are likely to be imperceptible to the occupants.

Cumulative Impact – Future Baseline 2

383. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of the 32 windows assessed, 1 window would experience a minor adverse impact, 11 windows would experience a moderate adverse impact and 20 windows would experience a major adverse impact (with absolute VSC changes between 1.1% - 2.4%).

384. The overall effect to daylight would be considered to be moderate adverse in the future baseline 2 scenario. The alterations are likely to be imperceptible to the occupants.

14-16 Creechurch Lane

Existing Vs Proposed Scenario

385. This property is located to the south the site and contains mixed use with commercial at ground floor and residential accommodation above. A total of 36 windows serving 16 rooms have been assessed for daylight.

386. The existing daylight values are very low, meaning a high percentage change may arise in relation to small absolute reductions.

387. For the VSC analysis none of the 36 windows assessed would meet the BRE guidelines. 2 of the 36 windows would experience reductions of between 20-30%, which would be considered to be a minor adverse impact. 20 of the 36 windows would experience reductions between 30-40%, which would be considered to be a moderate adverse impact. The remaining 14 windows would experience reductions greater than 40%, which would be considered to be a major adverse impact. It is worth noting that these windows have an oblique view of the site and the absolute VSC changes are between 2.3-4.1% and the changes would likely to be imperceptible to the occupants.

388. For the NSL, all of the 16 rooms assessed would meet the BRE guidelines and would be considered to be a negligible impact.

389. The overall effect to daylight and sunlight would be considered to be moderate adverse in the existing vs proposed scenario.

Cumulative Impact – Future Baseline 1

390. In considering the cumulative impact (the proposed development and other consented schemes), out of the 36 windows assessed, all of the windows would experience a major adverse impact with alterations in excess of 40%. It should be noted that the absolute VSC alterations range between 2.3% -4% and such small alterations are likely to be imperceptible to the occupants.

391. On that basis it is considered that the overall effect to daylight would be considered to be moderate adverse in the future baseline 1 scenario. The potential impact is more than that is seen in the previous existing vs proposed scenario and it can be concluded that this is largely attributable to the consented schemes of the cumulative assessment.

Cumulative Impact – Future Baseline 2

392. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of the 36 windows assessed, 1 window would experience a moderate

adverse impact and the remaining 35 windows would experience a major adverse impact with alterations in excess of 40%. It should be noted that the absolute VSC alterations range between 1.6% - 3% and such small alterations are likely to be imperceptible to the occupants. The potential impact is more than that is seen in the previous existing vs proposed scenario and it can be concluded that this is largely attributable to the consented schemes of the cumulative assessment.

18-20 Creechurch Lane and 27-31 Mitre Street

Existing Vs Proposed Scenario

393. This property is located to the southeast the site and contains mixed use with commercial at ground floor and residential accommodation above. A total of 175 windows serving 34 rooms have been assessed for daylight.

394. The building façade at the corner junction of Mitre Street and Creechurch Lane faces directly opposite the proposed development and is separated by 10-12m. in this context it is worth noting that any redevelopment on this site which is higher than the existing building is likely to have a greater effect than the targets in the BRE guidelines.

395. For the VSC analysis, 35 of the 175 windows assessed would meet the BRE criteria and would therefore have a negligible impact. Of the remaining 140 windows, 37 windows would experience reductions of between 20-30%, which would be considered to be a minor adverse impact. It should be noted that approximately one third are understood to serve bedrooms, which the BRE acknowledge have a lower expectation of light than primary habitable spaces (such as living rooms).

396. Out of the 103 remaining windows, 20 windows would experience alterations between 30-40% which would be considered to be a moderate adverse impact. The remaining 83 windows would experience reductions in excess of 40% which would be considered to be a major adverse impact. Of these 83 windows, 23 windows appear to serve bedrooms which are less important, while the remainder of the windows serve multi-purpose living spaces. These living areas are understood to be dual aspect and served by multiple windows (windows from north east and north west) which would provide mitigating light. The absolute VSC alterations range between 1.1% and 11.7% for VSC.

397. For the NSL, all of the 34 rooms assessed would meet the BRE guidelines where these rooms would experience very little change in the daylight distribution and a direct view of the sky would be retained to the back of all the rooms. The impact would be considered to be negligible.

398. In consideration of the adverse VSC effects, retained light levels and negligible effect on NSL the overall effect to daylight would be considered to be moderate adverse for the proposed vs existing scenario.

Cumulative Impact – Future Baseline 1

399. In considering the cumulative impact (the proposed development and other consented schemes), out of the 175 windows assessed, 32 windows would experience a negligible impact,35 windows would experience a minor adverse impact, 17 windows would experience a moderate adverse impact and 91 windows would experience a major adverse impact. 23 of the 91 which experience a moderate adverse impact windows are thought to serve bedrooms which have a lower expectation of light. The remainder of 68 windows serve multi-purpose living spaces. These living areas are understood to be dual aspect and served by multiple windows (windows from north east and north west) which would provide mitigating light). The absolute VSC alterations range between 1.1% and 9.6%.

400. The overall effect to daylight would be considered to be moderate adverse in the future baseline 1 scenario. The potential impact is slightly more than that is seen in the previous existing vs proposed scenario and it can be concluded that this is largely attributable to the consented schemes of the cumulative assessment.

Cumulative Impact – Future Baseline 2

401. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of the 175 rooms assessed, 23 windows would experience a negligible impact, 18 windows would experience a minor adverse impact (a quarter of these windows are thought to serve bedrooms, which BRE consider as less sensitive uses than other uses) and 134 windows would experience a moderate adverse impact and 102 experience alterations in excess of 40%. The absolute VSC alterations range between 0.7% and 7.9%.

402. The overall effect to daylight would be considered to be moderate adverse in the future baseline 2 scenario. It should be noted that the daylight values are very low in the future baseline 2 scenario as a result of the additional obstructions posed by the cumulative schemes, particularly 33 Creechurch Lane to the north. As this potential impact is not seen in the previous scenarios, it can be concluded that this is largely attributable to the proposed development at 33 Creechurch Lane.

Residential Use at 2 Heneage Lane

403. This residential property is located to the north of the site. A total of 7 windows serving 6 rooms have been assessed for daylight.

Existing Vs Proposed Scenario

404. All of the windows and rooms serving the Rabbi's residential property at 2 Heneage Lane would satisfy the BRE guidelines for VSC and NSL.

Cumulative Impact – Future Baseline 1 and 2

405. All of the windows and rooms serving the Rabbi's residential property at 2 Heneage Lane would satisfy the BRE guidelines for VSC and NSL.

Bevis Marks Synagogue

Existing Vs Proposed Scenario

406. This religious building is located to the north of the site. A total of 28 windows serving 2 rooms have been assessed for daylight.

407. For the VSC analysis, 23 of the 28 windows tested would meet the BRE guidelines and therefore would have a negligible effect. Of the remaining 5 windows 4 would experience reductions between 20-30% which is considered to be a minor adverse impact. The absolute reductions experienced by these 4 windows range between 1.7%-1.8%. The 1 remaining window would experience alterations between 30-40%, which would be considered to be a moderate adverse impact. The absolute VSC changes would be 1.3%.

408. The small absolute VSC changes to these 5 windows are fractional and would likely to be imperceptible to the occupants and it is also worth noting that there are very low existing VSC values and the small absolute changes translate into a high percentage. The Synagogue is also served by 23 other windows which remain unaffected.

409. For NSL, both of the rooms assessed would meet the BRE guidelines and therefore would be considered to experience a negligible impact.

410. In consideration of the above, including the small absolute VSC changes and the negligible effect on NSL, the effect to daylight within this building is considered to be minor adverse in the proposed vs existing baseline. It should also be noted that the Synagogue is served by 23 windows which remain unaffected.

Cumulative Impact – Future Baseline 1

411. In considering the cumulative impact (the proposed development and other consented schemes), out of the 28 windows assessed 23 windows would experience a negligible impact, 2 windows would experience a minor adverse impact and 3 windows would experience a moderate adverse impact. The absolute alterations to the effected windows range between 1.2%-1.8% and it is considered that these are

very small reductions which would be imperceptible to occupants but translate to a high percentage. For the NSL analysis, 2 of 2 rooms tested would experience a negligible impact.

412. The overall effect to daylight would be considered to be minor adverse in the future baseline 1 scenario. The potential impact is slightly more than that is seen in the previous existing vs proposed scenario (i.e. more windows are experiencing a moderate adverse impact) and it can be concluded that this is largely attributable to the consented schemes of the cumulative assessment.

Cumulative Impact – Future Baseline 2

413. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of the 28 windows assessed 21 windows would experience a negligible impact, 1 windows would experience a minor adverse impact, 1 windows would experience a moderate adverse impact and 5 would experience a major adverse impact. The absolute VSC alterations ranging between 0.1% -1.8% which are considered to be fractional and imperceptible alterations. For the NSL analysis, 1 of 2 rooms tested would experience a negligible impact (the first floor balcony area). 1 room would experience a minor adverse impact (the ground floor area).

414. The overall effect to daylight would be considered to be minor adverse in the future baseline 2 scenario. The potential impact is slightly more than that is seen in the previous existing vs proposed and Future baseline 1 scenarios (i.e. more windows are experiencing a major adverse impact) and it can be concluded that this is largely attributable to the proposed development at 33 Creechurch Lane.

415. The conclusions on the impact of the loss of light to the Synagogue, as a place of worship, is set out in the preceding paragraphs.

416. On the basis of the analysis set out above it is the view of officers that the impact on daylight would not be such as to cause a material impact on the ability to manifest religion in worship in the Bevis Marks synagogue.

417. In determining this application, the City is subject to the public sector equality duty imposed by section 149 of the Equality Act 2010. Due regard is to be had to the need to:

a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

418. The relevant protected characteristics include race, and religion or belief.

419. It is the view of officers that the proposal will not have a material impact on the continued use of the synagogue as a place of worship and that the duty is complied with.

St Katherine Cree Church

Existing Vs Proposed Scenario

420. This religious building is located to the south of the site. A total of 39 windows serving 2 rooms have been assessed for daylight.

421. For the VSC analysis 26 of the 39 windows assessed would meet the BRE guidelines and therefor would have a negligible impact. The remaining 13 windows all experience reductions of between 20-30% which is considered to be a minor adverse impact. The absolute VSC losses are all below 5%. 2 of these windows serve an office (which is considered to be a less sensitive use) and the 11 remaining windows serve the chapel which is served by numerous alternative windows which meet the BRE criteria.

422. For the NSL, all of the windows assessed serving 2 rooms would meet the BRE guidelines and therefore would be considered to be a negligible impact.

423. In consideration of the minor adverse VSC effects, and negligible effect on NSL the overall effect to daylight would be considered to be minor adverse.

Cumulative Impact – Future Baseline 1

424. In considering the cumulative impact (the proposed development and other consented schemes), out of the 39 windows assessed, 25 windows would experience a negligible impact, 9 windows would experience a minor adverse and 5 windows would experience a moderate adverse impact with absolute VSC alterations below 4.9%. 4 of the 14 windows impacted relate to a low sensitive office use and the remaining 10 serve the chapel which is served by numerous other windows which meet the BRE criteria.

425. The overall effect to daylight would be considered to be minor adverse in the future baseline 1 scenario.

Cumulative Impact – Future Baseline 2

426. In considering the cumulative impact (the proposed development and other consented schemes and those under consideration), out of

the 39 windows assessed, 27 would meet the BRE criteria and would experience a negligible impact, the remaining 12 windows experience a minor adverse impact with absolute VSC alterations below 3.8%.

427. The overall effect to daylight would be considered to be minor adverse in the future baseline 1 scenario.

Overall Daylight Conclusion

428. The applicants have identified all of the relevant locations in the vicinity of the development which would have a requirement for daylight, and have been comprehensive in this respect, by including a number of residential, religious, and educational properties.

429. The nearest ones are the Bevis Marks Synagogue and associated Rabbi's House, residential dwellings at 2, 4-8, 10-12, 14-16 and 18-20 Creechurch Lane and the Church of St Katherine Cree.

430. In terms of daylight, the proposed development would result in no significant adverse effect on the majority of the properties assessed with the exception of 10-12 Creechurch Lane, 14-16 Creechurch Lane and 18-20 Creechurch Lane & 27-31 Mitre Street which would experience moderate adverse impacts.

431. With regards to the residential properties at 10-12 and 14-16 Creechurch Lane, these buildings have very low daylight levels in the existing situation due to their location within a dense urban surrounding and therefore would experience relatively disproportionate percentage change in daylight levels when factoring in the proposed development. With regards to the residential properties at 18-22 Creechurch Lane and 27-31 Mitre Street, the rooms which are affected by daylight losses benefit from other windows which ensure good levels of daylight amenity are maintained.

432. The impact to Bevis Marks Synagogue and the residential property at 2 Heneage Lane would minor adverse with very small absolute VSC changes which would be imperceptible to the occupants.

433. The conclusions on the impact of the loss of light to the Synagogue, as a place of worship, is set out in the preceding paragraphs. The impacts on the Synagogue, as a place of worship have been considered within the context of the Equality Act 2010 and the Human Rights Act 1998.

434. In the cumulative scenario, many of the existing buildings would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (in some cases the proposed development under consideration at 33 Creechurch Lane) and very little of it would be due to the proposed development.

435. The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low.

436. It is considered that the proposed development would not reduce noticeably the daylight and sunlight levels to unacceptable levels, and that daylight and sunlight to surrounding premises would be sufficient, acceptable and appropriate for its context and complies with London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

Sunlight (Annual Probable Sunlight Hours (APSH)

437. The potential effect of the Proposed Development on the sunlight received by key nearby sensitive receptors has been assessed against the existing baseline conditions using the Annual Probable Sunlight Hours (APSH) methodology.

438. The following properties do not have windows that face the site and are not orientated within 90º of due south and therefore a sunlight analysis is not required, in accordance with the BRE guidelines:

- 2 Creechurch Lane
- 4-8 Creechurch Lane
- 10-12 Creechurch Lane
- 14-16 Creechurch Lane
- 2 Heneage Lane.

439. The following properties have been assessed and would experience no losses of annual probable sunlight hours (APSH) and would fully satisfy the BRE guidelines in all cases in the proposed vs existing scenario:

- The Aldgate School
- The Parish of St Helen Bishopsgate
- St Katherine Cree Church

Bevis Marks Synagogue

440. Within Bevis Marks Synagogue, not all of the windows would meet the BRE guidelines for APSH and the impact to this building is discussed below.

441. A total of 28 windows have been assessed for sunlight. It should be noted that not all 28 windows face within 90 degrees of due south; 15 of these windows are north facing (10 face north east, 5 face north west); 13 are south facing (3 face south-east, 10 face south west).

However, all the windows have been assessed as the Synagogue is a multi-aspect space, and it is noted that the north east and north west facing windows are able to receive some sunlight in the morning and late afternoon, respectively

Existing Vs Proposed Scenario

442. 20 (71%) of the 28 windows assessed would experience no losses of sunlight as a result of the proposed development. 15 of these windows are north facing, five are south west facing and at ground floor level. A further two windows on the south west elevation of the building (at first / balcony floor level) would experience small reductions in annual sunlight, that would be within the BRE guidelines, which would be considered to be a negligible impact.

443. Of the 6 windows remaining, greater relative reductions in annual sunlight would be experienced with alterations in excess of 40%, which in itself would be considered to be a major adverse impact. The effected windows (W9-W11/101 on the south west elevation and W14-W16/101 on the south east elevation) relate to the first floor of the Synagogue building, which are obstructed by the existing surrounding buildings including 4 Heneage Lane immediately to the south west, and 33 Creechurch Lane immediately to the south east, resulting in low existing values, particularly in the winter period when the sun's path is lower in the sky.

444. The absolute reductions in annual sunlight for the affected windows ranges between 7% and 13%. The south west facing windows (W9-W11/101), which benefit from the highest levels of APSH (16%, 13% and 12%) would be reduced to 3%, 4% and 5% respectively. The south east facing windows (W14-W16/101), which currently receive low existing levels of annual sunlight of between 7% and 8% APSH, would experience a 100% reduction in the annual sunlight that they receive with the proposed development in place.

445. The Environmental Statement concludes that the impact on the Synagogue for sunlight would be minor adverse in the existing vs proposed scenario.

446. As noted above, the City of London have reviewed the detailed daylight and sunlight assessment submitted with the application and have had it independently reviewed by daylight and sunlight consultants. The majority of the windows assessed (22 out of 28) would meet the BRE guidelines, 15 of these windows do not directly face the development site and are therefore expected to be minimally affected.

447. On the basis of the major adverse losses to the south facing windows and taking into consideration the small absolute reductions, it is the view of officers that the overall impact of the proposed development on the sunlight received by the Bevis Marks Synagogue

would be moderate adverse in the proposed vs existing scenario, and not minor adverse as was concluded Environmental Statement.

Cumulative Scenario – Future Baseline 1

In considering the cumulative impact, taking account of the proposed development and other consented schemes, out of the 28 windows assessed, 22 windows would meet the BRE guidelines for annual probable sunlight.

449. Of the 6 windows remaining, greater relative reductions in annual sunlight would be experienced, with alterations in excess of 40%. The effected windows (W9-W12/101 on the south west elevation and W14-W16/101 on the south east elevation) relate to the first floor of the Synagogue building and are obstructed by the existing surrounding buildings. The absolute reductions for the affected windows in the annual period ranges between 5% and 13%.

450. The site facing windows (on the south west elevation) would not experience a material difference from that in the proposed vs existing baseline scenario. The south east facing windows (W14-W16/101), would have lower existing levels of annual sunlight of 5% APSH, which would be reduced to 0% APSH with the proposed development in place.

451. On the basis of the major adverse losses to the south facing windows and taking into consideration the small absolute reductions, it is the view of officers that the overall impact of the proposed development for sunlight, on Bevis Marks Synagogue, would be moderate adverse (and not minor adverse as was concluded by the applicants in the Future Baseline 1 scenario).

Cumulative Scenario – Future Baseline 2

452. In the future baseline 2 scenario, which takes account of nearby consented developments and schemes currently under consideration (the Tulip and the redevelopment of 33 Creechurch Lane), the sunlight received by the windows in the Synagogue in the existing baseline condition would be significantly reduced or removed.

453. In this scenario, there would be no sunlight received by the ground floor windows of the Synagogue. The sunlight received at first floor level would be limited to six of the eight south facing windows only, with very low levels of APSH of between 1% and 4% to five windows and 7% to the remaining window (W9/101). In the proposed condition of the future baseline 2 scenario, these remaining levels of sunlight would be further reduced to 0% APSH.

454. In considering the impact of the proposed development on sunlight received by the Synagogue in future baseline 2 scenario, 27 of

the 28 windows assessed would meet the BRE guidelines for annual sunlight. This is because the absolute reductions of sunlight to these windows over the whole year would be no greater than 4% APSH. The one remaining window (W9/101) would experience reductions in sunlight in excess of 40%, and an absolute reduction of 7% across the whole year.

455. In the future baseline 2 scenario, the cumulative impact of nearby consented developments, schemes currently under consideration and the proposed development on the sunlight received by the Synagogue would be considered to be moderate to major adverse. As noted above, a significant proportion of this impact would be attributable to cumulative schemes, including those under consideration (the Tulip and 33 Creechurch Lane).

456. On the basis of the analysis set out above it is the view of officers that the impact on sunlight would not be such as to cause a material impact on the ability to manifest religion in worship in the Bevis Marks synagogue.

457. In determining this application the City is subject to the public sector equality duty imposed by section 149 of the Equality Act 2010. Due regard is to be had to the need to:

a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

458. The relevant protected characteristics include race, and religion or belief.

459. It is the view of officers that the proposal will not have a material impact on the continued use of the synagogue as a place of worship and that the duty is complied with.

Overall Sunlight Conclusion

460. Whilst the Synagogue would experience a degree of harm in terms of sunlight (moderate adverse), taking into account the BRE Guidance and the context of the building's location within a dense urban commercial environment, it is not considered that the proposed development would result in an unacceptable impact on the existing use of the property nor would it change the pattern of use of the Synagogue. The majority of the absolute reductions in sunlight

experienced as a result of the proposed development are considered to be low (and would be just beyond the BRE's 4% APSH threshold). Therefore, the degree of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

Overshadowing – Sunlight Hours on Ground (SHOG)

461. BRE Guidelines recommend that for an external space to appear well lit at least 50% of the area should receive at least 2 hours of sunlight on March 21st. If as a result of development an amenity area does not meet the above and the area which receives two hours of direct sunlight is reduced to less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

462. The potential overshadowing impacts of the proposed development has been assessed on 3 surrounding amenity areas:

- 30 St Mary Axe
- Bevis Marks Synagogue Courtyard
- The Aldgate School

463. Due to the existing dense urban environment, all of the above spaces receive less than 2 hours of direct sunlight to 50% of their area on 21st March in the existing condition.

The Aldgate School

464. This amenity area is located to the east of the proposed development.

Existing vs Proposed Scenario

465. The overshadowing results show that the impact of the proposed development of the amenity area for Aldgate School would be negligible and would meet the BRE guidelines.

Cumulative – Future Baseline 1 and Future Baseline 2

466. The overshadowing results show that the impact of the proposed development of the amenity area for Aldgate School would be negligible in the Future Baseline 1 and 2 scenario and would meet the BRE guidelines.

30 St Mary Axe

467. This amenity area is located to the west of the proposed development.

Existing Vs Proposed Scenario

468. In the existing context just over 13% of the amenity area receives two or more hours of direct sunlight on 21st March.

469. This is reduced to around 8% in the proposed condition. However, when expressed as a percentage, it results in a 38.4% reduction. The scale of the change is small in absolute terms and relates to a narrow area which would predominantly function as a pedestrian route. The impact on this amenity space would be minor adverse in the existing vs proposed scenario.

Cumulative - Future Baseline 1

470. In considering the cumulative impact (the proposed development and other consented schemes), approximately 1.9% of the area receives more than two hours of direct sunlight on 21st March in the existing condition. This reduces to 0% in this cumulative scenario. Whilst this equates to a 100% loss (major adverse), the level of sunlight amenity received prior to the proposed development's implementation is so small, the impact is considered to be minor adverse in the future baseline 1 scenario.

Cumulative - Future Baseline 2

471. Due to the high levels of obstructions in the Future Baseline 2 context, the impact of the proposed development of the amenity area would be negligible in the Future Baseline 2 scenario and would meet the BRE guidelines.

Bevis Marks Synagogue

472. This amenity area is located to the north of the proposed development.

Existing Vs Proposed Scenario

473. In the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none (0%) of the area received direct sunlight which equates to a 100% reduction. The area to which this reduction would occur is 4.86sq.m which arises to be a thin area of ground in the northwest corner of the outer courtyard.

474. The impact of the proposed development would be considered to be minor adverse in the existing vs proposed scenario.

Cumulative - Future Baseline 1 and 2

475. Due to the high levels of obstructions in the Future Baseline context and that no part of the Synagogue Courtyard receives sunlight, the impact would be negligible. The potential impact is slightly more

than that is seen in the previous existing vs proposed it can be concluded that this is largely attributable to the cumulative schemes.

476. The impact of the proposed development would be considered to be negligible in the cumulative scenario.

477. The conclusions on the impact of overshadowing to the Synagogue, as a place of worship, is set out in the preceding paragraphs. The impacts on the Synagogue, as a place of worship have been considered within the context of the Equalities Act 2020 and the Human Rights Act 1998 and is set out in the preceding paragraphs.

478. On the basis of the analysis set out above it is the view of officers that the overshadowing impact would not be such as to cause a material impact on the ability to manifest religion in worship in the Bevis Marks synagogue and courtyard.

479. In determining this application the City is subject to the public sector equality duty imposed by section 149 of the Equality Act 2010. Due regard is to be had to the need to:

a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

480. The relevant protected characteristics include race, and religion or belief.

481. It is the view of officers that the proposal will not have a material impact on the continued use of the synagogue and courtyard as a place of worship and that the duty is complied with.

Overall conclusion on Overshadowing (SHOG)

482. Whilst the Synagogue would experience a degree of harm in terms of overshadowing (minor adverse impact) and the loss of clear sky, taking into account the BRE Guidance and the context of the premises location within a dense urban commercial environment, it is not considered that the proposal would result in an unacceptable impact on the existing use nor would it change the pattern of use of the Synagogue (conclusions on the impact to the Synagogue is set out in the preceding paragraphs). As such the proposal is considered to comply with London Plan policy D6 Local Plan Policy DM10.7 and Policy DE8 of the draft Local Plan.

Transient Overshadowing

483. The transient overshadowing assessment covers three key dates in a year (21 March, 21 June and 21 December) with the key date being 21 March.

21st March

Proposed vs Existing Scenario

484. On 21st March, shadow is cast from the proposed development from 9am to 1pm for 30 St Mary Axe and between 1pm and 3pm for Bevis Mark Synagogue.

485. These shadows would be transitory and the majority of the day these amenity areas would remain unaffected by transient overshadowing from the proposed development on 21 March. For Bevis Marks Synagogue, this affects only the rooftop.

486. The amenity area at Aldgate School would not experience any additional shadow on 21 March.

Cumulative – Future Baseline 1

487. The impact on overshadowing on 21st March would be largely similar to that in the proposed vs existing scenario.

Cumulative – Future Baseline 2

488. On 21st March, shadow is cast from the proposed development from 9am to 11pm for 30 St Mary Axe and between 1pm and 3pm for Bevis Mark Synagogue.

21st June

489. In the summer period, shadows are shorter in length due to the higher position of the sun.

Proposed vs Existing Scenario

490. As a result of the proposed development, additional shadow would be cast on 21st June from 11am to 1pm for 30 St Mary Axe and 1pm-2pm for Bevis Marks Synagogue. However, these shadows would move quickly and for the majority of the day these amenity areas would remain unaffected by transient overshadowing from the proposed development on 21st June.

491. The amenity area at Aldgate School would not experience any additional shadow on 21 June.

Cumulative – Future Baseline 1 and 2

492. As a result of the proposed development, additional shadow would be cast on 21st June from 9am to 12pm for 30 St Mary Axe and 1pm-2pm for Bevis Marks Synagogue.

21st December

493. On 21st December at the sun's altitude is lower, longer shadows are cast.

Proposed vs Existing Scenario

494. As a result of the proposed development, all three amenity areas would not experience any additional shadow on 21 December.

Cumulative – Future Baseline 1 and 2

495. The impact on overshadowing on 21st March would be largely similar to that in the proposed vs existing scenario.

Overall Conclusion on Transient Overshadowing

496. In conclusion the results show that there would be no significant overshadowing effects caused by the development to any public amenity areas. The proposed development would impact on the sunlight enjoyed by these amenity spaces on 21st March and June. Overall the impact would not cause unacceptable harm to the open amenity areas and complies with policies London Plan D6, Local Plan policy DM10.7 and Policy DE8 of the draft Local Plan.

Response to the objections on daylight, sunlight and overshadowing to Bevis Marks Synagogue

Response to objections on the impact to daylight and sunlight

497. The Synagogue have submitted a document 'Bevis Marks Synagogue Significance and Community Impact Study' which sets out the details of how the Synagogue is used and how any further reductions in light would have a detrimental impact on the religious significance and use of the Synagogue. Concerns are raised about the loss of light to the raised platform where prayers are read (the Bimah). The report states that Jewish Worship requires each individual to read prayers from a prayer book at services throughout the week. If lighting is further reduced, worshippers, particularly vulnerable elderly members, would find it difficult to read and would no longer be able to attend.

498. The 'Bevis Marks Synagogue Significance and Community Impact Study' also states that in a Jewish house of prayer, light and windows are not just an amenity but a religious requirement. Judaism

and its rituals are connected with the positions of the sun and moon and at the morning service at 10am, light currently shines into the Courtyard and penetrates into the Synagogue. They state that the blocking out of the sun is a form of religious vandalism, forcing them to dislocate their worship from its original meaning.

499. Officers do not consider that the loss in daylight experienced within the Synagogue would impact on the ability of worshippers to read from prayer books or would materially reduce light to the raised platform where prayers are read (the Bimah). The losses experienced by the effected 8 windows (out of 28 assessed) in terms of VSC would be minimal with very small absolute reductions recorded between 1.7%-1.8%.

500. It should be noted that the Synagogue does already experience low levels of sunlight in the existing condition. The majority of the absolute reductions in sunlight experienced as a result of the proposed development are considered to be low ranging between 7-13% (and would be just beyond the BRE's threshold) and there would also be a number of mitigating windows which would continue to receive some levels of sunlight (16 out of 20).

501. The existing lighting conditions in the Synagogue are such that supplementary electric lighting is already necessary and therefore already in use. This applies generally through the Synagogue and including when at the Bimah. The difference between the existing and proposed condition for daylight and sunlight is very small that it would be imperceptible to the human eye. Officers consider that such fractional light alterations in real terms would not change the ability of worshippers to read prayers from the Bimah or from prayer books.

502. Overall in assessing the impact of the loss of daylight and sunlight to the Synagogue, for the reasons set out above, officers do not consider that the proposed development would result in losses which would have a detrimental impact on the use of the Synagogue.

<u>Response to objections on loss of sunlight to the Courtyard</u>

503. A number of objections have been received concerning the impact of the reduction in sunlight to the courtyard. The objections state that the courtyard is integral to Synagogue's communal functions and religious significance and represents the only place where worshippers of all sexes can gather before and after worship and is used for rituals and functions. If the proposed development is approved it will suffer even greater reductions of direct sunlight which will harm its usability, its amenity value and its contribution to the setting of the synagogue.

504. It is also explained how the courtyard adds an important amenity to the use and historic function of the Synagogue. They state that

sunlight appears in the early afternoon when the space is most likely to be enjoyed, either for gatherings after services, before weddings or for an outdoor afternoon prayer service during the week for City workers. The Rabbi and his family use the courtyard to enjoy the sunlight on Sabbath afternoons in spring and summer and the loss of any sunlight would cause a detriment to their lives as local residents.

505. The Synagogue Courtyard, is not considered to be a private residential courtyard but is seen to be part of the Synagogue as a place of worship.

506. The baseline analysis indicates that the courtyard currently experiences low levels of sunlight given the dense urban form surrounding the Synagogue. Only 1.5% of the courtyard (an area of 4.86 sqm) currently receives more than two hours of direct sunlight. The proposed development would reduce sunlight levels within the courtyard between 12:30 and 14:00. The overshadowing assessment map shows the small area which would lose the remaining sunlight within the courtyard, which is against the northwest corner of the courtyard. Officers acknowledge that the reduction of sunlight may slightly reduce the amenity of the courtyard but are of the view that it would not preclude the use of the courtyard for celebrations or gatherings before and after services nor would it be considered to detrimentally impact on the community or societal significance.

Response to objections on loss of clear sky from the Courtyard

507. The 'Bevis Marks Synagogue Significance and Community Impact Study' outlines the importance of sunlight into the Courtyard and states that many Jewish rituals are determined by the views of the sky. It also states that upon entering the courtyard of the Synagogue, the views of clear sky would be lost.

508. In the clearest view of the proposed building and synagogue from the courtyard entrance, the proposed building would add another modern form into the backdrop. It would occupy a significant portion of currently clear sky space over the synagogue. However a number of modern buildings are already visible in views from the courtyard, reflecting its location in the heart of a dynamic and continually evolving modern City.

509. In terms of the contribution of setting to significance, the wider modern setting includes a number of tall and very tall office buildings, both existing and consented, some of which are at present clearly visible as prominent elements from the courtyard such as One Creechurch Place, No. 6 Bevis Marks and the Gherkin. All have visual impacts on upward views from within the courtyard and visually reinforce the appreciation the synagogue's secluded location in the heart of the modern City.

510. Additional consented tall buildings, such as 100 Leadenhall Street, 40 Leadenhall and 1 Undershaft, will add to this backdrop. Otherwise, there is an open sky setting over the synagogue, courtyard and ancillary buildings. While the contrast between the scale and character of the synagogue and its taller modern setting is very noticeable when deliberately looking upwards, the established character of this part of the City is one of dramatic juxtapositions of old and new and of the visibility of taller buildings seen in the backdrop to historic buildings.

511. The close, immediate setting of the synagogue preserved in the intimate courtyard in part resembles the setting at the time the synagogue was constructed and therefore makes a strong contribution to its significance but the wider setting has changed significantly and now has a fundamentally different modern character that makes no material contribution to the historic significance of the Synagogue.

Response to objections on loss of Privacy

512. Objections have been received raising concerns about the loss of privacy and a security risk as a result of the proposed development. 'Bevis Marks Synagogue Significance and Community Impact Study' submitted by the Synagogue states that the Synagogue courtyard is a place where the community shares special private moments, celebrates Jewish festivals and takes photographs. It states that the Synagogue was built in a private courtyard do that the Jewish community could conduct their affairs discreetly away from the public street and the historic setting would be completely altered if the proposed development is constructed. Concerns are also raised that the Synagogue would become exposed and there would be a security risk as a result of proposed development.

513. Officers do not consider that there would be any more risk and loss of privacy than the existing situation as there are already a number of tall buildings which are in close proximity to the Synagogue.

Solar Glare

514. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. In this case, viewpoints for the analysis were positioned at points before a signalised railway, road junctions and pedestrian crossings where a distraction to motorists may occur.

515. A total of 8 viewpoints have been identified in the ES as sensitive to solar glare within 150m of the site. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions and pedestrian crossings at these locations.

516. The assessment concludes that the development would have a negligible effect on 6 of the 8 viewpoints. At Viewpoint 5, the solar glare assessment indicates potential incidences of solar glare for a period of 15-20 minutes at an angle of <30º and 30º>, mainly during February, March, September and October. At viewpoint 7, the solar glare assessment indicates potential incidences of solar glare for a period of 10 minutes at an angle of <30º and 30º>, mainly during January, February, March, April, August, September, October and November. It is considered that these occurrences are not lengthy or unusual for a proposed development of this typology.

517. Based on a combination of criteria including the angle of the solar refection in relation to the road users' line of sight, the ability to deploy a visor, the duration of the solar glare and the existence of alternative traffic signals at junctions enabling the road user to use different options, the effects of solar glare are assessed as being 'minor adverse' at both viewpoint 5 and viewpoint 7. The Assessment concludes that no additional mitigation are required to mitigate the impact of solar glare.

518. If planning permission were to be granted, a S106 obligation would be recommended to require a post completion solar glare assessment to be submitted if requested by the City, which would include details of any mitigation measures (if considered necessary). The development would comply with Local Plan policy DM10.1 and draft City Plan 2036 policy DE(8) to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Intrusion

519. Local Plan policy DM15.7 and draft City Plan 2036 policy DE9 require that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

520. Potential light pollution impacts arising from the Proposed Development have been assessed in relation to 5 buildings which have been identified as sensitive to the impacts of light pollution in accordance with Institute of Lighting Practitioners (ILP) Guidance. These properties include:

- 2 Creechurch Lane
- 10-12 Creechurch Lane
- 14-16 Creechurch Lane
- 18-20 Creechurch Lane
- 27-31 Mitre Street
- Bevis Marks Synagogue & residential use at 2 Heneage Lane

521. The light intrusion study indicates that pre-curfew (11pm), the levels of light trespass would be within the 25-lux level suggested by the ILP for the city centre location for 4 out of the 5 receptors under consideration. The one receptor that does not fully meet this pre-curfew threshold is 18-20 Creechurch Lane and 27-31 Mitre Street, where just over half of the windows will be within the 25 lux threshold, while the remaining minority will exceed this level. The latter windows are at first to fifth (top) floor and are located at the corner junction of Mitre Street and Creechurch Lane (i.e. directly opposite the site) where the highest lux levels are likely to be recorded. The windows affected primarily relate to living rooms rather than bedrooms.

522. The light intrusion assessment indicates that post-curfew (11pm) the light levels would be below the 5 lux level suggested by the ILP for a city centre location for 3 out of the 5 receptors under consideration. The two exceptions are 18-20 Creechurch Lane and 27-31 Mitre Street and 14-16 Creechurch Lane.

523. For 14-16 Creechurch Lane, half of the windows would be within the 5 lux threshold, which are located slightly further south along Creechurch Lane (no.14); while the remainder that exceed the threshold (between circa 7.5 and 17.5 lux) are at first to fourth floor located within the façade in closer proximity to the Site (no.16).

524. In relation to 18-20 Creechurch Lane and 27-31 Mitre Street, close to half the windows would meet the post-curfew 5 lux threshold within the façade further to the east along Creechurch Lane. The remaining windows would exceed the post-curfew threshold (circa between 7.5 - 25+ lux) and are located at first to fifth floor. This is due to the very close proximity of these windows to the Site, with those located at the corner junction of Mitre Street and Creechurch Lane no more than 10-12 metres away from the Proposed Development. Where the highest lux is recorded, this is understood to relate to areas, with bedrooms generally receiving much lower levels.

525. The assessment is undertaken on a worst case scenario, assuming both a generic lighting design and that all office area within the Proposed Development remain fully lit after 11pm. However it is considered unlikely that the space would be fully occupied or lit at this time and therefore the levels of light intrusion are likely to be less than those presented in the ES chapter. It is also worth noting that although the assessment of light intrusion is not a comparative assessment, the existing building on the site is commercial in nature and slightly taller than the receptors along Creechurch Lane. As such, an assessment of the baseline condition using the aforementioned worst-case scenario would likely result in lux levels outside of the suggested thresholds to the windows in closest proximity to the site.

526. The overall effects of light intrusion to the properties at 2Creechurch Lane, 10-12 Creechurch Lane and Bevis Marks Synagogue and the residential use at 2 Heneage Lane would be negligible. The effect to 14-16 Creechurch Lane would be minor adverse and the effect to 18-20 Creechurch Lane and 27-31 Mitre Street would be considered to me Major Adverse.

527. If planning permission were to be granted, a condition has been included which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

Wind Microclimate

528. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. CFD simulation and analysis has also been carried out in accordance with the City's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

529. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways and building entrances The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting/occasional sitting/standing/walking/Uncomfortable.

530. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.

531. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance - if conditions become unsafe or unsuitable for the intended use as a result of the development. If wind conditions become windier but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.

532. Assessments have been carried out for both the Windiest Season and the Summer Season.

533. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

Existing Baseline Conditions

534. In the existing baseline conditions, the wind tunnel tests and CFD show that conditions around the site are suitable for their intended use, primarily standing and walking around the site. The conditions at the existing and surrounding building entrances would be suitable for the intended use (standing conditions). There would not be any safety exceedances resulting in unsafe conditions in the existing scenario.

Wind conditions at thoroughfares

535. In the presence of the proposed development, all thoroughfares on-site would experience wind conditions which are suitable for the intended use (walking conditions or calmer). This would be considered to be a negligible impact.

536. The wind conditions at most of the off-site thoroughfare locations remain unchanged to that in the existing baseline conditions and are suitable for the intended uses (walking conditions). There are some thoroughfare locations (locations 28, 33,35,37, 38, 42, 43 and 47) around the site which would become marginally windier in the windiest season but remain in the same category as the existing baseline condition which is suitable for the intended use (walking conditions). This would be considered to be a moderate adverse impact.

537. The conditions remain broadly the same in the in the cumulative scenario.

Wind conditions at entrances

538. In the presence of the proposed development, all onsite entrances would experience wind conditions suitable for its intended use (standing or calmer conditions).

539. Most of the offsite entrances (21, 23, 25, 31, 50 and 51) would experience wind conditions suitable for its intended use (walking or standing conditions) with some offsite entrances (23, 25, 50 and 51) experiencing wind conditions which are calmer than in the existing baseline scenario. There would be two offsite entrance locations (21 and 31) which would become marginally windier (but would remain in the same category as in the existing baseline scenario) and still be suitable for the intended use, experiencing standing conditions).

540. The conditions remain broadly the same in the in the cumulative scenario with the wind conditions at some onsite entrance locations (including the cycling entrance). becoming calmer by one category.

Wind conditions in amenity spaces

541. The wind conditions in the proposed pocket park (James' Court – locations 11 and 12) would experience wind conditions ranging between frequent sitting to standing in the windiest season which would be suitable for the intended use.

542. The wind conditions in the outdoor café area in the pocket park would experience conditions suitable for occasional sitting during the summer season. In the windiest season, the café area would exceed the comfort criteria for occasional sitting and mitigation measures are proposed to improve wind conditions and make it suitable for the intended use throughout the year. The wind mitigation measures include:

- 1.0m high densely foliating evergreen shrubs of hedge planting on 0.5m high tall planters (along the south and south eastern elevation)
- 1.5m high, 30% porous screen.

543. The proposed wind mitigation measures would be secured via planning condition.

544. The wind conditions within the arcade would be suitable for occasional sitting during the windiest season and frequent sitting in the summer and would be suitable for the intended use.

545. The conditions in the cumulative scenario remain broadly the same or would be one category calmer in some areas within the pocket park and the outdoor café area.

Wind Microclimate Conclusion

546. In conclusion, with the proposed mitigation measures in place, where wind conditions become windier at ground level they remain suitable for the intended uses in the proposed and cumulative scenarios and so no additional mitigation above that proposed is required. The details of the proposed mitigation measures identified above will be secured by condition and will be required to be maintained throughout the life of the building.

547. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the ES, and

if any material adverse impacts are realised, mitigation measure would need to be explored and implemented.

548. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan policy DM10.1, and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Thermal Comfort Assessment

549. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

550. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The technique involves merging wind, sunlight, temperature and humidity microclimate data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

551. The Universal Thermal Climate Index (UTCI) metric will be utilized for predicting thermal comfort. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location.

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season.	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

552. Four configurations have been assessed including; the existing site with existing surrounding buildings, the proposed development with the existing surrounding buildings and the proposed development with consented cumulative surrounding buildings and proposed development with consented and unconsented cumulative surrounding buildings.

553. Sensitive receptors with a 400m radius of the existing Site and Proposed Development have been considered in the assessment. At ground level, all entrances have been considered and would require short-term thermal comfort conditions or better to be considered acceptable for their intended use.

554. Both the landscaping and the wind mitigation measures considered during the wind microclimate assessments have been included in the study.

Existing Baseline Conditions

555. The existing Site and existing surrounding context have thermal comfort conditions appropriate for their use, with the majority of the surrounding area falling into the seasonal and all-season categories with short term thermal comfort conditions around 122 Leadenhall Street and 1 Undershaft sue to increased windiness associated with these tall building and their reduced exposure to the sun due to heights of the surrounding buildings. There are more areas of short-term conditions to the west of the Site amongst the tall buildings of the Eastern Cluster.

556. The majority areas in the existing pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses. The exception is the southern end of the plaza south of the existing 1 Undershaft where a zone of short-term conditions was predicted due to below target comfort frequencies in winter. The northern half of the plaza was predicted to have appropriate thermal comfort conditions and patrons have the ability to move should they find the conditions at the southern end undesirable.

557. Leadenhall Market would experience a mixture of seasonal and all-season thermal comfort conditions which would be suitable for its intended use.

558. Off-site podiums and roof terraces have been assessed. They would experience short thermal comfort conditions or better.

Proposed Development with the Existing Surrounding Buildings

559. At ground level, the proposed development increases the percentage of time for which the area between 33 Creechurch Lane and One Creechurch Place would be thermally comfortable during the winter season (from 75%-90%). There would be a slight decrease in the area to the southwest of the building, along Bury Street, which would alter from being thermally comfortable during the winter season from 95% - 80%. It should be noted however that the thermal comfort categorisations of these areas or any others in the vicinity would be not be materially altered when compared to the existing baseline conditions.

560. The introduction of the Proposed Development would not have a material on the thermal comfort conditions around the Bevis Marks Synagogue, with all-season thermal comfort conditions occurring in the immediate vicinity of the Synagogue.

561. The entire area of the 1st floor public amenity terrace would have all-season thermal comfort conditions across the entire terrace and would be suitable conditions for the intended use.

562. The 21st floor private amenity terrace would also have mostly all-season thermal comfort conditions. A small area of seasonal thermal comfort conditions was predicted close to the building façade. This is likely due to afternoon shadowing from the remainder of the tower. The thermal comfort conditions would also be suitable for the intended usage of this terrace.

563. The introduction of the proposed development would not have any material impact on the thermal comfort conditions of Leadenhall Market and the existing podium and roof level amenity spaces in the local area.

Proposed Development with the Consented Cumulative Surrounding Buildings

564. In the immediate area surrounding the proposed development, thermal comfort conditions were predicted to be similar to those in the existing vs proposed scenario. As such, all areas at ground level around the proposed development in the cumulative scenario would have acceptable thermal comfort conditions for their intended use.

565. Further away from the site, the simulations predict that with the introduction of the consented cumulative schemes, there are increased short-term and short-term seasonal thermal comfort conditions to the west of 1 Undershaft and 100 Leadenhall Street. It is worth noting that the zone of short-term conditions in the plaza south of 1 Undershaft (as described in the previous existing vs proposed scenario) has shrunk, and the zone of all-season conditions at the north end has slightly increased in area.

566. Thermal comfort conditions at the on-site terrace level areas would be same as in the existing vs proposed scenario, as such all on-site terrace level areas would be suitable for the intended use.

567. Thermal comfort conditions within Leadenhall Market would also be generally similar to those in the existing baseline scenario, however, the area to the north and west of Leadenhall Market would have some areas of short-term seasonal thermal comfort conditions. This is due to the areas experiencing a significant reduction in winter thermal comfort. The areas of short-term comfort are thoroughfares and as such the short-term conditions can be considered appropriate.

568. The introduction of the cumulative schemes does not alter the thermal comfort conditions of the existing surrounding podium and roof level terraces to a level that would incompatible with their uses. All terraces are expected to have short-term thermal comfort conditions or better and only small areas of short-term seasonal conditions.

Proposed Development with the Consented and Unconsented Cumulative Surrounding Buildings

569. The introduction of the unconsented cumulative schemes would have little effect on the thermal comfort of the area around the proposed development. 33 Creechurch Lane would cause slightly more of the area to the northeast of the proposed development to have seasonal (rather than all-season) thermal comfort conditions. These minor changes would not affect the suitability of the thermal comfort of the area and its current use.

570. All areas at ground level around the proposed development would continue to have suitable thermal comfort conditions for the intended use.

571. Thermal comfort conditions at the on-site terrace level areas would be materially the same as in the proposed vs existing and consented cumulative scenarios. More of the 21st floor terrace level would have all-season thermal comfort conditions due to an increase in winter thermal comfort. This is likely a result of the unconsented cumulative schemes calming winter winds.

572. Thermal comfort conditions within and around Leadenhall Market would not be materially altered due to the introduction of the unconsented cumulative schemes, as such conditions would remain as reported in the consented cumulative scenario and would be suitable for the intended use.

573. The unconsented cumulative schemes would not materially alter the thermal comfort categories of the existing, or consented cumulative, surrounding podium and roof level terrace. All terraces in the local areas, including those of the unconsented schemes, would have short-term thermal comfort conditions or better with only small areas of short-term seasonal conditions. As such all off-site podium and roof level terraces would have suitable thermal comfort conditions for the intended use.

Overall Thermal Comfort Conclusion

574. The existing Site and existing surrounding context have thermal comfort conditions appropriate for their use, with the majority of the surrounding area falling into the seasonal and all-season categories. There are more areas of short-term conditions to the west of the Site amongst the tall buildings of the Eastern Cluster.

575. The Proposed Development is expected have an impact on thermal comfort in the surrounding urban realm, the change however is very limited. No areas around the Proposed Development were predicted to have their thermal comfort category reduced by the Proposed Development to a point where it would be incompatible with their use.

576. The Proposed Development features a public terrace at the 1st floor level and a private office amenity terrace at the 21st floor level. The 1st floor terrace would have all-season thermal comfort conditions, suitable for the intended use. At the 21st floor terrace, the majority of the area would have all-season conditions but there would be a small area close the façade of the building that is categorized as appropriate for seasonal uses. These thermal comfort conditions would be considered suitable for the intended use of this terrace.

577. Thermal comfort conditions at all areas in and around the Proposed Development would be materially the same with the introduction of the consented cumulative schemes and remain suitable for the intended use. The same is true with the introduction of the unconsented cumulative schemes.

Noise and Vibration

578. Local Plan policy DM15.7 and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that level of noise emitted from any new plant should be at least 10dBa below background noise levels.

579. The Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operational phase of the development; and noise associated with increases in road traffic, which could be attributed to the development.

580. In most City redevelopment schemes the main noise and vibration issues occur during demolition and early construction phases. The assessment identifies a major adverse impact on residential receptors at 18-22 Creechurch Lane) and a Moderate Adverse impact (significant) on residential receptors at 2 Heneage Lane and 10-16 Creechurch Lane. At the nearby places of worship; Bevis Marks Synagogue and Church of St Katherine Cree, the assessment identifies a negligible impact.

581. During the operational phase of the development, the assessment concludes that there would be a negligible impact on noise levels from road traffic and pedestrian movements compared with the existing.

582. As set out in the consultation responses table a number of representations have been received regarding the adverse impact of the proposed development on the Bevis Marks Synagogue in terms of noise, not only during the demolition and construction phase but also during the operational phase of the development.

583. As identified in the above paragraphs, the impact on Bevis Marks Synagogue is assessed as being negligible in terms of noise and vibration during the construction and operational phases. Notwithstanding and taking into account the representations received, details of noise and vibration mitigation measures, including control over working hours and details of the types of equipment to be used

would be required to be submitted to and approved and this would be done via the submission of a Scheme of Protective Works and Construction Environmental Management Plan which are to be secured by condition.

584. The Synagogue have submitted a document 'Bevis Marks Synagogue: Significance & Community Impact Study'. Comprised in this document are further details about Synagogue Worship and a sample timetable setting out when religious services are held. The applicant would be required to engage with the Synagogue to establish suitable construction working hours so that disruption could be minimised so not to impact on the religious services at the Synagogue.

585. Furthermore, freight movements would be controlled through the Construction Logistics Plan and would be secured by condition. The Scheme of Protective Works, the Construction Management Plan and the Construction Logistics Plan would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.

586. Concerns are also raised by objectors regarding the noise and disturbance from pedestrians and cyclists walking up and down Heneage Lane.

587. The main cycle access is proposed to be via Creechurch Lane as this is where the cycling entrance is located. It is not intended to encourage cyclists to divert off this intended route to use Heneage Lane as a cycle route. It should also be noted that the existing scheme has cycle parking that is accessed via the privately managed area of Heneage Place. The proposed scheme has all cycle access via the adopted highway with a cycle staircase accessed directly from Creechurch Lane and a cycle lift provision accessed via the eastern end of Heneage Place.

588. It is anticipated that the increased scale of the building would result in an increase in overall trips by pedestrian (as set out in the transport section of this report). Heneage Lane is approximately 3.5m wide and has capacity to accommodate around 2,000 pedestrians per hour at a comfort level of B+. It is agreed that the development would lead to an increase in pedestrian numbers on Heneage Lane following the continuation of the north/south desire line through the site. However, the land use of the proposed development is not expected to generate noise levels which would be unusual for a city centre location. Section 278 works are also proposed to improve the immediate highway network around the proposed site including on Creechurch Lane and Bury Street which would improve the pedestrian priority of the surrounding highway network, which would encourage pedestrian to the use of these alternative routes.

589. Whilst this is an increase in the expected use of Heneage Lane, in the context of the sites location in the heart of the City Cluster, it is

considered that the additional number of trips is unlikely to impact on the amenity of those travelling to and from the Synagogue or to have a materially detrimental impact on the use of the building to hold religious services..

590. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.

591. Subject to the recommended conditions, the proposal would comply with London Plan policy D13, Local Plan policy DM 15.7 and draft City Plan 2036 policy HL3.

Air Quality

592. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

593. The Environmental Statement includes an assessment of the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.

594. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans with the inclusion of an Air Quality Dust Management Plan (AQDMP) to be submitted and approved under conditions attached to the planning permission.

595. For the completed development, the proposed development would meet its energy demand for space and water heating from Air Source Heat Pumps (ASHP) with no onsite combustion. Therefore, the total building emissions would be zero. As there are no combustion processes, the Proposed Development would be considered air quality neutral for building emissions.

596. The development would be car-free and the assessment states that the transport emissions associated with the servicing vehicles

would have negligible impact. The assessment concludes that the development would have no significant impacts on local air quality.

597. The development meets the Air Quality Neutral benchmarks for both building and transport emissions assessment.

598. The City's Air Quality Officer has no objections and recommends that a condition is applied requiring the submission and approval of an Air Quality Report to detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and the submitted Air Quality Assessment.

599. Subject to the compliance with conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, policy SI1 of the London Plan which all seek to improve air quality.

Health Impact Assessment

600. The applicants have submitted a HIA which has been based on the Healthy Urban Development Unit criteria, with adaptions to take into account the particular circumstances of the City. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
- Provision of a pocket park at St James' Court providing much needed green space;
- Provision of a high-quality public realm in the form of an arcade; providing a north-south route which would improve connectivity and permeability, as well as enhancing the attractiveness of the physical environment;
- Inclusivity and accessibility as placemaking priority areas;
- A car free building minimising vehicle travelling to the site along with cycle parking to support active travel
- Building and landscape design considering sustainability and climate change with Air Source Heat Pumps (ASHP)
- Building and landscape design also providing an enhanced environment for workers and site users as well as the wider public through an attractive public realm, greening measures and active travel measures; and
- Provision of community floorspace and affordable workspace providing significant public benefits to the local community.

601. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:

- Implementation of a travel plan to maximise uptake of active travel options;

- Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight;
- Implementation of a Construction Environmental Management Plan (CEMP) including dust, noise and vibration and hours of construction works;
- Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction;
- Secure local employment and training initiatives via planning obligations
- An Air Quality and Management Plan to minimise the impact of dust at the construction phase; and
- The requirement for an Operational Management Plan to minimise noise at the operational and commercial uses.

602. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

Fire Safety

603. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage.

604. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further details would be required regarding the fire service access and the application of the evacuation lifts and these would be developed as the detailed design of the building progresses in consultation with City District Surveyors and the London Fire Brigade.

605. If planning permission were to be granted, a condition would be recommended requiring the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) with details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority in consultation with the London Fire and Emergency Planning Authority, Building Control Health and Safety Team prior to construction of the building and the strategy shall remain in place thereafter.

606. Subject to compliance with the condition the proposed development would meet the requirements of Policy D12 of the London Plan.

Assessment of the Public Benefits and the paragraph 196 NPPF balancing exercise

607. Paragraph 196 of the NPPF states "where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use". The National Planning Practice Guidance states that "public benefits…could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to the genuine public benefits". Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise.

608. The key social, environmental and economic public benefits of the proposal are considered to be as follows:

Economic Benefits

- Securing a strategic mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster as a 24/7 world class business destination, securing a significant contribution to the City of London economic base which is of UK-wide importance, including the generation of employment (anticipated creation in the range of 1,195-1,685 additional jobs following completion of the development) and increased spending in the locality boosting local businesses and a post-covid resurgence. This is a benefit which should be afforded substantial weight.

Retail Benefits

- Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages. Heneage Arcade, would be aligned with retail units and spaces which are designed to be utilised as vitrines for a rolling programme of displays including artworks, local community information, reference to the important history of the site and products of local artisans.

These spaces could also be utilised as small workshop and retail units for emerging local businesses and craft. The intention would be to help foster and support emerging local talent and provide space to create, make, display and sell their creations. This is a benefit which would attract moderate weight.

Public Realm Benefits

- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys. This includes;
  - A north-south route through the building is proposed, which would re-introduce an historic connection between Heneage Lane and Bury Street.
  - James' Court, a new pocket park is introduced which re-establishes an historic city court.
  - Within the public realm it is proposed to incorporate temporary and permanent art installation program to showcase work of local artists'. (secured by a S106 obligation).

- Extended public realm improvements are also proposed outside the red line boundary at Bury Street and Creechurch Lane. These improvements would be secured via a section 278 agreement.

These benefits should be afforded substantial weight.

Social and Community Benefits

- The provision of a dedicated community space within the building at mezzanine and level 1, referred to as 'Creechurch Hall'. This space is specifically designed for local groups, including schools and other education uses, charities and cultural/art groups. The space would be available for use at no charge between 10am -9pm on weekdays and 9am-5pm on Saturdays. As part of this offer, the applicant has committed to a minimum of 8 hours a week for the use of this space as an outreach, training and skills centre. This space would be flexible to provide for a wide range of uses including small meetings, larger organised events or rehearsal space for local artists in the area. It therefore offers the potential to make a significant contribution towards training and skills opportunities in the City. The community space is intended to provide a gateway for the population of the more economically deprived areas around the City fringe to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community. The space has the potential to serve a rich, diverse community from all backgrounds in a socially and

economically inclusive manner. This is a benefit that should be afforded substantial weight.

Environmental Benefits

- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste and use of resources through the adoption of circular economy principles. The proposed building is a fossil-fuel free, all electric building with zero combustion on site. This is a benefit that would attract moderate weight.

Townscape and Heritage Benefits

- The proposed building would result in a significant aesthetic enhancement to the Creechurch locality. The proposed building would, at ground floor level, present a sophisticated, dark blue faience elevations of a triple order to the surrounding townscape, complementing the existing warehouse buildings of brick with terracotta detailing which characterise the Creechurch locality. Through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. In wider pan-City and pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area. This is a benefit that would attract moderate weight.

609. When applying the policy in paragraph 196 of the NPPF those public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report, namely the harm to the significance and OUV of the Tower of London WHS arising from the impact on its setting in LVMF View 10A.1.

610. It is the view of officers that the public benefits, including delivering accommodation for City type businesses thereby contributing to economic growth, should be afforded significant weight, and that giving great weight to the less than substantial harm to the significance of designated heritage assets and considerable importance and weight to the desirability of preserving the setting of the listed buildings, the public benefits of the proposal outweigh the harm to significance of heritage assets as identified in this report.

CIL and Planning Obligations

611. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

612. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

613. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

614. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL 2 Payable	£4,409,466	£4,233,087	£176,379

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£1,959,450	£1,861,477	£97,973
City Planning Obligations			
Affordable Housing	£522,520	£517,295	£5,225
Local, Training, Skills and Job Brokerage	£78,378	£77,594	£784
Carbon Reduction Shortfall (*as designed*) ***Not indexed***	£0	£0	£0
Section 278 (Evaluation and Design) ***Not indexed***	£100,000	£100,000	£0
Security Measures (Eastern City Cluster)	£261,260	£261,260	£0
S106 Monitoring Charge	£4,750	£0	£4,750
Total liability in accordance with the City of London's policies	**£2,926,358**	**£2,817,626**	**£108,732**

City's Planning Obligations

615. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations
- Construction Monitoring Costs

- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Cycling Promotion Plan
- Cycle Hire Contribution *(£ 220k)*
- Carbon Offsetting
- Utility Connections
- Cultural Implementation Strategy
- Section 278 Agreement
- Public Route (Heneage Arcade - between Heneage Lane and Bury Street) and Publicly Accessible Amenity (421sqm) on Mezzanine Level (*Specification & Access / Management*) Open daily 7am-11pm
- Public Realm & James' Court Pocket Park - Open 24/7 (*Specification & Access / Management Plan*)
- Incubator (642sqm at Level 2) & SME Spaces
- Community Space at Level 1 (507sqm - 480 people) open 10am-9pm weekdays and 9am-5pm Sat/Sun (*Access & Management Plan*)
- Television Interference Survey
- Wind Audit
- Solar Glare

616. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

617. The scope of the s278 agreement shall include, but is not limited to, improvements to Creechurch Lane, Mitre Street and Bury Street to provide pedestrian priority on these streets.

Monitoring and Administrative Costs

618. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

619. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

620. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the area. In some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are yet to be fully scoped.

Cumulative Impacts

621. The Planning Practice Guidance on Environmental Impact Assessment states that "*Each application (….) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development."*

622. The impacts of the proposed development have been considered as part of the comprehensive Environmental Impact Assessment, which considered cumulative effects. The schemes identified for inclusion in the cumulative assessment are listed at paragraph 2.84 of Volume 1 of the Environmental Statement, and the locations shown on Fig 2.1. The schemes considered include those which have a full planning consent, those which have the benefit of a resolution to grant consent, and applications which have been submitted but not yet considered by a planning committee or determined.

A series of cumulative scenarios including one with just 'consented' schemes (referred to as Future Baseline 1; i.e. those with planning permission) and, separately, including those that do not and are either the subject of a live planning application (referred to as Future baseline 2 – those schemes include 33 Creechurch Lane, which is currently being evaluated and has not yet been reported to your Committee and the Tulip, land adjacent to 20 Bury Street, which was refused and is being considered at appeal). The assessment of cumulative scenarios has demonstrated that it is largely the potential impacts of the proposal for 33 Creechurch Lane which would give rise to moderate to major adverse cumulative daylight or sunlight impacts [mainly on the Synagogue]. All other developments considered in the cumulative scenarios including this 31 Bury Street application would give rise to minor to moderate adverse impacts on daylight and sunlight.

623. Officers consider the approach taken in the Environmental Statement to assessment of cumulative effects to be appropriate. When assessing the proposals your officers have had regard to, and

save if otherwise indicated in this report, have placed reliance upon the cumulative impact assessment contained in the environmental statement.

Impact to the foundation of the Synagogue and Ground Movement

624. Objections have been received raising concerns about the impact the proposed development and potential damage it would cause to the Synagogue Foundations.

625. An Objection has also been received in relation to the impact de-watering ground movement during construction stating that due to the delicate nature of the Synagogue, there must be no construction activities carried out likely to cause ground movement and monitoring will be required.

626. The applicants have submitted a Structural Statement and Basement Impact Assessment. The applicants have also confirmed that ground movement would be continually monitored throughout the demolition and construction process. With regards to monitoring, the applicants have stated that this would be undertaken in the excavation and on surrounding buildings in order to track movements against those predicted. They have also confirmed that a system of notifications would be set up to monitor movements and the system would create alerts should the results deviate from those expected. The submitted Structural and Basement Impact Assessment sets out the planned groundworks associated with the proposed development and it is not expected that any damage would be cause to the Synagogue particularly given the distance of the Synagogue from the site.

627. The submitted assessment has been reviewed by District Surveyor, who advised that due to the fact that the Synagogue is located some distance from the proposed development, there would be no material impact to its foundations. Notwithstanding, a condition is recommended for the submission of a demolition and construction methodology (including monitoring of ground movement) to be prepared by a heritage accredited structural engineer to be submitted and approved to address these concerns.

Equality Impact

628. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

629. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-
•eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;

• advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

• foster good relations between persons who share a relevant protected characteristic and persons who do not share it

630. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

631. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

632. This application has been assessed against the Equality Act 2010 and any equality impacts identified.

633. The Applicants have held a range of meetings with stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:

- Bevis Marks Synagogue
- Church of St Helen Bishopsgate
- Church of St Katherine Cree
- Tower Hamlets Business Education Partnership
- Aldgate School
- Canon Barnet Primary School

634. As set out in the submitted Statement of Community Involvement (SCI), the consultation process included a targeted community outreach programme, which sought to understand the needs of local community groups and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project – notable the community space and how that space can best serve the identified stakeholder.

635. As set out earlier in the report, it is intended that the community space is a free to use dedicated community space specifically designed for the diverse local community, charity, religious, cultural/art and education groups and organisations to hold events, gatherings and exhibitions for the public to take part in.

636. Potential impacts of the proposed development on the nearby occupiers identified above, have been assessed, including the impacts

on the use and functionality of the spaces. Officers do not consider that they would be detrimentally impacted in so far as these spaces become unusable nor would it be considered that there would be disadvantages to any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

Human Rights Act 1998

637. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR").

638. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate.

639. As set out above, it is the view of officers that there would be no infringement of Article 9 of the ECHR, and in particular there would no infringement of the freedom to manifest religion or belief in worship, teaching, practice and observance.

Conclusion

640. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft London Plan and the draft Local Pan and considering all other material considerations.

641. The scheme delivers a high quality, office-led development within the City Cluster, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses.

642. The scheme makes optimal use of the site and provides an increase in office and retail floorspace in accordance with the City's objective to support a thriving economy and remain the world's leading international financial and professionals services centre.

643. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies which supports post-covid recovery as identified in the 'London Recharged: Our Vision for London in 2025 report.

644. The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles.

645. The scheme delivers significant public realm enhancement and new amenity space including an accessible new north-south public route through the site, connecting Heneage Lane to Bury Street, as well as a new pocket park (James' Court).

646. The scheme delivers a dedicated community space within the building at mezzanine and level 1, referred to as 'Creechurch Hall'. The flexible community space is designed to be an inclusive dedicated space for the local community, charity, religious groups (including Bevis Marks Synagogue), cultural/art and education groups and organisations to hold events, gatherings and exhibitions such as careers events, micro workshops or gallery/rehearsal space for local artists. As part of this offer, the applicant has committed to a minimum of 8 hours a week for the use of this space an outreach, training and skills centre, providing training and skills opportunities for local communities. The community space is intended to reach out to the wider community and is intended to provide a gateway for the population in neighbouring boroughs to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community.

647. The increase in floorspace and occupation places extra pressure on the comfort and safety of the City's streets. In order to improve the pedestrian comfort levels, the nearby pedestrian environment will be improved by the implementing pedestrian priority streets on Creechurch Lane, Heneage Place, Mitre Street and Bury Street and the introduction of the new pedestrian routes which would draw people away from the busy main streets, which will be secured via a section 278 agreement.

648. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel.

649. In terms of daylight, the proposed development would result in no significant adverse effect on the majority of the properties assessed with the exception of 10-12 Creechurch Lane, 14-16 Creechurch Lane and 18-20 Creechurch Lane & 27-31 Mitre Street which would experience moderate adverse impacts. With regards to the residential properties at 10-12 and 14-16 Creechurch Lane, these buildings have very low daylight levels in the existing situation due to their location within a dense urban surrounding and therefore would experience relatively disproportionate percentage change in daylight levels when factoring in the proposed development. With regards to the residential properties at 18-20 Creechurch Lane and 27-31 Mitre Street, the rooms

which are affected by daylight losses, benefit from other windows which ensure good levels of daylight amenity are maintained.

650. The impact on daylight and sunlight to Bevis Marks Synagogue and the residential property at 2 Heneage Lane would minor adverse with very small absolute VSC changes which would be imperceptible to the occupants.

651. The Synagogue would experience a moderate adverse impact in terms of sunlight. With regards to Sunlight to the courtyard, in the existing context only 1.5% of the area receives more than two hours or more of direct sunlight access on 21st March. In the proposed condition, this reduces to none of the area receiving direct sunlight. The area to which this reduction would occur is 4.86sq.m which arises to be a thin area of ground in the northwest corner of the outer courtyard and would experience a minor adverse impact. Officers do not consider that the impact of daylight and sunlight to the Synagogue would be unacceptable and is not considered to impact the existing use of the property nor would it change the pattern of use of the Synagogue. It is considered that the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the moderate adverse impact.

652. In the cumulative scenario, many of the existing buildings would experience larger cumulative losses. However, the loss of light would be largely due to the other consented buildings in the cumulative scenario (in some cases the proposed development under consideration at 33 Creechurch Lane).

653. The adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that BRE compliant levels of daylight and sunlight are unlikely to be achievable. Account also needs to be taken of the existing levels of daylight and sunlight to the affected rooms, which, for a number of the affected rooms, are already low. It is considered that the proposed development would not cause unacceptable harm to the daylight and sunlight of surrounding land and buildings and complies with London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

654. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post

construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.

655. Objections have been received from statutory consultees and third parties, relating to the design of the development, its impact on designated and non-designated heritage assets including Bevis Marks Synagogue, the impact on the Tower of London World Heritage Site.

656. Numerous objections have also been received regarding the impact to the historical, religious and societal significance and the setting of Bevis Marks Synagogue. Concerns raised include; the loss of daylight and sunlight to the Synagogue and the Courtyard, the impact of noise and disturbance from construction and the increased number of pedestrian and cyclists as a result of the proposed development. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations. Officers do not consider the proposed development would cause a detrimental impact such that it would alter the use of the Synagogue or impact on the historical, religious and societal significance of Bevis Marks Synagogue.

657. It is a shared view with HE and HRP that the proposal results in harm to the setting (and to the significance) of the World Heritage Site of the Tower of London.

658. It is considered that the proposed development would result in less than substantial harm to the significance of the Tower of London World Heritage Site as result of the impact on setting arising as a result of the impact of the proposal in the view from the north bastion of Tower Bridge and would be contrary to Local Plan Policy CS12, and D9(e) London Plan Policies HC2, HC3 and HC4.

659. The proposal is contrary to Local Plan Policy CS13 and London Plan Policy HC 4 due to non-compliance with the LVMF visual management guidance for view 10A1 from the north bastion of Tower Bridge.

660. In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting.

661. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

662. In this case, while the proposals are in compliance with a number of policies which seek to promote economic growth, in particular policy CS1 in the Local Plan. The application site is a suitable site for a tall building within the City's Eastern Cluster. It is for the City

as local planning authority to make a judgement as to whether the proposed development complies with the development plan when considered as a whole. It is the view of officers that the proposals are not in compliance with the development plan when considered as a whole due to non-compliance with the heritage policies identified above.

663. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

664. The other material considerations relevant to this case are set out below.

665. Paragraph 8 of the NPPF sets out that there is a presumption in favour of sustainable development.

666. Paragraph 80 of the NPPF sets out that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

667. Paragraph 131 of the NPPF sets out that great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or which help raise the standard of design more generally in the area.

668. As set out in paragraph 193 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 194, that any harm should require clear and convincing justification. The world heritage site status and the Grade I listing places the Tower of London at the very highest level of importance and as a result greater weight should be given to the asset's conservation.

669. Paragraph 196 of the NPPF sets out that where development proposals will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal (set out below).

670. The proposals have been assessed against the policies in the NPPF and your officers consider that the proposals are in compliance with the NPPF.

671. The proposal has been assessed in accordance with the definition of the Outstanding Universal Value and significance of the

World Heritage Site as set out in the Tower of London World Heritage Site Management Plan (2016). In addition the proposal has been assessed in terms of the guidance set out in the Tower of London Local Setting Study (2010) and the London Views Management Framework SPG. The proposal is considered to dominate the Tower of London in view 10A.1 from Tower Bridge, contrary to para 183 of the LVMF guidance. In addition, the proposal by reason of its close proximity to the Tower, its vertical profile and eye-catching design would compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site contrary to paragraph 186 of the LVMF guidance for this view (10A.1).

672. The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.

673. Additional material considerations are as follows:

- Securing a strategic mixed-use development within the City Cluster, that would provide land uses which support the diversification, vitality and growth of the Cluster as a 24/7 world class business destination
- Increase in a diverse retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.
- Extended public realm improvements are also proposed outside the red line boundary at Bury Street and Creechurch Lane.
- The provision of generous community space that is intended to reach out to the wider community and provide a gateway into the City for the population in neighbouring boroughs to access opportunities to inspire, connect and educate themselves and deliver genuine public benefits to the wider community.
- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
- The proposed building would result in a significant aesthetic enhancement to the Creechurch locality, through the use of high-quality faience materials and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms. In wider pan-City and

pan-London vistas, the proposed building would be distinguished as the first wholly faience-clad tower in the City Cluster, forming an exciting new architectural counterpoint to its glazed predecessors, and distinguishing and enhancing the City Cluster with a sophisticated new form of architectural expression. It would constitute an innovative design which would promote sustainability and help raise the standard of design in the area.

674. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 and S278 Agreement. Together these would go some way to mitigate the impact of the proposal.

675. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan, and the other material considerations which do not support the proposal.

676. In carrying out that balancing exercise considerable importance and weight must be given to preserving the settings of listed buildings. As set out in paragraph 193 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 194, that any harm should require clear and convincing justification. The world heritage site status and the Grade I listing places the Tower of London at the very highest heritage level of importance.

677. Taking all material matters into consideration, officers are of the view that, giving very considerable importance and weight to the desirability of preserving the setting of the Tower of London as a heritage asset of the highest significance, the public benefits of the proposal nevertheless outweigh the priority given to the development plan and other material considerations against the proposals. As such that the application is recommended to you for approval subject to all the relevant conditions being applied and section 106 obligations being entered into in order to secure the public benefits and minimise the impact of the proposal.

Background Papers

Application Submission Documents

Initial submission (Oct 2020)

- Existing and Proposed Plans and Drawings, prepared by Stiff + Trevillion;
- Design and Access Statement, prepared by Stiff + Trevillion;
- Landscape Strategy and Drawings, prepared by Bowles & Wyer;
- Environmental Statement, prepared by Trium;
- Planning Statement including draft Heads of Terms, prepared by DP9;
- Statement of Community Involvement, prepared by Kanda Consulting;
- Tower of London Heritage Impact Assessment, prepared by Montagu Evans;
- Transport Assessment, prepared by Steer;
- Framework Travel Plan, prepared by Steer;
- Delivery and Servicing Plan (including Waste Management Strategy), prepared by Steer
- Energy Statement, prepared by Hoare Lea;
- Sustainability Statement, prepared by Hoare Lea;
- Whole Life Carbon Assessment, prepared by Hoare Lea;
- Circular Economy Statement, prepared by Hoare Lea;
- Ventilation and Extraction Statement, prepared by Hoare Lea;
- Utilities Statement, prepared by Hoare Lea;
- Fire Safety Strategy, prepared by Sweco;
- Flood Risk Assessment and Drainage Strategy, prepared by Thornton Tomasetti;
- Geo-environmental and Geotechnical Phase 1 Desk Study, prepared by Thornton Tomasetti;
- Structural Statement and Basement Impact Assessment, prepared by Thornton Tomasetti;
- Outline Construction Environmental Managemental Plan, including a detailed Construction Logistics Plan, prepared by Mace; and
- Biodiversity Net Gain Report (including biodiversity net gain assessment), prepared by Schofield.

Reg. 25 submission (Feb 2021)

- Equality Statement, prepared by Quod
- 31 Bury Street: A Building Ecosystem paper
- Public Benefits Statement, prepared by Stiff + Trevillion
- Updated ES Chapter 13, TBHVIA Addendum and ES NTS Update, coordinated by Trium
- Outdoor Thermal Comfort, prepared by RWDI

Responses / Notes

- Response to GLA Stage 1, prepared by DP9 (23 February 2021)

- Energy Strategy Note (and accompanying technical material), responding to detailed comments alongside GLA Stage 1, prepared by Hoare Lea
- Supplementary Views (to TBHVIA) for GLA using massing model, prepared by Cityscape
- Response to Bevis Marks Synagogue, prepared by DP9 (18 February 2021)
- Response to heritage stakeholder comments (including HE, HRP and LBTH), prepared by Montagu Evans (18 February 2021)
- Response to Thames Water, prepared by Thornton Tomasetti (28 January 2021)
- Response to CoL Energy / Sustainability queries, prepared by DP9 with Hoare Lea and S+T input (10 March 2021)

Representations:

[redacted]03.01.2021

Alan Bekhor 28.12.2020

Leon Nahon 27.12.2020

Philip Meir 28.12.2020

Joyce & Lucien Gubbay 31.12.2020

Mr Leslie Morgan OBE 31.12.2020

Rachel Kolsky 31.12.2020

Barbara Graham Collier 13.01.2021

Mrs Lampert Dorothy 29.12.2020

Mr Daniel Zubaida 05.01.2021

Mr Gary Kenton 15.01.2021

Katy Barron 30.01.2021

Dr Annette Lawson 07.01.2021

Mr Joseph Solomons 04.01.2021

Jonathan Ben Garcia 24.12.2020

Barbara Simon 28.12.2020

Adele Leffman 29.12.2020 and 28.02.2021

Michael Yudkin 29.12.2021

Paul Arwas 04.01.2021

Angela Rubens 05.01.2021

Gusti Martin 05.01.2021

Mr Darren Isaacs 07.01.2021

Leslie Morgan 05.01.2021

Richard Cohen 07.01.2021

Ronald Jaffa 07.01.2021

Ulla Thiessen 07.01.2021

Dr. Everett M. Jacobs 08.01.2021

Sasto Daniel 08.01.2021

Mrs Ina Machen 07.01.2021

Mrs Michele Bentata 07.01.2021

Mrs B Averberg 08.01.2021

Raymond Silver 08.01.2021

Rhys Thomas 08.01.2021

Riva Twersky 09.01.2021

Miriam Kramer 13.01.2021

Jacqueline Barnett 10.01.2021

Neil Graham 12.01.2021

Briess Peter 12.01.2021

Ruth Hart 12.01.2021

Daniella Kochavi 13.01.2021

David Cohen 14.01.2021

Catherine Hillman 18.01.2021

Sefton Kwasnik 22.01.2021

Philip Dante 23.01.2021

Anthony Phillips 24.01.2021

Barry C Musikant 25.01.2021

Carole Morganstein 27.01.2021

Howard Martin 28.01.2021

Mr Raymond Sabbah 23.12.2020

Julia Da Waal 29.01.2021

Mr James Martin 23.12.2020

Andrea Rosen - 31.01.2021

Edwin Segall 31.01.2021

Mrs Frances Flaxington 23.12.2020

Mr Mark Hammond 23.12.2020

Mr Frank Martin 23.12.2020

Mrs Vivien Baroukh 24.12.2020

Mr Michael Mocatta 23.12.2020

Dr David Sclar 23.12.2020

Mr Alan Hyman 24.12.2020

Mr Jeff Berger 23.12.2020

Mr Eden Dwek 23.12.2020

Mr David Stern 24.12.2020

Ms Jennifer Bell 25.12.2020

Mr James Pont 23.12.2020

Mrs Marlena Schmool 23.12.2020

Mr Edward Ziff 24.12.2020

Mrs Charlotte Green 25.12.2020

Mr Barry Chernoff 23.12.2020

Mr Brian Addlestone 23.12.2020

Mrs Amanda Newman 26.12.2020

Mr Johnny Blair 23.12.2020

Mr Martin Collins 24.12.2020

Mr Marc Pereira-Mendoza 28.12.2020

Mr David Isaacs 26.12.2020

Mr Michael Jackson 24.12.2020

Ms Judy Jackson 24.12.2020

Mr Daniel Bloom 24.12.2020

Dr SIMON GABBAY 24.12.2020

Mr ALAN LANGLEY 24.12.2020

Mr Isaac Baroukh 24.12.2020

Mr Michael Baroukh 24.12.2020

Ms ELEANOR LEVY 28.12.2020

Mr Cyril Morgan 25.12.2020

Mrs Jennye Seres 26.12.2020

Ms Patricia Book 26.12.2020

Mr Antoine Guivarch 28.12.2020

Mr Benjy Lebrett 25.12.2020

Ms Sandra Clark 28.12.2020

Mr Maurice Martin 28.12.2020

Mr Allan Lewis 25.12.2020

Mr Martin Ben-Nathan 28.12.2020

Mr Rick Sopher 23.12.2020

Mr clive sanford 23.12.2020

Mr Jason Ozin 29.12.2020

Mr Bensoor Awad 24.12.2020

Mr Anthony Tricot 28.12.2020

Mrs Rita Tricot 28.12.2020

Mrs Jessica Tricot 28.12.2020

Mr Sami Tricot 28.12.2020

Dr Sharon Elishe a Turkington 24.12.2020

Mrs Suzanne Ellul 29.12.2020

Ms Dianne Levitin 25.12.2020

Mr Jonathan Spencer 29.12.2020

Mr Robert Yentob 28.12.2020

Mrs RUTH BASRAWY 28.12.2020

Mr Edwin Birnbaum 28.12.2020

Mr Michael Kuhn 25.12.2020

Mr Russell Donoff 29.12.2020

Mr Derrick Smouha 28.12.2020

Ms Gemma Levy 28.12.2020

Mrs Simone Hillman 28.12.2020

Mr Maurice Moses 29.12.2020

Mrs Caline Chazan 29.12.2020

Lord Peter Levene 28.12.2020 (former Lord Mayor)

Mr Adam Grossman 29.12.2020

Mr Freddie Chazan 29.12.2020

Lord Harry Woolf 29.12.2020

Mr Mark Salem 30.12.2020

Ms Johanna Fredj 28.12.2020

Mr Freddie Chazan 29.12.2020

Mr Daniel Sopher 28.12.2020

David Zubaida 05.01.2021

Mrs linda Dangoor 29.12.2020

Mr Ben Arram 30.12.2020

Mr Michael Dias 29.12.2020

Mr Marcus Gomes da Costa 30.12.2020

Mr Ariel Chazan 29.12.2020

Mr Edward Mocatta 28.12.2020

Mr Simon Rosenberg 30.12.2020

Mrs Esther Shuker 29.12.2020

Mr frank khalastchi 29.12.2020

Ms Daniela Nawi 28.12.2020

Mr Adam Szasz 30.12.2020

Dr Brian and Judith Robinson 30.12.2020

Dr Brian and Robinson 30.12.2020

Dr Brian Judith 30.12.2020

Mr Marcos Chazan 29.12.2020

Mr Noam Attar 30.12.2020

Mr G Field 30.12.2020

Mr Philip Heitlinger 29.12.2020

Mr Anthony Israel 30.12.2020

Mr Daniek Ofer 30.12.2020

Mr Salem Freddy 28.12.2020

Mrs Jennifer Brooke 29.12.2020

Mr Stephen Davis 24.12.2020

Mr Samuel Chazan 29.12.2020

Mrs Yodia Lo 30.12.2020

Mr Ronald Levi 28.12.2020

Mr Emanuel Arbib 30.12.2020

Jonathan Webber 31.01.2021

Mr Charles Shamash 31.12.2020

Mrs Sue Shamash 31.12.2020

Mr Raphael Setton 31.12.2020

Mr Zeev Portner 31.12.2020

Mr Lawrence Salem 01.01.2021

Ms Linda Smith 02.01.2021

Mrs Kris Musikant 04.01.2021

Mrs Nicki Martin 03.01.2021

Miss Christie Thomson 03.01.2021

Mrs Genevieve Crewe 04.01.2021

Mr Ronnie Morgan 04.01.2021

Mrs Samantha Martin 05.01.2021

Mr Tony Silverman 05.01.2021

Dr Victor Kateck 06.01.2021

Mr Paul Olins 06.01.2021

Mr Ian Braidman 06.01.2021

Mrs Sharon Blacker 06.01.2021

Mr Stephen Blank 06.01.2021

Mrs Helen Skolnek 06.01.2021

Mr Hugh Shear 06.01.2021

Dr Ivor Nathan 06.01.2021

Mrs Leila Levine 06.01.2021

Mr Raphael Graziani 06.01.2021

Mr Philip Garcia 06.01.2021

Miss Ana Bernic 06.01.2021

Ms Carole Shaw 07.01.2021

Ms Miriam Marson 07.01.2021

Dr Beruriah Wiegand 11.01.2021

Miss Saresh Rose 11.01.2021

Ms Gillian Ansell Brauner 11.01.2021

Ms Lynne Beeden 11.01.2021

Mrs julie chandler 11.01.2021

Mr Gavriel Nelken 11.01.2021

Ms Nancy Jones 11.01.2021

Dr Tim Freed 09.01.2021

Mr John de Lange 10.01.2021

Mr Hubert Krukowski 11.01.2021

Ms Sarah Notis 11.01.2021

Ms Melissa Clifford 11.01.2021

Mr Jonathan Judah 11.01.2021

Mr Stuart Fletcher 11.01.2021

Mrs Hilary Jackson 11.01.2021

Ms Allison Jones 11.01.2021

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Mr David Raz-Rhodes 08.01.2021

Dr Mel Cappe 10.01.2021

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Lord isobel Hangasjarvi 11.01.2021

Mrs Andrea Rappoport 11.01.2021

Mr Matthew Shahin Richardson 11.01.2021

Mr Gordon Shiach - 11.01.2021

Dr B Yudkin 11.01.2021

Mr Edward Simonds 11.01.2021

Mr Daniel Bentley - 11.01.2021

Mr William Aghoghogbe 11.01.2021

Mr Adham Smart 11.01.2021

Miss Melissa Jennings 11.01.2021

Mr Russell Mishcon 06.01.2021

Mr Ivan Shaw 06.01.2021

Mr James Rath 06.01.2021 and 27.02.2021

Mr Derek Wax - 06.01.2021

Ms Sharon Abrahamson - 06.01.2021

Mrs Sue Gil 07.01.2021

Miss Lia Lalli 08.01.2021

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Mr Hirsh Cashdan 08.01.2021

Mr Daniel Saville 06.01.2021

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Mr Michael Bennett 07.01.2021

Mr Morgan Holleb 08.01.2021

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Mr Alex Rudofsky 13.01.2021

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Mr Harry Boteler 16.01.2021

Mrs Vickie Irwin 11.01.2021

Mr David Jacobs 11.01.2021

Mr Patrick Morrow 11.01.2021

Mr Tom F. 12.01.2021

Mrs Arlette Garcia 14.01.2021

Mrs Jennifer Ross 14.01.2021

Mr David Natali 18.01.2021

Mr Carroll Raphael 12.01.2021

Lord Enea Orsolini 12.01.2021

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Mr Joel Carlberg Torsell 11.01.2021

Ms Kate Menzies 15.01.2021

Ms Mary M 27.01.2021

Ms Zelda Star 12.01.2021

Ms Lianne Hitchen 12.01.2021

Ms Elliote Long 14.01.2021

Ms Smilynne Joukovski 20.01.2021

Miss Beth Madden 11.01.2021

Ms Stacey Holleb 11.01.2021

Mrs Beth Ashton 12.01.2021

Mr Barry Freedman 12.01.2021

Mr Barry Shaw 12.01.2021

Mrs Ranit Katz 12.01.2021

Ms Charlotte Purdham 15.01.2021

Ms Sarah Scott 11.01.2021

Miss Emily Hutchinson 12.01.2021

Mr Richard Pavry 12.01.2021

Mr John Lyons 12.01.2021

Mrs Andrea Leib 12.01.2021

Mr Martin Brown 12.01.2021

Mrs Malka Morris 12.01.2021

Ms Alastor Phoenix 12.01.2021

Dr Ivri Bunis 12.01.2021

Mrs Sharon Pearlman 12.01.2021

Dr David Bunis 13.01.2021

Miss Victoria Herriott 14.01.2021

Mr Leonidas Adams 21.01.2021

Ms Melanie Getto 22.01.2021

Miss Naomi Phillips 11.02.2021

Dr Royce Mahawatte 11.01.2021

Mr Craig Morrison 12.01.2021

Ms Amelia Cook 12.01.2021

Ms Sian Moseley 13.01.2021

Dr Michael Szpakowski 13.01.2021

Mr Deniz Genc 13.01.2021

Mr David Bloom 14.01.2021

Mr Ivor Richards 14.01.2021

Miss Holly Watling 14.01.2021

Mr Alasdair Black 15.01.2021

Dr Stuart Morganstein 24.01.2021

Ms Ruth Rosen 14.01.2021

Mr Jaime Starr 11.01.2021

Mr Liam Tielemans 11.01.2021

Mr Jesse Balter 11.01.2021

Ms Jules LoVecchio 11.01.2021

Ms Alese Clark 12.01.2021

Ms Elena Colman 13.01.2021

Miss Shelby Shoup 13.01.2021

Mrs Josie Abram 13.01.2021

Mr Jonathan Golan 13.02.2021

Dr John Dickinson 27.01.2021

Mrs Jacqueline Barnett 31.01.2021

Mr Paul Caswell 04.02.2021 and 25.02.2021

Mr Leonard Grant 12.01.2021

Mr PNatali 13.01.2021

Mr Keith Phillips 28.01.2021

Michael Mail 01.02.2021

Ms Melissa Bauman 14.02.2021

Mrs Elaine Avisror 11.01.2021

Mrs Danielle D 12.01.2021

Ms Carolyn Jacks 12.01.2021

Mr Daniel Hershon 21.01.2021

Ms Linda Rosen 31.01.2021

Mrs Kim Press 12.01.2021

Mr Philip Ross 13.01.2021

Miss Lorelei Sellers 13.01.2021

Mr Les Talisman 14.01.2021

Mr David Nunes 19.01.2021

Ms Marion Janner 27.01.2021

Miss Erin Hayes 11.01.2021

Mrs Deborah Talalay 13.01.2021

Mrs Joyce Nunes 19.01.2021

Mrs Pippa Landey 12.01.2021

Mr Robert Winckworth 15.01.2021

Ms Fiona Adler 05.02.2021

Ms Kay Lacey 12.01.2021

Mrs Victoria Azaz 29.01.2021

Ms Barbara Pietrzykowska 11.01.2021

Mr M. Higgins 21.01.2021

Mr Stephen Kramer 11.01.2021

Mr Ian Charles 12.01.2021

Ms Jane Liddell-King 12.01.2021

Mr Gary Stodel 12.01.2021

Mr Jonathan Murden 12.01.2021

Mr Jay Schlesinger 11.01.2021

Miss Victoria Mangan 11.01.2021

Ms Tal Janner-Klausner 11.01.2021

Mr Stuart Chaplin 11.01.2021

Dr Mark Kirby 11.01.2021

Mr Isaac Treuherz 11.01.2021

Ms Bobbi Barnett 11.01.2021

Mrs Olivia Starr 11.01.2021

Miss Adi Currie 11.01.2021

Mr Jak Ateara 11.01.2021

Ms Kiah Endelman Music 11.01.2021

Mrs Susan Rushworth 12.01.2021

Mrs Diana da Costa 12.01.2021

Dr Elisabeth Ehler 12.01.2021

Ms Pamela Freer 12.01.2021

Miss Hayley White 12.01.2021

Miss Naomi Magnus 11.01.2021

Mrs Melissa Gilroy 11.01.2021

Ms Marion Smith 11.01.2021

Dr Lindsey Taylor-Guthartz 11.01.2021

Dr Catriona McAleer 11.01.2021

Ms Kirsty Simmonds 12.01.2021

Mrs Juliet Barnett 12.01.2021

Dr David Watkis 12.01.2021

Mr Ben Young 12.01.2021

Mrs Yudit Collard Treml 12.01.2021

Miss Laura Swaffield 13.01.2021

Mrs Liane Wrigg 13.01.2021

Mrs Sylvia Gottschalk 13.01.2021

Mr Paul Richards 15.01.2021

Mr Mark Richards 14.01.2021

Mr Liron Bezalel 14.01.2021

Mr Ronald Schindler 14.01.2021

Mr Jeremy Garcia 14.01.2021

Mr Mark Parkinson 14.01.2021

Ms Amy Marks 15.01.2021

Mr Jess O'Sullivan 15.01.2021

Ms Rebecca Abrams 14.01.2021

Mrs Ariane Bankes 14.01.2021

Mr Louis Berk 15.01.2021

Mr David Jacobs 11.01.2021

Ms Grace Miller 11.01.2021

Ms Anya Metzer 11.01.2021

Miss Jessica Tamman 11.01.2021

Miss Zoe Arschavir 11.01.2021

Michele Bentata 08.01.2021

Miss Cassie Histed 13.01.2021

Ms Phoebe Taylor 13.01.2021

Mr Willem Steele 14.01.2021

Dr Doreen Shaoul 17.01.2021

Mr Roger Leon 12.01.2021

Mrs Katie Fox 15.01.2021

Miss Ildiko Connell 15.01.2021

Ms Melanie Goldberg 16.01.2021

Ms Hilary Guedalla 17.01.2021

Lord Ittai Welby 13.01.2021

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Miss Hannah Morley 12.01.2021

Mr Sam Garcia 14.01.2021

Mr Dan Carrol 14.01.2021

Mrs Susan Garcia 14.01.2021

Miss JJ Coleman 21.01.2021

Mr Norman Ereira 31.01.2021

Dr Avril Crollick 13.01.2021

Mr Stephen Gayer 15.01.2021

Mrs Christine Dickinson 27.01.2021

Mrs Gill Cohen 11.01.2021

Dr Ellis Saxey 11.01.2021

Ms Rose Aitchison 11.01.2021

Mr Leo Schindler 11.01.2021

Mr Calvin Smith 11.01.2021

Ms Elise Goodman 12.01.2021

Ms Madeleine Pearce 12.01.2021

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Miss Jamie Hathaway 15.01.2021

Mr Robert Victor Bentata 18.01.2021

Mr Leigh Mackay 21.01.2021

Dr Joanna Franks 24.01.2021

Dr Jonathan Beloff 30.12.2020

Mrs Ina Machen 07.01.2021

Mr Michael Arlington 07.01.2021

Mr Martin Collins 24.12.2020

Darren Isaacs 07.01.2021

Nigel Macdonald 12.01.2021

Annette Lawson 07.01.2021

Miss Marissa Salad 11.01.2021

Mr Gerald Stern 07.01.2021

Mr Mark Attan 08.01.2021

Dr Hannah Holtschneider 08.01.2021

Dr Alan Mendoza 24.12.2020

Mr Alfred Magnus 24.12.2020

Mrs Nicola Garcia 07.01.2021

Mr Raymond Dinkin 24.12.2020

Mr Michael Mail 24.01.2021

Rabbi Dr. Abraham Levy 19.01.2021

Solomon Green 07.01.2021

Mrs Siena Golan -

Anthony Eskenzi - 31.12.2020

Mrs Henrietta Ferguson 14.01.2021

Mr Scott Lebon 12.02.2021

Mr Christopher Gazzard 12.02.2021

Mr Jimmy Aldrich 13.02.2021

Mr Mandeep Dhaliwal 16.02.2021

Ruth Duston 18.01.2021 - Aldgate Connect BID

Mr Martin Ray 27.02.2021

Mr Edward Smith 16.02.2021

Mr Adam Caddy

Board of Deputies of British Jews 24.02.2021

Jewish Museum London 23.02.2021

Historic Royal Palaces - Bevis Marks Synagogue 24.02.2021

Foundation for Jewish Heritage 1.02.2021

Bevis Marks Synagogue Significance & Community Impact Study (Jonathan Solomons) dated 11 February 2021

Conference of European Rabbis 05.03.2021

Office of the Chief Rabbis (Rabbi Ephraim Mirvis) 3.03.2021

Jewish Historical Society of England (JHSE) (Miri Rubin) 02.03.2021

The Drapers Company (Tim Orchard) 05.05.2021

Jonathan Djanogly MP 19.03.2021

The Furniture History Society (Christopher Rowell, FSA) 17.03.2021

The Worshipful Company of Ironmongers (John Biles) 08.03.2021

Dr W. W. Apedaile Msc PhD Ceng MICE FRSA 10.03.2021

Mrs P K Wilkey 24.03.2021

Edge Plan (on behalf of the London Sephardi Trust and the Spanish & Portuguese Sephardi Community) Chris Maltby 8th February and 12 March 2021

The Friends of the City Churches (Oliver Leigh-Wood) 10.03.2021

The Society for the Protection of Ancient Buildings (Christina Emerson) 02.03.2021

Mr Edward Waller - O; 08.12.2020 - (The Georgian Group)

Rabbi Shalom Morris - O; 02.02.2021 (Rabbi of Bevis Marks Synagogue)

Sefton Kwasnik 22.01.2021

Peter Rose 01.03.2021

Dr. Everett M. Jacobs 08.03.2021

Mr William Carver 03.03.2021

Mr Leon Meyer 10.03.2021

Ms Eileen Hauptman 23.03.2021

Mr Kenneth Robinson 23.03.2021

Mr Stanley Roth 23.03.2021

Mrs Caroline MacDonald-Haig 24.02.2021

The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London 12 March 2021

Jonathan Lane 04.03.2021

CONSULTATION RESPONSES

Historic England 11.12.2021

GLA Stage 1 Letter 15.02.2021

Historic Royal Palaces - 31 Bury Street 19.11.2020

Transport for London 22.02.2021

Crossrail Safeguarding 13.11.2020 and 26.02.2021

London Borough Hackney 18.01.2021

London Borough of Tower Hamlets 18 December 2020

London Borough of Islington 19.03.2021

London Borough of Greenwich

Southwark Council 07.01.2021

City of Westminster 03.12.2020 and 02.03.2021

London Borough of Camden 26 March 2021

Civil Aviation Authority 15 March 2021

NATS Safeguarding 25.11.2020 and 02.03.2021

Heathrow Airport 13.12.2020 and 28.02.2021

London City Airport 30.11.2021

Environment Agency 26 November 2020 and 4 March 2021

Network Rail 02.03.2021

Thames Water 10.12.2020

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted. An objection received states that the Environmental Statement refers to uses defined under the categories of the Town and Country Planning (Use Classes) Order 1987. The description of development refers to the same types of uses but as defined under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which would potentially allow for a significantly different range of uses. Therefore, it is stated that the City of London need to determine that the Environmental Statement and all other documents adequately assess the proposed development.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the proposed amendments contained within the submission and sets out additional assessment of Townscape, Built Heritage Visual Impact Assessment (TBHVIA) Addendum, Updated parts of the Environmental Statement, comprising 'ES Volume 1, Chapter 13: Effect Interactions', and the ES Non-Technical Summary (NTS) and Energy Strategy Note (and accompanying technical material). It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space and a community facility. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change

to other uses specified within Class E.
The following conditions are recommended:

1. The development shall provide:
- 27, 815 sq.m. (GEA) of office floorspace (Class E);
- 62 sq.m. (GEA) flexible retail use (Class E)
and
- 1,006 sq.m (GEA) of Publicly accessible amenity and community floorspace (Class Sui Generis)
REASON: To ensure the development is carried out in accordance with the approved plans.

2. Not less than 60 sq m (GIA) of the Commercial, Business and Service (Class E) and the flexible Commercial, Business floorspace hereby approved to be provided at Ground Floor shall be used for purposes within Class E (a), (b), (c) under Schedule 2 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 amending or revoking and re-enacting that Order with or without modification.'

REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2

3. The areas shown on the approved drawings above ground floor as offices including internal amenity space and external terraces (at levels 20 and 21) and as set out in Condition 66 of this decision notice, shall be used for Class E office use only and for no other purpose (including any other purpose in Class E) 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).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

4. The areas shown on the approved drawings as offices (Class E), flexible retail use (Class E), and community use (Class Sui Generis) (including external terrace at level 1), and as set out in Condition 66 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E and Sui Generis as appropriate) 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 amending or revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in

the Environmental Statement and that public benefits within the development are secured for the life of the development

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Vehicle Lift Maintenance Strategy, a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures at the ground floor level. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

APPENDIX B

Relevant London Plan Policies

Policy GG1 (Building strong and inclusive communities) encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals, seeking to ensure positive changes to the physical environment and provide access to good quality community spaces, services, amenities and infrastructure. In addition, it supports London continuing to generate a wide range of economic and other opportunities promoting fairness, inclusivity and equality.

Policy GG2 (Making the best use of land) supports the prioritisation of well-connected sites for development including intensifying the use of land to support, amongst other things, workspaces, and promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Policy GG3 (Creating a healthy city) seeks to *"ensure that new* buildings *are* well-insulated *and sufficiently ventilated* to *avoid the health* problems *associated with damp, heat and* cold" and to *"promote more active and healthy* lives *for* all *Londoners and enable them* to *make healthy* choices."

Policy GGS (Growing a good economy) recognises the strategic aim to *"promote the strength and* potential *of the wider* city *region",* including the support and promotion of *"sufficient* employment *and* industrial *space* in *the right* locations to *support* economic *development and regeneration."*

Policy SD4 (The Central Activities Zone (CAZ)) states that *"the nationally and internationally significant office functions of the* CAZ should *be supported and enhanced* by all *stakeholders,* including *the* intensification *and provision of sufficient space* to *meet demand for a range of types and* sizes *of occupier and rental values"*

Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states that *"offices and other* CAZ *strategic functions are* to *be given greater weight relative* to *new residential development."*

Policy D4 states that *"design and access statements submitted with development* proposals *should demonstrate that the* proposal *meets the design requirements of the London* Plan."

Policy D5 (Inclusive Design) seeks to achieve the highest standard of accessible and inclusive design across new developments.

Policy D8 (Public Realm) establishes criteria for proposals which include public realm space. These criteria include making public realm "well-designed, *safe,* accessible, *inclusive, attractive,* well-connected, *related* to *the* local *and historic* context, *and easy* to *understand, service and maintain. Landscape treatment,* planting, *street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.* Lighting, *including for advertisements, should be carefully considered and* well-designed in *order* to minimise *intrusive* lighting *infrastructure and reduce* light pollution."

Policy D9 (Tall Buildings) sets out criteria where tall and large buildings will be considered acceptable, in principle. This includes the need to *"incorporate the highest standards of architecture and materials, including sustainable design and construction practices ...[to] ...have ground* floor *activities that provide a positive* relationship to *the surrounding streets ... [to] ... contribute* to *improving the* permeability *of the* site *and wider area, where* possible ... *[and to] ... make a significant contribution* to local *regeneration".* There is also a requirement for proposed tall buildings to be assessed in terms of potential adverse effects on their surroundings in terms of microclimate, wind turbulence, overshadowing and noise.

Policy D11 (Safety, security and resilience to emergency) states that *"development* proposals *should maximise* building resilience *and* minimise potential physical *risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures* to *design out crime that -* in proportion to *the risk - deter terrorism, assist* in *the detection of terrorist activity and help mitigate* its *effects. These measures should be considered at the start of the design process* to *ensure they are inclusive and aesthetically integrated* into *the development and the wider area."*

Policy D12 (Fire Safety) encourages proposals to achieve the highest standards of fire safety and ensure that they: *"1) identify suitably* positioned *unobstructed outside space for fire appliances* to *be* positioned on *and which* is *appropriate for use as an evacuation* assembly point; *2) are designed* to *incorporate appropriate features which reduce the risk* to life *and the risk of serious injury* in *the event of a fire."*

Policy D14 (Noise) seeks to avoid significant adverse noise impacts on health and quality of life, and mitigating and

minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

Policy S1 (Developing London's social infrastructure) states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Policy El (Offices) explicitly supports increases in the current office stock, noting that *"improvements* to *the quality,* flexibility *and adaptability of office space of different* sizes *(for* micro, small, *medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development."*

Policy E2 (Providing suitable business space) states that Boroughs should seek to *"support the provision, and where appropriate,* protection *of a range of* B Use Class *business space,* in *terms of* type, *use and* size, *at an appropriate range of rents,* to *meet the needs of* micro, small *and medium-sized enterprises and* to *support firms* wishing to *start-up or expand."* The policy also states that *"development* proposals *for new* B Use Class *business floorspace greater than* 2,500 *sqm (gross external area), or a* locally *determined* lower *threshold* in *a* local *Development* Plan *Document, should consider the* scope to *provide a* proportion *of* flexible *workspace or smaller units suitable for* micro, small *and medium-sized enterprises."*

Policy E3 (Affordable workspace) outlines the requirement for affordable workspace. It is noted that leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with submarket rents

Policy E9 (Retail, markets and hot food takeaways) states that development proposals should enhance local and neighbourhood shopping facilities and prevent the loss of retail. Proposals should also bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres.

Policy HC1 (Heritage conservation and growth) requires development proposals "should demonstrate a clear understanding of the historic environment and the heritage values

of sites or areas and their relationship with their surroundings."

Policy HC2 (World Heritage Sites) requires that "development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes." The policy also states that "development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment."

Policy HC3 (Strategic and Local Views) states that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

Policy HC4 (London View Management Framework) states that "development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

Policy G1 (Green infrastructure) states that "development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network."

Policy G4 (Open space) identifies that "development proposals should 1) not result in the loss of protected open space; 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency."

Policy GS (Urban greening) states that "major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

Policy G6 (Biodiversity and access to nature) states that "development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process."

Policy SI1 (Improving air quality) states that "development proposals should not: a) lead to further deterioration of existing poor air quality; b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; c) create unacceptable risk of high levels of exposure to poor air quality."

Policy SI2 (Minimising greenhouse gas emissions) requires that all new major development should be net zero-carbon. Major development proposals should also include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

Policy SI3 (Energy infrastructure) states that "development proposals should: 1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure; 2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as we!! as establishing new networks."

Policy SI4 (Managing heat risk) identifies that "development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure." The policy also states that "major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems."

Policy SI7 (Reducing waste and supporting the circular economy) identifies that "referable applications should promote circular economy outcomes and aim to be net zero-waste."

Policy SI13 (Sustainable drainage) states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features.

Policy SI12 (Flood risk management) requires development proposals to "ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses."

Policy SI13 (Sustainable drainage) states that "development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible."

Policy TI (Strategic approach to transport) highlights that development "should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated." Development that promotes walking through improved public realm is also supported.

Policy T2 (Healthy streets) encourages development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Proposals should "1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; 2) reduce the dominance of vehicles on London's streets whether stationary or moving; 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

Policy T3 (Transport capacity, connectivity and safeguarding) states that "development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed."

Policy T4 (Assessing and mitigating transport impacts) notes that "where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified."

Policy TS (Cycling) supports increases in cycling across London through the provision of secure, integrated, convenient and accessible cycle parking facilities as well as associated changing and facilities and showers.

Policy T6 (Car parking) sets out parking standards which need to be complied with and that "car- free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport."

Policy T7 (Deliveries, servicing and construction) states that "development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments."

Relevant GLA Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

Relevant Draft City Plan 2036 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

Policy HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities

S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE5 Terraces and viewing galleries
DE6 Shopfronts
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular transport and servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
Policy VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HE3 Setting of the Tower of London World Heritage Site
S12 Tall Buildings
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Spaces
OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR3 Sustainable drainage systems (SuDS)
S16 Circular economy and waste
CE1 Zero Waste City
S21 City Cluster
S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

City of London's Wind Microclimate Guidelines (2019);

Planning Obligations SPD (July 2014);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).

Eastcheap Conservation Area Character Summary and Management Strategy SPD 2013

Leadenhall Market Conservation Area Character Summary and Management Strategy SPD 2017

Bank Conservation Area Character Summary and Management Strategy SPD2012

Other

Tower of London World Heritage Site Management Plan

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

DM1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

a) prejudicing the primary business function of the City;
b) jeopardising the future assembly and delivery of large office development sites;
c) removing existing stock for which there is demand in the office market or long term viable need;
d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.2 Protection of large office sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

a) new accommodation suitable for small and medium sized businesses or occupiers;

b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
b) measures to be integrated with those of adjacent buildings and the public realm;
c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;

f)an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

a) conducting a full risk assessment;
b) keeping access points to the development to a minimum;
c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
d) ensuring early consultation with the City of London Police on risk mitigation measures;
e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;
b) restricting motor vehicle access, where required;
c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;
b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

CS7 Meet challenges of Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City.

CS10 Promote high quality environment

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
c) appropriate, high quality and durable materials are used;
d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
f)the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
i)there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
k) there is provision of amenity space, where appropriate;
l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

a) the predominant use of the space, surrounding buildings and adjacent spaces;
b) connections between spaces and the provision of pleasant walking routes;
c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;

f)sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
i)the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
j)the use of high quality street furniture to enhance and delineate the public realm;
k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

a) respect the quality and architectural contribution of any existing shopfront;
b) respect the relationship between the shopfront, the building and its context;
c) use high quality and sympathetic materials;
d) include signage only in appropriate locations and in proportion to the shopfront;
e) consider the impact of the installation of louvres, plant and access to refuse storage;
f)incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
h) resist external shutters and consider other measures required for security;
i)consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
j)be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

CS11 Encourage art, heritage and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
b) ensuring that financial provision is made for the future maintenance of new public art;
c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS13 Protect/enhance significant views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS14 Tall buildings in suitable places

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the

character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

CS15 Creation of sustainable development

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;
b) an energy statement in line with London Plan requirements;
c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise

conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

CS16 Improving transport and travel

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

a) road dangers;
b) pedestrian environment and movement;
c) cycling infrastructure provision;
d) public transport;
e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision

for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their

waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

a) reuse of existing structures;
b) building design which minimises wastage and makes use of recycled materials;
c) recycling of deconstruction waste for reuse on site where feasible;
d) transport of waste and construction materials by rail or river wherever practicable;
e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
b) the benefits of the development outweigh the flood risk to future occupants;
c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and
b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;
b) provide a high quality environment;
c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
d) have regard to biodiversity and the creation of green corridors;
e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

a) green roofs and walls, soft landscaping and trees;
b) features for wildlife, such as nesting boxes and beehives;
c) a planting mix which encourages biodiversity;
d) planting which will be resilient to a range of climate conditions;
e) maintenance of habitats within Sites of Importance for Nature Conservation.

CS20 Improve retail facilities

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

DM20.3 Retail uses elsewhere

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1

units near residential areas, unless it is demonstrated that they are no longer needed.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

SCHEDULE

APPLICATION: **20/00848/FULEIA**

Bury House 31 Bury Street London

Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use (Class E), flexible retail/cafe use (Class E), publicly accessible internal amenity space (Sui Generis) and community space (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.

CONDITIONS

1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

2 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition and construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition and construction shall not be carried out other than in accordance with the approved scheme.
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

3 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the

intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

4 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations. REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

5 Prior to the commencement of development a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.
REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

6 Prior to the commencement of development a Demolition and Construction Methodology and Structural Assessment (prepared by a Heritage Accredited Structural Engineer), assessing implications of the demolition and construction phase, as well as any medium and long-term structural and non-structural implications for the listed buildings Holland House (Grade I) and Bevis Marks Synagogue (Grade I), including a detailed methodology and specification of works which seek to mitigate any damage, shall be submitted and approved in writing by the Local Planning Authority and those relevant works carried out in accordance with the approved details.
REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Holland House and Bevis Marks Synagogue in accordance with the following policies of the Local Plan: CS12, DM12.1.

7 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

8 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

9 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an

impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

10 No works of excavation beyond the existing basement shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

11 Prior to the commencement of the development an update to the approved Circular Economy Strategy shall be submitted to and approved in writing by the Local Planning Authority, to reaffirm the proposed strategy or demonstrate improvements, and that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

12 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA at ZeroCarbonPlanning@london.gov.uk and the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON : To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

13 Prior to the commencement of the development (other than demolition) details of incorporating natural ventilation into the design of the buildings' envelope and the proposed buildings' services system must be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.
REASON: To comply with Local Plan Policy DM 15.5 (Climate change resilience and adaptation) and to demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

14 Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation

15 Prior to the commencement of the development (other than demolition), an updated energy strategy shall be submitted to and approved in writing by the Local Planning Authority, providing details on how the development would reduce carbon emissions in particular from passive design measures and from the incorporation of roof and facade mounted PV panels if identified as an effective measure to reduce carbon emissions.
REASON: To demonstrate that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

16 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

17 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

18 No development other than demolition shall begin until details of such measures as are necessary within the site to resist structural damage

and to protect the approved building and the new public realm within the site, from an attack with a road vehicle or road vehicle borne explosive device, have been submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. The development shall be carried out in accordance with the approved details.
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

19 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the Local Planning Authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

20 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, pumps, green roof systems, green walls, rainwater harvesting systems including the irrigation system, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.4l/s from the existing sewer connection, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 53m3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(s) Evidence that Thames Water have been consulted and consider the proposed discharge rate to the satisfactory; and
(d) Clarification on whether the attenuation tank will discharge via a pumped or gravity fed system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3

21 Before the shell and core of the building is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Local Lead Floor Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:

- a full description of how the system would work, its aims and objections and the flow control arrangements
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3

22 No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. If any of the proposed cranes are infringing London City Airport`s Obstacle Limitation Surfaces, they must be assessed against LCY's Instrument Flight procedures (IFPs) by a CAA approved procedure designer.
Reason: The use of cranes or tall equipment in this area has the potential to impact LCY operations, therefore they must be assessed before construction.

23 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:
(a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
(b) details of the proposed new facade(s) including typical details of the fenestration and entrances;
(c) details of a typical bay of the upper floors of the development;
(d) details of the ground floor triple order and cornice;
(e) details of the internal elevations of the Heneage Arcade including the entrances, shopfronts, soffits, walls, lighting, paving and any infrastructure required to deliver programming and varied uses;
(f) details of the Community Space at Level Mezzanine and Level 1 (Creechurch Hall) including details of external and internal level ground

to first floor including: all elevations: entrances: fenestration; internal circulation and fit out; planters; fixed seating; fixed lighting; signage; and any infrastructure required to deliver the Sui Generis use;
(g) details of the proposed programme of public art throughout the external surfaces and faces of the building;
(h) details of the urban greening proposed throughout the external surfaces and faces of the building;
(i) details of the proposed external lighting scheme proposed throughout the external surfaces and faces of the building;
(j) details of James Court, including elevations, planters, seating, lighting, wind mitigation measures, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
(l) details of junctions with adjoining buildings;
(m) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level
(n) details of the integration of cleaning equipment, cradles and the garaging thereof;
(o) details of plant and ductwork to serve the Class E use(s); -
(p) details of ventilation and air-conditioning for the Class E use(s);
(q) details of all ground level surfaces including materials to be used;

(r) details of external surfaces within the site boundary including hard and soft landscaping;
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, DM12.2.

24 Before the works thereby affected are begun, sample panels of agreed sections of the faience facades shall be built, agreed on-site 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.
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, DM12.2

25 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works to install such green wall(s)/roof(s) are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

26 All unbuilt surfaces, forming part of the development, shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. 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. 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 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

27 Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

28 Details of the position and size of the green walls(s), the type of planting and the contribution of the green wall(s) to biodiversity shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

29 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

30 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

31 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.
REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

32 Prior to any plant being installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6

33 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

34 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

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, DM21.3.

35 No live or recorded music that can be heard outside the premises shall be played.
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, DM21.3.

36 No amplified or other music shall be played on the roof terraces.
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, DM21.3.

37 The roof terraces on level 1 hereby permitted shall not be used or accessed between the hours of 23.00hrs on one day and 07.00 hrs on the following day, other than in the case of emergency.
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, DM21.3

38 No cooking shall take place within any Class E use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

39 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the retail uses (Class E) and any Class E (office) kitchens. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the said use takes place.
REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

40 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of

light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.

41 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.
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: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036

42 A post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

43 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

44 No part of the development shall be occupied until confirmation has been provided and agreed with the Local Authority in consultation with Thames Water that either:
(a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or

(b) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.
Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.
REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning

45 No part of the development shall be occupied until confirmation has been provided that either:
(a) Waste Water Capacity exists off site to serve the development, or

(b) A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or
(c) All wastewater network upgrades required to accommodate the additional flows from the development have been completed.
REASON: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.

46 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

47 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at:

ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.
REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

48 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation

49 The pass doors shown adjacent to or near the to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.
REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.

50 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 443 long stay pedal cycle spaces, and a minimum of 26 short stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

51 A minimum of 5% of the long stay cycle spaces shall be accessible for adapted cycles.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, ItP London Plan policy T5 cycling B, emerging City Plan policy 6.3.24.

52 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in

consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.
REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan policy: T5

53 443 lockers and 46 showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

54 A clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.

55 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.

56 A minimum of 1 electric charging point within the delivery and servicing area must be provided.
REASON: to further improve the sustainability and efficiency of travel in, to, from and through the City in accordance
with the following policy of the Local Plan: CS 16 and draft Local Plan 2036 Policy VT2.

57 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

58 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.

REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.

59 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

60 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

61 Prior to construction (excluding any works of demolition) the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) including details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority (after consultation with the London Fire Brigade, Building Control Health and Safety Team) and the strategy shall remain in place thereafter. The development shall be carried out in accordance with the approved Fire and Emergency Escape Strategy details.
REASON: In the interests of the safety of occupants of the buildings in the event of a fire or emergency in accordance with City of London Local Plan policy CS3.

62 The areas shown on the approved drawings as offices (Class E), flexible retail use (Class E), and community use (Class Sui Generis) (including external terrace at level 1), and as set out in Condition 66 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E and Sui Generis as appropriate) 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 amending or revoking and re-enacting that Order with or without modification.

63 The areas shown on the approved drawings above ground floor as offices including internal amenity space and external terraces (at levels 20 and 21) and as set out in Condition 66 of this decision notice, shall be used for Class E office use only and for no other purpose (including any other purpose in Class E) 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).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

64 Not less than 60 sq m (GIA) of the Commercial, Business and Service (Class E) and the flexible Commercial, Business floorspace hereby approved to be provided at Ground Floor shall be used for purposes within Class E (a), (b), (c) under Schedule 2 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 amending or revoking and re-enacting that Order with or without modification.'
REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2

65 The development shall provide:
- 27, 815 sq.m. (GEA) of office floorspace (Class E);
- 62 sq.m. (GEA) flexible retail use (Class E)
and
- 1,006 sq.m (GEA) of Publicly accessible amenity and community floorspace (Class Sui Generis)
REASON: To ensure the development is carried out in accordance with

the approved plans.

66 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:
ST-PR[01]001
ST-PR[01]002
ST-PR[02]098
ST-PR[02]098M
ST-PR[02]099
ST-PR[02]099M
ST-PR[02]100
ST-PR[02]100M
ST-PR[02]101
ST-PR[02]102_107
ST-PR[02]108_111
ST-PR[02]112_119
ST-PR[02]120
ST-PR[02]121
ST-PR[02]122_143
ST-PR[02]144
ST-PR[02]144M
ST-PR[02]RoofPlant
ST-PR[02]RoofTop
ST-PR[02]Roof

ST-PR[03]001
ST-PR[03]002
ST-PR[03]003
ST-PR[03]004
ST-PR[03]101
ST-PR[03]102
ST-PR[04]101
ST-PR[04]201
ST-PR[31]201
ST-PR[31]202
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.

INFORMATIVES

1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

2 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:
Office £185 sq.m
Retail £165 sq.m
Hotel £140 sq.m
All other uses £80 per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sq.m for offices, £150 per sq.m for Riverside Residential, £95 per sq.m for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

3 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7C2d4268d77e7d49eaab9608d8a0399f8e%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637435516630978933%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=egpOm%2FrY8owwky4HbbycQcgEdtrCm3iVIFbq%2FS3Cswo%3D&reserved=0. Please refer to the Wholsesale; Business customers; Groundwater discharges section.

4 The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2d4268d77e7d49eaab9608d8a03

99f8e%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637435516630983911%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=BhdYiTUeXAG%2BUnTO5LtBHcgc1APsBX6sWZbazMh%2FjDQ%3D&reserved=0. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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Chief Planning Officer and Development Director 3rd January 2021
Department of the Built Environment
City of London PO Box 270 Guildhall
London EC2P 2EJ

Your reference: 20/00848/FULEIA

Dear Planning Officer

31 Bury Street London EC3A 5AR

Reason for writing: the proposed building of 48 above ground storeys will completely overwhelm the nearby Bevis Marks Synagogue (opened 1701, which is the oldest synagogue in the UK and much of Europe in continuous use. I have attended for worship on an occasional basis for the past forty years. The synagogue has recently received a grant of nearly £2.8 million from the National Heritage Lottery Fund for restoration work and the conservation of collections, and work is about to begin. It seems perverse, to say the least, to spend public money on conserving the synagogue and at the same time to destroy its setting with new skyscrapers at 31 Bury Street and 33 Heneage Lane. This is not joined-up thinking.

Heritage Policies

The new draft plan for the City up until 2036 proposes concentrating taller buildings in this area. However, it also makes clear that this should not be at the expense of existing heritage assets:[1]

Strategic Policy S11: Historic Environment
The City's heritage assets, their significance and settings will be positively managed, by: 1. conserving and enhancing heritage assets and their settings to ensure that the City's townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing.

[1] The quotations are from https://www.cityoflondon.gov.uk/assets/Services-Environment/proposed-submission-draft-city-plan-2036.pdf pp. 125 and 133.

The important phrase here is "**and their settings**." This is reiterated in Strategic Policy S12: Tall Buildings which states:

The construction of tall buildings should have regard to:

- *the character and amenity of their surroundings, including the relationship with existing tall buildings*
- *the impact on the significance of heritage assets and their immediate and wider settings.*

Because this new plan is still in draft form, that means that the current policy is still that from 2015. The City of London Local Development Scheme Introduction (2015) page 5 states:[2]
The setting of designated heritage assets and conservation areas, views along streets and glimpsed views into courtyards are all significant in their contribution to the historic environment and the diverse character of the City of London.

Turning to the Mayor of London's policies, one finds similar considerations. Tall buildings should relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level; and should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference. This advice goes on to say that the impact of tall buildings proposed in sensitive locations should be given particular consideration. Sensitive locations mentioned include listed buildings **and their settings.**[3]

The synagogue was designed by a pupil of Sir Christopher Wren and deserves as much environmental protection as the City's Wren Churches, to which it is comparable in scale and standard. In my travels round Europe I have visited many historic synagogues and seen none hemmed in and overshadowed by such a close and tall building as is here proposed. If they accept this proposal, the planning committee would be totally ignoring the City's stated objective and current practice of preserving and enhancing the setting of heritage assets. The new Aldgate Square, a few metres away, enhances the setting of St Botolph's Aldgate and by providing leisure space, ensures that people stop to admire the Church. On the other side of the synagogue, the setting of St Helen's Bishopsgate has also been enhanced by new open space at the Gherkin Plaza. Contrast the synagogue, which will be hemmed in as if the City were ashamed of it.

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[2] https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/heritage-and-design/Documents/hes-introduction.pdf (accessed February 2019, but no longer at this URL)

[3] https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-seven-londons-living-spac-12

In view of the importance of heritage in the centre of one of the world's oldest cities, and the huge importance of tourism to the city, questions need to be asked about how these considerations are considered by the Planning Committee and in particular whether there is specific heritage representation on or to the group.

Other Concerns

In addition to the overwhelming size of the building, there are many specific concerns about the proposal for 31 Bury Street. One of them is the ground floor shopping arcade which will provide a through walkway in line with Heneage Lane, which runs immediately behind the synagogue's eastern wall. This feature will greatly increase footfall in the quiet lane. Furthermore, the synagogue has done studies indicating the further lessening blocking of daylight within the synagogue and its historic courtyard. The daylight is already minimal, because the synagogue is surrounded by other buildings, and this minimum amount needs to be conserved. The air flow around the synagogue is also likely to be affected. The synagogue has a historic ventilation feature: vents in the ceiling and in the roof can be opened to allow air to circulate inside the building. This system, constructed in 1701, still works well and provides a pleasant and healthier environment in the summer and during pandemics.

The environmental impact assessment submitted by the developers (non-technical summary paragraph 128) points out that daylight levels in some surrounding buildings which would include the synagogue are already low, so that a further small reduction of light in absolute terms can be categorised as a large percentage alteration. This is a damning conclusion, suggesting that because Bevis Marks synagogue is already surrounded by other buildings, it is acceptable to hem it in still further). The same argument is used about overshadowing in paragraph 139 – because the synagogue is already overshadowed, that makes it somehow acceptable to overshadow it further. The visual impact from the courtyard does not appear to be considered at all. Heritage aspects are considered in this document, but bizarrely it is argued here and in other documents that the overall impact of the new building will be beneficial (para 176, and the non-technical summary para 178). Historic Royal Palaces, who run the Tower of London, do not think this is correct, and neither do the community of Bevis Marks Synagogue.

The Heritage Impact Assessment document submitted by the developers only considers the impact on the Tower of London and does not even mention the much nearer synagogue and historic churches, which suggests that the developers have not seriously considered the matter at all.
The City's current policies require a consideration of the proposed view along Heneage Lane—I have not seen this mentioned in any of the documents submitted on behalf of the developers. Chapter 5 of Volume 2 of the Environmental Statement provides a summary of the synagogue's heritage history, but offers no comment other than "taken forward for further assessment."

Covid-19 considerations

The planning application reads as if it predates the current pandemic. The Corporation of the City of London has made a good start on post-Covid thinking with its plan, published in October 2020, to create more start-up hubs and affordable workplaces in the area. The proposal for 31 Bury Street does not fit with that. It proposes the same old large offices which are going to be redundant before they are even completed. Everyone thought both during both world wars that life would revert back to the way it was afterwards, but the reality was quite different. The pandemic is a similar time of shifting ideas. Many people are going to be very happy working from home and will never go back to their old offices. But many lack space in their present homes. What the city needs is good quality, residential accommodation with built in high tech facilities and home offices in each residence. That is the way to enhance City life for the future and prevent it becoming a ghost town. This application is yesterday's news.

Summary

Any acceptance of the planning application would be a serious violation of the City's and Mayor of London's heritage policies; and the effect would be discriminatory compared to the sensitive treatment given to the setting of nearby churches. The building will increase footfall adjacent to the synagogue and have a negative visual and overshadowing impact on the synagogue and its setting and context within the City townscape. The proposal for more office space in the area is unsuited to post-Covid needs.

Please note that I would like to speak at the meeting when this is discussed.

Yours sincerely

[redacted]

[redacted]

From: [redacted]
To: PLN - Comments
Subject: 20/00848/FULEIA 31 Bury Street
Date: 28 December 2020 14:19:22

REF: 20/00848/FULEIA

Dear Sirs

I wish to register my strong objection to the application submitted for the contemplated development of Bury House.
Bevis Marks Synagogue is a beautiful building and one of the most important heritage sites in the City of London. It is also hugely important to the Jewish Community. For more than 300 years Bevis Marks has continued to function as house of worship and is without question the most prestigious venue in the UK for ceremonies and gatherings of the Jewish Community.

I consider it completely inappropriate and a serious overdevelopment of the adjacent sites to allow a 51 story skyscraper to be built alongside it. The proposed development at Bury House will overshadow this historic building, blocking the entry of light into the synagogue, would turn the adjacent pathway into a noisy thoroughfare, and in all respects detract from the beauty and magnificence of this treasured building, so resonant with the rich history of Anglo-Jewry.

Yours faithfully

Alan Bekhor
Member of the Spanish and Portuguese Jews'Congregation

Registered office address: British Marine Limited, 5th Floor Millbank Tower, 21-24 Millbank, London, SW1P 4QP. Registered in England, registration number 03821514.

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From: [redacted]
To: [redacted]nts
Cc:
Subject: 20/00848/FULEIA
Date: 27 December 2020 17:27:48

I strongly object to this proposal
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Leon Nahon
Garden Cottage
Garden Road
London
NW8 9PR

From: [redacted]
To: PLN - Comments
Cc: [redacted]
Subject: reference 20/00848/FULEIA.
Date: 28 December 2020 12:25:20

Objections to the above project:

The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

29 Clifton Hill, london NW8 0QE

Kind regards, Philip

Philip Meir
Director
AJIS Capital
www.ajiscapital.com

AJIS Capital Limited

From: [redacted]
To: PLN - Comments
Subject: Reference: 20/00848/FULEIA.
Date: 31 December 2020 18:36:43

We strongly object to the proposal to create a huge new building close to Bevis Marks Synagogue. Our reasons are similar to those you will have received from others, as follows.

The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Joyce and Lucien Gubbay
26 Linden Lea
London N2 0RG

From: [redacted]
To: PLN - Comments
Subject: Fwd: Reference 20/00848/FULEIA
Date: 31 December 2020 12:51:51

I strongly object to this proposal.
The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

20 Woodstock Road,
London NW11 8ER

Mr Leslie Morgan OBE DL
Representative Deputy Lieutenant for The London Borough of Tower Hamlets

www.greaterlondonlieutenancy.com

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From: [redacted]
To: PLN - Comments
Subject: Re: PLANNING OBJECTION - 31 Bury Street - Ref: 20/00848/FULEIA ** with address - my error, apologies **
Date: 31 December 2020 16:05:08

To whom it may concern,

Ref: 20/00848/FULEIA

Please accept this email as a formal objection to the development at 31 Bury Street.

My comments mirror those already filed by others to your planning department, namely:

· The unique history of Bevis Marks synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is a Grade 1 Listed Building and the oldest Synagogue in the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith.
· The sheer size of the planned building will have a hugely detrimental impact. The synagogue will lose much of its sunlight and daylight both to the courtyard and inside in the synagogue. This will negatively impact on the ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, not only blocking out any sky around the synagogue but also unattractive to the eye.
· The proposal creates an unnecessary shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house. There is no shortage of coffee shops and small outlets in this area. There is NO need for any more. There are already too many.
- Such a development is not necessary in the City. There are already many new developments in the neighbourhood. They are already blocking out light, making wind tunnels, adding shadows during the day and providing excess office accomodation over and above the need. Please learn from what has already been happening in the City. It is being overdeveloped and becoming aesthetically displeasing.

Note: Should you put objections on the internet - PLEASE PUT MINE AS ANONYMOUS. I DO NOT WANT MY NAME MADE PUBLIC. THANK YOU.

Best wishes and looking forward to hearing that sense will have taken priority over the venality of property developers in the City,
Rachel Kolsky

Rachel Kolsky
16 Ingram Road
London N2 9QA

From:	Barbara
To:	PLN - Comments
Subject:	Proposed Developments by Bevis Marks Synagogue - 20/00848/FULEIA.
Date:	13 January 2021 13:34:17

Dear Sir/Madam,

I am appalled to hear about the proposed developments that will so terribly affect this beautiful, historical and regularly used synagogue.

Please reconsider and show respect for the Jewish Community and the Synagogue. It means so much to so many Jews, not just the ones who use it on a regular basis. It would have a devastating effect on them.

The following must be considered to ensure that the developments do not go ahead in the current proposed locations.

· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the

I beg you not to destroy this beautiful Synagogue with these horrendous plans.

Thank you.

Barbara Graham Collier

Sent from Mail for Windows 10

From: [redacted]
To: PLN - Comments
Subject: reference 20/00848/FULEIA Bevis Marks Synagogue
Date: 29 December 2020 15:42:48
Importance: High

Dear Sirs/Madam

· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
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Sincerely

Dorothy Lampert (Mrs)
Member of Bevis Marks Synagogue
Personal Address
2 The Lanterns
120B Avondale Road
Bromley BR1 4EY

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniel Zubaida
Address: 71A Fitzjohn's Avenue LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This is another outrageous application and the simplest objection is that this would never be allowed to be contemplated around St Paul's. The synagogue is over 300 years old and would have it's sunlight completely blocked out if this and others were to be built.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr GARY KENTON
Address: 3 PEMBROKE GARDENS HOVE

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:as a regular visitor to Bevis Marks Synangogue I am apallled at the proposals for 31 Bury StreetMy reasons for objections are as follows:
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it

when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

From:	[redacted]
To:	PLN - Comments
Subject:	31 Bury Street 51 storey building proposal dwarfing adjacent Bevis Marks Synagogue OBJECTION REGISTERED
Date:	15 January 2021 12:57:44

Dear Sirs, further to my comments , please find my strong list of objections below :

· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Kind regards

Gary & Stephanie Kenton

[redacted]

Begum, Shupi

From: Katy Barron [redacted]
Sent: 30 January 2021 18:09
To: PLN - Comments
Subject: Re: Objection to 20/00848/FULEIA.

full address:
Katy Barron
Flat 5
35 Belsize Park
London
NW3 4DY
Please register my objection.
Thank you

On Thu, Jan 28, 2021 at 3:06 PM PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

> Hello,
>
> Thank you for your comments on the above Planning Application, please note we require both a full address.
>
> Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.
>
> Please visit our webpage for further information:
>
> https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx
>
> Kind regards,
>
> Rianne
>
> **From:** Katy Barron [redacted]
> **Sent:** 13 January 2021 21:53
> **To:** PLN - Comments <PLNComments@cityoflondon.gov.uk>
> **Subject:** Objection to 20/00848/FULEIA.

I am writing to object to the application for planning permission for 31 Bury Street (Bury House) which will result in huge detrimental effects to the hugely significant heritage site that is Bevis Marks Synagogue. The synagogue is he only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. It will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on the community's ability to pray and to celebrate weddings and other events of national importance.
The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Please confirm receipt of this objection and that I am not too late in writing.

Thank you,

Katy Barron, London

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From: [redacted]
To: PLN - Comments
Subject: Fwd: Bevis Marks Synagogue - Planning application Objection 20/00848/
Date: 07 January 2021 13:26:10

Apologies, I seem to have used an incomplete reference. It is:

20/00848/FULEIA

Thanks,
Annette Lawson

Begin forwarded message:

From: Annette Lawson [redacted]
Subject: Bevis Marks Synagogue - Planning application Objection 20/00848/
Date: 7 January 2021 at 12:56:39 GMT
To: PLNComments@cityoflondon.gov.uk
Cc: Annette American [redacted]

Your reference: 20/00848/FULEIA

This is an objection to the planning application for a building right on top of the ancient Bevis Marks Synagogue in the City of London. Your web form would not work and despite being completed showed only as an error when submitted and I tried to register. Hence my use of this email,

Best wishes,

Dr Annette Lawson
5 Carriage House
88 Randolph Avenue
London W9 1BG

[redacted]

[redacted]

Emails: [redacted]

[redacted]

I am a British Jewish woman with Sephardi/Ashkenazi heritage. I am appalled at the idea of this proposed building that will damage the importance historically and as a sacred place by loss of light and other impacts. I support the objections of the Chair of the synagogue, all who worship there and care for the heritage and its vital

history, and its continued religious functioning:
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

[The link to object can be found here
https://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=makeComment&keyVal=QJ0RIOFH0QH00
Objections can also be emailed to the following email address
PLNComments@cityoflondon.gov.uk

If emailed, please use the following reference 20/00848/FULEIA]

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Joseph Solomons
Address: 4 Teal Close Braintree

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I am objecting to the proposed plans as this synagogue has been in my family for generations. I have been going to Bevis Mark's since birth and my family have strong connections here. I had my Bar mitzvah there when I was 13 and feel this would be a great shame to plunge my synagogue into darkness. Please do no let this happen as this would be a great shame to the Jewish community.

Adjei, William

From: PLN - Comments
Subject: FW: Objection to Planning Application 20/00848/FULEIA

Dear Mr Richards

I am writing to object to the new planning application 20/00848/FULEIA for the proposed tower block at 31 Bury Street. Several of these points are the same as the planning application 18/00305/FULMAJ for the proposed tower block at 33 Creechurch Lane (see email below from 21 Nov).

To supplement my previous objection, I have the following additional comments:

- As well as it being forbidden to use a microphone, there are also several sections of the service that involve silent meditation. Increased noise from pedestrian traffic and cyclists would interrupt these moments of silent meditation.
- Rabbi Morris has also released a new video regarding the impact of the proposed tower block on the Synagogue's lighting: https://youtu.be/196tIIzTb2w. As Bevis Marks Synagogue is Grade 1 listed, it's environment should be preserved including the natural light on the eastern side and to it's courtyard.
- As well as being used for religious worship, "civil services have been held at Bevis Marks for many occasionsincluding the 50th anniversary of the Council of Christians and Jews, the 50th Anniversary of VE Day and the first visit to Britain of a president of Israel ... (in 1984 for the bicentenary of the birth of Sir Moses Montefiore and in 1965 for the death of Sir Winston Churchill."
  see https://www.sephardi.org.uk/bevis-marks/history-design/. The building works and subsequent tower blocks will impact on such future events.

Best regards

Jonathan Ben Garcia

Flat 6, Heathway Court
Finchley Road
LONDON NW3 7TS

From: [redacted]
To: PLN - Comments
Subject: Re 31 Bury Street planning permission
Date: 28 December 2020 16:58:34

Dear Sirs

For the third time, I feel forced to write to you to object to the plans of the above for their proposal to build a 51 storey building next door to our historic and beloved Bevis Marks synagogue, the Cathedral Synagogue of the United Kingdom. I cannot begin to credit that you would give this proposed development any credence. The lack of light as a consequence of such mammoth buildings, together with the planned shopping arcade and accompanying traffic, would render any religious worship impossible.
I beseech you to totally reject this proposal.

Yours sincerely

Barbara Simon
Chairman, Lauderdale Synagogue
S&P Sephardi Community

8B Garlinge Road
London
NW2 3TR

From: [redacted]
To: PLN - Comments
Date: 29 December 2020 10:40:13

Dear Madam,
Ref. 20/00848/FULEIA

In addition to the building application at 33 Creechurch Lane I note that you have been asked to consider a further proposal at 31 Bury Street for a 51-storey extension.

Included would be a shopping mall in Heneage Lane with parking for over 200 cycles. This would result in a busy thoroughfare impacting on the eastern wall of our synagogue which also comprises the Rabbi's home. Perhaps you are unaware that we pray towards the east so the result for us would be catastrophic.

Our courtyard is used for many ceremonies which would be horribly overshadowed. If either of the above applications were granted we would be crushed between both in darkness and oblivion. We have a statutory right to light.

After your own magnificent St. Paul's we are the only other religion represented in the City of London. As a fully qualified City Guide since 2004 I can vouchsafe for the interest shown in our building by clients worldwide, not only Jews Our survival in the face of adversity is reflected here and gives hope to others of various backgrounds who are similarly placed for whatever reason.

Cromwell, as I'm sure you know, brought us back to be a benefit to London which I believe we have been . It would be a poor return on our efforts if we were now to be shunted aside. I mention the Bloomberg contribution with the Temple of Mithras, two Lord Mayors and many working in the financial sector for which London is renowned.

We ask nothing but to continue in peace. Is this to be denied us?

Adele Leffman (Mrs)

25 Wharfdale Road
London
N1 9SD

Adjei, William

From: PLN - Comments
Subject: FW: Application Consultation (20/00848/FULEIA)

Dear Sir,
Ref. 20/00848/FULEIA

My objections to the proposed building works at Bury House, 31 Bury Street, EC3A 5AR are as follows.

Excavation for basement extensions would create a danger to the surrounding structures.

The upper stories for office use are not necessary as even before the current lockdowns there was empty office space in the City. Now, there will certainly be some continuity in WFH which will render more office space a bad investment.

Within a brief walk there are already many cafes, takeaway bars and sandwich delivery outlets for workers in the area. As it is not notable for nightlife, restaurants are not needed and would be killed by the lack of parking in the area. Retail outlets would suffer the same fate.

Aldgate Square offers excellent community space in addition to several smaller squares in the immediate neighbourhood. No more is needed.

Worst of all, the building work would create at least 2 years' disruption for an almost worthless result. The money could be better spent.

Our synagogue, the most important religious building in the City after St. Paul's, would be permanently overlooked and cast into dark shadow making our courtyard unusable for various ceremonies we are in the habit of celebrating there. There would be a total lack of privacy for the Rabbi and his family and their house would be in the dark, without the statutory right-to-light. Work is under way to update our premises, some of it generously funded by yourselves and the remainder the result of considerable time and effort by our committee to raise money in these difficult times.

May I suggest that now is a good moment to take a step back and look at the desecration brought by uncontrolled expansion to the London we all loved. It was once a most elegant city with a lovely skyline. Sunlight brightened the streets and cheered us on our way. Now the unconsidered skyscrapers cast gloom and give the impression of a giant having flung his unwanted lego pieces down on us. No-one has ever emulated Wren in making a coherent plan for the City. Much has been done to save Paris where 18 century buildings line the Seine and construction higher than 4 storeys is forbidden within the walls.

Please do your bit to conserve what is left of our London. In particular, I beg you not to allow indiscriminate and unnecessary expansion to blot out what ought to be treasured, respected and conserved.

Yours

Adele Leffman

25 Wharfdale Road
London
N1 9SD

From: [redacted]
To: PLN - Comments
Subject: Bury House - 20/00848/FULEIA
Date: 29 December 2020 16:50:42

I wish to oppose the granting of planning permission for the development of 31 Bury Street, which would have a catastrophic effect on the synagogue at Bevis Marks.

I am a member of the S&P congregation and attend Bevis Marks synagogue, although I live very far away (in Oxford). Bevis Marks has a particular meaning for me (my wife and I were married there), but that is not the reason that I oppose this application.

Bevis Marks is central to the life and the history of Jews in England, and it would be intolerably painful to the Jewish community to have it overshadowed by the proposed building. More than that, the architecture and historic importance of the synagogue are of great significance to the community as a whole, well beyond those of the Jewish faith. It's not for nothing that Bevis Marks is Grade One-Listed. Apart from the many practical problems that have been mentioned (the permanent loss of light, the shopping arcade, the extensive bicycle traffic etc.) the proposed building would suffocate the historic synagogue building and its beautiful courtyard, and would destroy its context.

I hope this wholly inappropriate building will not be allowed to go ahead.

Michael Yudkin,

12 Lonsdale Road, Oxford,

OX2 7EW

From: [redacted]
To: PLN - Comments
Subject: 20/00848/FULEIA
Date: 04 January 2021 12:22:06

Dear Bhakti Depala,

I have a close association to Bevis Marks as I was married there and have regularly attended services at the synagogue.

I wish to object strongly to the proposed development at 31 Bury street.

Bevis Marks is a unique building, being the oldest working synagogue in the UK and the Cathedral Synagogue of the United Kingdom.

The massive size of the development will overwhelm the synagogue and block out the sky.

The cumulative effect of this and other developments will be to block out the sun from 9AM to 4PM which will have a very detrimental impact on services including weddings - Bevis Marks is renown for its wonderful stained glass windows which need sunlight to be viewed.

The proposed shopping arcade on Heneage Lane which is a narrow street. This wil cause noise nuisance inside the synagogue as well as increase air pollution due to greater amounts of traffic and traffic jams.

Please reject this inappropriate development.

Best regards,

Paul Arwas
57 Pottery Lane
London
W11 4LY

This email has been scanned by BullGuard antivirus protection.
For more info visit www.bullguard.com

Begum, Shupi

From: Angela Rubens [redacted]
Sent: 05 January 2021 10:25
To: PLN - Comments
Subject: Re: 31 Bury StreetBury House)

On 4 Jan 2021, at 12:48, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

Hello,

Thank you for your comments on the above Planning Application, please note we require your address.
Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:
https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx

Kind regards,
William

I have now added my address.

From: Angela Rubens [redacted]
Sent: 29 December 2020 10:41
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 31 Bury StreetBury House)

20 Westfield ,!5 Kidderpore Avenue , London NW3 7 SF

Dear Sirs

I would like to register my objections to the proposed development at 31 Bury Street (Bury House). It is going to have a detrimental affect on Bevis Marls Synagogue which is the Cathedral Synagogue of the UK. It is of great historical interest and visited by people from far and wide. It is also the only

ISynagogue in the city of London. The proposed development will dwarf Bevis Marks will prevent the sun from giving light to the synagogue and the courtyard for most of the day.There will be an increase of traffic up and down Heneage lane which will cause an increase in noise which will disturb the services in the Synagogue.The view from inside the Synagogue will be of towering buildings only. I hope that you will see fit to review the proposed development. 20 Westfield,!5 Kidderpore Avenue London NW3 7SF

Yours truly

Angela Rubens. (angela@rubens.org)

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Begum, Shupi

From: Gusti Martin [redacted]
Sent: 04 January 2021 18:53
To: PLN - Comments
Subject: Objection to building Bury Street. E,1.

Please note our address is as follows

Mr M Martin
Mrs. Gusti Martin
16, Paragon Court
129, Holders Hill Road
London NW4 1LH

Hope this what you need
G. Martin (Mrs)

Begum, Shupi

From: Gusti Martin [redacted]
Sent: 30 December 2020 11:38
To: PLN - Comments
Subject: Objection Bury House Building

As a regular member of Bevis Marks Synagogue and wife of the choir master, I must object strongly that you have another request for a such an enormous building be to be built which Is totally unacceptable Bevis Marks, is the only non-Christian place on worship in the city, and is the Cathedral Synagogue of the United Kingdom, which is most important to the Jewish faith.
The sheer size of the building will have a hugely detrimental effect on the day light that will be lost if this building is allowed to be built.
This ancient lovely synagogue will lose all the atmosphere that has been created by worshippers for over 319 years and we strongly object to an enormous building being erected in Bury Street.
Hoping this will influence your judgement re this enormous project Your faithfully Gusti Martin

From: [redacted]
To: PLN - Comments
Subject: 20/00848/FULEIA.
Date: 07 January 2021 12:47:50

Dear Sir/Madam

I seem to be struggling with your website sever please note the following objection.

The proposed development detrimentally impacts on the setting of listed buildings and the nature of a conservation area.

In particular the effects of loss of daylight, increased noise and loss of amenity to a listed building of national and local significance at Bevis Marks.

The propose use (retail/cafe), height and form will impact on the future use of the synagogue for daily religious worship and ceremonial use.

Best regards

Darren Isaacs

139 Friern Park, London, N12 9LR

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Leslie Morgan
Address: 20 Woodstock Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

From: [redacted]
Subject: Bevis Marks Synagogue
Date: 07 January 2021 11:22:26

Mesdames

This building is part of British and Jewish Heritage.

Please preserve it.

Kind regards

Richard Cohen

61 Traps Hill
Loughton
IG10 1TD

Comments on Planning Application Ref: 20/00848/FULEIA
Bury House, 31 Bury Street, London EC3A 5AR Ronald Jaffa

Comments by
Ronald Jaffa
66 Rotherwick Road
London, NW11 7DB

1. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on the relevant planning authority to consider the impact on listed buildings and their settings.

2. The National Policy Framework (2019) sets out the importance of protecting and enhancing the historic environment. At section 16 paragraph 133 it says that local planning authorities should give great weight to preserving the heritage assets significance. In paragraph 194 it says that in relation to Grade I and Grade II* listed heritage buildings substantial harm should be wholly exceptional.

3. It is submitted that the positioning of the proposed extremely tall and wide block will not preserve heritage assets and will cause substantial harm.

Objection 1

4. **The wider impact will be to blot out various long views of historic City of London and adversely affect the wider setting of this proposal. The harm caused will be substantial. Others, in particular Consultee Comment from Historic England, have described the adverse effect as a "*high level of harm*".**

Objection 2

5. **The proposed building on its own will cause substantial harm to Bevis Marks Synagogue [erected 1699-1701] a Grade I listed heritage building. It is listed as it is of "exceptional historical interest." A vital ingredient of such a building is its setting.**

   The synagogue is the only non-Christian place of worship in the City of London. It is the most iconic synagogue in the UK and has been in continuous use since it was built. The proposed building would be about 75 metres to the south of the synagogue.

   Types of harm that would be caused:-

5.1 Sunlight and overshadowing - At about 198 metres high and many metres across it will literally blot out the sun and light from late morning to late afternoon. Everyone knows the impact on a building of loss of sunlight and daylight. It will adversely affect all those who use the building.

The applicant has mainly provided plans with satellite prospective made coloured representation of the building they hope to build. Although there are two images of the Synagogue there is no image provided of the reality of what this new building will mean to the Synagogue.

The planning application avers that: "No significant effects have been identified as being likely ….. in respect of ….. Sunlight, Overshadowing," [Chapter 14.8]

I would ask that those making any planning decision go and visit the Synagogue and stand in the courtyard and Heneage Lane and look towards the current building. That building is roughly the height of the "mezzanine floor' of the application. That is about 42 metres high. Now add the additional 48 storeys on top which makes an extra 156 metres. The visual impact would be enormous. The sunlight and overshadowing from the proposed building, which is south of the Synagogue, will be obvious. The Council's legal responsibility is to give greater weight to preserving this Grade I building.

5.2 Potential for heave and lack of sunlight and overshadowing- The building has for 320 years been used to natural sun and light. The change of conditions leading to the ground becoming wetter may lead to expansion of the ground causing heave.

5.3 Setting - This application by itself should be refused on the basis of the sunlight and overshadowing. However, the harm caused must be considered in the context of other applications to build tall buildings close to Bevis Marks Synagogue**.** The affect of more than one large buildings on sun and light will be substantial.

5.4 Noise of people coming and going from the proposed building from early morning to late at night. In addition to the historic merits of the fabric of the building this is a place of worship and a gathering place for non-religious events. Any such building and those that use it should be respected and cherished**.** The quiet enjoyment of the synagogue would be taken away. The holiest part of the synagogue is the part that abuts Heneage Lane. The Rabbi lives on Heneage Lane

The proposal will increase the numbers of people using the Lane.
Just two examples:-

(1) Current office space will increase from 3,259 to 25,460 square metres.
(2) Shopping arcade and restaurants space will be provided. Opening times will be 6 days a week until 2300.

Objection 3

6. **The applicant's Planning Statement, at paragraph 3.8, is wrong to suggest that there is an unmet demand for 25,000 square metres of office floorspace to meet the needs of "specifically small and medium sized enterprises" [SME]**.

The efficacy of this business model has the following problems;

(1) It relies on a time that was before Covid and before the Brexit agreement made in the last few days of 2020. The latter did not contain the expected 'level playing field' agreement for financial services.

Even pre-Covid there was a change away from office space to apartments. I know that from my experience of owning an office building beside Gray's Inn. In the years from about 2013 office buildings in my area were turned into living spaces. Now no-one knows what the future may hold but it is very likely that the methods of working will be different and the need for skyscrapers providing office and shop space will be diminished.

(2) As I write this on 6 January 2021 there are available many small and medium business rental spaces in the City of London. Many are modern and of the sizes suggested in the application. They are just as well placed to provide services to larger companies. Some examples can be found at:- workspace.co.uk and regus.com. Another example is the large firm of financial managers I deal with have very large offices near Moorgate station. Their entire workforce have been working from home since last March. Their offices can be changed easily to SME use.

From my experience, as a legal professional, from about 2010 I worked mostly from my study at home even though we had an office beside Gray's Inn. I used various video chat companies and conference calling. Most of my face-to-face meetings with larger companies were, when necessary, at their City premises.

Many cities round the world are currently reviewing the type and method of working arrangements and even New York is now turning offices into apartments. City of London have granted planning permission to large developments of what will be offices.

At this time, it would be a brave step to grant planning permission for more of the same as opposed to preserving heritage assets.

Ronald Jaffa
6 January 2021

From: [redacted]
To: PLN - Comments
Subject: 20/00848/FULEIA 33 Creechurch Lane
Date: 08 January 2021 08:44:16

Objections

Dear Planning Department of the City of London,
I strongly object to any more ultra-Highrise buildings being permitted to be built in the City of London, particularly the above proposal at 33 Creechurch Lane. The nearby historic buildings like Bevis Marks synagogue and some residential houses would be rendered unusable and that is totally unforgivable!

Please limit the height of any reconstruction to maximally 20 metres height.
Many thanks, yours
Ulla Thiessen MITG DGA BGTG APTG
41 St. Gabriels Rd, London NW2 4DT

--
null

Dr. Everett M. Jacobs 64 Dunkeld Road, Sheffield S11 9HP

8 March 2021

Planning Committee
City of London
PLNComments@cityoflondon.gov.uk

Dear Members of the Committee,

Re: 20/000848/FULEIA, 31 Bury Street, EC3A 5AR

I write to you about the proposed new building next to Bevis Marks Synagogue. My wife's family have been members of Bevis Marks since the beginnings of the Congregation in the 1650s. We in fact were married there in 1982 and remain members though living in Sheffield. You can understand that I write with considerable feeling.

The proposed building is inappropriate and not in keeping with the area. You would certainly not allow such a building to be built just a few yards from St Paul's Cathedral or Westminster Abbey. Nor should you allow it next to what has been called the 'Cathedral Synagogue' of British Jewry.

Bevis Marks is a beautiful Grade I listed building, and its architectural context and aesthetic qualities should not be destroyed by what may be called cultural barbarism. Bevis Marks' architect was clearly influenced by his contemporary Sir Christopher Wren with the large clear glass windows placed around the building. The proposed new structure will rob Bevis Marks of most of its daylight.

The objections of Prince Charles to the then-proposed extension to the National Gallery (he called it a carbuncle) are equally valid for the proposed building here.

I sincerely hope that you will reject the above planning application.

Yours faithfully,

Everett M. Jacobs

From: [redacted]
To: PLN - Comments
Subject: ref 20/00848/FULEIA
Date: 08 January 2021 18:11:15

Dear Sirs/Mesdames,

My wife's family have been members of Bevis Marks since it was founded over 350 years ago. Although we live in Sheffield, we are still members, and were married in the synagogue 38 years ago. We are very much attached to Bevis Marks, and strongly object to the proposed development.

The proposed development at 31 Bury Street is far out of proportion for the location, and not at all in keeping with its surroundings. No one would dream of erecting such a huge building to overshadow St. Paul's Cathedral or Westminster Abbey. Bevis Marks holds the same place in the minds of British Jewry, as the Cathedral synagogue of Britain.

You may not know that until recently Bevis Marks did not have electricity. Services were held in natural light or by candle light. To see the interior flooded by natural light was part of the great charm of this ancient building. I would say that the inspiration for Bevis Marks's great windows was Sir Christopher Wren and the churches built and inspired by him after the Great Fire. The proposed development would rob Bevis Marks of light and plunge it into a new darkness. This would be cultural vandalism, added to the proposed development's aesthetic vandalism.

We sincerely hope you will reject the planning application.

Yours sincerely,

Dr. Everett M. Jacobs

64 Dunkeld Road
Sheffield S11 9HP
[redacted]

From: [redacted]
To: PLN - Comments
Subject: Re: Planning Application 20/00848/FULEIA - Objection
Date: 08 January 2021 12:21:43

Hello

My address is:

1 Almond Way
Borehamwood
Hertfordshire
WD6 1HF

Kind Regards

Daniel

Sent from my iPhone

> On 8 Jan 2021, at 12:03, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:
>
> Hello,
>
> Thank you for your comments on the above Planning Application, please note we require your address.
> Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.
> Please visit our webpage for further information:
> https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx
> Kind Regards
>
> Rianne
>
> ---
>
> **From:** Daniel Sasto [redacted]
> **Sent:** 08 January 2021 10:56
> **To:** PLN - Comments <PLNComments@cityoflondon.gov.uk>
> **Subject:** Planning Application 20/00848/FULEIA - Objection
>
> The proposed development is overbearing and will have a vastly detrimental effect to Bevis Marks Synagogue, which is the 'jewel in the crown' of the Jewish

community (indeed my wife's family tree traces all the way back to when the synagogue first opened).

I cannot begin to imagine what sort of uproar would (correctly) arise if such a development were proposed to be immediately adjoining St Paul's Cathedral or Westminster Abbey for example, and therefore it should not be any different for the oldest functioning synagogue in the UK.

It will greatly hinder the congregations ability to pray and celebrate other religious and communal occasions through the loss of natural sunlight and daylight as well as an increase in noise and traffic up and down Heneage Lane.

I urge that this application be rejected

Yours sincerely

Daniel Sasto

Sent from my iPhone

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From: [redacted]
To: PLN - Comments
Subject: Re: Objection to Planning Application 20/00848/FULEIA
Date: 08 January 2021 16:08:28

Dear Rianne

Thank you for your email.
I am resending my objections and have included my address at the end of the email. I am unable to file my objections on you website.

>
> Subject: Objection to Planning Application 20/00848/FULEIA
>
> Dear Sir/Madam
> I strongly object to the proposed building of Bury house, 31 Bury Street, London EC3A 5AR
>
> My objections are as follows:
> 1. The building will have a severely detrimental impact on the Bevis Marks synagogue in terms of loss of light, increased noise and the negative aesthetic impact
> 2. It is questionable that there a need for more office space in London. Following the pandemic it is clear that many more people will be working from home and they will be vacant office accommodation in the city of London.
> 3. A building of this height in limited space will create windtunnels and will dominate other local buildings apart from the historical synagogue.
>
> In conclusion I object because this is a totally inappropriate for the position, it will be detrimental for the buildings in close proximity and is unnecessary.
>
> Yours faithfully
> Ina Machen
Ashdown
Newlands Close West
Hitchin
SG4 9BA

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Michele Bentata
Address: 17 South Lodge London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed development at 31 Bury Street , City of London,does not respect the importance and status of the synagogue of Bevis Marks, this 1701 Grade 1 Building, part of our collective British Heritage. This development will dominate the Bevis Mark Synagogue - the consequent footfall and noise will severely detract from the quiet atmosphere and character of the synagogue & its precinct area, not to mention the huge detrimental impact on its architecture. This building is special, not only for the Jewish Community, but also historically in Britain. It is a symbol of British Jews and their history and relationship to the UK.
As a part of our British Heritage, it needs to be given the status and respect it deserves as the Cathedral Synagogue of Great Britain, patronised by many from Samuel Pepys to Prince Charles.

I have walked the City and visited some of the many churches in the Square Mile, many with their beautiful stained glass windows restored, some redesigned - with love, respect - and funds. We

are only asking for one classic eighteenth century style building to be given similar respect, so that it can be bathed in the atmosphere of light and spirituality which are literally an integral part of the original design - the light available to the architecture, most particularly in its interior, is Essential, absolutely essential, and only with the light does the architecture and soul of the place work as it should, as any visitor could corroborate.
Without its light this will become a gloomy place indeed , one to which no one will want to go. It is a shame.
Please think carefully about the above
Michele Bentata

From: [redacted]
To: [redacted]
Subject: Re: Bevis Marks Synagogue
Date: 08 January 2021 15:08:43

My details are as follows:

Mrs B Averberg
14a Queensborough Court
North Circular Road
London N3 3JP

Sent from my iPad

> On 8 Jan 2021, at 12:02, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:
>
> Hello,
>
> Thank you for your comments on the above Planning Application, please note we require your address.
> Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.
>
> Please visit our webpage for further information:
> https://gb01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.cityoflondon.gov.uk%2Fservices%2Fenvironment-and-planning%2Fplanning%2Fplanning-applications%2Fview-planning-applications%2FPages%2Fdefault.aspx&data=04%7C01%7C%7C1467a5f0180344e49f32408d8b3e74899%7C9fe658cdb3cd405e85193222fa96be8%7C1%7C0%7C637457153218121664%7C Unknown%7CTWFpbGZzb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6IkIlaWwiLCJXVCI6Mnf%3D%7C1000&sdata=t5vNkRxSpAlI%2F3wt9jUDwWHM9Aamo9369eTbi7S1amo%3D&reserved=0
>
> Kind Regards
>
> Rianne
>
> ----Original Message----
> From: Barbara Averberg
> Sent: 07 January 2021 19:19
> To: PLN - Comments
<PLNComments@cityoflondon.gov.uk>
> Subject: Bevis Marks Synagogue
> I've been informed that there are to be large buildings erected extremely close to the Bevis Marks Synagogue. I would like to voice my objection as the synagogue will be squashed and overshadowed by the new buildings which would, no doubt, have a bad effect on the clergy and congregation. This historical synagogue would probably end up closing down as it would lose it's congregation because of it's poor situation.
>
> Sent from my iPhone
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From: [redacted]
To: PLN - Comments
Subject: Bevis Marks
Date: 08 January 2021 13:41:38

Raymond Silver 21 Wolmer gardens Edgware HA8 8PY. The proposed development is not appropriate being so close to a grade 1 listed building.
Sent from my iPad

From: [redacted]
To: PLN - Comments
Subject: Re: 20/00848/FULEIA
Date: 08 January 2021 15:05:18

Dear sir/madam,

I have just learned of plans to have two tall buildings boxing in Bevis Marks Synagogue. This will completely deprive it of light and make it very noisy.

Bevis Marks is one of the most important heritage sites left in the City. Considered by many in the Jewish community to be the birthplace of Judaism in the UK. Having been a Synagogue in continuous worship since 1701 is unique across Europe. Speaking as a Christian, we can afford to lose churches in London as we have so many which are barely used. However Bevis Marks is unique and must be preserved.

Regards

Rhys Thomas
www.rhysthomastours.com
Blue Badge Guide and City of London Guide
Flat 52 Kiln Court
Newell Street
Limehouse
London
E14 7JP

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: 08 January 2021 12:02
To: Rhys Alexander Hugh Thomas <rhys.alexander@hotmail.co.uk>
Subject: RE: 20/00848/FULEIA

Hello,

Thank you for your comments on the above Planning Application, please note we require your address.
Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.
Please visit our webpage for further information:
https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx
Kind Regards

Rianne

From: Rhys Alexander Hugh Thomas
Sent: 08 January 2021 10:23
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: 20/00848/FULEIA

Dear sir/madam,

I have just learned of plans to have two tall buildings boxing in Bevis Marks Synagogue. This will completely deprive it of light and make it very noisy.

Bevis Marks is one of the most important heritage sites left in the City. Considered by many in the Jewish community to be the birthplace of Judaism in the UK. Having been a Synagogue in continuous worship since 1701 is unique across Europe. Speaking as a Christian, we can afford to lose churches in London as we have so many which are barely used. However Bevis Marks is unique and must be preserved.

Regards

Rhys Thomas
www.rhysthomastours.com
Blue Badge Guide and City of London Guide
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From: Riva Twersky
To: PLN - Comments
Subject: Re: Bevis Marks synagogue
Date: 09 January 2021 00:02:47

My name is Riva Twersky
Flat N 18 Templewood Avenue
London NW37XD
Regards

Sent from my iPad

> On 8 Jan 2021, at 11:59, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:
>
> Hello,
>
> Thank you for your comments on the above Planning Application, please note we require your address.
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>
> Kind Regards
>
> Rianne
>
> ----Original Message----
> From: Riva Twersky
> Sent: 06 January 2021 21:34
> To: PLN - Comments
<PLNComments@cityoflondon.gov.uk>
> Subject: Bevis Marks synagogue
> It is not just for the Jews,
> It is part of England history that the English people are so proud.
> Prince Charles who is involved on protecting England from being a New Dubai should be approached, I am sure he will act.
> Regards
> Riva Twersky
>
> Sent from my iPad
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From: [redacted]
To: PLN - Comments
Subject: Re: Reference 20/00848/FULEIA
Date: 13 January 2021 13:25:03

My address is
56 The Vineyard
Richmond TW10 6AT

Get Outlook for Android

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: Wednesday, January 13, 2021 1:23:53 PM
To: Miriam Kramer
Subject: RE: Reference 20/00848/FULEIA

Hello,

Thank you for your comments on the above Planning Application, please note we require your address.
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https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx

Kind Regards

Rianne

From: Miriam Kramer
Sent: 10 January 2021 18:08
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Reference 20/00848/FULEIA

To whom it may concern
Once again I must object to planning permission being given to a projected office building in the City. Some time ago I registered my views against the proposed building at 33 Creechurch Lane. This was largely because of the scale: it would overshadow Bevis Marks Synagogue, its historic neighbour, and also block a significant amount of daylight into the synagogue, its courtyard and the rabbi's home.
Now there is an application for an even higher building at 31 Bury Street. This is about twice as high as the one proposed in Creechurch Lane but will have much more than twice the negative impact. With both buildings there would be minimal daylight reaching Bevis

Marks Synagogue. There are large and beautiful historic glass windows which add considerably to the religious atmosphere of the building. There is a courtyard which would would now have barely any daylight at any time of the day - regardless of the time of year. Even more alarming is that the quiet Creechurch Lane would become a busy pedestrian and cycling thoroughfare. Due to significant bicycle sheds being part of each building the Lane would be used as access. In addition the Bury Street building will contain a mall with shops and restaurants; this means the resulting traffic and noise would detract greatly from the primary activity of Bevis Marks Synagogue, namely daily prayer.

As the oldest synagogue in the United Kingdom in continuous use and as a Grade 1 listed building Bevis Marks, its purpose for existing would be severely compromised by the construction of either, let alone both, of these buildings.

Finally, given the significantly reduced call for new office space during and following the Coronavirus pandemic these buildings would not be viable commercially but would be white elephants even before completion.

On these grounds there can be no justification for granting planning consent for either project.

Miriam Kramer

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From: [redacted]
To: PLN - Comments
Subject: Planning objection Ref: 20/00848/FULEIA
Date: 12 January 2021 13:35:55

Objection re 31 Bury Street

There is no need to increase Central London City office space. Patterns of work were changing even before Covid, such that more work hours were online either from home or from local rented office space. Covid has merely accelerated and exaggerated this trend. We have enough tall buildings in the City already. We don't need any more. What we need is more office space (but not high rise) in the suburbs either for rent or for purchase.

The area around the synagogue should be respected, in a similar manner to the precincts of St Paul's and its sightlines. Bevis Marks has a significance beyond the 'average' synagogue. Planning high rise (51 storeys) building close by in the manner of Bury House is thoughtless and unnecessary, and serves only to benefit the property developers.

Thank you
Neil Graham LLB FCA
(Retired City worker over 40 years)

From: [redacted]
To: PLN - Comments
Subject: Bevis Marks Synagogue
Date: 12 January 2021 11:06:15

Dear Sirs,
Whilst I am not a member of Bevis Marks Synagogue I have attended services there and visited on numerous occasions. It is an extraordinary historic and valuable building with a history going back over 300 years. In recent years it has become surrounded by highrise offices which have begun to overwhelm it and reduce access to light and air. The current plans to build yet another high rise nearby concern me greatly and I would earnestly ask you to ensure that any plans do not further threaten this fragile synagogue which apart from its religious value also acts as a great tourist attraction for the City of London.
Thank you for your kind consideration

Peter Briess
London NW3 7UE

From: [redacted]
To: PLN - Comments
Subject: 31 Bury St
Date: 12 January 2021 18:29:40

To whom it may concern,

I would like to object to the proposed building of a 51-storey building on this site as a) it overlooks the Bevis Marks Synagogue, and, like the other proposed development at 33 Creechurch Lane, will block out any remaining daylight and building work may also cause dangerous shifts in the foundations and walls of the synagogue which is the oldest place of Jewish worship in continuous use in Britain and of historic and architectural interest within and beyond the Jewish community.

In addition to objections on behalf of worshippers and tourists, it seems to me that after the fire in the Grenfell Tower, building so high also constitutes a danger to those who work inside it since in the event of a fire, they must choose between trying to get down 50 flights of stairs and taking the lift. Additionally, since many of us are now working from home at least for part of the week, London will need less, not more office space.

Yours sincerely,
Ruth Hart

From: [redacted]
Subject: Reference 20/00848/FULEIA
Date: 13 January 2021 16:09:32

Re: 20/00848/FULEIA. Planning application.

Sirs,

I would like to object to the planning application to get rid of old office buildings on the sites and replace them with high rise buildings on those two sites:

33, Creechurch Lane, EC3
To build a 21 story high building on this site instead of the building standing there at the moment, which is low rise.

And

Bury House,
31, Bury street, EC3
To build a 46 stories high building instead of the low rise building standing on the site at the moment.

Those two new building are standing in close proximity to Bevis Marks the oldest Synagogue in the U.K. It has the merit of being build in the Neoclassical style and opened in 1701. It has the merit of being a Grade I listed building and has been use continually since it was opened in 1701 by the Jewish community.

As tourist- guide in this building, I have noticed how much it is liked by many people regardless of country or religion. I guided tourists from Germany, Switzerland, France and Israel. The sense of proportion and restrained decoration and the ambient light in the space is spell binding and the fact that it is also a quiet place, after the bustle of noisy streets, adds to the sense of contemplative space for the healing of our souls.

I have read in some papers, that the pandemic we are suffering from at the moment, sent many city workers to work at home, for their health & safety. The shift to remote and and home-working would be embraced by many employers, even after covid-19 might be eradicated. This will decrease the demand for office spaces, especially in city centres and will push down costs of rents. I would suggest that the planning application -

for both office buildings - should be rejected for two reasons:

1) Bevis Marks has many large windows that offer much needed light penetration into the building. The two proposed building, will cast a big shadow not only on the courtyard where it stood for over 300 years, but also darken the wonderful interiors from 9:00 till 15:00 every day. Changing the ambiance of the building drastically. I mean not only spiritually but also as an aesthetic experience. This building should be continually be preserved as a National Treasure.

2) We will not need new more office spaces in the future, while more people will work from home in the future. Therefore building more and higher office building - as proposed - will only increase the amount of vacant office spaces.

Regards,

Daniella Kochavi
35,Summerfield avenue,
London NW6 6JT

From: [redacted]
Subject: Ref: 20/00848/FULEIA - Building Work at Bevis Marks
Date: 14 January 2021 10:45:39

I wish to add my voice to the many others who will complain about the building work to take place next to the Bevis Marks Synagogue.

The scale of building work proposed will have a hugely negative impact upon this beautiful, historic place of worship.

If a 51 storey building was proposed directly next to St. Paul's Cathedral, I cannot suspect that it would be approved by the City of London's planning department.

Yours sincerely

David Cohen

Sent from Mail for Windows 10

From: [redacted]
To: PLN - Comments
Subject: 20/00848/FULEIA. Development around Bevis Mark Synagogue
Date: 18 January 2021 11:34:03

Good morning

I would like to express my horror at the proposed new development around the Bevis Marks Synagogue. This is a very important historical building, representing the Jewish heritage in the City of London since it was built in 1701. The new buildings will completely change the tone and atmosphere of the area and totally obscure the light from it. The increased traffic will destroy the quietness.

Please can you reconsider the new development to respect the synagogue and its huge importance to the Jewish community in London.

Regards,
Catherine Hillman

From: [redacted]
To: PLN - Comments
Subject: Comments for Planning Application 20/00848/FULEIA
Date: 22 January 2021 18:33:44

Dear Sirs

Although I live in the north of England, I have visited the Bevis Marks Synagogue, both for religious reasons and cultural ones.

As such I strongly object to this application of for a 51 storey commercial building being constructed so near to Bevis Marks Synagogue, the impact of which would be disastrous for a place of worship, let alone the fact that this synagogue is an incredible heritage site, being the oldest synagogue in the UK. The mere thought of this seems unconscionable especially is this day and age.

I have visited a number of ancient synagogues throughout Europe, including those in Budapest, Venice, Berlin ,Prague and also on the Greek Islands.

It is wholly apparent that in all of those locations the community has sought to preserve and promote the importance of the original structure and presence of the building to keep alive the enormous history that such places of worship embody.

They go to the heart of understanding the growth of the community and its persecution through the centuries, and in my very respectful submission the buildings and immediate surrounds should be left as close to the original presentation as is possible.

Any development whether commercial or otherwise will deprive the entire community, and the world the opportunity to fully appreciate the significant history that this building represents.

It would appear that over and above these observations the plans for the proposed buildings will no doubt have a significant adverse effect on the very important aspect of natural light within the holy place of worship.

I would also expect that commercial developments nearby would dilute the history surrounding the building.

I understand that the Grade 1 listed synagogue was built in 1701, and represents the oldest synagogue in Great Britain, which has been providing uninterrupted worship since then.

I understand that the building withstood a terrorist attack in the 1990's and that there has been a constant drive to ensure that this historical synagogue is preserved as close to its original structure and purpose as possible.

I am gravely concerned that this planning application, if granted ,will create a very serious blight on the property, it will adversely effect its congregants from enjoying their place of worship, and it will irreversibly destroy the proud heritage and history that it currently represents.

My name is Sefton Kwasnik

My address is 1 Ashley Road Altrincham Cheshire

Thank you for registering my objections

Sefton Kwasnik

From: [redacted]
To: PLN - Comments
Subject: Proposed development 20/00848/FULEIA
Date: 23 January 2021 18:17:32

Dear sir,
I wish to add to the objections to these plans in the strongest terms.
The proposed development would have a catastrophic impact on the oldest Synagogue in England, Bevis Marks, which should be protected from any interference that would impact on this shining light to the congregants and community who continue to go from strength to strength even in these trying times.
I hope that the volume of objections will ensure that commonsense prevails and these massive inappropriate proposed developments are scrapped once and for all.

Yours faithfully

Philip B. Dante

Sent from my Galaxy

From: [redacted]
To: PLN - Comments
Subject: Planning 20/00848/FULEIA Proposed Bury House 31 Bury Street London EC3A 5AR
Date: 24 January 2021 18:01:41

From; Anthony Phillips, Old House Farm, Thakeham, West Sussex. RH20 3EH.

Objection re 20/00848/FULEIA Proposed Bury House 31 Bury Street London EC3A 5AR
This letter submitted by email in case my objection submitted electronically to the planning portal does not register correctly

I write to object to the planning proposals regarding 31 Bury Street because of the serious adverse impact for Bevis Marks Synagogue, which is a Grade 1 listed Building (Historic England Listing number 1064745).

Importance to the City and Jewish Community
This is the only non-Christian place of worship in the City of London and further is the Cathedral Synagogue of the UK. It is of great importance to the Jewish community and should not be allowed to be downgraded and affected adversely as proposed under these plans. It is Britain's oldest Synagogue and in recent years its importance has been demonstrated also by the award of a National Lottery grant for conservation work and to develop a religious and cultural centre in London.

Natural Light
The synagogue has always enjoyed natural light with large windows at its end and sides which are an important part of the environment for worship within the building, as well as being intrinsic design features of the interior. Its courtyard is an important part of the community life and has also always enjoyed natural light.
The proposed 31 Bury Street building is of a totally different scale and concept to the existing one whose height and style blends with its environment. Instead the proposed building is many times taller and includes a substantial part that would be 46 stories high. As a result, it would deprive Bevis Marks synagogue permanently of daylight except in the early morning and late afternoon, with consequential damaging impact on the ability of the building to provide its users with the natural light for their worship and cultural activities that they have enjoyed for more than 300 years. Artificial light cannot replace that.

Aesthetic Impact
From an aesthetic point of view the external effects would also be very damaging if the application were to be approved. The proposed new building will dominate the immediate area, blocking out the sky around the synagogue and completely overshadowing it from the outside approaches, as well as from the courtyard within. It would also change completely the longstanding quiet nature of the narrow Heneage Lane immediately adjacent to the eastern (prayer) wall of Bevis Marks Synagogue.

Traffic and Noise
The proposed new building would create a shopping arcade opening onto on Heneage Lane with parking for hundreds of bicycles, with a consequent huge increase in traffic through the lane. The Walls of the Synagogue are not thick, and this would result in intrusive noise inside the synagogue and in the Rabbi's house which is an integral part of the Bevis Marks building.

Importance of the Synagogue
The importance of this Grade 1 listed building transcends even its important role as the only non-Christian place of worship in the City of London and the Cathedral Synagogue of the United Kingdom. I therefore urge you to reject the proposed 31 Bury Street building

for you should not permit an important part of the history of our City to be ruined. Alternate proposals must be feasible which respect this building which remains in active use as well as being of such historical and spiritual importance to the City of London.

From: [redacted]
To: PLN - Comments
Subject: REF: 20/00848/FULEIA
Date: 25 January 2021 10:46:59

I am writing to register my objection to the proposed plans for 31 Bury Street (Bury House) as per this planning application.
Having been Buildings Committee Chairman of the S & P Sephardi Community at the time of the IRA bombs in 1992/3, I was responsible for overseeing the beautiful 320 year old building return to its previous glory. The massive 46 stories high proposed Bury House will substantially reduce the light and view of the sky in the Bevis Marks courtyard as well as reduce the light internally. The internal level of light is already low and cannot be improved with artificial and at the same time maintain the heritage of the place. If such plans were submitted for a site similarly close to St Pauls' Cathedral, it would be rejected. The significance of Bevis Marks Synagogue, the only non-Christian religious building in the square mile, is to people of the Jewish faith as St. Paul's is to Christians.
Thoughts on the future of skyscrapers need to be assessed in the light of Brexit and Covid 1 - I refer to recent articles in The Times, (21.11.2020), Estates Gazette (23.11.2020) and Evening Standard (22.01.2021).However, regardless of this, the Bevis Marks Synagogue needs to be safeguarded from such encroachment.

Barry C Musikant
2 Hillside Close
London NW8 0EF

From: [redacted]
To: PLN - Comments
Subject: 31 Bury Street (Bury House) - 20/00848/FULEIA
Date: 27 January 2021 11:10:20

Dear Sirs,

I would like to object to this proposed development for many reasons, the most obvious of which is the fact that Bevis Marks Synagogue would lose much of its sunlight for most of the day and this building would dominate the skyline to the west of the synagogue. The building would be the first thing people will see when entering the courtyard of the synagogue.

Bevis Marks Synagogue is a most important site for the Jewish religion, being the oldest synagogue in continuous worship in England, and probably in the world. It was opened in 1701 and is a Grade I listed building, the only non-Christian place of worship in the City of London.

The proposed development would mean increased footfall and cycle use in the very narrow Heneage Lane, which is adjacent to the Synagogue, with the accompanying increase in noise. This could be detrimental to services within the Synagogue and also to the Rabbi's house.

At present there is only a small number of disabled bays and these would be insufficient for such an enormous building, with the increased number of visitors. Where would you provide extra disabled bays?

Yours truly,

Carole Morganstein (Mrs.)
5 Defoe House
Barbican
London, EC2Y 8DN

OBJECTION TO 31 BURY STREET

I worship regularly at Bevis Marks Synagogue and Chair the Bevis Marks Heritage Foundation. The Synagogue has been my family's communal centre and place of worship since 1701. I object to this proposed development in the strongest possible terms on the following grounds.

Significance

The developer has failed to understand, appreciate and take into account the international significance of Bevis Marks Synagogue including its surrounds (see below). National, London and Local planning laws require planning applications to be considered in the context of the significance of the heritage site and its surrounds. They also require the cumulative effects of developments to be considered.

Bevis Marks Synagogue is much more significant than its Grade 1 listed status and is recognised as such by the National Lottery Heritage Fund, Historic England and many other bodies. Independent heritage experts, using the Historic England assessment frameworks, give the Synagogue and its surrounds an "Outstanding Significance" rating. For example

- It is the only non-Christian place of worship in the square mile
- It is considered to be the Cathedral Synagogue of UK jewry
- It is the place representing the readmission and tolerance of Jews in the UK following the expulsion of Jews in 1290
- It has and has always had very significant connections with and contributed to the City of London

And from 2022 this significance will be increased further by the opening of an amazing new Visitor Centre, supported by the National Lottery Heritage Fund. The Patron is HRH Prince Charles. It will attract 40,000 plus visitors a year as well as providing a major schools programme. The Centre will appeal to and attract visitors of all faiths and none. It adds another major cultural attraction to the City and will make a significant contribution to diversity, interfaith relations and tolerance.

Extracts From Mayor of London Plan

Some of the harms caused by this proposed huge development would alter the nature of this historic site forever. In law, given the outstanding significance of the Synagogue even small harms should be avoided. Please see the extracts here from the Mayor of London Plan followed by some of the harms arising from this proposed development.

Tall buildings:
proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area p149

Heritage:
Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets 'significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. p312

7.1.3 Ensuring the identification and sensitive management of London's heritage assets, in tandem with promotion of the highest standards of architecture, will be essential to maintaining the blend of old and new that contributes to the capital's unique character. London's heritage reflects the city's diversity, its people and their impact on its structure. When assessing the significance of heritage assets, it is important to appreciate the influence of past human cultural activity from all sections of London's diverse community. Every opportunity to

bring the story of London to people and improve the accessibility and maintenance of London's heritage should be exploited. Supporting infrastructure and visitor facilities may be required to improve access and enhance appreciation of London's heritage assets p317

Harms from this proposed development

The height and position of the tower will result in a significant loss of sunlight and daylight to the courtyard and inside the Synagogue itself. The cumulative effect of this proposal alongside other approved and proposed developments would mean we lose forever the unique ambiance, spiritual setting and utility that make Bevis Marks Synagogue so special. We cannot just add electric lighting to the Synagogue and stay true to this hardly altered heritage site. The light level will be below that needed to read our prayers at services and also below the level needed by older people (like myself) to read at all. The courtyard, an integral part of the Synagogue, will be in shadow and darkness damaging our outside religious ceremonies, communal gathering spaces and celebrations. Just imagine thousands of visitors arriving to look at the Synagogue from the outside in darkness when they should be able to admire the Wren period architecture in daylight. In addition, unlike today, the visitor will not see the sky - the skyline will be full of modern office blocks. What an awful impact on the new Visitor Centre, the community and the City of London.

There will be greatly increased noise levels in the historic Heneage Lane from the proposed retail arcade, cyclists and increased footfall. Many more pedestrians and cyclists will affect the peace and tranquility of our religious services and disturb the special atmosphere for our many visitors and school groups. This noise and disturbance will be heard through the Eastern wall of the Synagogue, where the ark housing our holy scrolls is located and where many of our religious ceremonials take place. Buildings in 1701 had no soundproofing. We will be able to hear everything!

Conclusion

These development proposals would not be allowed next to St Paul's Cathedral. Bevis Marks Synagogue needs to be afforded similar protections in keeping with its outstanding international significance. Please reject this and other proposals with similar impacts and provide long term protections in the new Local Plan 2036.

Howard Martin

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Raymond Sabbah
Address: 51A Clapham Common North Side London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The construction of a 40+ floors building near the Bevis Marks synaguogue will totally destroy the unique character of this London land mark. The Bevis Marks building will be in shadow all day long, with no direct sunshine. In addition it will create added noise and pedestrians and bicycles new and increased traffic. It is simply crazy and mad to build a skyscraper in this unique environment. The area and the synagogue must be preserved.

Begum, Shupi

From: Julia de Waal [redacted]
Sent: 29 January 2021 14:40
To: PLN - Comments
Subject: Re: BEVIS MARKS 20/00848/FULEIA.

Apologies for not signing it correctly. I have tried to send a new email but it has been returned.

Julia de Waal, Flat 1 21 Warwick Square, London SW1V 2AB

My Name and address

On 28/01/2021 15:07, PLN - Comments wrote:
> Hello,
>
> Thank you for your comments on the above Planning Application, please note we require both a full address.
> Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.
>
> Please visit our webpage for further information:
> https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.
> cityoflondon.gov.uk%2Fservices%2Fenvironment-and-planning%2Fplanning%2
> Fplanning-applications%2Fview-planning-applications%2FPages%2Fdefault.
> aspx&data=04%7C01%7C%7C70e3af68f8984deb32e608d8c463c50e%7C9fe658cd
> b3cd405685193222ffa96be8%7C1%7C0%7C637475280546415964%7CUnknown%7CTWFp
> bGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn
> 0%3D%7C1000&sdata=SE%2BhOaLWbvVybVYkZQrO0293%2Bva4cOxrkvz6fWbLv5k%
> 3D&reserved=0
>
> Kind regards,
> Rianne
>
> -----Original Message-----
> From: Julia de Waal [redacted]
> Sent: 19 January 2021 15:02
> To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
> Subject: BEVIS MARKS 20/00848/FULEIA.
>
> 20/00848/FULEIA.
>
> I support the Committee in their objections to the surrounding area re
> development. It will considerably encroach on the worship and
> community use of the Synagogue
>
> Julia de Waal
>
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> ityoflondon.gov.uk%2F&data=04%7C01%7C%7C70e3af68f8984deb32e608d8c4
> 63c50e%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637475280546425961
> %7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6I
> k1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=gShJA79ci90djvE%2B9CPF6b9WK8MmY
> cUehdPOGYUfOsg%3D&reserved=0

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Address: Bury House 31 Bury Street London EC3A 5AR
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Case Officer: Bhakti Depala

Customer Details

Name: Mr James Martin
Address: Flat 6 Grovewood House 168a Granville Road London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:As a member and from a family which founded this venerable synagogue over 300 years ago, I am deeply disturbed by this planning application which would destroy the experience of praying in the Jewish community's 'Cathedral Synagogue'. Namely:-
- This heritage will be put at risk by the construction of such a building
- The sheer size of the building will have a hugely detrimental impact on the synagogue itself. We will lose much of our light both to the courtyard and inside which will impact on our ability to pray- greatly diminishing my religious experience. It will set the backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
- The proposal provides parking for hundreds of bicycles, which means there will be an increase in bicycle traffic up and down Heneage Lane, along the synagogue's eastern wall, causing more

noise inside it, and in the rabbi's house. All noise on Heneage Lane can be heard inside.
- The cumulative effect of this and other buildings on the existence of such an important heritage site, the only non-Christian place of worship in the City of London. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith. As a member of the Nunez Martinez family which still has a 'family seat' it is unconsionable that this plan can be even considered

Begum, Shupi

From: Andrea Rosen [redacted]
Sent: 31 January 2021 23:08
To: PLN - Comments
Subject: Objection to planning application 20/00848/FULEIA

Re: planning application 20/00848/FULEIA (31 Bury Street)

To whom it may concern,

I am writing this objection both as a regular congregant of Bevis Marks Synagogue and as a resident of number 2 Heneage Lane, EC3A 5DQ, just metres from the proposed construction. I will organise my objection around these two positions.

Objections as resident.

- 2 Heneage Lane is my family home. Obviously we will be impacted by construction, which will create significant and serious disruption from shaking, dust, debris, noise, foot and vehicle traffic, etc. It will be very difficult to live normally under these conditions, especially when children are considered.
- The finished building will loom over us, blocking light into the house and back courtyard. I understand that the house is considered 'unaffected' in light calculations because the Heneage Lane windows open onto our main stairwell, but a) this main stairwell is the core of the house and also needs light and b) overshadowing of the courtyard will restrict light into all the main rooms of the house as well and this will greatly diminish visibility, which is already compromised.
- Concerningly, there are proposals to open up Heneage Lane and make it a pedestrian & cycle thoroughfare with amenities and cycle parking, which will hugely increase traffic on our quiet lane. Every single noise and conversation that takes place on Heneage Lane can be heard in the house, so the noise pollution we will experience is likely to be significant.
- Having a 50 storey building looming over us will greatly reduce privacy as hundreds of people will be able to watch what goes on in our back courtyard, where we spend a lot of time. This is also a security risk.
- The cumulative impact of this proposal and the application at 33 Creechurch Lane would be intolerable, as all of the above issues are multiplied.

Objections as congregant.

- Construction will seriously disrupt the life of the community – which, like me as a resident, will be subject to shaking, dust, debris, noise, foot and vehicle traffic, etc. This is a place of worship, which for 319 years has provided a quiet space in the City of London for prayer, reflection and learning. This cannot be accomplished under such conditions. Furthermore, under normal circumstances, our building, unlike others in the City, is in use nearly all of the time (daytime, evenings, weekends) for worship, education or tourism, so we will be affected by the construction no matter when it is scheduled.
- After the construction is completed, the proposed building will overshadow us, darken our synagogue & courtyard, and change the atmosphere of the place tremendously. The backdrop to Bevis Marks will forever be ruined, the sky literally blocked out by walls. If the City's stated aims are to preserve not only its historic places, but their "immediate and wider surroundings," then allowing this building to go forward feels a betrayal of those aims completely. It also seriously undermines the narrative of the new heritage centre, supported by the National Lottery Heritage Fund and under the patronage of HRH the Prince of Wales, which highlights the respect the City has always shown to its Jewish community. Will visitors believe that story when the site itself has been so thoroughly disregarded?
- The lack of privacy that will result from the overshadowing of our site is a major concern, as well as the security risk this poses to a sensitive site like ours. The outdoor space is used for religious ritual and celebration.
- As above, the cumulative impact of this proposal and the application at 33 Creechurch Lane would be intolerable, as all of the above issues are multiplied.

Finally, a word about the significance of Bevis Marks Synagogue. Bevis Marks is far and away the most important Jewish site in Britain - our 'cathedral synagogue' - as well as the longest continuously running synagogue in the world. This latter fact makes it a precious place to all Jews. Besides being a growing community, our synagogue welcomes visitors from all over the world to join us for worship as well as tourism, bringing thousands of people a year into the City of London. Building a 50+ storey tower block over the synagogue and its courtyard will negatively impact the visitor experience, and change forever this historic site that has been part of City history – and Jewish history – for over three centuries. I ask that you reconsider this construction project, and help us to protect this building, our community, and my home.

Sincerely,

Dr Andrea Rosen

2 Heneage Lane

Begum, Shupi

From: Edwin Segall <h[redacted]
Sent: 31 January 2021 23:52
To: PLN - Comments
Subject: Objection to Planning Application Ref. 20/00848/FULEIA

I am a member of the S&P Sephardi Congregation and a regular Worshipper at Bevis Marks Synagogue.

I was horrified to learn of the application which has been made to erect a 51 storey office building on the site of 31 Bury Street which, combined the proposal to build a new 21 storey office block on the site of 33 Creechurch Lane and a shopping mall with direct access from Henage Lane, would have a devastating effect on the Synagogue and those who worship there.

The Synagogue is already surrounded by buildings which cut out a good deal of natural light, particularly on dull days, although on bright days the sun shining above those buildings does add some welcome light to the interior, which highlights many of its unique features.

If both of the proposed new office buildings were to be erected however, not only would the Synagogue itself be deprived of sunlight but its surrounding courtyard would not see the sun until late afternoon, even in midsummer.

Henage Lane, which runs directly outside the Synagogue building, is a quiet walkway which is little used when the weekly Sabbath morning Services are held and worshippers often use it to exit the building at the end of the services. I understand that the proposed new office buildings would include parking facilities for a vast number of bicycles and cyclists using Henage Lane would pose a serious hazard to worshippers exiting the building, many of whom are elderly. (They would also pose a hazard to anyone entering or leaving the adjoining Rabbi's house, the entrance to which also opens onto Henage Lane.)

I am also most concerned about the damage which the excavation works involved with the erection of both of the proposed office blocks could cause to the foundations and upper structure of the Synagogue building, especially bearing in mind that it was built over 300 years ago, when building regulations were non existent and foundations were much shallower than they are today. If, despite the overwhelming opposition to these planning applications, permission were to be granted, then the architects, civil engineers and other professionals involved in the erection of the new buildings, not to mention the contractors themselves, would need to be fully covered by indemnity insurance against the untold damage that could be caused to the Synagogue and other nearby properties.

I would be most surprised if the Corporation of London were to grant its consent to the erection of two completely out of scale office buildings which would leave such a shameful and permanent legacy on one of its most unique and historic buildings. What a contrast this would make to the recently constructed piazza at the end of the street, which has secured an uninterrupted view of St Botolph's Church .

Finally, I would question the necessity of building such huge office blocks. The Covid pandemic has taught us the benefits which can be derived from working from home and could well spell the demise of large commercial offices. The Book of Genesis describes the attempt to build the Tower of Babel. The project was a total disaster.

Edwin Segall
34 Aston Avenue
Harrow
Middx HA3 0DB
[redacted]

Sent from my iPad

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Frances Flaxington
Address: B47 Parliament View 1 Albert Embankment London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Not appropriate for this development to be next to this previous, ancient synagogue

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Mark Hammond
Address: 18 Great Suffolk St Southwark London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:My local synagogue will be permanently spoiled by these developments adjacent to it. Traffic, noise, and light are all obvious problems both during the build and after they are completed. After 2020, do we need more office accommodation? Could they not refurbish the present accommodation?

Strongly object.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Frank Martin
Address: 6 Priory Field Drive Edgware

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:The proposed building will have a very substantial detrimental effect on Bevis Marks Synagogue, the oldest synagogue in the UK, a grade 1 listed building and the longest continually functioning synagogue in the world. There will be a massive loss of sunlight amenity both within the synagogue and in its courtyard. It should be noted that the synagogue relies substantially on reflected light from existing surrounding buildings and that light would be lost if the new construction went ahead. The creation of a thoroughfare through the proposed new building will create substantial increased footfall through Heneage Lane which will create a noise impact particularly through the eastern wall of the synagogue and bearing in mind the narrow confines of that Lane.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Vivien Baroukh
Address: 44 circus road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:· The synagogue has a unique history as well as being the only non-Christian place of worship in the City of London -it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The loss of light from the sheer size of the building will have a hugely detrimental impact. Much of the sunlight & daylight both to the courtyard and inside in the synagogue will be lost, which will have a negative impact on the building itself (cold walls)as well as for those who use the building.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue and overwhelming it. It is out of all proportion.
· The cumulative effect of this and other proposed buildings will mean that the entire backdrop of the synagogue will be made up of these buildings and which will block out the sun from 9 AM-4

PM ie most of the day.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue during worship and in the rabbi's house where all noises on the street are already highly audible.
I therefore strongly object to this proposal.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Mocatta
Address: 25 Templars Crescent London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This proposal fails to protect the spiritual sanctity of Bevis Marks synagogue, which my family have been attending since it was founded in the early 1700s.

It will eliminate daylight from this most precious of spaces (it's the only non-Christian place of worship in the City of London) and daylight is necessary for any wellbeing, particularly wellbeing of a religious nature. How else are we to connect with the majesty of God?

Further, Bevis Marks is a residential site with our rabbi living on premises. This proposal significantly worsens his quality of life, making the roads adjacent to the synagogue a shopping and bicycling district.

The Jewish community has been active and vibrant members of the general community in London

for over 350 years. It is objectionable that developers can submit plans which ride roughshod over our communal and spiritual needs in this manner. Please reject the planning application immediately.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Dr David Sclar
Address: 160 BENNETT AVENUE #3G APT 3G NEW YORK

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The plan to erect a hi-rise building near an historic place of worship will block out light, obstruct views from within and without Bevis Marks, hinder tourism efforts to the forthcoming Museum that has the support of the government and The Royal Family, and possibly damage the historic building's shallow foundations.

There are innumerable places for a developer to build a nondescript
office building, but there are not many opportunities to value and celebrate our ancestral heritage in an urban space.

I am a PhD in History and a researcher at Harvard University. The notion that the City of London will allow this speaks terribly to its lack of appreciation for its own history and its duty to preserve historical monuments for future generations.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Alan Hyman
Address: Flat 4.4 Pulse Apartments London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed development will have significant adverse impact on the neighbouring synagogue by blocking light and sunlight, creating disruptive noise which would hinder the holding of prayers services, and by creating a visual impairment to environment of, and backdrop to, the synagogue. The synagogue is the principal synagogue in the City of London and is of historical importance, and the proposed development would significant alter the locality to the detriment of the synagogue, its members, and to the community of the City of London as a whole.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jeff Berger
Address: 50 Cardinal Avenue Borehamwood

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:We object to this planning application for the following reasons:

1. The project will overshadow and disturb the Bevis Marks Synagogue which has a unique history dating back to 1701.

2. Bevis Marks is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. Imagine this kind of encroachment being permitted on the doorstep of St Paul's Cathedral! Bevis Marks plays a similar importance to people of the Jewish faith.

3. The massive size of the building will have a hugely detrimental impact on sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact our ability to pray and to celebrate weddings or other national ceremonies.

4. The building will become the new backdrop to the synagogue, blocking out any sky around our location. The cumulative effect will be to obscure the sun all day from 9 AM-4 PM.

5. The proposal creates a shopping arcade on the very narrow Heneage Lane and provides parking for hundreds of bicycles. This will add a large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

6. During the pandemic period when most people are no longer working in offices, and many highrise buildings are sitting empty in the City of London, is it really necessary to build more offices?

Most sincerely,
Jeff Berger

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: [redacted]

Address: [redacted]

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of

bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Stern
Address: 8 hill rise Ruislip Middx

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Most activities are during daylight hours the proposed building will cut most of our natural light as well bad noise levels

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Jennifer Bell
Address: Flat 36 Eagle Wharf Court Lafone Street Londkn

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:This project is shameful and insulting. This would not have been allowed next to Westminster Abbey. It shows a total disregard for Jews and Jewish culture. Bevis Marks is the oldest synagogue in the United Kingdom. This project should not be authorised. A building of such historical importance should not be threatened mereky fir finsbcial gain.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr James Pont
Address: 11 Granary House 2 Hope Wharf London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This will ruin a historic Jewish site within the City of London. I rather hope sense might prevail over money as this would ruin the surroundings of the site and remove all natural lighting.

I wonder if, with current events and working trends as they are, whether the developers are fully confident they will achieve the necessary occupantancy to make this profitable. If they don't, at what cost what to the culture of the City will this have come at?

I implore you to reject this application and allow the City to continue as something other than a collection of building to harbour office employees, but as a space to celebrate the City rich heritage.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Marlena Schmool
Address: 11 Defoe House London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I cannot believe that this is even being considered. Already Bevis Marks Synagogue is threatened by the 21 storey building in Creechurch Lane which will cut light from one direction and now this even taller edifice is being considered from another. The combination will mean that there is virtually no light in the synagogue courtyard. The peace of the area will be disturbed by the anticipated footfall and cycle traffic in Heneage Lane. This will impact adversely on the services in the synagogue. Obviously a shopping mall will attract people (otherwise why build it) and this means more noise, and 300 years ago buildings were not soundproofed.
I do not understand how such a project could be countenanced. At a time when the synagogue is being supported with a heritage grant to renovate its fabric, it is being threatened on two sides. It's irrational and unbelievable.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Edward Ziff
Address: 3 Nottingham Terrace York Terrace West London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:an area of immense architectural significance that needs protecting properly

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mrs Charlotte Green
Address: 7 Bloomfield Rd London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity

Comment:Please, I beg you, do not allow this proposal to go through. You wouldn't allow it, if it were St Paul's, and it has even more significance for Jews.

What is proposed is enormous, and will take light from both the Synagogue and the courtyard, and will cast a gloom on festive events (my daughter was married in Bevis Marks). If built, the new building will completely overshadow everything.

· The proposal will lead to a big increase in traffic, alongside the Synagogue's Eastern wall, and will cause a lot of noise which will disrupt prayers and which also will impact on the Rabbi's house.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Barry Chernoff
Address: 6 Dickens Rise Chigwell

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This proposed development will have a major detrimental affect on the synagogue building and the Jewish community that has used this building for worship for over 300 years.
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Brian Addlestone
Address: 6 Brookside Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is the only non Christian place of worship in the City and the new building will badly affect light and block the sky around the synagogue impacting on the ability to pray and enjoy weddings and other festivals especially if there is also going to be increased traffic from the proposed new shopping area causing noise which will disrupt prayers and services

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Amanda Newman
Address: 4 Narrow Lane Warlingham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:This development will have an irreversible affect on the Grade 1 Bevis Marks Synagogue which is over 300yrs old and important part of Jewish and the City of London history

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Johnny Blair
Address: 36 Gordon Ave Stanmore Middlesex

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is a ludicrous development design and wholly incongruous with the surrounding buildings

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Martin Collins
Address: 4 Courtgate Close Mill hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building is an eyesore amongst the building locally and will totally block out the light to this great landmark synagogue that has been there for 100s of year's

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Marc Pereira-Mendoza
Address: 30 Bancroft Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I object very strongly to the proposed development of Bury House which will enshroud the beautiful synagogue where my family have worshipped for many generations and where I myself was married.

In objecting to the development - I would like to highlight the following comments:

1. Bevis Marks synagogue is unique in its historical importance for British Jewry and is the only non-Christian place of worship in the City of London. It is clearly the "Cathedral Synagogue" of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis Marks's similar importance to people of the Jewish faith
2· The sheer size of the building will have a hugely detrimental impact. The synagogue will lose much of its sunlight & daylight both to the courtyard and to the interior and it is the light which

enables the synagogue to have shone through generations . This will negatively impact the ability to pray and to celebrate weddings and other events of national importance.
3· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue and taking away massively the "oasis of tranquility" one feels when one arrives.
4· The cumulative effect of this and other proposed buildings (33 Creechurch Lane). The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
5· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in particular the side to the synagogue where Jews face to pray and which houses our most sacred texts as well as the Rabbi's house

I do not believe these concerns have been adequately thought out in the proposed development

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Isaacs
Address: 39 Uphill Road Mill Hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I have attended many services at this incredible synagogue of major historical importance & the only non Christian place of worship in the City of London .
A close friend sits in the same seat that his forefathers sat in at the inception of the synagogue which is remarkable within the Jewish community which has been decimated by antisemitism over the centuries since the establishment of Bevis Marks .The disruption caused to the serenity & wonderful light within the synagogue by both the construction and the additional traffic of people & bikes following construction would destroy the incredible atmosphere & the noise polllution would severely impede regular services & cause special services ,eg Weddings & Barmitzvahs,to be no longer held there due to the short & long term disruption .I strongly object to the proposed development

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Jackson
Address: Flat 701 Grove End Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I am a member of The Spanish and Portuguese Synagogue of London. I married in Bevis Marks Synagogue in 1961, as did one of my sons in 1992. The synagogue is a major cultural and heritage site, built in 1701 and continuously used for Jewish worship since then. For the Jewish community it has a similar historic and emotional status to that of St Pauls (completed and opened in 1710) for the Christian and more generally, the whole national community.

The proposed building will destroy the environment of the synagogue by cutting off its light almost completely, and by turning Creechurch Lane into a noisy thoroughfare used by cyclists parking their bicycles and by shoppers going to a proposed shopping centre. In addition the huge size of the proposed building will bring a major increase in the number of people working in the vicinity, with all the crowding and stress that this implies in the ancient narrow streets of the area. This will

destroy much of the peaceful atmosphere in the synagogue which means very much to the regular services of worship and to the many Jewish couples who place a high value on being able to marry in this beautiful and historic synagogue.

This development takes no account of the nature of the district, aiming to crowd yet another ludicrously oversized commercial building into the tine narrow streets. The most lukewarm feeling for the history and beauty of London's heritage must surely compel the refusal of this planning application.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Ms Judy Jackson
Address: flat 701 Grove End Gardens 33 Grove End Road London

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
Comment:I was married nearly 60 years ago in Bevis Marks synagogue, the oldest working Sephardi synagogue in the country, and one of very few Western Sephardi synagogues surviving with frequent services, in the whole world.

Building a structure of over 40 floors would considerably damage the light and view of the sky from the synagogue courtyard and inside the synagogue premises. Footfall to and from the new proposed building would cause noise and disruption to a previously calm space.

It would be tragic if this building would be allowed. Historically, Bevis Marks synagogue is as valuable to the city and the community as St. Paul's Cathedral. We hope the planning committee will realise the dreadful impact of such a plan - providing office or residential space at the cost of part of the history of the City of London.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniel Bloom
Address: 1100 Magnolia Rd. Teaneck, NJ

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I am writing to strongly object to this construction, which will forever negatively impact an incredibly precious heritage site for Jewish (and all) UK citizens, and the Jewish community around the world. Particularly during these polarized times, the greatest efforts need to be exerted to show deference to communities of faith seeking to preserve the character and use of their heritage sites. Please do not allow this monstrously large construction to overshadow and negatively impact such a holy and historically significant site. Respectfully submitted,
Daniel Bloom, Teaneck, NJ

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr SIMON GABBAY
Address: 26 Manor Hall Avenue LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity

Comment:Strongly object to demolition and construction of New building at 31 Bury Street,London EC3A 5AR .
The proposed project will be greatly detrimental to the Existing use and preserving the sanctity and quiet of the Synagogue which is a historical place of worship that the community enjoyed for around more than three centuries .
The light will be reduced and the effect will be a "boxed-in" effect over shadowed by creating high rise buildings adjacent and at the rear of the building with increased noise and traffic.
I therefore, strongly object to grant permission to construct such a building'

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr ALAN LANGLEY
Address: 715 KENTON LANE HARROW WEALD HARROW

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I strongly suggest that a more diligent review of the plans should be made. The building of yet another massive structure dwarfing the synagogue, a beautiful and historic building of some 300 + years. In fact the oldest synagogue in the UK .
A massive structure anywhere close would endanger the shallow foundations and further reduce the remaining natural light to the building.
Office space is becoming less important in todays world, as many many are people working on line from home or suburban offices.
Is there now need for these tall skyscraper buildings to be built in an already crammed area?
I strongly object to any more building of this and any tall structures ruining our Capital and its historical sites.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Isaac Baroukh
Address: 44 Circus Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:· The synagogue has a unique history as well as being the only non-Christian place of worship in the City of London -it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The loss of light from the sheer size of the building will have a hugely detrimental impact. Much of the sunlight & daylight both to the courtyard and inside in the synagogue will be lost, which will have a negative impact on the building itself (cold walls)as well as for those who use the building.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue and overwhelming it. It is out of all proportion.
· The cumulative effect of this and other proposed buildings will mean that the entire backdrop of the synagogue will be made up of these buildings and which will block out the sun from 9 AM-4

PM ie most of the day.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue during worship and in the rabbi's house where all noises on the street are already highly audible.
I therefore strongly object to this proposal.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Baroukh
Address: 44 Circus Road London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:· The synagogue has a unique history as well as being the only non-Christian place of worship in the City of London -it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The loss of light from the sheer size of the building will have a hugely detrimental impact. Much of the sunlight & daylight both to the courtyard and inside in the synagogue will be lost, which will have a negative impact on the building itself (cold walls)as well as for those who use the building.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue and overwhelming it. It is out of all proportion.
· The cumulative effect of this and other proposed buildings will mean that the entire backdrop of the synagogue will be made up of these buildings and which will block out the sun from 9 AM-4

PM ie most of the day.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue during worship and in the rabbi's house where all noises on the street are already highly audible.
I therefore strongly object to this proposal.

Comments for Planning Application 20/00848/FULEIA

Application Summary
Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details
Name: Ms ELEANOR LEVY
Address: 20 ERSKINE HILL LONDON

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I AM CONCERNED ABOUT THE POTENTIAL SHADOW IN THE SYNAGOGUE COURTYARD, WHICH CURRENTLY ENJOYS SUNLIGHT IN THE MORNING AND EVENING.

THE NEW PROPOSAL WILL ENCIRCLE THE SYNAGOGUE WITH BUILDINGS, TRAFFIC AND GENERAL NOISE, WHICH WILL HAVE A NEGATIVE IMPACT UPON THE SANCTITY OF THE SYNAGOGUE.

BEVIS MARKS IS THE OLDEST SYNAGOGUE IN BRITAIN AND IS
HELD IN ENORMOUS ESTEEM BY THE JEWS OF THIS COUNTRY.
IY WOULD BE TRAGIC IF THE PEACE AND WONDERFUL AMBIENCE OF THIS PLACE OF WORSHIP WAS ENDANGERED.

ELEANOR LEVY A MEMBER OF THE COMMUNITY.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Cyril Morgan
Address: 59 Woodstock Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Jennye Seres
Address: Flat 18, Heathfielde Lyttelton Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Residential Amenity
- Traffic or Highways

Comment:This proposed development is massive and will have detrimental effects on the unique Bevis Marks synagogue. The history of the synagogue goes back to 1701. It is the only non-Christian place of worship in the City of London.
One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
The sheer size of the building will have a hugely detrimental impact. The Synagogue will loose sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue and blocking out sun all day from 9 AM-4 PM.

The cumulative effect of this and other proposed buildings will dominate the entire backdrop of the synagogue.
The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
Such a huge building is totally inappropriate in such an already overbuilt and narrow old area.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Patricia Book
Address: Flat 2 Clementine Court 4 Dollis Park London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed redevelopment with so many storeys will overwhelm and block sunlight from the historic Bevis Marks synagogue as well as increasing traffic through the pedestrian pathway alongside it. Please consider the importance of this heritage site and reject the application.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Antoine Guivarch
Address: 17 Ashworth Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Jewish places of worship deserve respect and protection just like all other religions' places of worship. Bevis Marks synagogue is the oldest and most important synagogue in the country and encapsulating it within these skyscrapers all around, overshadowing it all day long, is outrageous for members of this community who come to pray and celebrate their belonging to their community and the British community as a whole. It would give an unfortunately clear and unacceptable message again about how Jews should be treated in this country and this city. Hundreds of planning applications are rejected everyday on the basis of nuisance or privacy impact to the neighbours, I hope the massive impact of this proposed building onto a whole community will be equally taken into account. Consider
. The unique history of the synagogue, the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's

similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, causing disruptive noise

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Benjy Lebrett
Address: Holmbrook drive London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity
- Traffic or Highways

Comment:The construction will disturb prayers in the synagogue nearby.

The construction will prevent sunlight into synagogue courtyard.

The extra flow of traffic post construction will disturb prayers in synagogue.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Sandra Clark
Address: 10 Fir Tree Court Allum Lane Elstree

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Traffic or Highways

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom.
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
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Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Maurice Martin
Address: 16 Paragon Court 129 Holders Hill Road London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:As my family have been regular worshippers at Bevis Marks since it opened in 1701, I strongly object to the proposal.
I am disabled aged 85, and recovering from cancer but as the retired choirmaster, I still attempt to attend regularly, although prevented recently due to COVID restrictions.
I am a blue badge holder, and also have dispensation to park near the synagogue, which would be affected if the proposal to build went through.
Please confirm the proposal for building has been rejected .
Maurice and Gusti Martin

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Allan Lewis
Address: Flat 5 29 Beaumont Rise London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to this application on the grounds that it will inevitably have an adverse impact on the historic Bevis Marks Synagogue, the oldest in the UK, which is nearby.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr martin ben-nathan
Address: 1 hillside gardens preston hill harrow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:Bevis Marks Synagogue is a listed building with a unique history, the cathedral synagogue of UK Jewry. The project would obscure the building, overshadowing its character as a place of worship, weddings and social events. Heneage Lane would become a busy throughway intrusive to an atmosphere of prayer and to the privacy of the rabbi's house,

Construction works would be highly disruptive to ongoing religious services..

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Rick Sopher
Address: 3 upper belgrave street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The Development very severely overshadows Bevis Marks Synagogue, the oldest synagogue in the UK. It is therefore overbearing and should be modified or soped.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr clive sanford
Address: 46 chiddingfold london

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Bevis Marks synagogue is the oldest synagogue in the UK and one of the most important to the Jewish faith and culture. It is used for prayer and family celebrations, as well as being a building of historical significance.
The proposed development will take virtually all natural daylight and sky view from the synagogue courtyard and along the side of the building, as well as providing an uninspiring (and some would say ugly) backdrop.
Further, the proposed Heneage Lane shopping arcade, alongside the proposed Creechurch Lane development bicycle parking area, will inevitably lead to a very significant increase in foot traffic and noise, likely to have a serious disruptive impact on the prayer requirements and (current) largely tranquil surroundings of the synagogue.
I'm a great believer in progress but this development would have an unacceptably detrimental impact on one of the most important Jewish buildings in the UK.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jason Ozin
Address: 1 Minster Court Mincing Lane London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I work in the City and use Bevis Marks synagogue. This 300+ year old synagogue is unique and special.
moving from 7 stories to 48 stories will deny natural light to Bevis Marks, tower over all other nearby buildings and completely change the character and usability of this historical space.
You simply can't let this go ahead.
Surely the City of London needs more community and less office space at this moment in history? I can't imagine there is going to be much demand for new office space given the fact that most of us are looking to downsize our footprints.

Comments for Planning Application 20/00848/FULEIA

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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Bensoor Awad
Address: 6 Holders hill drive London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I work in the city.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Anthony Tricot
Address: 65 Eton Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:As a regular visitor to Bevis Marks syngagogue next door, I object to this development on the following grounds:
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it

when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Rita Tricot
Address: 10Neville Drive London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I would like to object to this development on the following grounds:
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Jessica Tricot
Address: 65 Eton Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I object to this development on the following grounds:
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
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Case Officer: Bhakti Depala

Customer Details

Name: Mr Sami Tricot
Address: 10 Neville Drive London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:As a regular visitor to Bevis Marks synagogue next door, I object to this development on the following grounds:
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
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· The building will become the new backdrop to the synagogue, especially when first seeing it

when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Sharon Elishe a Turkington
Address: 19 Wellington Street Oxford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed building of over 40 floors is a dangerous and ubprecedented risk to the Bevis Marks Synagogue, opposite this building.
This building threatens the Jewish heritage of London's earliest and most historically important Jewish community.
It is the only synagogue in Europe that has been used constantly and without interruption for over 300 years, a synagogue that did not shut its doors during the Holocaust, but instead opened up soup kitchens for tired WW2 soldiers.
This building threatens the historical character of the neighbourhood, and is an unnessecary frivolous waste given the empty towers all over London due to businesses cancelling offices during the COVID pandemic.
Furthermore the building will affect the security of Bevis Marks, which has in the past received terrorrist threats, as it will affect the evacuation plan of the synagogue.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Suzanne Ellul
Address: Golders Close Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Strongly object to demolition and construction of New building at 31 Bury Street,London EC3A 5AR .
The proposed project will be greatly detrimental to the Existing use and preserving the sanctity and quiet of the Synagogue which is a historical place of worship that the community enjoyed for around more than three centuries .
The light will be reduced and the effect will be a "boxed-in" effect over shadowed by creating high rise buildings adjacent and at the rear of the building with increased noise and traffic.
I therefore, strongly object to grant permission to construct such a building

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Dianne Levitin
Address: Flat 36 Eagle Wharf Court Lafone Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:This is an appalling assault on what should be an historic site for all of Britain. It demonstrates a callous disrespect governed by the pursuit of financial gain, a disregard for cultures other than the dominant one.... would you do this to St Paul's?.... and an egregious opportunism based on the powerlessness of others. You should be ashamed, but even more, you should not do this here, or to others elsewhere. The disrespect you show for Jewish culture and values has no place in modern society.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Jonathan Spencer
Address: 49 Rosebery Gardens London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Given the history and relevance to this day of the adjacent Bevis Marks synagogue, this application is particularly harmful to the surrounding area, short-sighted and culturally and politically insensitive.

I would ask please that the planning authority considers this application with the weight it deserves and with an eye on history and the terrible effect a successful application will have on the synagogue (as outlined by the many other objections offered).

There is a myriad of new skyscrapers currently being erected in London at a time when demand for office space is clearly in decline as a corollary of the current pandemic (and we all expect reduced demand to continue in due course even once we have moved passed the pandemic).

The synagogues importance to the City and its history should not be undervalued if we are to live

in a society where human and cultural value conquer short term profit - this should be our communal goal; please don't let us down.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Robert Yentob
Address: 18 Cumberland Terrace London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This building will deprive our beautiful synagogue of light for most of the day.

I also means the passageway on the east of the building, the side we face to pray, will become a pedestrian and cycling passageway. This will disturb our prayers as well as the peace of our Rabbi and his family whose house is on that side. At the moment that passageway is very quiet.

This synagogue is the oldest in the UK and of extreme importance to the Jewish community all around the country. This building should not be allowed to destroy the atmosphere and peace of our beloved synagogue.

Robert Yentob

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs RUTH BASRAWY
Address: 44 Netherhall Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This proposal will lead to loss of light and sun all day long.
This will have a detrimental effect on the enjoyment of the synagogue
This will affect weddings and other communal events, as well as normal services.

Please reject the application, Bevis Marks has huge historical and present day importance for the area and the Jewish community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Edwin Birnbaum
Address: 27 Holne Chase London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Traffic or Highways

Comment:This development will have a massive negative impact on the leading historic Jewish landmark in the UK. This is an unacceptable destruction of UK heritage

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Kuhn
Address: 32 Highbury Place London N5 1QP

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:outrageous desecration of synagogue amenity- ruining the oldest synagogue in britain Would yo allow this near St Pauls?

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Russell Donoff
Address: Penshurst Gardens Edgware

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:The City of London has thrived due to its ongoing renewal and development. However, that development cannot be allowed to run amok or without the correct checks and balances.

It it critical that we preserve the history and character of both the long-established buildings as well as the space and amenity around them.

This proposed development is just too close to the very unique Bevis Marks: this is not just a historic building, but a living, breathing community centre which has spiritual significance to both its regular and special visitors.

The London Building Act of 1888 prohibited the construction of new buildings which might overshadow St Pauls Cathedral. Whilst no-one is asking for the height of neighbouring buildings to be less than the height of Bevis Marks, having such a tall building so close will result in such a

level of overshadowing and will be completely inappropriately high and dominant.

There are already a number of tall buildings in the area, but they are not as close so do not create such a sense of enclosure.

There is also the issue of noise and disturbance: the design of the shopping arcade will inevitably funnel large numbers of people through Heneage Lane, which is the exact direction that all attendees of prayer services face. It seems that no consideration has been given to the level of disturbance and disruption that a dramatic increase in pedestrian traffic will have upon the services in the building.

Whilst developers might want to capitalise upon the valuable space in the City by building higher, to allow such a permanent blight on what is the UK's oldest and cherished Synagogue would be devastating.

All development guidelines emphasise the importance of minimising the negative influences upon the area and for any proposed design to by sympathetic to the area and ensure that it is proportional and indeed, has a positive effect.

This proposed development does not take full consideration of the permanent detriment it will cause.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Derrick Smouha
Address: 32 Chemin des Crêts-de-Champel Geneva

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I have been a member of the Spanish and Portguese Community for over seventy years and I have a very special tie to Bevis Marks Synagogue. I have examined the projects for the two buildings in the vicinity and I am unable to understand how the council could possibly consider allowing the plans to go ahead; it is contrary to all accepted standards and would adversly affect the Bevis Marks environment.both from the point of view of light and sound, in the IMMEDIATE vicinity of an historic building of such value to the community at large. Apart from light and sound, it cannot be guaranteed that the erection of the proposed buildings will not seriously affect the very foundations of Bevis Marks Synagogue. PLEASE do NOT allow these projects to go ahead. To do so would be a total surrender of all cultural and intellectual values which are so much a part of the City of London.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Gemma Levy
Address: 139 Manor Road Guildford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:History and importance of Bevis Marks Synagogue

Lack of sunlight to the Synagogue caused by the new buildings

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Simone Hillman
Address: 52 Linkside London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object in the grounds that Bevis Marks is a Heritage site and blocking the light will completely take away the charm of tgg hi e building inside and out.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr maurice moses
Address: 16 bentley way stanmore

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane,

along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Caline Chazan
Address: 80 Harley House Marylebone Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will affect negatively Bevis Marks Synagogue depriving it of sunlight and daylight both to the courtyard and inside in the synagogue.

Bevis Marks Synagogue is the oldest synagogue in the country and, as such, should be protected.

Thanks

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Lord Peter Levene
Address: Penthouse 3, Harley House Marylebone Road LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I am submitting this objection as former Lord Mayor of London, former Alderman of the ward of Aldgate and Chairman of the Bevis Marks Synagogue Trust. The proposed development at 31 Bury Street,
coupled with the other proposal at 33 Creechurch Lane would create a totally overpowering environment surrounbding the Synagogue which has stood there for more than 300 years.
Bevis Marks Synagogue is not only the oldest Synagogue in the UK, but in fact one of the oldest religious buildings still standing in the City of London.
It was strongly supported financially by the City Corporation following damaged caused by the adjacent bombing, and has been the subject of many formal visits by Lord Mayors over the years as well as members of the Royal Family and Prime Ministers.
A new foundation to promote and develop the heritage of the Synagogue has been established with HRH The Prince of Wales as Patron, annd backed with a £2million grant from the National Lottery Heritage fund.

Permission for either of these two developments would cause untold permanent damage and I trust that the Planning Committee will be persuaded to refuse permission.

Levene of Portsoken

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Adam Grossman
Address: 97 PENSHURST GARDENS Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the

rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Freddie Chazan
Address: 80 Harley house Marylebone road London

Comment Details

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

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

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Case Officer: Bhakti Depala

Customer Details

Name: Lord Harry Woolf
Address: 18 Lansdown crescent London

Comment Details

Commenter Type: Councillor/Ward Member
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposal will dominate adversely the finest and oldest synagogue in the country which by it history demonstrates the
role of the Jewish community in the UK. To allow this encroachment
on this special place of worship will show a lack of respect for the religious observance of the members of the community that treasure and use this unique place of worship

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Mark Salem
Address: 105 Jermyn Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:As a Trustee and a member of the Spanish and Portuguese Jews Congregation, as well as a concerned member of the public, I strongly object to this proposed development for the following reasons:

1) The proposed construction puts at serious risk Bevis Marks, the oldest and arguable most important synagogue in the UK. The construction process itself will threaten the structural foundations of Brevis Marks. They cannot to replaced or repaired.
2) The height of the proposed development is absurb given its proximity to a historical heritage site. It will block out all direct natural light, to the building and the surrounding historic courtyard, and destroy its attractiveness for the many important daytime events and celebrations held throughout the year. In effect it would encase Bevis Marks in shadow and darkness forever.
3) The near elimination of the natural light will harm the daytime experience of the Synagogue's

interior for all congregants and visitors for generations to come.
4) The construction period will rob the congregants of the ability to conduct service in this house of worship. Not least there will be no access to the Synagogue for those with disabilities.

There are few buildings of more significance to Anglo Jewry, diminishing such an important site would be a great loss to the UK and it's heritage and so should not be allowed.

I hope that this proposed development will be denied.

Yours sincerely,

Mark Salem

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Johanna Fredj
Address: 17 Ashworth Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks synagogue is the oldest and most important synagogue in the UK in continuous use since 1701. Jewish places of worship deserve respect and protection just like any other religion' places of worship. Encapsulating it within skyscrapers, overshadowing it all day long, and increasing the traffic around the building is outrageous for members of this community who come to pray and celebrate their belonging to their community and the British community as a whole. It would give an unfortunate and unacceptable message about how Jews are considered in this country and this city. Hundreds of planning applications are rejected everyday on the basis of nuisance or privacy impact to the neighbours. The massive impact of this proposed building onto a whole community should be equally taken into account due to:
. The unique history of the synagogue, the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact, obstructing much of the sunlight & daylight both to the courtyard and inside the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· A new shopping arcade on Heneage lane and new parking for hundreds of bicycles means a very large increase in traffic up and down the lane, causing disruptive noise and security issues.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Freddie Chazan
Address: 80 Harley House Marylebone Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will affect negatively Bevis Marks Synagogue depriving it of sunlight and daylight both to the courtyard and inside in the synagogue.

Bevis Marks Synagogue is the oldest synagogue in the country and, as such, should be protected.

Thanks

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Daniel Sopher
Address: 3, CARLTON HILL London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:The architects of this building have no sense of the historic nature of its neighbouring building.

This is the oldest surviving synagogue in London and it is the Cathedral Synagogue of the United Kingdom.

No one has thought that creating a thoroughfare right next to the eastern wall of the building to lead to a shopping arcade! Will mean that prayers will be interrupted by shoppers walking and cycling to shop!

The impact on sunlight through the amazing windows will have an impact on the spiritual atmosphere of the building. It will lose much of its sunlight & daylight both to the courtyard and inside in the synagogue.

This will negatively impact on the ability to pray and to celebrate weddings and other events of national importance.

· The building will become an overbearing background to the building and blight the sky when you look at the building on arrival.

· This together with other buildings will block out the sun all day from 9 AM-4 PM.

· The cycle super highway as a result of the shopping arcade and the cycle parking station will cause disruptive noise inside the synagogue and in the rabbi's house a in particular during morning prayers and Friday night prayers which in the winter commence from as early as 1530.

Begum, Shupi

From: David Zubaida [redacted]
Sent: 05 January 2021 11:02
To: PLN - Comments
Subject: Re: 20/00848/FULEIA - Objection to proposed building at 31 Bury Street

Hello,

My details are below:
David Zubaida
6 Crespigny Road
London
NW4 3DY

Thanks,

David

> On 4 Jan 2021, at 2:23 pm, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:
>
> Hello,
>
> Thank you for your comments on the above Planning Application, please note we require your address.
> Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.
>
> Please could you respond with your details to: PLNComments@cityoflondon.gov.uk
>
> Please visit our webpage for further information:
>
https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.cityoflondon.gov.uk%2Fservices%2Fenvironment-and-planning%2Fplanning%2Fplanning-applications%2Fview-planning-applications%2FPages%2Fdefault.aspx&data=04%7C01%7C%7C9b81504a185542d5cfbd08d8b1696299%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637454413478323261%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=Z1jyI840fnZ5rc2atj8HCax3rkaH2TFqQ2kghG13Ux8%3D&reserved=0
>
> Kind regards,
> William
>
> -----Original Message-----
> From: David Zubaida [redacted]
> Sent: 29 December 2020 15:01
> To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
> Subject: 20/00848/FULEIA - Objection to proposed building at 31 Bury Street
>
> Dear sir/madam,
>
> I would like to register my objection to the proposed building on 31 Bury Street given the detrimental impact it will have to Bevis Marks synagogue of which I am a member. My concerns are as follows:

> · The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith · The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
> · The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
> · The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
> · The proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the Rabbi's house.
>
> Please can you formerly record this objection in your records as you consider the planning request which I strongly urge you to reject.
>
> Thanks,
>
> David Zubaida
> THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website:
https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=04%7C01%7C%7C9b81504a185542d5cfbd08d8b1696299%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637454413478323261%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=UR4MdYUZzWIS2jB70ydqYN8FOP%2F8nNulq2bEjg5zfSc%3D&reserved=0

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
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Case Officer: Bhakti Depala

Customer Details

Name: Mrs linda Dangoor
Address: 1 Huson Close Swiss Cottage London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I am objecting to this planning application for the following reasons:

1) Bevis Marks Synagogue is the oldest synagogue for the Sephardi
Jewish Community in London. It is as important as st Paul's is for those of the Christian faith. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith.

2) The sheer size of the building will have a detrimental effect on the little sunlight that the synagogue enjoys inside and outside.

3) Heneage lane which flanks the Eastern side of the synagogue is a quiet lane at the moment. Proposals of building a shopping arcade as well as parking for numerous of bicycles will

completely changed the lane and increase the traffic of people causing disruptive noise inside the synagogue.

4) The new building will create a very claustrophobic environment around the synagogue, squeezing it into a sort of basement-like building.

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Ben Arram
Address: 32 Clifton Avenue London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I object to this development on the following grounds:

The scale of the buildings would make them dominant features out of keeping with the existing historical buildings and architecture. This would distract greatly from the tranquil and naturally lit setting of the Bevis Marks Synagogue, which offers a place of refuge from the city and of religious contemplation. This would severely decremented by the large structures that would obscure much of the natural sunlight the synagogue currently benefits from.

The proposed bicycle storage would introduce increased levels of noise and disturbance in extremely close proximity to the external wall of the synagogue that forms a key element of the prayer hall. The bicycle storage would also be incredibly close to the residence of the synagogue's rabbi. This would interrupt religious services, residential privacy, residential accommodation and

may also pose an increased security risk.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Dias
Address: 15 Clatterfield Gardens Westcliff On Sea

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed structures are far too close to the Cathedral Synagogue of the United Kingdom.The demolishing of the existing buildings might well create sufficient ground movement to damage the sub structure of the Synagogue something that might never be rectified
This synagogue which was built in 1701 is a part of Jewish heritage and anything that jeopardises it's fragile structure must be avoided at all cost .
It would never be possible for such a structure to be erected as close to Saint Pauls Cathedral,Westminster Abbey,The Catholic Cathedral in Victoria or the Mosque in Regent's Park although this building is just a important to Jews throughout the UK and in fact the World
It is visited frequently by many people from all faith and Nationalities and should not be allowed to sit in the shadow of these proposed monstrosities

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Marcus Gomes da Costa
Address: 22 Edgwarebury Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ariel Chazan
Address: 80 Harley House Marylebone Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will affect negatively Bevis Marks Synagogue depriving it of sunlight and daylight both to the courtyard and inside in the synagogue.

Bevis Marks Synagogue is the oldest synagogue in the country and, as such, should be protected.

Thanks

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Edward Mocatta
Address: 43 Southwood Lane London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:46 stories to the south of Bevis Marks synagogue (opened in 1701) will entirely overshadow it and cut off all direct sunlight from late morning onwards. Coupled with the 21 storey building planned for Heage Lane, the synagogues will be entirely walled in. This is very damaging to a unique heritage site in the City of London.

I understand that for line of sight reasons EC3 is the favoured location for high rise buildings in the City, but has not this gone too far? TGhere are already several very tall buildings in the area so is another (or two) necessary or desireable. I understand ther are plans also to rebuild the Aviva Tower overlooking the plaza on Leadenhall Street.

These very tall buildings would each house thousands of office workers and the medieval road plan of the area is, and will even more so be, totally overloaded with pedestrians at peak times

accessing Liverpool Street and Aldgate stations. This is already a problem but with the opening of the Elizabeth Line will be even worse.

I think this application should be turned down. There may be a case for rebuilding the Bury street site, but it should be no taller than the existing building.

Also is Heneage lane wide enough to become what appears to be a major pedestrian and cycle pathway to these buildings and through the Bury Street "Heneage Mall".

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Simon Rosenberg
Address: 44 Trinity Road East Finchley London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The impact of the planned works on Bevis Marks Synagogue would be extremely detrimental to the oldest synagogue in Britain. It is a monument of incredible importance to Britain's Jewish community. Kind of like the Jewish version of St Paul's.

This development would block out much of the synagogue's natural light, and make the place an oppressive, walled-in environment. In addition, the increased traffic and noise from the proposed shopping arcade would be very disruptive to services, weddings and any other events held in the synagogue.

The City of London should protect historic buildings, especially when they are still in daily use and at the centre of national community life. To allow developments such as this one and the proposed development at 33 Creechurch, right on top of the synagogue, is entirely inappropriate,

disrespectful and an insult to Britain's Jewish community.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Esther Shuker
Address: 28 Cissbury Ring South London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I oppose the construction of the proposed 48 storey building on the grounds that it will overshadow and put into darkness the nearby Bevis Marks Synagogue - the oldest synagogue in the UK, and as important in its history as St Paul's cathedral.
Not only will it leave the synagogue in near darkness all day long, given the proposed height, but it will also affect the area, rendering it so much more congested and noisy.
Who knows what damage to the foundations, walls and holy artifacts will be caused to the synagogue by the drilling and excavating work?
Kindly add my objection to your doubtless long list and reconsider the siting of the proposed building so that it does not affect the existing and ancient cultural heritage of London.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr frank khalastchi
Address: 3 Court lodge 48 Sloane sq London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I object to the above planning application for the following reasons :
1-Bevis Marks Synagogue is of great historical and religious significance for the Sephardi Jews and needs to be protected properly
2- the proposed building will be out of place, dwarfing the 300 years old building and will remove the little sunlight the synagogue enjoys.

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Case Officer: Bhakti Depala

Customer Details
Name: Ms Daniela Nawi
Address: 9 Platts Lane Londin

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:We need to protect the history and conservation of our country's historic sites , including important religious paces of worship

Changing the experience and the nature of the light will have dramatic consequences on the Bevis Marks experience

Also the increased pedestrian traffic and bicycle parking on the side will have a real impact on the praying experience

Thank you

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Adam Szasz
Address: 16 Newberries Avenue Radlett

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The synagogue is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom.

The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Brian and Judith Robinson
Address: 20 Delamere road LONDON London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The 'cathedral synagogue ' of Angle Jewry will be 'drowned ' by this development.
It is too great a national institution to be buried by modernity.
We should be preserving our historic buildings.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Dr Brian and Robinson
Address: 20 Delamere road Ealing London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The 'cathedral synagogue ' of Angle Jewry will be 'drowned ' by this development.
It is too great a national institution to be buried by modernity.
We should be preserving our historic buildings.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Brian Judith
Address: 20, Delamere Road Ealing London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The 'cathedral synagogue ' of Angle Jewry will be 'drowned ' by this development.
It is too great a national institution to be buried by modernity.
We should be preserving our historic buildings.

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Case Officer: Bhakti Depala

Customer Details

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

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will affect negatively Bevis Marks Synagogue depriving it of sunlight and daylight both to the courtyard and inside in the synagogue.

Bevis Marks Synagogue is the oldest synagogue in the country and, as such, should be protected.

Thanks

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Noam Attar
Address: 19 Langland Gardens London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I would like to object the planning for 31 Bury Street as it will have a significant negative impact on Bevis Marks synagogue which is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith·

The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue

will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

I hope you will take my objection in consideration.

Kindest regards,
Noam Attar

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr G Field
Address: 122 Leadenhall Street London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:No thought has been taken into account of the historic synagogue which is next door to the development and the impact it will have on this very important site. The current plans will have a hugely detrimental impact due to the sheer size and scale.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Philip Heitlinger
Address: 11 Woodberry Way London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will have a detrimental effect on the operation of one of the City's most cherished institutions the Bevis Marks synagogue.Bevis Marks is to the Jewish community what St Paul,s is to the Christian community.The proposed buildings will deprive the synagogue of natural sunlight all the time.It would be unthinkable and in fact illegal to build tall buildings overlooking St Paul,s.To allow such developments next to Bevis Marks is an act of profound disdain and contempt for the Jewish community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr ANTHONY ISRAEL
Address: 30 Heddon Court Avenue Barnet

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Traffic or Highways

Comment:BEVIS MARKS IS A LISTED BUILDING SOME 300 YEARS OLD. THIS NEW DEVELOPMENT WILL CAUSE DICOMFORT AND NOISE TO THE CONGREGANTS OF THE SYNAGOGUE, ESPECIALLY WHEN AT PRAYER. THE SYNAGOGUE IS A NATIONAL INSTITUTION AND IS VISITED Y BOTH JEWS AND NON JEWS DUE TO ITS HISTORICAL VALUE WHICH STARTED WITH OLIVER CROMWELL.THE BUILDING WILL BE OVER SHADOWED AND LOSE SOME OF ITS LIGHT. THE SURROUNDING ROADS WILL BE A MASS OF LORRIES AND DIRT IF THE NEW DEVELOPMENT DOES PROCEED. ADDITIONALLY, THE DEEP DIGGING TO PROVIDE 2 BASEMENTS AND THE PILE DRIVING, WILL HAVE AN ADVERSE EFFECT ON THE FOUNDATIONS OF BEVIS MARKS, POSSIBLE CAUSING DAMAGE TO ITS FOUNDATIONS AND STRUCTURE. THIS NEW XDEVELOPMENT MUST NOT BE GIVEN CONSENT TO BUILD.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniek Ofer
Address: 43 Chelsea square London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This will inhibit and grossly harm the use of the most important synagogue In the UK and an important piece of British history. Sometimes I am ashamed at how people are treating British religious landmarks especially the Jewish religion which is experiencing such a surge in anti Semitic. We must work together Now more than ever. Please do not approve this development which will be yet another blight on our history and humanity.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Salem Freddy
Address: 10 Gloucester Gate London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:This development of 48 floors will plunge Bevis Marks Synagogue, a grade I listed heritage building,into darkness for most of the day.
How do we protect and enhance our heritage if this application is granted?

Comments for Planning Application 20/00848/FULEIA

Application Summary
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Case Officer: Bhakti Depala

Customer Details
Name: Mrs Jennifer Brooke
Address: 14 Hancock Court Borehamwood Hertfordshire

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:20/00848/FULEIA.

The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom.

One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith.

The sheer size of the building will have a hugely detrimental impact.

We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day
rom 9 AM-4 PM.

The proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr stephen davis
Address: 1 Finsbury Circus London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:This post Covid is the wrong development in the wrong place. This area is one of the few low rise havens including historically important buildings. The utility of further high rise needs to be assessed against prevailing practice post the pandemic. Don't rush in on a box ticking sphere of interest basis. Existing landlords , with whom I am unconnected, need a return to proper usage and the Elizabeth Line to be open.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Samuel Chazan
Address: 80 Harley House Marylebone Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will affect negatively Bevis Marks Synagogue depriving it of sunlight and daylight both to the courtyard and inside in the synagogue.

Bevis Marks Synagogue is the oldest synagogue in the country and, as such, should be protected.

Thanks

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Yodia Lo
Address: Flat 515 Spice Quay London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I live on the Thames River and have a direct line of sight to the Gherkin. Over the past ten years I have seen massive, unbridled construction in the area. I appreciate one of London's best-known qualities, that of being able to have the very modern built next to the very historic, but it seems that this building goes too far in overwhelming a place of worship. As a parishoner at St. Paul's Cathedral, I see the need for spiritual landmarks in the City. We must preserve the prestige of the Cathedral Synagogue of the UK, in the heart of London's centre of finance.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ronald Levi
Address: 24 St Anns Terrace London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Given the historic and cultural significance of the Bevis Marks Synagogue, I believe it would be abhorrent to allow the construction of a concrete block building so close to the synagogue.
Bevis Marks was the first synagogue in the UK and the beginning of organized Judaism in the UK. As the first non Christian place of worship within the City, it has a unique historical significance and therefore must be protected at all costs.

Please be sensible. There are many tall office blocks in the city and beyond, there is only one Bevis Marks, it is incumbent on intelligent people to fully protect this cultural site.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Emanuel Arbib
Address: 67 Cranbourne Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:the construction of these two high rise buildings will envelope and wall up the oldest jewish site in the UK. it would be outrageous.

Begum, Shupi

From: Jonathan Webber [redacted]
Sent: 31 January 2021 11:16
To: PLN - Comments
Subject: 20/00848/FULEIA

Dear City of London,

Developers' plan regarding the site at 31 Bury Street (Bury House)

As a member of the Spanish and Portuguese Jews' Congregation I have been informed of a developers' plan regarding the site at 31 Bury Street (Bury House), to build a very large tower block of more than forty storeys just forty yards from our community's synagogue in Bevis Marks. I am writing to you to register my protest at this plan and to ask you to not to grant the developers planning permission.

I have studied the plans, and I am horrified. There is no doubt whatever that such a very large building will be catastrophic. It will cast a shadow – quite literally – over the synagogue, which has been in continuous use for over 300 years and is hugely treasured by the congregation for its extraordinary beauty, especially in its natural light during daytime. Unique among the synagogues of the United Kingdom, it is a Grade I listed building. Having such a tall building so nearby will darken the atmosphere inside – quite literally – and outside in the courtyard it will block the sky during daylight hours. The building works, which may well damage the foundations, will inevitably create a huge amount of noise, making it impossible for worshippers to pray peacefully. All that will discourage our members even from wanting to come for prayer services at the place at all – after all, a place of worship requires tranquillity and serenity of spirit.

The Spanish and Portuguese synagogue in Bevis Marks is the only non-Christian place of worship in the City of London, and on those grounds alone it surely deserves full protection by the City's authorities, without environmental encroachment. It is rightly regarded by British Jews as its "cathedral synagogue" – for three centuries it has been the key British synagogue which has hosted prayer services at key moments of national importance (important royal anniversaries, for example, or moments of great national danger during wartime), and the printed liturgies that were specially prepared for such occasions, in the presence of members of the Royal Family and other distinguished VIPs, attest to this.

My wife and I were married in that synagogue and have extremely warm memories of an uplifting spiritual occasion. My family have been members of this congregation for three generations -- beginning with my grandfather, who was executive Secretary of the congregation for fifty years, 1895-1945. I feel very much attached to this synagogue, and am in considerable fear of this new plan, which threatens my very soul.

I realise this letter reaches you at the eleventh hour – I hope it is in fact not too late to ask you to reject the planning application.

Yours sincerely,

(Prof.) Jonathan Webber
UNESCO Chair of Jewish and Interfaith Studies (emeritus), University of Birmingham

Address:
Plac Sikorskiego 4 m. 2
31-115 Kraków, Poland

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Charles Shamash
Address: 3Hillside Close London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As a small community with limited resources, it was necessary to first focus all our energy into objecting to 33 Creechurch. Now I must now urge you all to spend a little bit of time submitting a similar objection to 31 Bury Street.
The key messages that should be conveyed in any objections are
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
The link to object can be found here

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Sue Shamash
Address: 3 Hillside Close London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As a small community with limited resources, it was necessary to first focus all our energy into objecting to 33 Creechurch. Now I must now urge you all to spend a little bit of time submitting a similar objection to 31 Bury Street.
The key messages that should be conveyed in any objections are
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
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· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
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Case Officer: Bhakti Depala

Customer Details

Name: Mr Raphael Setton
Address: 124 Merrion Avenue Stanmore

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite the Bevis Marks synagogue having similar importance to people of the Jewish faith.
The sheer size of the building will have a hugely detrimental impact.
We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
The proposed building will become the new backdrop to the synagogue, especially when first

seeing it when entering the courtyard, blocking out any sky around the synagogue.
The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun from 9am to 4pm EVERY day.

The proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Zeev Portner
Address: Hessian Flat 0 Room 12, Hughenden Park Student Vil Hughenden Park Student Village, Hughenden Avenue High Wycombe HP13 5GG

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The size of the building will have a negative effect on Bevis Marks synagogue which is the oldest synagogue in the UK. It will block out the sunlit from entering the building during prayers , other events and during tours for the wider community, and will cast a shadow over the courtyard which is used for receptions on occasions

A building of that size has a place in London, but should not be towering over Bevis Marks synagogue which is he equivalent for the Jewish community of St Pauls cathedral. It will have a detrimental effect on Bevis Marks synagogue and all those who visit the synagogue.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Lawrence Salem
Address: 3-5 Gloucester Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The presented redevelopment of this site at such a scale will overwhelm and restrict the natural sunlight of this historic synagogue as well as causing significant disruption. Please consider the importance of the heritage of Bevis Marks and reject the application. This degrades the significance of such an important part of London and its Jewish communities' history.

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Linda Smith
Address: 101, Benslow Lane Hitchin

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I write to object to the planning proposals regarding 31 Bury Street and the negative impact that these would have on Bevis Marks synagogue if the application was approved.
The sheer size of the proposed building will have a hugely detrimental impact on the synagogue, which lose much of its sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on the ability to pray and to celebrate weddings and other events of national importance.
· The proposed building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative . The entire backdrop of the synagogue will be made up of this buildings and other proposed buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane,

along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

The synagogue is of national importance and is of particular importance to everyone - both Jewish and Gentile, in the City of London. It has a unique history and is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom - not only Jewish people but also, everyone in the City of London and indeed, the nation deserve that a building of such historical and spiritual importance is more sympathetically treated by the City of London Corporation, which is an important current guardian.

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Customer Details

Name: Mrs Kris Musikant
Address: 2 HILLSIDE CLOSE St. JOHN'S WOOD LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I am a Trustee on the Board of the S & P Sephardi Community and of the Bevis Marks Synagogue Heritage Foundation and am objecting to the planning application for 31 Bury Street on the grounds of the huge negative impact that this development will have on the historic setting of the Bevis Marks Synagogue. The Synagogue is a Grade I building and is the only non-Christian place of worship in the City of London: it is the Cathedral Synagogue of the United Kingdom.

The sheer size of the proposed building at 31 Bury Street will have a hugely detrimental impact, including the reductions in daylight and sunlight into the Synagogue and the much-used courtyard. This overbearing presence, height and proximity, of the tower building will change the character and atmosphere of the Synagogue and its immediate surroundings forever and will have a

permanently huge effect on the ability to pray and to celebrate events of personal and national importance. The proposed tower will become the backdrop to the synagogue and the dominating feature when entering the courtyard, blocking out much of the sky. Together with other proposed developments, the sky will be blocked between 09.00hours - 16.00 hours of the day. There is also great concern regarding disturbance to the services and damage to the Synagogue's foundations and fabric during the construction of such a large tower so close to this ancient building. Noise and dust will also significantly affect the building and users.
The proposal for a shopping arcade on Heneage Lane and provision for parking for hundreds of bicycles means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

One cannot begin to imagine this kind of encroachment being permitted on the doorstep and immediate surrounds of St. Paul's Cathedral, despite Bevis Marks Synagogue's similar importance to people of the Jewish faith.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Nicki Martin
Address: 21 Tretawn Park Mill Hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I am a long standing member of Bevis Marks synagogue which is yards away from this proposed development. My husband's family have been practising members since the synagogue was built in 1701 and they have their original seat inside.

I strongly object to the application on the following grounds-

. The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
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Case Officer: Bhakti Depala

Customer Details

Name: Miss Christie Thomson

Address: 4 Teal Close Great Notley Braintree

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I object to this development near the Bevis Marks Synagogue due to the fact it is such an important and historical venue for many people that it would be a real disappointment and misjustice. Not only will it increase the noise in the quite peaceful synagogue but will have a huge impact on the light and view of the synagogue.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Genevieve Crewe
Address: 34 rue Jean Pierre Biermann Luxembourg

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Objection due to the impact this will have on Bevis Marks Synagogue- a cathedral for Jewish faith and a heritage centre for British Jews.
Noise and lack of light will impact this wonderful historic building, and the community and tourism it gathers. The building survived world war and IRA bombings - let's not destroy it with commercialism.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ronnie morgan
Address: 39 Woodstock Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The building will be an eye sore as well as damaging to the local community as well as affecting natural light in the surrounding properties

There is already a crazy amount of traffic and this will only exacerbate this.

You cannot let this approval be granted as it will do irreparable damage to the sanctity and heritage of the local area.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Samantha Martin
Address: 3a Bourne Road BUSHEY

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:Bevis Marks Synagogue has a unique history. It is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the UK. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith.

The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Based on the above, I strongly urge you to reject this planning application.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Tony Silverman
Address: Flat 1 8 Coolhurst Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:City authorities are rightly looking for ways to nurture and expand the draw of the City in order to rebuild footfall. It is therefore a truly dysfunctional madness to undermine the setting and role of Bevis Marks Synagogue (Bevis Marks) at this time in favour of another accommodation shell.
Bevis Marks is a completely world class heritage gem in almost every conceivable way - architecturally, aesthetically, culturally, historically and socially, and that's just to start with! I'm always thrilled to visit, which is not often enough. Why on earth would you want to, figuratively and literally, cast a shadow over Bevis Marks and everything that happens there?
If it needs saying, what should be happening instead is to brainstorm ways of sensitively promoting the social role of Bevis Marks in the 2020s. It is an absolute treasure trove of history and literature relevant, for example, to tolerance (not least of course in its founding and the return of Jews to England) and diversity. It is a beacon in many respects which, while already bright, has the potential to shine far more strongly. (Including, to my own mind, within the Jewish community

although that is perhaps another story!)
The significance of Bevis Marks has been recognised by City authorities in the support that has been provided, as I understand it, over recent years. There is a potentially rich reward for harvesting this investment by preserving, nurturing and expanding Bevis Marks' reach and influence in the 2020s.
31 Bury Street is not a suitable development site. There is no reason why further skyscrapers should not be built but the right location, for the City, would simply be north of Bevis Marks. 31 Bury Street would only become a development site were the City to donate, to the account of the site's owners, the irreplaceable heritage, social relevance and footfall assets that would be lost/diminished in the development. It would be madness to do so for the sake of an accommodation shell.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Victor Kateck
Address: Flat 19, The Manor, Regents Drive Repton Park Woodford Green

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is the oldest synagogue in the UK. It is Grade 1 listed and its environs should be respected in the same way that no one would dream of putting a 21storey building next to Westminster Abbey or St. Margaret's Westminster. This dreadful proposal cannot be allowed to proceed.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Paul Olins
Address: Apartment 37, Alberts Court 2 Palgrave Gardens LONDON

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:development out of place

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr ian braidman
Address: 9 Lower Merton Rise LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Then proposal will detract from the enjoyment and use of the building due to noise and light issues

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Sharon Blacker
Address: 62 Warwick Avenue Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:This will be totally detrimental to the fabric and integrity of Bevis Marks Synagogue

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stephen Blank
Address: Flat 10 Holmrook Suffolk Road Altrincham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:The proposed building is immediately beside Bevis Marks Synagogue, a Grade 1 Listed building dating back to 1701. Not only is it a historic building but it is in use today and has a status equivalent to the Cathedral Synagogue of the whole United Kingdom. It is the only non-Christian place of worship in the City of London. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, but despite Bevis has similar importance to people of the Jewish faith.

The sheer size of the proposed building will have a hugely detrimental impact on its use. It will lose much of its sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on the ability of worshippers to pray and to celebrate weddings and other events of national importance.

The building will become the new backdrop to the synagogue, especially when first seeing it when

entering the courtyard, blocking out any sky around the synagogue.
There is a cumulative effect of this and other proposed buildings which would mean that the entire backdrop of the synagogue becomes these buildings and they will block out the sun virtually all day from 9 AM-4 PM.
Furthermore the proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Helen Skolnek
Address: 12 Elder Court Magpie. hall Road Bushey

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:It will hide light into the building. The building was the first Synagogue in the City of London and is therefore of great historic value and should not lose its appearance or use of light.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Hugh Shear
Address: 99 Highfield Avenue LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Dear Sirs. I very strongly object to the building of this 48 storey office block in Bury Street. The effect it will have on the most historically important and most beautiful synagogue in the whole of the UK will be catastrophic. The proposed edifice will cast a long shadow over the synagogue through most of daylight hours and dominate the at present open sky view from the synagogue's small courtyard in front of the main entrance. The proposals of the new building include space for a large bicycle park and shopping arcade. The access will be through Heneage Lane which runs along the eastern wall of the synagogue under the three large windows of the wall and past the front door of the Rabbi's home which abutts the northern wall of the synagogue. This lane at present is a very quiet thoroughfare but if the proposed developement is built it will become a very busy through route with noise affecting the the interior of the synagogue most of

the day and through the weekend. Nevermind with levels of antisemitism rising throughout Europe and the UK the security of the synagogue, it's congregation and visitors could be compromised with the greatly increased footfall along the lane.
The current coronavirus crisis has reduced the need for new office developement in the city drastically. The existing buildings are now sadly standing nearly empty and it's not at all clear when, if ever they will be full of office workers again. 0
Please reject this planning application as I'm sure you would not allow a forty eight storey building adjacent to ,say, St. Stephen's Wallbrook, St. Mary-le-Bow or at the south east corner of St. Pauls. Bevis Marks Synagogue holds a similar position in the affection and importance of the Jewish Community, not only here but in Western Europe as, sadly due to recent history it is the only synagogue to be continually worshipped in for over three hundred years in Europe.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Ivor Nathan
Address: Ty-Gwyn 2a Ridge Park Bramhall

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The sheer size of the building will have a hugely detrimental impact on the synagogue. They will lose much of their sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on its ability to support pray and to celebrate weddings and other events of national importance

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Leila Levine
Address: Apt.4 Beechmount 10 Langham Road Bowdon, Altrincham

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Light is going to be blocked out of the synagogue at Bevis Marks, to say nothing of the noise and possible damage to the foundations. This is a most important historical site and not just for Jews.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Raphael Graziani
Address: 18 Suffolk Close Colchester

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is the oldest synagogue in the UK and the only non-Christian place of worship in the City of London.
The building that would be built would take away the sun light and daylight and would make it very difficult to pray, especially when celebrating weddings and other events.
I used to go to this synagogue when growing up and know that even then, it was quite hidden away with not too much light, this would only make it much worse.
Also, there would be a lot more outside noise in the synagogue, which is not conducive for prayers.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Philip Garcia
Address: 48 Hamilton Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I strongly object to this planning application. The proposed development of a 48-storey building at 31 Bury Street, which overlooks Bevis Marks Synagogue, is highly detrimental to the setting of the Synagogue. The Synagogue is Grade 1 listed and is both the oldest synagogue in the country and is also of significant architectural merit. The Synagogue has occupied this site for nearly 320 years and its importance both historically and architecturally can hardly be overstated. The proposed 48-storey building would cause substantial harm to the Synagogue, including significant loss of daylight. I urge the City's planning committee to show consideration on both amenity and heritage grounds and refuse this planning application in its current form.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss ana bernic
Address: 81 a york mansions prince of wales drive london

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Carole Shaw
Address: 199 Clements Rd London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I am objecting to planning permission for 31 Bury Street due to the impact of a 51-storey building on the neighbouring Bevis Marks Synagogue as follows:.

· The synagogue has a unique history including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith;

· The sheer size of the building will have a hugely detrimental impact. The synagogue will lose much of its sunlight & daylight both to the courtyard and inside in the synagogue. This will

negatively impact on the ability to pray and to celebrate weddings and other events of national importance;

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue;

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM;

· The proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

I trust you will take these objections into consideration. Than you.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Ms Miriam Marson
Address: 63 Victoria Road Barnet

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:This is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom.
The sheer size of the building will have a hugely detrimental impact. with loss of sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on ability to pray and to celebrate weddings and other events of national importance.
The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Beruriah Wiegand
Address: 44 C Sunny Gardens Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:It would be just awful to have a 48 story building right next to Bevis Marks Synagogue, which is the largest and most important Sephardi synagogue in this country and which was the very first synagogue in the UK that has been in continued use. The new building would block out the sun and plunge the synagogue into darkness, which we cannot allow to happen !

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss saresh rose
Address: Inglefield Street Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed building will remove all natural light from this buildings

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Gillian Ansell Brauner
Address: 3 Chel Nashim Street, Apt 1 Old Katamon Jerusalem

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This project is adjacent to the historic Bevis Marks Synagogue, a listed building and a valuable cultural heritage landmark, lit mainly by candlelight in Spanish and Portuguese style.
The plan is not in keeping with the surroundings and in the present move to home-working environments, it is totally unwarranted, wasteful and detrimental to the environment, increasing pollution and placing a further burden on the inner city.
The works would be detrimental to cultural heritage in this area, in that faith services and ceremonies would not be closed down for a long time, nor tours for the public and other educational programs.
Furthermore, such work would also likely to endanger the foundations and stability of this amazing building.
Whereas another office building would fit in, a skyscraper block would eclipse all natural light from the synagogue and plunge it into darkness.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Lynne Beeden
Address: The Warren Burgess Hill

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:The beauty and history of this building must not be compromised by large amounts of building work which endanger the structure of the Synagogue. The working life of the building would be very difficult during a long and noisy development.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs julie chandler
Address: 6 Faversham Brow Oldham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I lived in London for 22 years and developers are erasing history and causing upset to residents. How many more high storey buildings do you want, especially next to a historic synagogue. Enough is enough.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Gavriel Nelken
Address: 16, Berkeley Square Bristol

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I vehemently object to this plan, which would encroach on an extremely significant sacred place

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Nancy Jones
Address: 12/4 Brunton Terrace Edinburgh

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The synagogue this building would obscure is a crucial part of Jewish British history. At a time of heightened antisemitism we should be protecting this heritage.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Tim Freed
Address: 29 Upper West Drive Ferring Worthing

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I strongly object to the proposed developments at 31 Bury Street and Heneage Lane. The project shows no respect or sensitivity to the proximity of several historic places of worship in the area, particularly the Bevis Marks Synagogue, the oldest and one of the most significant Jewish places of worship in the country, and the only non-Christian place of worship in the City. The building of further multi-storey offices here will block out and reduce sunlight and warmth from the synagogue and its courtyard while constant noise disturbance caused by an increase in footfall and bicycle usage in Heneage Lane is totally incompatible with an environment of worship and prayer. Likewise, the domination of towering offices would be totally inappropriate and detrimental to the genius loci.
It is extremely probable that deep excavating in the vicinity of the synagogue will cause damage to its building and fabric in addition to being hugely disruptive to worship, ceremonies and regular

events taking place there. This seems insensitive and incongruous particularly at a time when the synagogue is being supported by a heritage grant.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr John de Lange
Address: 103 Torrington Park North Finchley London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:How can you allow building two skyscrapers so close to one of England's historic sites, a synagogue which was built by one of Christopher Wren's assistants, built by Jews allowed to return by Oliver Cromwell?
The Nazis attacked, so did the IRA, and now developers. Vandaism cannot be allowed to suceed.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Hubert Krukowski
Address: 3/3 craws close Edinburgh

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The project would restrict the use of the synagogue nearby

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Sarah Notis
Address: 4827 Pine St Apt C2 Philadelphia USA

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks synagogue is a very important heritage site for Sephardic Jews, for British Jews, and the Jewish people in general. Even though I am in the States I know about Bevis Marks and its significance to British Jewry. Jewish history should be preserved and Bevis Marks' light into its sanctuary should not be blocked so this synagogue can continue to be an inspiring place of worship for many generations.

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Melissa Clifford
Address: 572 Alexandra Parade Flat 3/2 Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Residential Amenity

Comment:The proposed building would block off light to the synagogue next door.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jonathan Judah
Address: 21 Ashmore Road Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This will affect the light within the synagogue and will overshadow it

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stuart Fletcher
Address: House No. 3 Crabtree Place London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed development would be catastrophic in it's impact on Bevis Marks Synagogue. Key points that are essential to take into account and underpin a rejection of the proposed development are as follows:
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. Much of our sunlight & daylight both to the courtyard and inside in the synagogue will be lost. This will negatively impact on the ability of those worshipping to pray as well as to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Hilary Jackson
Address: 12 Sandmoor Mews Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:Would impact in the most detrimental way.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Allison Jones
Address: 18 KEYFIELD TERRACE St. Albans

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will destroy the character of the neighboring synagogue, the UK's oldest synagogue in continuous use, by blocking nearly all natural light from the building. This is entirely unacceptable.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr RICHARD BOLCHOVER
Address: 53 Exeter Road LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This plan would damage the oldest and most beautiful synagogue in the United Kingdom. It should not be contemplated.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Raz-Rhodes
Address: 6A WESTROW PUTNEY LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Object most strongly - how can the esteemed City allow such a desecration of a JewishHeritage site? The only synagogue in continual use since the beginning of the 18th century, a symbol of liberal protestantism of England, and a place of world wide veneration. A place of pilgrimage to Jews both Sephardic and Ashkenasic. A beautiful building in original setting and a classic example of Wren style church architecture. Just imagine if it was St Paul's cathedral!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Mel Cappe
Address: 204 Cottingham St Toronto

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is an historic place of worship deserving of being protected from incursions, shade and detractions.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Michael Miller
Address: 3 Cecil Rd Liverpool

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:this will block the light to the beautiful old synagogue next door. it doesn't seem fair or respectful.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Lord isobel Hangasjárvi
Address: Vivarium House Glasgow

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Holy places should be utilized as places of faith and not for the generation of individual wealth. Hand this property back to the community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Andrea Rappoport
Address: 2 2 Montgomery court 66 mountfield road

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:Bevis marks is an historic building with important history not only to the Jewish community but to British history of tolerance and accommodating ethnic minorities.
It is also a listed building and on heritage tours of the area.
Building skyscrapers in the area would dwarf this precious site.
But also surely since COVID19 there's far less demand for office space and resources could be better used for affordable housing.
It would be a win win win solution.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Matthew Shahin Richardson
Address: 47 Windmill Court Newcastle upon Tyne

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The Sephardic heritage of this country must be protected at all costs.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Gordon Shiach
Address: 1c Elliothill Street Dunfermline

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Proposed new development would likely jeopardise the adjacent 300+ year old synagogue given the extent of earthworks initially requirement and at a later stage deny light to it. The proposed new development should not be allowed next to the listed, historically important, Bevis Marks Synagogue for the reasons given above.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Dr B Yudkin
Address: 1 Keble Court 45 Sunderland Avenue Oxford

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:The proposed development lies between and very close to two Grade 1 listed buildings, Bevis Marks synagogue and St Katharine Cree Church. It would radically alter the setting of both buildings, which legally must be conserved.

Bevis Marks Synagogue in particular is of immense heritage significance and is the oldest synagogue in continuous use in the whole of Europe. To allow a development that would not be allowed right next to an equally significant church -- St Paul's, for example -- would raise significant questions about equality of treatment.

The proposed development would alter the whole character of Heneage Lane, changing it into a busy thoroughfare for cyclists and shoppers who work and shop in the proposed building. This

would create a great deal of additional noise and remove the tranquillity that is a unique part of the heritage in the immediate surroundings of Bevis Marks Synagogue. Large numbers of pedestrians using a very narrow area for leisure inevitably create a lot of noise even if there is no motor traffic.

The EIA claims to take account of loss of light. But its methodology is inappropriate for this building because it looks at the reduction across all times of day and all times of year. This does not reflect the impact on the synagogue, which is used predominantly at certain times of the day and year. The EIA justifies using a 2011 methodology for sunlight, daylight, etc. even though much more recent guidance is available, saying that the new guidance is intended for residential rather than commercial properties. This justification has not been properly explained. Furthermore, although the EIA finds that loss of daylight is small, there does not appear to have been any assessment as to whether the remaining light would be sufficient for the building, and no access has been sought to the affected buildings to measure this.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Edward Simonds
Address: 2 Swainstone Road Reading

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Impact on neighbouring properties of historic importance: notably interrupting light access to the countries longest used synagogue.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniel Bentley
Address: 23 Bellfield St Ottawa

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is one of the most important business London. It is a physical reminder of the first British steps to decency in relations with the Jewish community. It appears prominently marked in maps and descriptions of London going back to the early 18th century when it was built. Obscuring it with a modern monstrous tower would be an act of unique
Ioffensiveness and disrespect

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr William Aghoghogbe
Address: 3 Cleeves Avenue Warwick

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This proposed development presents a disruption and danger to a historically and culturally significant building. The current plans would be detrimental to the local community who use the building, and are generally insensitive to the building and area itself.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Adham Smart
Address: 9 Alfoxton Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development is so tall that it will totally block the light coming through the windows of this historic synagogue - this cannot be allowed.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Melissa Jennings
Address: 3/1, 27 Dixon Road Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocking sunlight from entering a sacred space is abhorrent. This plan should not go through.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Russell Mishcon Mishcon
Address: 2 Prince Arthur Mews London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks synagogue is a Grade I listed building and is the only synagogue in Europe which has held regular services continuously for more than 300 years.The unique history of the synagogue includes the fact that it is the only non-Christian place of worship in the City of London.

The sheer size of the proposed new building will have a hugely detrimental impact on the synagogue as much sunlight & daylight both to the courtyard and inside the synagogue will be completely lost for much of the day. This will negatively impact on the ability to pray and to celebrate weddings and other events of national importance. This kind of encroachment would not be permitted on the doorstep of St Paul's, despite Bevis Marks's similar importance to people of the Jewish faith.
The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the

rabbi's house.
I am not against redevelopment but not such that so adversely affects London's heritage sites, one of which is this unique and famous synagogue.
And given the probable changes in office and retail requirements as a result of the current pandemic has the developer established need for such a large and tall building?
I hope that planning permission will be refused.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Ivan shaw
Address: 55 Hermitage Lane London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The 2 buildings proposed would completely overshadow the Bevis Marks Synagogue. The Synagogue is a historic place of worship for Jews. Worshipers praying in the courtyard would be doing so in the shadows as there would be no direct sunlight nearly all day.

The Cycle parking facility planned nearby would result in a lot of bicycle traffic and noise through the narrow lane next to the Synagogue. The City has a proud history in its acceptance of Jews. The first Jewish MP sent to Parliament, Rotschild, represented the City. He was a member of Bevis Marks, as was Disraeli's father.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr James Rath
Address: 28 Alba Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity
- Traffic or Highways

Comment:Disruptive noise inside synagogue and rabbi's house
Loss of sunlight and daylight. Blocking out sky and sun all day
Large increase in traffic

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr James Rath
Address: 28 Alba Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity
- Traffic or Highways

Comment:Noise
Environmental issues
Traffic and highways issues

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Derek Wax
Address: 8 Henson Avenue London London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity
- Traffic or Highways

Comment:would block all light from this very historic, precious and significant religious building and create a lot of noise

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Sharon Abrahamson
Address: 24 Magnolia Court The Mall Harrow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The planned buildings will ruin the surroundings, light, seeing the sky from this wonderful synagogue built in 1701.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs sue gil
Address: 12 Bridgewater way Bushey

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I am a London blue badge tour guide and have led numerous groups on visits to the East End of London AND TO THIS WONDERFUL LISTED BUILDING
NOT ONLY IS IT A PRICELESS LISTED BUILDING IMPORTANT IN JEWISH HERITAGE AND AS A PLACE OF WORSHIP BUT TOURISTS FROM ALL OVER THE WORLD VISIT LONDON AND COME TO VISIT BEVIS MARKS SYNAGOGUE
I have been guiding since 1976 and am delighted to see our tourists and visitors impressed by the beauty and history of the building
Even Samuel Pepys mentions a visit to Bevis Marks in his famous diary and our late prime minister Benjamin Disraeli was a member when a child
The Duke Street synagogue was destroyed in a bombing raid during the Second world war
It is vital that we preserve Bevis Marks ,an important piece of history ,in all its glory
Sue Gil BA ,MITG

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Lia Lalli
Address: Flat 3, 6 Mildmay Grove South London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:This is a historical site and we need to protect and preserve there are enough high rise buildings in the City of London

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Angela Donen
Address: The New Meeting House Station st Mansfield

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Quite apart from the size of the proposed development and its effect on the light available to Bevis Mark's I object on other grounds
Currently the City is under occupied and there is little indication of need for a development of any kind let alone one of the size planned.
The synagogue is unique and represents a period shortly after Jews were allowed to resettle in England
It would send a message that development is more important than respectful continuity.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Hirsh Cashdan
Address: 9 Sydney Road Richmond

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The Bevis Marks synagogue is the oldest existing synagogue in the UK, the only one in the City of London and a most beautiful place of worship for the Jewish community. The proposed development will cause the synagogue to be overshadowed and lose any sunlight entering the courtyard and the synagogue itself. This will create an atmosphere of isolation not consistent with the values of the Jewish community or the community at large.
Further the plans for bike storage and even more for a shopping precinct will significantly increase the noise coming from the lane outside into the synagogue, disrupt services and spoil the atmosphere of this much loved iconic building.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniel Saville
Address: 60 Gracechurch Street LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development in the heart of the City is completely over-bearing in size and would surround and dwarf the historic Bevis Marks Synagogue. What is currently a tranquil Synagogue courtyard would be in shadow for most of the day and the quiet side passage would become a main route into the proposed arcade. Regular services and special religious occasions would be disrupted by additional traffic and noise on all sides. The combined effect of this and other proposed buildings would leave the Synagogue, an elegantly proportioned historic building, as a curious blip bearing no relationship to the surrounding concrete and glass.

As this is the oldest Synagogue in Britain, of huge importance to the Jewish community and to the history of the City itself, it raises the question whether such vandalism would be allowed next to St Paul's or Canterbury Cathedrals.

The City of London has changed beyond recognition over the past 20 years. It has already lost

much of its character and historic buildings, but this proposed development crosses a line. Do we really want Shanghai on Thames, or are there still some buildings and aspects of the City worth protecting?

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jeremy Gordon
Address: New London Synagogue 33 Abbey Rd London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I'm saddened to see this project threaten the peaceful position of Bevis Marks Synagogue, the most important site of Jewish interest in the United Kingdom.
Bevis Marks is a place that stands not only for Britain's welcome of places of great architectural importance, of the heritage of the Jewish people and our place in this society, but more than all of that, Bevis Marks stands as a place which marks Britain as a place that values diversity and plurality and respect of difference. It has so stood, proudly, since 1701. It doesn't deserve to be dwarfed by a skyscraper.

A 40+ storey tower is entirely inappropriate a site of such special importance.

Yours,

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Leon Malins
Address: 88 Hartland Drive Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I am horrified that the proposed developers, West End of London Property Unit Trust (Welput), could even think to put up such a large and overbearing new building comprising two basement levels (plus two mezzanines) and ground floor plus 48 upper storeys within 25 metres of a 320-year-old synagogue of importance and historic interest. The existing building which it is to replace is just eight floors.
Bevis Marks Synagogue is the oldest Synagogue in Great Britain which is still used as an active place of worship. The Grade 1 listed, plain rectangular building of red brick with modest dressings of Portland stone and two tiers of windows is unchanged since being built in 1701. The internal fittings, some of which predate the building, include seven large brass chandeliers, which are not electric as one would expect but are still used with real candles.
It is unacceptable that the proposed building, with its 48 floors and very close proximity, will completely overshadow the two-storey synagogue in its historic courtyard setting and the Beadle's House which dates from about 1890 and now used as the rabbi's house. It has been calculated

that the synagogue will be in the shadow of this proposed 48 storey building from the early afternoon onwards.
The proposal should be greatly reduced in size in order to obtain planning permission. Should that happen, particular attention must be paid during construction to possible damage to the fabric of the synagogue by ground heave, noise during synagogue services, vibration, dust and any other such annoyances.
For the above reasons I believe that the proposed plans must not be approved as they stand.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Bennett
Address: Bedegars Lea Kenwood Close London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:As a friend & occasional congregant of Bevis Marks Synagogue I wish to lodge an objection to the proposed development of 31, Bury Street. My concerns are a)The loss of daylight/sunlight both in the courtyard & the Synagogue. b)The sheer bulk of the proposed development will ruin exterior views of this old building(1701). It must be remembered that not only is this the only place of Jewish worship in the City it is regarded by many people as a sort of Cathedral for people of the Jewish faith. At present Bevis Marks is a secluded backwater but with this development & other proposed schemes it will become a busy thoroughfare which will disturb the both the worshippers & the home of the Rabbi.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Morgan Holleb
Address: 451 Victoria Road Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:A tall building would encroach upon Bevis Mark Synagogue, harming the Sephardic Jewish community for the profit of London's developers. It is completely unacceptable.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Ms Alex Lacey
Address: 6 greenland mews London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This proposed development will completely wall in bevis marks synagogue. This is a place of worship, and should be allowed a quiet location for worshippers to come. This development would strip light away from bevis marks for most of the day and increase noise and disturbance down what is currently a quiet alley. Please don't ruin this historic and important site with towers around it. We are better than bowing to money like this.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Miss June Addison
Address: 53 Calbourne Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to this development because of the grave effect it will inflict on the Bevis Marks Synagogue. I am a concerned resident of London and am also a City of London Guide. Do the City of London planners have absolutely no perception of the importance of the historic and religious heritage of the Square Mile. There are strict rules for the preservation of the area around St Paul's Cathedral, a centre of Christian worship. Why are there not the same rights granted to the Bevis Marks Synagogue, a centre for the Jewish faith since the 17th century. Disgraceful.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Miss June Addison
Address: 53 Calbourne Road London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I am a City of London Guide and this proposal will not enhance the City in any way at all. I will impact very badly on the Bevis Marks synagogue. This is an important centre for the Jewish faith. There are strict guidelines for any building, rebuilding, close to St Paul's Cathedral and other heritage sites - such guidelines should also protect the heritage of Bevis Marks and its importance to us all.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Clive Winkler
Address: 44 Green Lane Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Traffic or Highways

Comment:I believe this development would be detrimental to the Bevis Marks Synagogue which was opened in 1701 and is the oldest continuously used synagogue in the UK.

There would be significant loss of light and increased foot traffic in the adjacent thoroughfares.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniel Ettinghausen
Address: 248 Lauderdale Mansions LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed development so near to a Grade 1 listed Synagogue is unacceptable. It would dwarf the building whish has held services continually since 1701, would restrict the light both within the building and in the yard outside, used for weddings and other functions.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Amy Weichselbaum
Address: 34 Wickliffe Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Vivienne Newgrosh
Address: 4A The Drive Hale Barns Altrincham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I object on the grounds that future high rise developments will be detrimental to the integrity of Bevis Marks Synagogue, a Grade 1 listed building; it is unique being the oldest synagogue in the country; built in its original Spanish & Portuguese style; its surrounding courtyard area; loss of light, and possible danger in case of emergency in such a narrow locality.

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Ian Stolerman
Address: 60 Arc House 82 Tanner Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Bury House is the second of two huge buildings that developers wish to construct within a few yards of the historic Bevis Marks Synagogue, a unique place of worship that has been in continuous use ever since Oliver Cromwell allowed Jews to live again in England after the expulsion of 1290; in fact, it has been in uninterrupted use for longer than any other synagogue in Europe. No other synagogue has such a prominent place in the minds and hearts of British Jews, and I believe that we feel about it much as Christians do about St. Paul's Cathedral. We, like Londoners of the Christian faith, would be horrified if huge skyscrapers were to be built at a similar distance from historic St. Paul's Cathedral and imagine that Christians would react to such an occurrence much as we now do to the proposed works on the threshold of Bevis Marks.
The proposal includes the development of a shopping arcade and will hugely increase pedestrian traffic in Heneage Lane on the synagogue's eastern boundary. There would inevitably be an associated increase in noise that will have a disruptive effect upon services inside the synagogue

and on social events in the courtyard surrounding it. The courtyard, in the open air, is presently an immense resource much used for celebrations of festivals and community events and it will lose much of its appeal should views of the sky and natural light be largely obliterated by the construction of enormous buildings directly adjacent to it.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Joshua Maslin
Address: 10 Edinburgh House Tenterden Grove London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks has been granted World Heritage status and has many visitors from abroad apart from the services that are held there. Most of these activities are during daylight hours. The large window behind the Ark is the main source of light. If these buildings that are planned are built, there will be no natural light into the synagogue during the day Which as I said earlier is when the majority of activities take place.

I strongly urge you to reconsider your plans in the light of the above.

Thank you

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Messias
Address: Sandalwood Pinner Hill Pinner

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed development is totally inappropriate adjacent to such an important historical, cultural, architectural and religious building as the Bevis Marks Synagogue.
The more so because of the significance of the "BMS" in the history of Anglo-Jewry and it's relationship to English history.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Nicholas Guitard
Address: New Mill Manor Poundstock Bude

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
Comment:Development affecting Bevis Marks Synagogue

This proposed development is said to threaten the amenities of the "home church" of Britain's Sephardic community.

Were it a Christian building of equal historic importance I do not doubt that its peace, space and light would be considered as precious aspects of its character deserving protection.

Were it a Muslim building of equal historic importance, I suspect very great care indeed would be taken not to offend community susceptibilities.

Given the horrifying institutionalised anti-semitism we have seen in this country in recent years, as well as the resurgence of such sentiments worldwide, I hope that especial weight will be given to

Jewish sensitivities when this application is considered.

I am not Jewish, but I am aware of both the long and terrible history of anti-semitism and of the valuable contribution Jews have made for centuries to the City, to London and to Britain.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Cyril Ordman
Address: Flat 1 Northlands Hill Top Hale Altrincham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The new Bury House would environmentally overwhelm Bevis Marks Synagogue, which is of great national importance, from religious, historic & heritage points of view.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs karen smith
Address: romneys house holly bush hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is such an important architectural and historical building. It is the oldest surviving synagogue in the UK . My husbands family can trace their connection to this synagogue back over 300 years to when it was first built and they were members of the congregation.
It such an important building but also symbol of historical religious tolerance in the UK it would be mad to build such an large office block right next to it . I would urge the City of London to consider carefully about approving such an application

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Judy Weleminsky
Address: 3 Chelwood gardens Richmond

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Residential Amenity

Comment:Bevis Marks synagogue is the oldest synagogue in the UK and the only non Christian place of worship in the City of London. This building will vastly overshadow Bevis Marks thus reducing the cultural and religious heritage and amenity of this historic site

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Adam Seres
Address: Flat 7 139 York Way London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Hello,

I'd like to object to the proposed construction at 31 Bury Street due to the significant adverse impact which the new building will have on Bevin Marks synagogue.

The synagogue has a unique history and it is the only non-Christian place of worship in the City of London It can be considered as the Cathedral Synagogue of the United Kingdom.

One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith.

The sheer size of the proposed building will have a hugely detrimental impact. Much of the

sunlight & daylight both to the courtyard and inside in the synagogue will likely be lost and this will negatively impact on comgregants' ability to pray and to celebrate weddings and other events of national importance.

The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue and impairing its visual beauty, dating back many centuries.

The cumulative effect of this and other proposed buildings is that the entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

Furthermore, the proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue.

For all of the above reasons, I'd be grateful if the proposed plans could be revisited and I ask that the architects liaise with the synagogue authorities to find reasonable solutions to each of the concerns raised.

Many thanks,
Adam

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Susan Hadley
Address: 43 Elmhurst Drive South Woodford London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I would like to object to this current proposal for a high rise block, particularly as this, and the proposed building in Creechurch Lane will literally overshadow the Bevin Marks Synagogue. I see no need for such developments in the current changing work practices brought on by Covid. As a London guide I also fear that the historical heart is being torn out of the City by a number of bland High rises with no redeeming architectural features. I hope this plan will be reconsidered.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Richards
Address: 62 Cissbury Ring North London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:There are many reasons to express an objection to this proposed development but paramount of those is the effect it'll have on the synagogue at Bevis Marks. The loss of light and the huge additional noise impact, potentially all day every day, even after the works are complete, are really enough to consider, to throw out this application.
I'm not one to object for the sake of it but this really is above and beyond the realms of being reasonable. I cannot see this sort of thing being considered/allowed, should it impact on any other site of religious significance within the square mile!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Alastair Bloom
Address: 3 Sydney Grove London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This developement will impact to the detrement of Bevis Marks Synagogue ... one of the oldest in the world ... please protect it

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Anna Targett
Address: 2 Sidney Road Twickenham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:It is unacceptable that all light should disappear from this area with so many tall buildings. Smaller, historic sites will be totally dwarfed. No existing building should be deprived of fresh air and light. This is unacceptable... Bevis Marks synagogue is a part of the fabric of the City and should not be disadvantaged in this way.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Grace Gerardi
Address: 981 Danforth Dr Batavia, IL, USA

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:You will hide the synagogue!! Sephardic Jews endowed London with fish and chips, don't erase Sephardi heritage in London.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Daniel Borin
Address: 150 St. Alphonsus Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:The cultural, architectural and functional arguments set out below by the Bevis Marks Synagogue Committee are eloquent and powerful enough. It is plain to all, Jew and non-Jew alike that the proposed development is planning vandalism on a grand scale. I add my voice to the cry for law, decency and respect to prevail.

The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. The synagogue will lose

much of its sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Bernard Garston
Address: 88,Hillway,Highgate London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed new buildings will completely block in the Bevis Marks Synagogue which is one of the most celebrated ones for Anglojewry. It is their equivalent of St Paul's Cathedral and is one of the most celebrated buildings in London. In my opinion, no tall building should be erected which will compromise in any way this synagogue

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Baron
Address: 68 Porchester Terrace London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity
- Traffic or Highways

Comment:The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Veronica Weldon
Address: 40 Colenso Drive Mill Hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:Bevis Mark's Shul being of heritage value would have no light and far too many cars and foot fall around it. It is a religious building and should have ease of entry light and noise awarded to it.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Louise Primrose
Address: 122 Slateford Road Edinburgh

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:To protect the Bevis Marks historic site

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Shinwoo Kim
Address: 24 Kneller Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:This building is such an important heritage site in London that is still in use. Most synagogues in the UK are Ashkenazi, leaving only a few places for Sephardi Jews to go worship and practise their religion. The building was the work of Sephardi Jews in 1701 and it holds so much history and is used by Sephardi Jews to this day. Do not demolish this building as it is equivalent to demolishing a 600 year old history - you wouldn't do this to other heritage sites in the UK so why would you do this.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr David Lewin
Address: 156 Totteridge Lane London

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I may physically live remotely from the Synagogue, but regularly visit and attend this spiritual home. It is a centre of both worship and communal activities and functions at which generations of our families have gathered.

The proposed development gives no, or at least insufficient, protection to this historically significant communal synagogue built 130 years ago and preserved by the minority Jewish population of Spanish and Portuguese origin.

The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One

cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

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· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs SUSAN BENNETT
Address: 50 LACY ROAD PUTNEY London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Traffic or Highways

Comment:Please consider the huge detrimental impact these high-rise building(s) will have on the surrounding area and particularly on the beautiful Bevis Marks synagogue.
I strongly object to the planning permission. There must be a better way.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Anna Roszak
Address: 30 St Vincent Terrace Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Who needs another office building after covid-19? Please keep this historical and religious site intact.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Daniel Preter
Address: 11 Park Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The space around the historic Bevis Marks synagogue must be preserved. These developments will block this old and historically important building of worship in completely, entirely changing the setting and access to light.
In Covid, and post Covid times, another office block will not be needed. Please do not allow this building to go ahead.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Jonathan Lever
Address: apartment 7 dunham mount 92 dunham road altrincham cheshire

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I have visited the Bevis Marks Synagogue previously and it is presently very low down amongst neighbouring buildings. The present development suggested will be extremely detrimental to the enjoyment of members of the synagogue and the reduction in the right of light will be enormous. As this is a national heritage site I think that the proposal should be dealt with in a far more sympathetic manner and to allow the synagogue to maintain its presence for members of the synagogue as the reduction in the right of light will be enormous.Surely they have by now earned the ancient right of usage to maintain their present site unencumbered any further .

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Marc Cohen
Address: 14 Magnolia Gardens Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This proposal will negatively impact on the area and the synagogue. It will prohibit the ability to pray for synagogue goers to celebrate weddings and other events of national importance.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Anthony Levy

Address: 19, York Court, The Albany Albany Park road Kingston upon Thames

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment:The proposed development would be detrimental to an historic place of worship, namely Bevis Marks Synagogue, and to those who worship there by affecting its external and internal amenities through loss of light, increase in noise and generally overpowering this beautiful and holy edifice.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Kat Fox
Address: 7 Tolbooth Wynd Cellardyke

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:This project would negatively impact the UK's oldest shul. The building would block out the sun and bring added noise and traffic.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Morgan Hale
Address: 15 Arthington Street Rochdale

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed development would block virtually all sunlight from entering the next-door synagogue, the oldest in continuous use in the UK. This would be a dreadful blow both to the heritage of the synagogue and to its congregation, whose place of worship would be plunged into darkness. I strongly feel that the proposed development should not be granted planning permission for this reason.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Stella Green
Address: 23 japan crescent London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Destruction of Sephardic jewish heritage in the name of large building development given the context of mounting antisemitism seems outrageously insensitive and unneeded - the obstruction of light this build would incur insults the synagogue and it's congregants.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Scott Crawford
Address: 4 Tulloch Street Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development would only negatively impact on the buildings surrounding, plunging Bevis Marks Synagogue into darkness. As a historic building this should be protected at all costs.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Luke McWilliams
Address: 318 Springburn Road Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to the impact which the height of this new building would have on other buildings in the area, such as the local synagogue.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Isaac Ofori-Solomon
Address: 3315 Ridge Hill Parkway Douglasville

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I feel like this historic landmark shouldn't be put into a position where it is compromised

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Chestnut Van Bramer
Address: 614 Queen Street Philadelphia

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Don't block the synagogue

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Robina Harper
Address: 29 Drumtrocher Street Kilsyth

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The building of this tall building adjacent to the Bevis Marks Synagogue which is the oldest continually occupied synagogue in the UK will destroy a huge part of Jewish History. There are few and far historical buildings left and to disrupt this is a travesty.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Joy Levene
Address: 37 Greenwich South Street, London, United Kingdom

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This is absolutely horrific. I am a London Blue Badge tour guide and have been alerted to this proposal by by colleagues, Jewish and otherwise, who are all alarmed at the prospect. How can the City of London allow this or even suggest it? I passed my City of London Guiding examination over 30 years ago and was so thrilled. I loved the course and all the lectures and meetings. I regarded the City of London so highly and have proudly showed people round ever since. The look of the City has changed forever, not always for the best and now we see how dreadful this proposal is. How can you destroy forever the impact of such a historic building as Bevis Marks which has been there so long? These two enormous tall buildings at 33 Creechurch Lane and 31 Bury Street will be it's death nell. You might just as well pull it down and consign it to history. It is a totally anti Semitic decision and anti London and anti tourist as well. It will lead to a virtual shopping arcade and bring noise and cyclists and bike stalls and at worst leave the synagogue in darkness for most of the day. PLEASE, PLEASE, PLEASE STOP THIS. For the love

of God!!

I wish to copy this to apply to 33 Creechurch Lane as well.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Flora Frank. BEM
Address: 70 kenilworth Road Edgware Middlesex

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks Syngogue is a beloved, long standing and cherished Heritage Building. Its very essence will be marred by the project. Bevis Marks enhances the beauty of the city of London and its site should not be spoilt in any way!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Claire Morland
Address: 16 Elmcroft Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is a working synagogue of cultural and historical importance, part of the City of London's multicultural heritage. This building will negatively impact on Bevis Marks' daily use and is opposed.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Sue Gouldman
Address: 2 Water Gardens Stanmore

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity
- Traffic or Highways

Comment:This is a unique and historic building, in terms of both religious significance and its place in the fabric of the City of London.
The Bevis Marks Synagogue will be overshadowed (literally with light being restricted to the building) and physically hemmed in at ground level with consequences for the movement of pedestrians to this heritage building.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Gary Plein
Address: 28 St. Mary's Avenue Finchley London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I have been to this amazing historical synagogue.
You surely cannot allow them to lose their light.
What sort of place would it become?

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Mary Buss
Address: 5 The Mews Cherry Orchard Highworth, Wiltshire

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I think hat this is going to make it almost impossible for a place of worship to function.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Trevor berkowitz
Address: 67 Northway Hampstead garden suburb London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:To maintain a beautiful historic building for the Jewish community

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jim Grover
Address: 7 Northbourne Road LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I am not of the Jewish tradition...I am a CoE regular worshipper. I have visited the Bevis Marks Synagogue. I am a strong believer that all of the diverse faiths that co-exist in London should be respected and protected. I also know how important the 'space' in which one worships, and how that space 'is' and 'feels', is incredibly important in the act of worship and practising one's faith. I am shocked to see that a space which is so, so important to the Jewish community, and which is so rich in heritage, is about to be diminished forever by two insensitive commercial developments that will, literally, envelop this precious space and change the act of worship and community forever. I would urge you to reconsider these developments...even more so when it's just not clear why we need to be adding commercial space in London. Thank you.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Brendan O'Neill
Address: 30 Burdon Lane Cheam Sutton

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to this application for several reasons.
The proposal involves a shopping arcade and parking for many bicycles along the eastern wall of the synagogue, creating significant noise and disruption.
A 51 story building will be very detrimental, causing significant disruption to sunlight and daylight to both the courtyard and inside, impacting on ability to pray and to celebrate weddings.
This is a truly historic building-the only non-Christian place of worship in the City and the Cathedral Synagogue of the UK. It should be treated with appropriate respect as other nationally known places of worship like St Pauls would be.
The proposed building would be the new backdrop to the synagogue when entering the courtyard blocking out any sky round the synagogue.
So I am firmly opposed to this proposed development.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr leslie lipowicz
Address: 21 elmgate gardens edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The granting of this application will cause loss of light to the synagogue next door

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs JACLYN CHERNETT
Address: 17 Peters Lodge Stonegrove Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane,

along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Katherine Davey
Address: 4 Pair South 3 Hare Court London

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Bevis Marks, a synagogue of incalculable importance not only to the Jewish community but to the spiritual and social history of the City and London as a whole, will be overwhelmed by this unnecessary development. As a City of London resident I am shocked by the unbridled building of disproportionate, ugly and superfluous buildings at the expense of historic buildings and venerable landscapes and street patterns in the square mile. The City has a shameful record in relation to its history (I was involved in the Smithfield enquiry) and will, it seems, allow any application by any developer regardless of the harm (noise, aesthetics, pollution, light) to residents, workers or worshippers. The City does not need these buildings - it did not need them before the pandemic. Southwark rejected Vinegar Yard as it had taken no account of changes in post-Covid requirements. The City should do the same. I have no faith in the City planners doing

anything other than rolling over for the developers - it would be heartening to be proved wrong. The City should take very careful note of the objections by Historic England. Has the Georgian Group been involved? Bevis Marks dates largely from after 1700 and the GG have a statutory right to be consulted.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Richard Wolfe
Address: 3 Rochester Terrace London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:There are times when the interest of business should not over-ride important local interests and this is a case in point

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Lester Kershenbaum
Address: 243 Lillie Road LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I was surprised to learn that the City of London is considering granting planning permission to the erection of two very large buildings adjacent to the historic Bevis Marks Synagogue which is, I believe, one of only two Grade-1 listed synagogues in London. The presence of towering blocks in the immediate vicinity of the synagogue would destroy the ambiance and peaceful setting of this historic building. Surely, it is the responsibility of the City of London to protect and conserve one of the most historic places of worship in the country.
I hope you will be able to reject the request for planning permission.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Deborah Behrens
Address: 11 Ross Way Northwood

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The sheer scale of the proposed development will have a massively damaging effect on the Synagogue. This will be due to loss of daylight and sunlight for much of the day as will as noise pollution from increased traffic which will be audible inside the Synagogue. Bevis Marks should be revered both as a place of worship of supreme importance to the Jewish Community as well as a building of outstanding historic significance to the entire nation.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms dmitri orion
Address: 5557 osage ave philadelphia

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is wildly disrespectful to the incredibly important synagogue next door which is a piece of living history and cultural religious connection. There are so few synagogues that have not been disrespected or destroyed by historical antisemitism. This holy place has survived that. Building this planned building next door would be a blight and would be disastrous for this beloved space.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Sabrina Lee
Address: Flat 22, Normandy House Wolsey Road HEMEL HEMPSTEAD

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

I was married in this Synagogue in August 20202, as were my family married here for for 300 years. This has such importance to myself and my family.

· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact

on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Customer Details

Name: Ms Aleph Ross
Address: 47 Lambeth Walk London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This would destroy the space light and atmosphere of the oldest synagogue in the country. Jewish heritage must be protected and particularly Sephardic Jewish heritage in London.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Oliver Martin
Address: 3a Bourne Road Bushey Bushey

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:Bevis Marks Synagogue has a unique history and my family has been attending for 10-11 generations back to 1701 when the synagogue was opened. It is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the UK. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith.

The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

The building will become the new backdrop to the synagogue, especially when first seeing it when

entering the courtyard, blocking out any sky around the synagogue.

The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Based on the above, I strongly urge you to reject this planning application.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr RICHARD REUBIN
Address: 35 ELLINGTON ROAD Muswell Hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object because the proposed construction is within yards of the ancient, historic and Grade 1 listed Bevis Marks Synagogue built in 1701.
The detrimental aesthetic effect of a 50 storey office block on the adjacent site and the inevitable vibration and disturbance of the ground in order to build a high rise building could cause untold , if not permanent, damage to the fabric of the historic and much loved Bevis Marks which is a building much loved Worldwide and not just in The City of London.

Comments for Planning Application 20/00848/FULEIA

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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Estelle Weiner
Address: 3 Larchwood The Crescent Cheadle

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:My grandparents were married at Bevis Marks Synagogue. There is a special air of reverence inside and outside in the same way one feels when by a cathedral or old church. Traffic noise will impact upon this atmosphere. Further, the shadows that will be created by such unsympathetic adjacent building will adversely affect the enjoyment of the synagogue grounds and the lack of light through the windows will be detrimental to the ambience brought out by the beautiful interior. It's the oldest synagogue in use in the country dating back to 1700's and needs to be conserved as such without imperilling it by allowing unchecked building nearby to it.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Simon Dias
Address: 8 Barclay Oval Woodford Green Essex

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
Comment:Dear Sir / Madam

Bevis Marks Synagogue is not only the oldest place of Jewish worship in the United Kingdom with a historical heritage spanning over 300 years, but is a truly beautiful building that needs preserving.

This is not only for future generations, but for the millions of tourists, both from the UK and across the globe, as well as all the schools, that visit it regularly for its historic information and value.

The safety of this building would be jeopardised by building new buildings too near. This is sad and wrong and surely cannot be allowed to happen? There is no telling what effect building work so close to Bevis Marks could have on the structure of a building of that age and it should be cherished not put at risk, as we assume is the case for all Grade 1 listed buildings.

In addition, building so close to Bevis Marks Synagogue would cut
out the already reduced amount of natural light and completely overshadowing the building.

We strongly object to these building works being permitted.

Lorraine and Simon Dias

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr RICHARD STOCK
Address: 5 Horseshoe Lane London N20 8NJ 5 Horseshoe Lane London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I object to the proposed building. It is of a massive scale which will result in the total dominance of the amenities of the historic Bevis Marks Synagogue

The ambience of the currently quiet environment will be disrupted by the associated high activity levels that will result from the office workers and shoppers that the new building will result in

The development is of a scale that totally is inappropriate and I hope that the planning decision pays the fullest respect to all of the negative implications that would clearly have a very detrimental impact on the synagogue building and the users of its facilities

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Joanne Benjamin
Address: Flat1, 159 Fallsbrook Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:The synagogue has a unique history including the fact that it is the only non-Christian place of worship in the City of London. It is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's Cathedral, despite Bevis's similar importance to people of the Jewish faith
·The sheer size of the building will have a hugely detrimental impact. The synagogue will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on the congregants ability to pray and to celebrate weddings and other events of national importance.
The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
The cumulative effect of this and other proposed buildings means that the entire backdrop of the

synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
The proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
This is a very important building to those of us of the Jewish faith, and as a historic building itself. These proposed buildings will ruin our heritage site and disrupt our ability to use the building for the purpose it was built and for which it has been used for hundreds of years, namely to pray and hold religious ceremonies in peace and without interruption or hindrance

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Madeleine Korn
Address: 2 Mansfield Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I object to the current planning application re Bury House for the following reasons.
The sheer size of the proposed building ie c 50 floors will have a hugely detrimental impact on Bevis Marks Synagogue. The synagogue will lose much of the natural sunlight & daylight every day from 9-4 pm both to the courtyard and inside in the synagogue. This will negatively impact on the congregants ability to pray and to celebrate weddings and other events of national importance.
The proposed building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue. The cumulative effect of this as well as other proposed buildings is that the entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
The proposed shopping arcade on Heneage lane with its parking for hundreds of bicycles, means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's

eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house. Madeleine Korn

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Matthew Owen
Address: 7 Sheen Common Drive Richmond

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:It is completely inappropriate for a 51-storey building to be adjacent to the oldest Jewish place of worship in this country.

A building of that size will plunge Bevis Marks into darkness, having a hugely detrimental impact on the experience of people who go to the synagogue, either for daily prayers, for communal celebrations or for weddings etc.

It is hard to imagine that such an application would be countenanced if this was a historic cathedral. Bevis Marks commands the same status amongst Anglo-Jewry.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stephen Latner
Address: 15 Stormont Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Bevis Marks synagogue, a historic and listed building, will suffer greatly from this development as will the London Jewish Community in general and other communities because the historic building is used for important occasions by many and not only the local membership. Also, it is a historic visiting attraction for overseas visitors, whether Jewish or not. Would permission for the development be allowed in the vicinity of St. Paul's Cathedral-which is as important to Christians as Bevis Marks is to Jews? Thankfully, both were spared during WW2.

The synagogue is situated on a narrow street. The development's sheer size will have a massively negative impact on the synagogue with light being blocked and a historic building being surrounded by a backdrop of large, totally unsuitable buildings towering over the synagogue.. A

shopping arcade is being created which will cause a considerable increase in traffic along the synagogue's eastern wall, causing unacceptable noise in the synagogue and in the rabbi's house.

I do not usually get involved in planning applications. However, I cannot remain silent when such a clearly unacceptable proposal is being submitted it seems on the basis that its clearly considerable negative impact on a historic synagogue and the Jewish community is not sufficiently important.

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Peter Toeman
Address: Abbey Rd, St Johns Wood, London NW8 9AS

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to this application on heritage grounds due to cumulative harm that would be caused by the scale and massing of the two applications to the setting and therefore the significance of the Bevis Marks Synagogue.

I wish to echo the concerns raised by Caroe Architecture in relation to the potential impact that any proposed development within close proximity could have on the physical fabric of the synagogue. If any damage was to occur to the synagogue then this could amount to substantial harm and therefore paragraph 195 of the NPPF would be directly relevant. More information on this matter will be available in the report which is to be produced by Arcaero.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Rosemary Eshel
Address: 11 Montpelier Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As archivist and historian of Spanish & Portuguese Jews in England was upset & disturbed when I saw the plans to build a tall building that will dwarf this historic site which has existed here in continuous use since 1701. We should be acting to preserve such historic buildings for future generations. If this building goes forward it will forever eclipse a remnant of historic London and destroy its intimate character.

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Jonathan Solomons
Address: 55 Pentlow Way Buckhurst Hill

Comment Details
Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I write to you in my capacity as a regular attendee and member of Bevis Marks Synagogue. This building, which is considered by most of Anglo-Jewry to be the most important Synagogue in the UK is being placed at risk by the significant over-development of the immediate vicinity.

The Synagogue, which is as important to Jews as St Paul's Cathedral is to the Christian community has served the City uninterrupted for over 300 years. We have tolerated and even supported the changing landscape of the city but must now plead for additional protection.

Once this heritage is lost, either due to physical damage caused or by the fact that the light and atmosphere of the local area means that worship is not longer viable, it will be impossible to get back.

These proposals, particularly at this time must be reviewed and reconsidered. The long term impact of the pandemic is yet to be known andI urge the planning committee to reject this proposal.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Edward Brett
Address: 15 Templewood Avenue Hampstead

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The unique history of Bevis Marks synagogue including the fact that it is the only non-Christian place of worship in the City of London makes it the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. The sunagogue will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of

bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house. This poses an additional security risk.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr john reizenstein
Address: 34 heath drive london London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:1. Synagogue will lose much of its natural light which is a key feature of the environment for weddings and regular prayer, · The entire backdrop of the synagogue will be made up of this and other proposed buildings which will block out the sun all day from 9 AM-4 PM.
2. The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
3. It will ruin the background and outlook of a heritage building dating back to 1701 which is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Gillian Raab
Address: 10/1 Ainslie Place Edinburgh

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I would like to object to this building because of its impact on the Bevis Marks synagogue. This is the oldest synagogue in the UK and the new building will completely overshadow it.
The construction of the new building will damage this important part of the UK's Jewish heristage by making it into a dark space, instead of the airy place it is now.

Comments for Planning Application 20/00848/FULEIA

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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Richard Donner
Address: Tudor Lodge Hendon Wood Lane Mill Hill

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I wish to record my objection to this proposed development . This development would have a serious adverse impact on one of the UK's most important heritage sites for both the Jewish and wider community. Bevis Marks is in effect the "cathedral synagogue" for the entire Jewish community, a status reflected in royal visits to the site. The scale and proximity of both the office and retail development will seriously affect this oasis of calm and reflection in the middle of the City.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Geoffrey Wolf
Address: 2 Gleneagles HA7 3Qg Stanmore

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed development would be far too tall and intrusive being next to the oldest Synagogue in the UK.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Deborah GUNDLE
Address: 32 Wildwood Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:We are extremely concerned about how it will affect the significantly important Jewish heritage site of Bevis Marks synagogue - which is of great importantance historically and spiritually to us all in the British Jewish community. With thanks for your consideration about how this would negatively impact such an important place. Deborah Gundle

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Lady Camilla Panufnik
Address: Riverside House Riverside Twickenham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I object to the planned heavy over-buildling that will severely damage the environment of the famous old Bevis Marks Synagogue which has deep religious meaning to all practising Jewish people and which deserves as much resect and appreciation as any religious setting, and which fully deserves care of its position in the City morally, architecturally and historically.

It seems to me a foolish and unnecessary idea to create dirt, dust and other unpleasantnesses of constructing large new building when the City is already has a massive amount of empty office and commercial space in existing buildings, as situation that is not going to change now that so many commercially-involved people are intending to continue to work from home even when the Pandemic is over.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Shamash
Address: 16 St John's Wood Park London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I wish to make a strong objection to the rebuilding of 31 Bury Street into a 51 storey building. The sheer size of the development so close to the Bevis Mark Synagogue (the oldest place of worship for Jews in the City of London)will obliterate most of the natural light coming into the synagogue and the courtyard inside the synagogue. Also, the proposed shopping arcade on Heanage Lane will increase traffic and congestion . The noise will also affect the synagogue inside and the Rabbi's residence.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ian Trehearne
Address: 20 New End Square London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This application is overbearing and an inappropriate neighbour to the Bevis Marks synagogue in terms of

- bulk and height, which will be very overbearing;
- uses, as the shopping arcade onto Heneage Street in an inappropriate neighbour;
- deep excavations, which may well have effects on this historic building

The heritage effects are quite wrongly dismissed in the application documentation

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Alice Goodman-Pinto
Address: 30 Abbotsford Court Edinburgh

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I the above signed object to the proposed building plans at 31 Bury Street (Bury House) and 33 Creechurch Lane. These buildings will dwarf the important historic synagogue (Bevis Marks), which has been in constant use since 1701. This synagogue is not just any historic building, it is unique. The erection of the proposed buildings will shut out all sunlight, causing perpetual darkness in the synagogue. In addition, the heavy traffic will make so much noise that services, celebrations and official functions will become untenable. As this building is so old it is possible that building work of this scale could cause damage to the foundations. Purely on aesthetic grounds alone the encircling of the synagogue by skyscrapers is inconsistent with the values of Historic Britain.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Kanareck
Address: 9, Russell Grove Mill Hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:* Only Synagogue in the City. One cannot imagine this sort of encroachment onto St Pauls for example.
* The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
- The sheer size of the building will have a hugely detrimental impact. Much sunlight & daylight both to the courtyard and inside in the synagogue will be lost. This will negatively impact on the ability to pray and to celebrate weddings and other events of national importance.
* The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
* The cumulative effect of this and other proposed buildings. The entire backdrop of the

synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
* The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Barrie Goldstein
Address: 31 Delamere Road Goldstein Cheadle

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I strongly object to the proposed high rise buildings which will not contribute to the personal warm welcoming scale of
Bevis Marks Synagogue.

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs karen smith
Address: Romneys House Holly Bush Hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is such an important architectural and historical building. It is the oldest surviving synagogue in the UK . My husbands family can trace their connection to this synagogue back over 300 years to when it was first built and they were members of the congregation.
It such an important building but also symbol of historical religious tolerance in the UK it would be mad to build such an large office block right next to it . I would urge the City of London to consider carefully about approving such an application

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Case Officer: Bhakti Depala

Customer Details

Name: Mr John Hammond
Address: 4, Woodlands Grove Ilkley

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I must object to the proposal to build a very high tower block to overshadow the historic and Grad 1 Bevis marks Synagogue.
The proposal will block daylight from both the interior and exterior of the Synagogue, especially as the windows were specially designed to let maximum light to assist worshipers to glorify God for the great benefits of sunlight.
This Synagogue is the only one in the City of London and deserves maximum protection. It is considered as the Cathedral" of Judaism in the uk.
It is important to note that many of the past and present members of this Synagogue were and are major contributors in many ways to the City of London. This proposal, if approved, would certainly damage relationship with the City and also have repercussions throughout the UK.
I would point out that other major historic and religious buildings are protected from nearby development to preserve their especial status of our heritage.
I hope that this proposal will be rejected to save the Synagogue for short term gain, as it is certain

that this Synagogue will outlast any new tower block.

John Hammond
Musician and Organist

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stuart Reece
Address: Flat 4 125 High Road Bushey Heath Bushey

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:You have taken no notice of the impact on the area. The drilling of foundations will severely damage the building and there will be an impact to the light inside the synagogue as well as severe traffic disruption. Your main consideration is money which is great if the development is sensible. This is not

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Eileen Austin
Address: 62 Homefield Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The Bevis Marks synagogue will be badly impacted by both light and footfall. It is the oldest synagogue in the UK and a heritage site that you intend to ruin for the sake of more commercial premises no longer needed as COVID has ravaged the city of London and people will now start working from
Home so Office's are no longer going to be needed

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Duncan Ponikwer
Address: 10 White Knobs Way Caterham

Comment Details

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

Comment:I object for the following environmental reasons and impact on religious life:

· The synagogue has a unique history ncluding the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Martin Warren
Address: 4 Farm Court Pinner

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Please do not destroy the unique heritage of Bevis Marks Synagogue by virtue of these proposed buildings

Comments for Planning Application 20/00848/FULEIA

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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Anne Astaire
Address: 6 Bigwood Court Middleway London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:You are ruining an important historical site by building so close to Bevis Marks Synagogue. Please reconsider this planning application.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Peterman
Address: 36 Whitehouse Avenue Borehamwood

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:These proposals will spoil the uniqueness and structure of such historic significance.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Walter Sneader
Address: 15 Eaglesham Road Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Throughout the land there is clear recognition that buildings which form part of our national heritage must be protected from damage whether physical or situational. Bevis Marks Synagogue is one such structure. It represents the establishment in London of a Jewish community which has contributed much to our nation's well-being, science, and economy. No other synagogue in the land is endowed with such a heritage. Permitting a gigantic structure to dwarf and occlude such an important edifice would be an act of sheer vandalism.

·Were this proposal to be accepted it would inevitably clear the way for further insensitive developments. That this would grievously wound the Jewish community is bad enough. But as Bevis Marks Synagogue is the sole centre of non-Christian religious practice within the City of London it would strike at the heart of interfaith relationships throughout the United Kingdom.

I pray that this proposal is rejected so that our nation can hold is head high in the name of decency

and fair play.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Elias Fattal
Address: 72 Nottingham terrace York Terrace Wset London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to this new planning application as it affects the historical monumental synagogue in Heneage Lane.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr rowan franck
Address: flat 2, 10 cottle close glastonbury

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development would be a massive blow to the Jewish community, blocking the light out of the UK's oldest synagogue in continuous use. It is a disgusting and shortsighted move that would massively detract from a building that is an important part of UK Sephardi Jewry's heritage.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Jane Gough
Address: 19 Station Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:If this build goes ahead, next to bevis marks synagogue-the uk's oldest shul in continuous use, from 1701- it will block out the sun and plunge the synagogue into darkness

Surely during a time of pandemic we need all the light we can get

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Alex Rudofsky
Address: 11 Ranulf Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocks sunlight- important for the religious vitality of Bevis Marks

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Case Officer: Bhakti Depala

Customer Details

Name: Mr John Styles
Address: 130 Alexander Close Abingdon

Comment Details

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

Comment:This egregious scheme will seriously affect the Grade 1 listed synagogue by cutting its light levels, an act of cultural vandalism

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Rachel Guthartz
Address: 44b Gascony Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This will be next door to the UK's oldest synagogue and block natural light from entering, severely impacting the building and the community who have been praying here since the early 1700s.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Max Simmonds
Address: 65 Etchingham Park Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:An eyesore which will ruin this deeply important space for Jews, by blocking out the natural light. Please do not let this sacred place be desecrated by greed.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stephen Rooney
Address: Flat 22 St. John's Chambers 2 Ashwell Street Leicester

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I am deeply concerned at the impact this development will have on the Bevis Marks Synagogue.

As others have commented in their objections, it is inconceivable that this would be permitted were the neighbouring building in question St Paul's Cathedral or Westminster Cathedral or any other Christian place of worship of analogous religious, cultural and historical significance.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Mitzi Kalinsky
Address: 24 Grove Road Chingford London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Mark's Synagogue is the most culturally important synagogue in London and in the UK. It is the earliest synagogue in existence in the UK and is still in use. Putting a building like this next door would cause untold damage in terms of light and amenity

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Theodore Anton
Address: Flat 36, Tramway Court 3 Candle Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Building a 48 storey building next to Bevis Marks synagogue will block out the sunlight it receives and plunge it into darkness, seriously compromising services in the synagogue. It is the UK's oldest shul in continuous use, going back as far as 1701, and is a heritage site that must be protected, not ignored and damaged in this way.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stephen Levy
Address: Flat 35, Spencer Heights 28 Bartholomew Close London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed development will have a serious adverse impact on Bevis Marks Synagogue, including as follows:
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. The synagogue will lose much of its sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
· The period of development will create a huge disturbance to the use of the synagogue

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Clive Hyman
Address: 32 Chester Close South London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocking off of light to one of oldest Synagogues in the Uk

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Emma Whitaker
Address: 3 Rushmead Close Croydon

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I object to this planned development. The plans will have a catastrophic negative impact on the Bevis Marks Synagogue in terms of loss of natural light and also noise pollution. The synagogue is a building of national importance - historically and spiritually it is of equal significance to the City of London and the nation as St Paul's Cathedral should must be protected.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr STEPHEN MACK
Address: 8 Sandmoor Chase ALWOODLEY LEEDS

Comment Details

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

Comment:i am objecting to the plan on the basis of the following;-

-sheer size of the proposed development resulting in loss of daylight both to the courtyard and interior of the synagogue.
-this will have a negative effect on the ability for prayer and the celebration of weddings and other joyous occasions
-the proposal includes a shopping arcade and provision of parking for hundreds of bicycles creating a vast increase in traffic.
-this will result in increased noise levels
- unacceptable encroachment to the synagogue as a result of the size of the proposed development

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Pearl Foster
Address: 29 Cornwall Crescent Yate Bristol

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I have visited London and been inside the historic synagogue of Bevis Marks which is close by the proposed development. The synagogue has a magnificent interior which will be poorly affected by the reduced sunlight caused by the height of the proposed building. I am a Christian which makes me even more certain that such an important religious building - built 1701 so the oldest synagogue surviving in England - should be allowed to flourish and serve the congregation and wider community. It is in a densely built-up area and any increase in traffic, which will inevitably arise from the usage of the proposed works, will increased the noise levels in and around this religious building. We should be protecting our beautiful religious heritage buildings - whether they be cathedrals, churches or other faiths. Please deal sympathetically with this. Other less obstructive sites for the proposed development will still be available.

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Elizabeth Bosworth
Address: 13 Eliot Park Basement Flat London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I reject this plan for a new construction that will have a hugely negative effect on a thriving community that worships in a beautiful, historically significant building.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Robin Quinn
Address: 61/12 Waterfront Park Edinburgh

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I think this is a disgraceful proposal which will have a severe negative impact on the community, and urgently needs to be re-considered, especially on the grounds of the history of the neighbouring buildings.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Anthony Metzer
Address: 97 Anson Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is a beautiful, historic religious site for Jewish people. This proposed development will block out all the light emanating from the Synagogue and make the experience of praying there a considerably less pleasant and spiritual experience. I strongly object.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Lynda Gillinson
Address: 24 Sandmoor Court Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This is the MOST INSENSITIVE DEVELOPMENT and completely unnecessary.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Harry Boteler
Address: Flat 22, Mulberry Apartments, Coster Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I strongly disapprove of this egregious plan which will harm the community of this old and important building

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Vickie Irwin
Address: 22 Princess Court Queensway London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocking out light from a house of worship.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Jacobs
Address: Flat 8 269 Regents Park Road Finchley London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As the Chair of the Working Party on Jewish Monuments I want to object strongly to this development. The development will be profoundly detrimental to the unique heritage of the Bevis Marks Synagogue, the oldest Synagogue in the United Kingdom which has played such a crucial.part in the story if Anglo-Jewry.
The Bury Street development would result in the Synagogue losing much of its light both to the courtyard and inside which will have a significant impact on worshipers in the sanctuary.
It is most deeply concerning to the members of the Working Party that this development is being proposed and hope very much that the committee members will reject this proposal.

Comments for Planning Application 20/00848/FULEIA

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Customer Details

Name: Mr David Jacobs
Address: Flat 8 Regency House 269 Regents Park Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:As the Chair of the Working Party on Jewish Monuments I want to object strongly to this development. The development will beprofoundly detrimental to the heritage of the Bevis Marks Synagogue, the oldest Synagogue in the United Synagogue which has played such a crucial.part in the story if An glo-Jewey

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Patrick Morrow
Address: 3 Toronto Avenue London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:My conviction is that this proposal would adversely affect Bevis Marks synagogue, ruining its architectural prominence in the street and lessening its access to natural light.

The synagogue rightly has a world reputation, and is the oldest synagogue in continuous service in the country. It offers spiritual and cultural delights, which, once ruined, cannot be restored.

The costs of this proposal, in its context, are greater than its benefits.

I speak as a non-Jew who has enjoyed hospitality there, and recognises its frankly unique beauty-in-situ.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Tom F.
Address: 57A-57B St Clement's Street Oxford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocking of light.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mrs Arlette Garcia
Address: 67 BRENT WAY London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Residential Amenity
- Traffic or Highways

Comment:I am speaking as a regular congregant to the Synagogue where I got married and also as a Professional as a Chartered Landscape Architect and Member of the Landscape Institute for the past twenty + years.

This building is of huge significance and historical value to our Jewish community and its unique atmosphere is a major reason for its survival throughout the last 400 years.

From a townscape viewpoint the overriding impact of the development is that of massive overcrowding and overshadowing way above the height of Bevis Marks Synagogue itself. The new proposals dwarf the Synagogue, making it feel very overlooked and causing a severe loss of light from overshadowing. It will completely alter the peaceful and serene small entry courtyard area

and change the way congregants feel and the huge amount of tourists that also visit annually. The building is cold at the best of times currently but the loss of sunlight through out the day (studies have shown loss of light from 10-3pm even in summer) will make the building colder and impact determentially on the beautiful light and atmosphere through the huge windows that is created in the Synagogue.

Not only that but on a town street level, the amount of people walking through the new development once the street plan is opened under the building will mean that services are interrupted by the noise from the street and the acoustics maybe affected.

If this were a residential street, your neighbour would be denied an extension of their house that causes overshadowing, so I cannot see that this level of development has any justification here. They would not allow it around St Pauls and this building is the Jewish equivalent of St Paul's Cathedral - let it breathe!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs jennifer ross
Address: the garden flat 21 thurlow road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Bevis Marks is the equivalent to St Pauls for the Jewish people. It should be given the same level of planning protection as any other heritage site. It is the oldest UK synagogue and perhaps the most beautiful and its whole environment will be changed and darkened if these two proposals go ahead. The synagogue will lose its natural light and the lane will become a noisy thoroughfare. A badly thought out proposal which should be rejected.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Natali
Address: Birchwood Ashley Green Chesham

Comment Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I am a member of the Spanish & Portuguese Jewish Community of which Bevis Marks Synagogue is the principal synagogue which I attend on special occasions. I write to object to this planning application for the reasons set out below. As a member of the synagogue, I regard myself as a neighbour of the site for this application. My family has worshipped there since at least 1778.

Bevis Marks is unique, it is a recognised heritage site and it is the oldest and most important synagogue in the UK. It was built in 1701, not long after the Great Fire of London, by (I believe) a student of Christopher Wren. It is for the Jewish Community the equivalent of St Pauls for the Christian Community. It is the only non-Christian place of worship in the City of London: it is our 'Cathedral Synagogue'.

The proposed new building will soar over Bevis Marks, will keep it and its courtyard in shadow for much of the time and will lead to major noise and crowd problems in the immediate vicinity. The sky and daylight will effectively 'disappear'.

Further, the proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house. It will have a negative impact on our ability to pray and to celebrate weddings, and will interfere with events of national importance such as when the Prime Minister, the Chief Rabbi, the heads of other faiths, the Lord Mayor of London and other dignitaries attend.

Although the City has in recent years acquired many fine, modern tower buildings, none has encroached on Bevis Marks as the one the subject of this application would.

I hope this application will be refused or, at least, greatly modified to lessen its impact on Bevis Marks which is such an important and ancient building of great significance to the Jewish Community and to the Nation

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Carroll Raphael
Address: 171 Edgwarebury Lane Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I speak as someone with a connection to Bevis Marks Synagogue. My cousin was a past Rabbi at Bevis Marks and, accordingly, I have been a frequent visitor. My objection to the proposed development is principally founded on the fact that it will deny the Synagogue and its forecourt virtually all of its natural light for a large part of the day and will detrimentally affect the experience of those attending for prayer and the large numbers of tourists/visitors, both Jewish and non-Jewish, who come to see the oldest working Synagogue in the UK.

I also object on the grounds that the proposed shopping arcade at the base of the development will, together with close to 300,000 sq. ft. of offices, turn Creechurch Lane into a major pedestrian and cyclists thoroughfare. The Lane is presently quite quiet; its narrowness has meant that, although open to vehicles, it has not been "over-trafficked" but the proposed development will necessarily change its character. And the resultant increase in noise (which will filter through the eastern wall of the Synagogue) and activity will significantly impinge on whatever is going on

inside, whether religious services, lectures, visits etc.

It would surely be sensible to delay consideration of such large schemes until it becomes clear whether, in the light of working practices during and after the pandemic and following Brexit, they are needed. Nobody wants the City of London to have a vast excess of empty space and developments such as that proposed may well exacerbate this theoretical problem.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Lord Enea Orsolini
Address: 451 victoria road Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Defend the heritage of the synagogue Bevis Marks

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Fiona Curran
Address: 23C shepherds loan Dundee

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocks out all natural light in the nearby Jewish faith building, one of the oldest in the UK.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Joel Carlberg Torsell
Address: Hälsinggårdsvägen 18d Falun

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Lightning

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Kate Menzies
Address: Flat 8 Edgehill Lodge 153 Turnham Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:this new building will block out the sun for the synagogue and the jewish community who worship there - they don't deserve this. please reconsider this proposal.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Mary M
Address: 380a Forest Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The size of the building will mean the synagogue will lose much of the natural light inside the synagogue. This is a beautiful building of religious and historic importance and sunlight is key to preserving its beauty for future generations.

The cumulative effect of this and other proposed buildings will mean the entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Zelda Star
Address: 3 Clarence Mews London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:If constructed, this building will block natural light to the historic and still in use synagogue next door. This will be hugely detrimental to the Jewish community

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Lianne Hitchen
Address: 57 green lane Tadworth Lower Kingswood

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The impact this development would have on the Bevis Marks synagogue is absolutely unacceptable. Whatever is built on this site cannot be allowed to obstruct the light into the synagogue much in the same way my neighbour ought not to be permitted to build and extension to their home that obstructs the natural light into my house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Ms Elliote Long
Address: Flat 14 Kerridge Court LONDON

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity

Comment:I strongly object to this proposal for a 48-storey-high building beside the Bevis Marks Synagogue. This structure will block the sun in the Synagogue and have a huge negative impact on the community of worship. As a Londoner, I must stand together with the Bevis Marks Synagogue community and oppose the plans in the strongest terms.

Bevis Marks Synagogue, which was opened in 1701, is the oldest synagogue in continuous use in Great Britain and the only synagogue in Europe that has held regular services continuously for over 300 years. So, as well as a sacred space of worship today, this is historic building is an important heritage site for Jewish people in London and across Europe, particularly for the Sephardi community.

Above the entrance is carved in Hebrew the name of the synagogue, "Kahal Kadosh Shaar Asamaim", which means "Holy Congregation The Gates of Heaven" and expresses the gratitude

for the safe refuge that those first Sephardim felt they had found in the City of London. The proposed development would have a terrible impact on that space of refuge and community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Smilynne Joukovski
Address: 1 West Heath Close London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I am incredibly upset to hear about the proposal to develop 31 Bury Street which is located right next to the uniquely historical Bevis Marks Synagogue. As the Collections Documentation Officer at the synagogue, working directly with its archives department, I feel very strongly about objecting to the upward development of 31 Bury Street (to 46 floors!). Bevis Marks Synagogue is an incredibly important heritage site for the Jewish community; as the oldest synagogue in the UK, it represents the beginning of Jewish Life in this country and is considered a unique gem in the hearts of London Jewry. It needs to be looked after and cherished as it is a building of great historical significance to the Jewish community. With the adjacent Creechurch Lane development rising to 21 storeys, the Bury Street proposal to elevate Bury House to 46 stories will totally over-shadow Bevis Marks, blocking essential daylight and leaving little light source for the synagogue and its congregants. Light is essential for prayer so this reduction of light

is critical, especially since Bevis Marks has its original 18th century light fittings which provides limited lighting at the expense of retaining its unique interior. Natural light source is therefore critical for the synagogue to operate efficiently.
The additional proposal for a shopping arcade and bicycle park at Bury House is a devastating blow to the Jewish community as this will detrimentally increase the noice levels and activity on Heneage Lane and therefore significantly impact the calm tranquility of the synagogue - making it less conducive to quiet prayer. Heneage Lane runs adjacent to the Eastern wall of the synagogue which is the direction that Jewish people face during prayer - the Mizrach refers to the wall of a synagogue that faces east. The eastern wall is critical for Jewish prayer, so making Heneage Lane a thoroughfare for bicycles and shoppers will totally damage the experience of quiet prayer.

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Beth Madden
Address: 32 Thornwood Avenue 1/2 Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:No comment.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Stacey Holleb
Address: 1825 Kendall St Lakewood

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:We need to protect ALL shuls! In this day and age of rising anti- Semitic uprisings, this is even more important. Allowing construction that will deprive this sacred space of natural light, add noise and generally harm the community, I strongly oppose this idea!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Beth Ashton
Address: 11 Courtleet Road Coventry

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Concern regarding affect this construction will have on nearby synagogue.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Barry Freedman
Address: 74 Warwick Avenue Edgware HA8 8UJ 74 Warwick Avenue Edgware

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Traffic or Highways

Comment:Bevis Marks Synagogue is a world Jewish Heritage Site. The construction of this building would loom over the synagogue blocking out the light and taking away the whole character of the synagogue. The alleyway along side the synagogue which is presently very quiet, will become a busy thoroughfare and the noise will heard inside thus disrupting prayers.
I ask you to reconsider this construction for the above reasons, but also at this present time when staff are asked to work at home due to Covid, and employers hinting that this could become the norm, is there a need for a new building such as this?

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Barry Shaw
Address: Flat3 Hill Crest Lodge 41 Allum Lane Elstree

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Don't take away the privacy of this Synogogue.
It's heritage, it's life!!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Ranit Katz
Address: The Tosh St Andrews

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is not a compassionate, kind or understanding thing to do. This is cruel, unkind and disrespectful to the faith of the Jewish people.
The building was built specifically to bring the light into the worship of the Jewish people. How could you possibly allow a man made structure to be built on purpose to block out the light for the worship. I wonder if this were a Christian church would it even be a question?

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Charlotte Purdham
Address: 187 Whittington Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I strongly object to this proposal, which would be of detriment to the community this building is an important part of.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Ms Sarah Scott
Address: 11a Byron Hill Road Harrow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This proposal would block all light to inside Bevis Marks Synagogue. This is the countries oldest synagogue in continual use and much of its beauty would be lost if the natural light that floods in through the windows were to go
This would be in blatant disregard to London's Jewish community and heritage of everyone.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Emily Hutchinson
Address: 227 Wightman Road London

Comment Details

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

Comment:The development will disrupt worship and block all light from the Bevis Marks Synagogue, a key community hub and cultural institution open for worship since 1701.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Richard Pavry
Address: 21 Lower Addison Gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Increased traffic and loss of light for the local synagogue.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr John Lyons
Address: Low Gable 181 Alwoodley Lane Leeds

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I have family who are members of Bevis Marks Synagogue and have attended services on a few occasions.

The size and mass of the proposed development would have a huge detrimental effect upon the smooth and efficient running of the synagogue and its religious services.

The lack of sunlight and overshadowing would be enormous.

The development would surely be ignoring the City's objective of preserving and enhancing the setting of heritage buildings.

The proposed shopping mall which would provide a walkway would greatly increase footfall and

cause excessive noise and nuisance.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Andrea Leib
Address: 32 townfield Rickmansworth

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:My family comes from that area. It's part of my heritage. It's part of so many others heritage. It's the equivalent of blocking out and wrecking the area around St Paul's Cathedral. In memory of my grandparents and all my family who would also object. I object.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Martin Brown
Address: 43 The Grove Edgware Greater London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed building will grossly cause loss of natural light to Bevis Marks synagogue, a building of great historic significance to the UK. The synagogue is still in constant use and attracts many tourists. The synagogue has the same importance to the Jewish Community as St Paul's Cathedral has to the Christian Community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Malka Morris
Address: 7810 Lago Del Mar Dr. #110 Boca Raton, FL

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I strongly object to the construction of a high-rise building at 33 Creechurch Lane which which block daylight to the historic Bevis-Marks synagogue and will also bring increased noise into its interior. This synagogue, constructed in 1701, the oldest synagogue in London, is the Jewel in the Crown of the Jewish British Empire. Don't change the unique character of this beautiful, historic building. It's already hemmed in enough by other taller buildings. Help preserve its unique character, and let it breathe on its own. Don't destroy the special quality of this special gem located in the original City of London. I have already visited this synagogue on several separate occasions and have been so impressed with its quiet beauty, its original interior, and its stillness so conducive to contemplative prayer. Please preserve the unique character of this most special, historic building, and save it for the enjoyment of all future generations.

I also wish to voice my extreme objection to the 31 Bury St. proposal to build an even larger building that would overshadow the Bevis-Marks Synagogue. This will totally block all natural light and restrict the air flow around this most beautiful, historic building. What the Blitz and the IRA bombings were not able to do in the past century, and which G-d has protected for the past several hundred years, the London Planning Commission is now planning to obliterate. Instead of allowing the construction of massive buildings around this incredible gem, why not designate the entire area surrounding Bevis-Marks Synagogue as a protected area, and turn it into a lovely park-like setting. The National Lottery Trust Fund recently granted a most generous stipend to the synagogue to preserve both its interior and exterior spaces. Don't undo the recognition that the Trust has placed in this holy institution, and make wise decisions that will only enhance this hallowed ground.

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Alastor Phoenix
Address: 316 Camberwell New Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This would block the sun from one of London's oldest shuls in continuous use.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Ivri Bunis
Address: 21 Aylestone Road Cambridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is next to a historic Jewish synagogue, one of the oldest in the UK, which serves as a central location for the Jewish community of London and the UK in general. The new building will ruin the setting in which this synagogue has existed for centuries, block the light and be extremely detrimental for the manner that the synagogue runs, for the community of worshipers, for tourists visiting the site and for others

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Sharon Pearlman
Address: Rivlin6 /11 Netanya

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:To obscure this magnificent building is sacrilege. Don't let it happen.

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Case Officer: Bhakti Depala

Customer Details

Name: Dr David Bunis
Address: Hakatros 4 Maale Adumim

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocking the sunlight which naturally floods the synagogue with light through its impressive historic windows would have a highly deleterious effect on this unique historic site. Please do not allow the proposed building project!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Victoria Herriott
Address: 37 Napoleon Road Twickenham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The application doesn't appear to have taken into consideration the effect of Covid 19 on the City. There will undoubtedly be a glut of office space as citizens continue to work from home. The synagogue is a precious piece of London's heritage and the community therein deserve their right to sunlight. Ill-timed considering Europe's Jews have been subject to continuing waves of anti-semitism.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Leonidas Adams
Address: Room D 12 Manor Terrace Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Allowing the planned works to go ahead would overshadow the UK's oldest contuinuously used synagogue and have a real and negative impact on the London and wider UK Jewish community. This building is a part of Jewish people's cultural heritage. It, and the people for whom it is an important cultural symbol, deserves enough respect to not be placed next to a building that would cut off its light and disrupt those who worship there during the building process.

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Melanie Getto
Address: 3 Coronation Cottage Flittogate Lane Tabley, Knutsford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I strongly object to this application of this 51 storey commercial building being constructed so near to Bevis Marks Synagogue, the impact of which would be catastrophic for a place of worship, let alone the fact that this synagogue is an incredible heritage site, being the oldest synagogue in the UK. The height of the building will have a major impact on any natural light being visible in the synagogue's courtyard and it will be dwarfed by this multiple storey building. Creating shops inside Bury House and bike stores in front of it will make the small alley at the side of Bevis Marks into a major thoroughfare so that there will be constant noise polluting the quiet space needed for services and prayer in the synagogue. The alley is on the eastern side of the synagogue which is the side that Jews prayer towards and the constant noise will impact any services being held there. The application to build Bury House and the building of 33 Creechurch Lane which is only 4 meters from the synagogue will hem in the synagogue, blocking and

encroaching on it's very soul, taking it's view of the sky, it's light, it's peach and tranquility and essentially negatively impacting the right of peaceful worship in the UK's oldest synagogue which has held regular services continuously for more than 300 years. My brother in law's family has had a seat there since the time of Oliver Cromwell. In this time of a national pandemic with so much loss and fear around us, the spiritual needs of all faiths, including the Jewish faith should be considered a priority for our nation and it is shameful that commercial gain is to be considered more important than preserving a most important place of worship for the Jewish community in the UK.

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Naomi Phillips
Address: 37a Clarence Road Moseley Birmingham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I strongly oppose this development for all the reasons given by other people and organisations who have already raised their objections to it in relation to its effects on Bevis Marks synagogue. In addition to practical considerations such as the deprivation of light and probable structural disturbance, this building is of enormous cultural importance for everyone - not only for Jews but non-Jews as well. Its spiritual value (its raison d'être) will be severely marred by any such development in such close proximity. An office block (including its self-serving shopping area) can be built anywhere; this synagogue is an immovable jewel in the heart of the City. It's all too easy to be wooed by buzzwords such as pedestrian 'permeability' and 'pocket park', which are but minor and potentially temporary aspects to attempt to make more palatable this monstrosity. If developers were truly so desirous of improving the 'public realm', they could surely find a way to

do so with the existing building. And what is the existing area already but the perfect 'place for dwelling and reflection'? I beg the planning department not to forget that we live for more than money and work but to feel and experience culture, history, beauty, spiritual nourishment (I say this as an atheist), and a sense of community - within communities and between them. Please reject this proposal.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Dr Royce Mahawatte
Address: Welfenstrasse 16 Bonn

Comment Details

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

Comment:Do not obstruct the local synagogue.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Craig Morrison
Address: 53 millbrae road Langside Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building would block out the sun and the outside of the UK'S oldest practicing synagogue, this building is a spot on the Jewish community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Amelia Cook
Address: 3/4 289 Bath Street Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will have a lasting negative impact on the daily activities of Bevis Marks Synagogue next door, a site of ongoing use and great historical significance for the Jewish community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Sian Moseley
Address: 24a Stoke Newington High Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This will be detrimental to the Jewish community in the area.

Comments for Planning Application 20/00848/FULEIA

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Customer Details

Name: Dr Michael Szpakowski
Address: 135 Altham Grove Harlow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is an appallingly insensitive and brutal privileging of money and corporate greed over human needs and values. The developers should be ashamed of themselves and anyone determining planning who lets this go through should be equally ashamed.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Deniz Genc
Address: Flat 5, Veryan Court Park Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I strongly disapprove of this egregious plan which will harm the community of this old and important building

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Bloom
Address: 51 Cissbury Ring North London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Having worked next to the building for many years, I know that this would be a disastrous development for one of the City's most iconic and beautiful buildings. The City, however, really does not need another shopping area or high rise development.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ivor Richards
Address: almog8 Kadima

Comment Details

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

Comment:The mian problem is the lack of light and the access to a hostoric site, particularly, though not exclusively, for visitors from abroad

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Holly Watling
Address: 9 broom lane Manchester

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Terrible shame to harm the beauty of the oldest synagogue in the uk. Will impact on a beautiful community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Alasdair Black
Address: 15a Victoria Roaf Kilburn London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I very strongly object to planning permission being granted to these proposed developments which if granted would completely overshadow and eclipse this three-century-old place of worship in the city.
Although not a Jew myself I am aware of the significance of this important place of worship to the Jewish community here in London.
All these towering, tasteless cement, steel & glass buildings in the city have already eclipsed far too many other churches and similar places of worship in the city.
Please - we really do not need more of these ugly Temples of Mammon.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Dr STUART MORGANSTEIN
Address: 5 Defoe House Barbican London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I object to this development on the following grounds:-

1) The large building will loom over the 320 year old Grade 1 listed Synagogue and in particular the Courtyard which is both important for the Succoth Holiday but also for the amenity it gives to the Congregation.. It will also put the entrance to the National Heritage Lottery Funded Project facility in the synagogue buildings into the shade.

2)The increased footfall and consequential increased noise levels, in the historic Heneage Lane from pedestrians and cyclists toward the building at all times because of the multifunctional nature of the building including both retail, leisure and offices.

3) Creechurch Lane along with Mitre Street have 3 designated parking spaces for people with disability. I can see nothing in the proposals for this building that indicate that the access to these will be maintained throughout the construction and once open there will be additional disabled parking provided for users and workers in the proposed building so as not to take the current spaces away from current users.

I object to this building being given planning permission for the above reasons.

I

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms ruth rosen
Address: frognal gardens london

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Any place of worship needs light. It needs access to natural light,to lift the spirit,to be able to see the sky-or the light therefrom, to remain in touch with the natural world. That is the essence of Religion and is referenced throughout the Bible. No place of worship is delegated to a dark dungeon and the historic acknowledged beauty of the Bevis Marks Synagogue is no different. Its interior has inspired generation after generation with its sacred atmosphere - and the beauty of its interior - much of it suffused with natural light, has given great elevation of spirit and peace to thousands upon thousands of people since its inception. To deprive it of light - to create a dark,claustrophobic Bevis Marks Synagogue - invalidates its whole existence. It would amount to vandalism.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jaime Starr
Address: 3 Audley Road Levenshulme Manchester

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building work will block out the daylight from the Bevis Marks synagogue. Bevis Marks is the oldest synagogue in the UK and has been continuously used since 1701. This building project will make the beautiful synagogue less welcoming, and impact on both the people coming to see it as a historical building (negatively impacting tourism) and on those coming to pray.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Liam Tielemans
Address: 10A Market Avenue Ashton-under-Lyne

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development would negatively affect the historic synagogue nearby; as a person of Sephardi heritage myself I want to see this historic building preserved in use and retain access to light.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jesse Balter
Address: 788 Carsten Cir Benicia

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The Synagogue next door gosh darn it!!!!!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Jules LoVecchio
Address: Flat 1 Sycamore Corner Gun hill COVENTRY

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocking natural light and damaging the business of worship and wellbeing of the community

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Alese Clark
Address: 26 Patten Rd Billerica Massachusetts

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Blocking the sun and fresh air from the synagogue must not happen. This old and dignified building deserves respect.

Comments for Planning Application 20/00848/FULEIA

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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Ms Elena Colman
Address: 55 Cossall Walk London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object on the grounds that this development will block light to the Bevis Marks synagogue, something that will have a horrific impact on the community

Comments for Planning Application 20/00848/FULEIA

Application Summary
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Case Officer: Bhakti Depala

Customer Details
Name: Miss Shelby Shoup
Address: 322 Ausley Rd Tallahassee

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
Comment:Good afternoon,

My name is Shelby and I am a Diaspora Jew and college student living in Florida, USA. It is very important to me that this building is not constructed next to Bevis Marks so that the synagogue's congregants may continue to enjoy sunlight in their house of worship. It is so important that we cherish historic Jewish buildings across the Diaspora and protect the rights of Jews to worship in comfort. The Bevis Marks synagogue is an important part of London's Jewish history and the congregation an important part of London's community. Please support the Jewish community in London and across the entire Diaspora by protecting this important cultural site.

Respectfully,
Shelby

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Josie Abram
Address: 19 Lullington Rd Bristol

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:X

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jonathan Golan
Address: 31 Milton Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The erection of a 48 storeys building next to Bevis Marks, the most important synagogue in the UK, will irreparably impede the activities of the synagogue. It will block daylight throughout the whole day and create noise pollution.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr John Dickinson
Address: Swans Mead Haverbreaks Road Lancaster

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:Already compromised by the Creechurch development, Bevis Marks is an historic and important synagogue which would be totally dominated by its surroundings should the Bury Street development proceed. Not only would it be literally overshadowed by a 46 storey tower, with very little light at all reaching it, but it would also be constantly assailed by the noise of passing cyclists, pedestrians, and all those involved with the busy commercialism of a nearby shopping centre.

This building and its community is of major importance to the Jewish people in London and indeed the UK. To allow this development would be a deliberate and disrespectful repudiation of our claim as a nation to welcome and embrace those of all faiths. One cannot help but wonder what reaction there would be to the planning application had Bevis Marks been an ancient Christian church or indeed an ancient Mosque.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Jacqueline Barnett
Address: 12B Eton Avenue London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:As an architectural historian I am dismayed that my colleagues in the Built Environment are considering approving the construction of a 48 storey building at 31 Bury Street adjacent to the Bevis Marks synagogue, a Grade 1 listed building of immense importance. The proposed building would be detrimental to the synagogue in so many ways. The atmosphere preserved in this little corner of the City of this unique building of 1701 would be ruined by a structure which would tower over the courtyard. The lack of natural daylight which the height of the intended structure would cause would deem services to be stopped as the building is serviced solely by candlelight. The footfall and cycle lane would be increased to an unacceptable level thus causing noise and pollution to the delicate fabric of the synagogue. and the worshippers. Please remember we have a historical responsibility to preserve our buildings and their surroundings.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Paul Caswell
Address: 37A Clarence Road Moseley Birmingham

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:Poor Bevis Marks. As if 33 Creechurch Lane wasn't enough, we now have Bury House, 31 Bury Street.

The Bevis Marks synagogue (built 1701) was erected to be 'off the beaten track' deliberately, to be hidden from almost all. Apart from the obscene height of the proposed new development, we now have a 'shopping mall' proposed at the end of a narrow alley crossing the most important part of the whole building - the east end, where the Ark is kept, which holds the most important possessions of any synagogue, and the most holy.

The walls of the synagogue are not thick, and any sound from without is audible within, and this goes for the adjoining Rabbi's house. With a thoroughfare with relatively high footfall inches away,

this promises to make the acoustic conditions inside intolerable.

Secondly, we have the lighting problem. The synagogue will be in shadow for almost all of the daylight hours. Creechurch is bad enough, but this, at twice the height, is potentially even more devastating. I can think of no other country in the world that would treat its people and heritage this badly.

For once, please put profits second to a thriving community and a Grade 1 listed building of international importance. I ask you to please refuse permission to allow the Bury House (31 Bury Street) development.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Paul Caswell
Address: 37a Clarence Road Moseley Birmingham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:Apropos my previous comments, having seen Section 2.1 of the so-called 'Public Benefits Statement', it seems that the developers have turned a deaf ear to one of the prime sources of complaint re the 'development'.

The opening up of a thoroughfare in Heneage Lane is one of the key sources of objections, and yet the developers insist on this cultural vandalism literally within touching distance of the 1701

Grade 1 Listed Synagogue, which will cause untold harm to the actual use of the building.

Despite all that has been said, it appears that the developers are ploughing on regardless.

Once again I beg of the Planning Department to reject this totally out of place application.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Leonard Grant
Address: 31 Sunbury Lane London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building application is next to Bevis Marks Synagogue - it would completely block out the light from the UK's oldest shul in continuous use. We must protect, not damage, our Jewish heritage!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr PNatali PNatali
Address: 14LeasideAvenue London

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
Comment:I object to this planning application.

I am very concerned about the proposed development at Bury House, 31 Bury Street. Bevis Marks is the oldest continually functioning Synagogue in the UK, with families able to trace their roots back to the early days of the community. It is an important part of this country's multi-faith heritage and is an active and vibrant Synagogue and community. It is a pity that the proposed developer is seeking to obtain planning consent for a scheme that will be detrimental to the synagogue, its community and its wider place in Britain's heritage.

My objections to the proposals are many and include, in part, the following:

- Loss of light or overshadowing: the height and proximity of the new tower would result in an overbearing built form that would hugely damage the historic setting of the Grade I listed

Synagogue. It would reduce the amount of natural light to the Synagogue's much used courtyard and to the interior of the building and thus harm the daytime experience of the Synagogue's interior. This will negatively impact the community's ability to pray and to celebrate weddings as well as events of national importance.

- The new tower will become the new backdrop to the Synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the Synagogue.

- The cumulative effect of this new tower and other proposed buildings (eg 33 Creechurch Lane). The entire backdrop of the Synagogue will be made up of these buildings and they will block out the sun all day from 9am to 4pm.

- The proposed new tower creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the Synagogue's eastern wall, causing disruptive noise inside the Synagogue and in the rabbi's house.

Thank you for your attention.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Keith Phillips
Address: 1 Regal House 987 Finchley Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is a historic landmark for the Jewish community. My great grandfather was an honorary member and my daughter was married in the synagogue in 2016. This construction will impact daylight/sound and most probably the foundations of such an important landmark in our lives

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Mail
Address: 20 Neeld Crescent London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:The London-based Foundation for Jewish Heritage which campaigns on behalf of Jewish heritage https://www.foundationforjewishheritage.com/ is very concerned regarding this Bury Street development which is substantial in scale and will have a major adverse impact on the surrounding area. In particular, the development will badly affect the historic grade I listed Bevis Marks Spanish & Portuguese synagogue overshadowing and dominating this remarkable synagogue site, the oldest and most important functioning synagogue in the UK, and damaging its setting within the City of London. There will be less light, and increased traffic in what is already a busy street. The synagogue has an iconic place within the City and this development will cause great harm. We object in the strongest terms to this planning application and hope it will be denied.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Melissa BAUMAN
Address: 10409 FLOWERFIELD WAY POTOMAC

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue

will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Elaine Avisror
Address: Flat 16, Paragon Court 129 Holders Hill Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:· This is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. This synagogue also has unique history, including my ancestors from the 1700s.
· The synagogue and courtyard will lose much of the sunlight and daylight which will have a negative impact on our ability to pray, celebrate weddings and other events of national importance. The proposed buildings will block the sun all day.
· There will be a large increase in traffic in Heneage Lane due to the shopping arcade which will have parking for hundreds of bicycles which will cause excessive noise inside the synagogue and the Rabbi's house.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Danielle D
Address: 30 Sunnybank Road Bury

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This will impact on an important heritage site

Comments for Planning Application 20/00848/FULEIA

Application Summary
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Case Officer: Bhakti Depala

Customer Details
Name: Ms Carolyn Jacks
Address: 36 Herons Place Isleworth

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
Comment:
- The huge size of the building will result in the loss of natural light both within the synagogue and the courtyard. This will negatively impact on the services and events with the sun being blocked throughout virtually the full day.

- A building of this nature should be protected as a unique structure being the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. Would this be allowed to happen to a building such as St Paul's? Bevis is of similar importance to the Jews of not just London but the wider Jewish community around the world.

- The proposed creation of a shopping arcade on Heneage lane and parking for hundreds of bicycles, will result in very large increase in traffic up and down Heneage Lane. Apart from the daily noise the rabbi's house will suffer from, the Jewish sabbath will be particularly affected as

prayers will be disrupted by the noise of traffic and people outside.

- The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Daniel Hershon
Address: Shankfoot Farm Cottage Haltwhistle

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:This is an appalling and totally inappropriate development that will destroy the atmosphere and religious life of what is undoubtedly the most important synagogue building in Britain. The encroachment of the proposed grotesque structure constitutes an attack on the Jewish people who belong to, worship in and visit Bevis Marks, as well as the Rabbi who lives there. If the previous development opposite was curtailed after strong objections, then how can the new development of Bury House be allowed?- it would constitute a perverse and frankly immoral action.

Even more so now with the effects of the Covid pandemic, this area of London does not need more massive office and commercial developments, particularly not on such an obscene and immoral scale. Think of human beings first and please do allow this development.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Linda Rosen
Address: 5 Nunroyd Grove Moortown Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The development will severely impact on the special and listed building Bevis Marks Synagogue. It has a unique history as it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis Mark's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. The building will lose much sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on the congregation's ability to pray and to celebrate weddings and other events of national importance.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings are extremely detrimental. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all

day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Kim Press
Address: 64 Normandy Avenue Barnet

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Blocking light and view of historic synagogue

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Philip Ross
Address: 8 Clorane gardens London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:The proposed application should be fully rejected . Bevis Marks Synagogue Sun light will be blocked from 9 AM -4PM, The backdrop of The Synagogue will be lost , Disruptive Noise caused by increased traffic along The Synagogues eastern wall causing disruptive noise inside the synagogue and in the rabbis house.
The scheme does not take into account the importance of Bevis Marks Synagogue and how it will impact on the community for now and the future and its importance going forward

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Lorelei Sellers
Address: 154 Hilton Drive Main Street Aberdeen

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building is the oldest synagogue in Britain, this building and its history are important and preserving the integrity of this religious and cultural landmark should be forefront. The addition of this new building would severely impact this.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Les Talisman
Address: 35 Courthouse Road West Finchley London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:This work will undoubtedly cause disruptive noise inside the synagogue and in the rabbi's house and will be an eyesore.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr David Nunes
Address: 11a Melbourne Road Ilford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The detrimental effect on Bevis Marks Synagogue- light, noise and possible damage to it's foundations.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Marion Janner
Address: 6 Mill Close, Blockley MORETON-IN-MARSH

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building would be hugely damaging to the exceptionally historic Bevis Marks Synagogue. You will already have had the carefully articulated details of how damaging this would be (including the actual and symbolic darkness that would be inflicted on the building and its congregants and visitors.)

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Erin Hayes
Address: 12 Birch Crescent Apt 3 Rochester

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks Synagogue is the UK's oldest Sephardic synagogue in continuous use. The development of this new building will obscure the synagogue and block all natural lighting, directly impacting Jewish Londoners' ability to pray in the building. The construction of this building directly next to a religious building without taking into consideration its impact on those around its construction site is disrespectful, apathetic, and disgusting.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Deborah Talalay
Address: 6 Stamford Brook Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:There will be a huge surplus of office space after the pandemic. Why is an office building that will be so ruinous to the Bevis Marks Synagoguge even being considered?
· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it

when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Joyce Nunes
Address: 11a Melbourne Road Ilford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Detrimental effects of building to Bevis Marks Synagogue- noise, damage to foundations and disruption to the area on completion.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mrs Pippa Landey
Address: 1The Manor House Manor Gardens Thorner

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:The unique history of Bevis Marks synagogue including the fact that it is the only non-Christian place of worship in the City of London makes it the Cathedral Synagogue of the United Kingdom.

One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

The sheer size of the proposed building will have a hugely detrimental impact.

The synagogue will lose much sunlight & daylight both to the courtyard and inside in the synagogue.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Robert Winckworth
Address: 67 Dongola Road Tottenham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:I strongly disapprove of this egregious plan which will harm the community of this old and important building. Bevis Marks synagogue is a place of serenity, and this planning will dwarf it and all but block out natural light.

Comments for Planning Application 20/00848/FULEIA

Application Summary
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Case Officer: Bhakti Depala

Customer Details
Name: Ms Fiona Adler
Address: Apartment 26 75 Little Britain London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
Comment:I strongly object to the planning application for the following reasons:

- the development would have a massive negative impact in the reduction in daylight and sunlight into the Synagogue and the much used courtyard.
- This overbearing presence will change the much loved character and atmosphere of the Synagogue and its immediate surroundings.
- The disturbance to services, disabled access and damage to the Synagogue's fabric during the construction of such a large tower so close to this 300 year old Grade 1 Listed building.

I appreciate the needs of a modern and thriving City but urge the City Planners to reject this application. If permitted a question will be raised as to why the 'Protected Views' of St Paul's Cathedral are more important in our inclusive and diverse City than the detrimental effect this development will have on Bevis Marks Synagogue.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Ms Kay Lacey
Address: 47 weavers way London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The development is unsuitable next to an historic heritage building and it will ruin its setting. This is one of the most important old religious buildings in London and holds huge significance for UK history. A more sensitive development would be appropriate. Continally building skyscrapers which destroy the L8ndon skyline, block out light, creating wind tunnels, shows a dereliction of duty by City Planners. This must end. The development is not respectful of the site and harms the setting of a Listed Building.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Victoria Azaz
Address: 124 Lower Radley Abingdon

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This will completely overshadow Bevis Marks Synagogue. It will deny it light, thus destroying the atmosphere inside and it will create noise and extra footfall outside together with a huge bicycle park so services will be disrupted and interrupted. We will not be able to see the sky around the courtyard.
Bevis Marks is historic and also the only non-Christian place of worship in the City of London. It is the Cathedral Synagogue of the United Kingdom and it will be significantly impacted. Would you put these buildings outside the door of St Paul's Cathedral? No? So show some respect for the historic Jewish community and for the multi-cultural heritage of the City of London. The buildings you want to build could go anywhere - you are destroying something irreplaceable for something that could be built anywhere.

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Barbara Pietrzykowska
Address: 69 camberwell church street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is the oldest still in use synagogue in London, it has an important place in the community and should not have the sun blocked out over it

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr M. Higgins
Address: Athlone Grove Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:london has an abundance of residential buildings; it does not have an abundance of centuries-old synagogues still in active use. to prioritise the former over the latter is unnecessarily cruel.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stephen Kramer
Address: 56 The Vineyard Richmond

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:In my email of 23rd November 2020 I set out my objections to the proposed developments at 33 Creechurch Lane. I now learn of the proposal to develop a site and build an even taller building than that proposed at Creechurch Lane at 31 Bury Street. Each of these developments alone would have a substantial detrimental effect on Bevis Marks Synagogue. If permission were given for both developments the effects on the Synagogue would be disastrous.

As I said in my earlier email, as a former judge at the Old Bailey (Central Criminal Court) and Past Master of the Worshipful Company of Bakers, an active Liveryman and an occasional congregant at Bevis Marks Synagogue, I am well aware of the history and values of the City. At the same time I appreciate the need for sympathetic and appropriate development in the City to ensure that the

City thrives and moves forward, keeping its pre-eminence. However, this proposed development is neither sympathetic nor appropriate:

1. It would dominate the historic synagogue where services are held daily. Bevis Marks Synagogue is a flagship building of immense historic importance both within and outside the City, nationally and internationally. It should not be dwarfed and hemmed in any further than it is at the moment.
2. For most of each day the development would block out the sky and light to the Synagogue both inside the building and in the courtyard.
3. The proposal for a shopping arcade on Heneage Lane with the inevitable associated increase in traffic, both pedestrian and other, would cause disruption and noise both inside the Synagogue and also to the home of the rabbi and his wife.
4. Finally, in the current climate and for the foreseeable future I question the need for office space on the scale proposed.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ian Charles
Address: 32 Windsor Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed building will have a detrimental impact on the oldest synagogue in the UK, Bevis Marks - both from loss of light and from noise. Given the changing work patterns arising from the Covid-19 pandemic, it seems absurd to think more office space is needed in this part of the city

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Jane Liddell-King
Address: 77 Selwyn Road Cambridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed building wholly ignores the communal and historical role of this landmark synagogue. It is wholly out of keeping with the surroundings and with human scale.
Why deprive this synagogue of light ?
There is nothing to be said in favour of this design.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Gary Stodel
Address: The Beeches 32 The Street North Lopham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Will ruin experience of synagogue members at Bevis Marks.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jonathan Murden
Address: Flat 2 79 Central Road Manchester

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:It is unacceptable that the oldest shul in continuous use in England should be treated so disrespectfully. The proposed development would totally obstruct sunlight to Bevis Marks Synagogue, which has been present in the area since 1701, which as well as indicating a total apathy to the well-being of the Jewish community in the area, would also make the building more expensive to run without any compensation. I am deeply concerned that as anti-semitism becomes more prevalent in our society, such a development could be proposed in earnest without taking such considerations into account.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jay Schlesinger
Address: 88 Rowlands Close Mill Hill London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks Synagogue is the oldest place of worship of the Jewish faith continuously in operation for little over 300 years. It sounds absurd that they should lose daylight access for a new development. Bevis Marks should not suffer as a consequence of a new-build.

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Victoria Mangan
Address: 29 Argyle Street Oxford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This development will block out all light from the UK's oldest working synagogue. This is an insult to a valuable part of Britain's Jewish and cultural heritage.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Tal Janner-Klausner
Address: 15 Totnes Walk London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed building would block out the light to Bevis Marks synagogue, which would severely impact on the ability to pray and generally enjoy communal life in this important and historic synagogue.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stuart Chaplin
Address: 13 Chestnut Avenue Edgware

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Building would obscure sunlight to adjacent properties.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Mark Kirby
Address: 7 Uplands Beckenham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The impact on Bevis Marks Synagogue would be dreadful. It is an enormously important historic building and deserves to be better prtected and respected. The new building would put it permanently in the shade and cut off.

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Isaac Treuherz
Address: 2 (side entrance) Exeter Rd London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Among the many other detriments to Bevis Marks Synagogue being commented on here, this development will also block with wheelchair entrance to the synagogue. The accessibility of this incredibly important building is so important, and this development will be putting the community in an impossible position by externally rendering them breaking discrimination law. It is no straightforwards thing to alter the entrances of a 300 year old building to provide a new wheelchair entrance if this one is blocked, but it is untenable to cut off people from access. A development that prevents accessibility to this site should not be allowed to go ahead, and if it does, it should be liable for providing alternative arrangements.

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Bobbi Barnett
Address: 46 Salisbury Road Sheffield

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I deeply object to this project as a 48 story building places right next to bevis marks synagogue-the uk's oldest shul in continuous use, from 1701- will block out all natural light the synagogue receives and plung it into darkness!

This is a sight of sephardic Jewish heritage and any new building projects should be developed with protecting the integrity and function of this synagogue. New developments should enhance existing landmarks not detract!

Please don't build this!

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Olivia Starr
Address: 3 Audley Road Levenshulme Manchester

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Taking away so much natural light from a popular, historically and culturally important place of worship (Bevis Marks Synagogue) is unacceptable, and detrimental to a whole community.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Adi Currie
Address: Flat 19, Bartholomew Court London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This new development will block sunlight into the neighbouring synagogue, stopping light getting inside. It's an extremely important, historical building and its attendants deserve natural light! this sort of proposal would never be suggested for any building near St Paul's or a christian church of such importance.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jak Ateara
Address: 26 Claremont Street Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The amount of noise and blocking of daylight into the synagogue is unacceptable, extremely disruptive and unfair to members of this congregation. This is a historic shul and if it were a church, much more careful planning would be done.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Kiah Endelman Music
Address: 235 Kenmure Street Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:Building a huge towerblock, next to the oldest synagogue still in constant community use in the UK, blocking sun and views, is not acceptable.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Susan Rushworth
Address: 1 Bronze Street March

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Residential Amenity
- Traffic or Highways

Comment:I object to the planning, I feel that it would be wrong to block the light from this precious building. Also the damage that could be done to the foundations. The Bevis Marks Synagogue is an historic building.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Diana da Costa
Address: 45, Stone Road Broadstairs

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks Synagogue is a national treasure and it is morally wrong that those worshiping there should be denied light because of an ill-conceived building plan. Would a similar plan have been allowed affecting the light for other places of worship in the City such as St. Mary-le-Bow?

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Elisabeth Ehler
Address: 49 Balfe Street London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Lack of light: The proposed building would severely impact on the amount of light that comes through the windows of Bevis Marks Synagogue and intzo its courtyard. For somebody like me, with a keen interest in London's history, this would be the same as if a skyscraper were to obscure the light from St Paul's Cathedral - unthinkable.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Pamela Freer
Address: 341 Front Lane Cranham Upminster

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:1. The proposed scheme will result in loss of light to the Bevis Marks Synagogue for most of every day throughout the year as the far too high tower will cast its shadow over the building.

2. The proposal for cycle access will result in a huge increase in traffic and accompanying noise through the lane passing the east wall of the synagogue which will disturb services and meditation inside the building (and the Rabbi's house, which is used for teaching and counselling.)

3. The Bevis Marks Synagogue is the oldest in Britain and is a unique place of cultural and religious heritage which needs to be conserved and protected. The proposed building, by threatening its light and quiet, threatens its very existence because if it becomes an unpleasant

place to visit its congregation and therefore its income will dwindle so it will become unsustainable.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Hayley White
Address: 316 Devonshire Rd London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other
- Residential Amenity

Comment:The current building holds an important history. Surely there are better suited sites elsewhere in the city for these plans.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Naomi Magnus
Address: 2/2 90 westmoreland street Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis marks synagogue is the UK's oldest shul in continuous use, from 1701. This development would mean blocking out the sun from the synagogue and plunging it into darkness. As a member of the Jewish community I am extremely concerned about this prospect. The synagogue is of huge historical and religious significance, and a new development must not (literally) overshadow this.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Melissa GILROY
Address: 2/2 Craufurdland Edinburgh

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise

Comment:Hideous new building, not contributing anything valuable to the cityscape.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Marion Smith
Address: Cavendish Tutor Flat, Woolton Hall, Whitworth Lane Manchester

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:This building development will mean that all light is blocked out from the synagogue. Sephardic heritage needs to be protected

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Lindsey Taylor-Guthartz
Address: 123A Sunnny Gardens Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:This proposed 48-storey building would be right next to Bevis Marks Synagogue, the oldest synagogue in the UK and a unique and beautiful building of immense significance. It would grotesquely alter the surroundings in an appalling way. Even the suggestion to erect a tower block here is unbelievably insensitive and recklessly irresponsible in terms of safeguarding and preserving British Jewish heritage and a unique feature of London.

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Catriona McAleer
Address: 41 Cameron Crescent Hamilton

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building will eliminate the light available to the synagogue next door, which has been in continuous use since 1701 - the longest in the UK. Observant Jews may not use electricity on the Sabbath, so blocking the light it will prevent use of this building for its religious purpose. So much Jewish heritage in the UK has already been lost. Please protect this site of historical, cultural and religious interest from this proposed defunctioning. Thank you.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Kirsty Simmonds
Address: 6 Humberton Close London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Plunging Bevis Marks, the UK's oldest synagogue in continuous use, into darkness due to this new development is utterly unacceptable and should not be so much as entertained.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Juliet Barnett
Address: 14 Lonsdale Drive Enfield

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:This proposed building will severely impact the historic Bevis Marks Synagogue. It will block nearly all the daylight the synagogue currently enjoys which have an impact on services, weddings and community events. The fact that Bevis Marks had received considerable Lottery funding to renovate the synagogue and create an educational experience for the wider community goes to show how important it is. It's the oldest synagogue in the UK. Would this be allowed to go ahead if this was a Christian place of worship? A Jewish place of worship should have the same standing.
In light of the pandemic should we not be having a rethink on building new office blocks . Most people will not be returning to working 5 days a week in the centre of town and will also be looking to shop local.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Dr David Watkis
Address: 99 Grovehall Drive Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Detrimental impact on Bevis Marks synagogue, particularly on light entrance through windows which will result in a significantly reduced level of natural daylight in the historic interior. Please deny this application which is in too close a proximity to this active place of worship.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ben Young
Address: 53 Conistone Way London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The development will overshadow the Bevis Marks synagogue, the oldest functioning synagogue in the U.K. and totally cut off its natural light.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Yudit Collard Treml
Address: 16a Stewarts Way Marlow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Such a building would have a major detrimental effect on the synagogue next door due to preventing light entering the oldest still in use synagogue in the UK.
Additionally the building work itself will potentially damage the building and the building work will cause major impact on the religious life of the congregation.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Laura Swaffield
Address: 36 Crewdson Rd London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I have deep affection for this area. It reflects a rich & varied heritage which brings in a variety of visitors. For Jews it is obviously special.
What are you thinking of?
Bevis Marks is equivalent to St Paul's Cathedral. Even one of the proposed buildings - let alone both - would be a gross desecration of the synagogue, completely robbing it of the daylight that currently floods into its beautiful unspoilt interior and even plonking a shopping centre on its doorstep.
With all the current talk of anti-semitism, the council is laying itself open to justified opprobrium. It is shameful. It is a disservice to the current residents, whose own heritage is also precious and who have no thoughts of desecrating the heritage of others in their name.
I need hardly add that big, ugly office blocks are already over-provided and have no future in the

post-Covid world.
But the main point is that any such buildings, whatever their purpose, would wreck a synagogue that has survived the war and much else, and which as I say is the national equivalent of St Paul's. Would you do this to St Paul's?
I am not Jewish myself but I am deeply shocked that you would for one moment entertain this crass, stupid, obscene proposal.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Liane Wrigg
Address: Pendle, Lower Station Road Newick Lewes

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:· The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom must be protected. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. Much of the sunlight & daylight both to the courtyard and inside in the synagogue would be lost. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings mean the entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of

bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Sylvia Gottschalk
Address: 30 Maricas avenue Harrow

Comment Details

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

Comment:The proposal will result in sun light being blocked on the Bevis Marks synagogue. It is an active synagogue and the oldest in UK, in addition to being a listed building.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Paul Richards
Address: 62 Cissbury Ring North London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:Bevis Marks Synagogue is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. Would this kind of encroachment be permitted on the doorstep of St Paul's Cathedral??!! The Synagogue is no less important to the sizeable Jewish community than the Cathedral is to the Christian community.
The sheer size of the planned building will have a hugely detrimental impact. Much of the sunlight & daylight will be lost both to the courtyard and inside the synagogue, which will negatively impact the ability to pray and to celebrate weddings and other events, even those of national importance.
The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of vehicles, including bicycles, which means there will be a very large increase in traffic up and down

Heneage Lane, along the synagogue's eastern wall, causing disruptive noise and air pollution inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Mark Richards
Address: 10 Creswick Walk London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This synagogue is the oldest in England and a very important building for the entire UK Jewish community. The light disruption as well as noise and possible foundation issues will be unacceptable, especially as these buildings are unnecessary.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr LIRON BEZALEL
Address: 86 HATTON GARDEN London

Comment Details

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

Comment:object in strongest possible terms

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Ronald Schindler
Address: Hornbeam House Kingston Hill Kingston upon Thames

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I believe this new, very tall building would impact adversely on the oldest synagogue in London. Bevis Marks is a remarkable historic building and it should not be boxed in and overshadowed to this extent. I would urge the planners to seek a more appropriately sized alternative to this proposal.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jeremy Garcia
Address: 67 Brent Way London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:The develop is not in keeping with the surrounding area.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Mark Parkinson
Address: 9 Livingstone Rd Thornton Heath

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This monument to greed will blight the historic and beautiful Bevis Marks synagogue. I strongly disapprove of this egregious plan which will harm the community of this old and important building.

48 storeys is aggressive and unnecessary.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Amy Marks
Address: 60 St James Street Walthamstow London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I strongly disapprove of this horrible plan. Bevis Marks is the oldest synagogue in the UK and is especially important to London's Sephardi community. Building an enormous block beside it will block out the sun, harming the community of this old and important building. It is a piece of history still in use, a beautiful space and a community treasure. We must protect it!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Jess O'Sullivan
Address: 30 Fairlands Grove Auckley Doncaster

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I strongly disapprove of this egregious plan which will harm the community of this old and important building. The plans would block all sunlight from the synagogue.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Rebecca Abrams
Address: 49 Fairacres Road Oxford

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This planned building will blight a historic synagogue which had been in continuous use as a place of worship and social and educational centre for 200 years, creating huge noise nuisance during construction and permanently obscuring the light inside the synagogue once it is finished. Please do not do this.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Ariane Bankes
Address: E6 Albany Piccadilly London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:The proposed building is entirely out of scale with the surrounding area and will dwarf the surviving historic buildings nearby such as Bevis Marks Synagogue. What is the point of building more office space when a large part of the working population will opt to work at home? It will be a white elephant in every sense of the term.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Louis Berk
Address: 52 Kentish Town Road LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:A 48 story building will have a significant impact on the heritage architecture of the surrounding streets, including Holland House (Grade II), Bevis Marks synagogue (Grade I) and Sir John Cass Primary School (Mitre Street) and St Katherine Cree (13th C church) Creechurch Lane and many others. The current pandemic has altered significantly the need for further expansion of the financial district and it is now imperative that the City of London conducts a strategic review of this any other expansion to decide if there is any need in the short, medium or long term for office space which might ultimately be largely unoccupied.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Grace Miller
Address: 1050 Windjammer Drive Hampton, Virginia

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Constructing this building as planned will throw an historic synagogue into shadow. From the time of its construction in the 18th century until now, it has been filled with light. So many synagogues have been destroyed throughout history that it is especially meaningful to protect those which still stand. Moreover, it is an architectural beauty and it would be a loss from that vantage point.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Anya Metzer
Address: Churchill College Cambridge

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Growing up in London as a Jew with Spanish & Portuguese heritage, the historical and architectural triumph of Bevis Marks has always been a source of pride. It has a storied history and is a beacon of Jewish life in the midst of the city. Anything to compromise its sanctity should be opposed.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Jessica Tamman
Address: 33 Weatmorland Road Harrow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Bevis Marks is a historical landmark for the Sephardi Jews of London. A vastly important location for community and representation of our history. To plunge the synagogue into darkness for an unnecessary high rise would be disrespectful to the community and the city.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Zoe Arschavir
Address: 2A Forth Crescent Riverside

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:The planned building would block a great amount of light from entering windows. This would be a massive shame and hugely effect people's experience of this place.

From: Michele Bentata
To: PLN - Comments
Subject: Re: 20/00848/FULEIA
Date: 08 January 2021 12:20:53

My address is 17 South Lodge. London NW8 9ES.
Thank you Michele Bentata

Sent from my iPhone

> On 8 Jan 2021, at 12:00, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:
>
> Hello,
>
> Thank you for your comments on the above Planning Application, please note we require your address.
> Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.
>
> Please visit our webpage for further information:
> https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2Fservices%2Fenvironment-and-planning%2Fplanning%2Fplanning-applications%2Fview-planning-applications%2FPages%2Fdefault.aspx&data=04%7C01%7C%7C6be32440c92348bcc4c608d8b3d118cd%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637457057929779163%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1uaWwiLCJXVCI6Mnf%3D%7C1000&sdata=fu0Sxv09QdFrJqNBvEzZIXcI3iZXpw9sQLRGE1j0qZo%3D&reserved=0
>
> Kind Regards
>
> Rianne
>
> ----Original Message-----
> From: Michele Bentata
> Sent: 07 January 2021 13:39
> To: PLN - Comments
<PLNComments@cityoflondon.gov.uk>
> Subject: 20/00848/FULEIA
> Re:Proposed building at 31 Bury Street, City of London and its impact on Bevis Marks Synagogue
>
> The proposed development at 31 Bury Street does not respect the status and importance of this 1701 Grade 1 Building, part of our collective British Heritage. This development will dominate the Bevis Marks Synagogue ,this, together with its footfall and accompanying inevitable noise will severely detract from the unique quiet atmosphere and character of the synagogue and its precinct area, not to mention the great impact on its architecture.
> This building is special, not only to the Jewish Community, but also historically in Britain.
> It is a symbol of British Jews and their history and relationship to the UK.
>
> It needs to be given the status and respect it deserves as the Cathedral Synagogue of Great Britain , patronised by Samuel Pepys to Prince Charles.
>
> I have walked the City and visited some of the many churches in the Square Mile, many with their beautiful stained glass windows restored , some redesigned - with love, respect and funds. We are only asking for one classic eighteenth century style building to be given the same respect, so that it can be bathed in the atmosphere of light and spirituality which are literally an integral part of the original design - the architecture and the light are symbiotic.
> Without its light this will become a gloomy place to which no one will want to go. It is a shame.
>
> Please think carefully about the above
> Michele Bentata
>
>
>
> THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=04%7C01%7C%7C6be32440c92348bcc4c608d8b3d118cd%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637457057929779163%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1uaWwiLCJXVCI6Mnf%3D%7C1000&sdata=w8tQ6lU9eUGrF2ssJXXQ6fb5X56%2BqFpqU80NEA4vCk%3D&reserved=0

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Cassie Histed
Address: 59 Chesham Street Leamington Spa

Comment Details

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

Comment:The block will reduce light and add congestion.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Phoebe Taylor
Address: 46c Mansfield Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building will severely impact the community in the neighbouring synagogue by blocking out all the light to their place of worship

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Willem Steele
Address: 35 Devlin court Whins of milton Stirling

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:You wouldn't do this to St. Paul's, why do it to us

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Dr doreen shaoul
Address: 39/2 Spinoza street 2 Tel Aviv

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I am writing to object to the proposed building development 31 Bury Street, due to its impact on Bevis Marks Synagogue. This structure will dominate the area, reducing the status of Bevis Marks Synagogue to that of a mere "garden shed" Due to its height the courtyard and synagogue will be in shadow most of the day. The impact of foot traffic will turn the area from a backwater to a main thoroughfare.
The main entrance to the shopping mall will be directly opposite the synagogue so that there will be a constant flow of people passing throughout the day, and presumably, well into the evening. The whole character of this area is going to be changed. Bevis Marks Synagogue will be overwhelmed by these huge buildings surrounding it on all sides.
The beauty of the ancient windows will no longer be able to be appreciated due to the lack of

sunlight, and even lack of light. Religious and community events in the courtyard will not be enjoyed in tranquility, but will take place in an environment, of noise and bustle.
Bevis Marks Synagogue is the oldest synagogue in the United Kingdom, Built in 1701 by the first Jews to return here after their expulsion over four hundreds previously.
It is the only non Christian place of worship in the City of London.
It is our Cathedral Synagogue, and occupies the same place in our hearts as St Paul's Cathedral in the hearts of Protestants.
It is here we celebrate our important events, national and religious. The Prince of Wales has attended services here. Tony Blair attended our 300th anniversary celebration.
Sir Moses Montefiore worshipped here, and held his Service of Thanksgiving when he was Lord Mayor of London.
Benjamin Disraeli used to pass by on the eve of our Day of Atonement listening to the prayers through the window.
Bevis Marks is still the synagogue used by Jewish Masters of Livery Companies. It is not just a museum or an ancient building. It is still thriving, and in constant use by many of the same families since 1701.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Roger Leon
Address: 10 COMPASS CLOSE EDGWARE

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:I have attended services at Bevis Marks Synagogue for decades. Not only weekly services, but have also experienced the pleasure of family occasions and special Sephardi community celebrations. They include my daughter's wedding and visits by Prince Charles, Tony Blair to name a few. It is part of our family history and has been a unique synagogue for 350 years.

The development being planned seriously affects this in a very adverse and negative way. It will change the quiet character outside the Synagogue on Heneage Lane and in particular take away much needed light for the whole day. The would transform dramatically the whole atmosphere of this unique synagogue in very negative way.

The last thing the City of London needs is a huge tower in that particular location.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Katie Fox
Address: 1104 Autumn Hill Court Crozet

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I object to any new structure being built that would disturb or take away from an historic, spiritual home. Building a 48 story structure would be detrimental to the historical aesthetic & religious feelings the synagogue evokes.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Ildiko Connell
Address: 80 B Dalyell Road London

Comment Details

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

Comment:This development will all but block out the sun for the local community.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Melanie Goldberg
Address: 53 milverton road Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is an affront to UK Jews

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Ms Hilary Guedalla
Address: 57 Leaview House Springfield Hackney

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I strongly object to this because of the negative impact it would have on the synagogue.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Lord Ittai Welby
Address: 11 B Morley Road Lewisham

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:This proposal will have a detrimental effect on the community by blocking light

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Rowen Ellis
Address: 11 Neptune House Olympian Court York

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:In building here you will be effecting Bevis Marks, the oldest synagogue in the UK, and the wellbeing of its community.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Sam Chappell
Address: Sevenoaks Rd London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This ridiculously tall building will block all sunlight and ruin the beautiful synagogue next door. It is an important historical building with a continously live and vibrant community. The community who worships here deserve to have their history and culture respected and protected! Please do not allow a corporate new build to perpetuate harm to this local community.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Hannah Morley
Address: 5 Byrds Lane Uttoxeter

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Protecting the rights of the UK's oldest shul next door to have natural light - covered under religious rights & historical interest, I would hope.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Sam Garcia
Address: 1 Wilton farm cottages Radlett lane Shenley

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:The suppose planning will take the complete heritage away from this remarkable landmark.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Dan Carrol
Address: 10 Eden Grove London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The application plans would cause a severe detriment to the Bevis Marks Synagogue which is both a historically important and a much used community asset, I oppose this development in the strongest terms

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Susan Garcia
Address: Susan 66TALMAN Grove Stanmore

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:Bevis Marks Synagogue is a historical site. It was founded nearly 400 years ago and it can be compared to St.Pauls Cathedral for Christians as the Synagogue is for the Jewish community also the oldest remaining synagogue inUk. It is one of the last Synagogues in City of London. It is a place for prayer, learning, tranquillity to feel traditions & culture in the peaceful surroundings.
The proposed development would put all this in jeopardy.
The magnificent synagogue has windows roof that bring natural light and also into the courtyard which is Place to sit and feel a sense of well-being. The developement would destroy this as the natural light would be hidden until around mid afternoon.
The proposed bicycle park would create noise in a very quiet lane which is next to the western wall of the Synagogue. This would also cause the Rabbi much disruption as his home is situated in the

Synagogue.
In a time of a pandemic with so much change please leave this beautiful piece of the City of London as it is.

Thank you

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss JJ Coleman
Address: Flat 7, 16 Ash Grove Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Plunging the synagogue next to it into darkness.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Norman Ereira
Address: 39 Chase Way London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. It will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue

will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Avril Crollick
Address: 2 The Mall London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:The Bevis Marks Synagogue is the oldest synagogue in the UK. It has historical, architectural ,and spiritual importance not just to the Jewish population of the UK. It is as important to Jews as St Paul's is to Christians.
The proposed new building will obscure light and completely destroy the peaceful and beautiful atmosphere.
It will be like a desecration of a spiritual place!

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stephen Gayer
Address: 1 Burnt House Pudding Lane Chigwell

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The City of London is not just a central business district but also the central core of one of the greatest cities in the world and home to some of our most important, most historical and most treasured buildings. The Grade 1 Listed Bevis Marks Synagogue is not only one such building but has also been the beating heart of the Jewish community in England for over 300 years. The proposed construction will be yet another step towards encapsulating the Bevis Marks Synagogue, depriving it of light, further destroying its outlook and by virtue of the noise pollution that will be created, impeding its use for the religious purposes it is intended. The building should be afforded the same protection and respect as other major religious structures in the capital; St Paul's Cathedral, The Roman Catholic Cathedral in Westminster and the Regents Park Mosque. For the reasons stated, the scale of the proposed building is totally inappropriate in this location and I strongly object to these plans.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Christine Dickinson
Address: Swans Mead Haverbreaks Road Lancaster

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:This oldest synagogue in the UK which is quiet, bright and conducive to prayer is going to be transformed into a dark building overshadowed by a 46 storey tower. Furthermore the holiest side of the synagogue where Jews pray is no longer going to be in a quiet alleyway but a major thoroughfare with shops and heavy use by bicycles and pedestrians. If this goes ahead this does not respect the Jewish community in our capital city.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Gill Cohen
Address: 20 Hayfield Close Bushey

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Will block natural sunlight inti the Bevis Marks Synagogue which has been on site since 1701
This is an important landmark

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Ellis Saxey
Address: Flat 6, Hadrian Court, 27 Breakspears Rd London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The restriction of light to Bevis Marks synagogue and the change of character of the immediate area (including noise levels) both raise a large objection to this project. Including community space in the project seems tokenistic if it negatively impacts on existing communities. I believe there is a particular responsibility to preserve Jewish and Sephardic architectural heritage, and support present-day communities, given the historical and ongoing attempts to marginalise and erase Jewish people and history.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Rose Aitchison
Address: 38 Aster Court Woodmill Road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building project concerns me greatly due to its extreme proximity to a historically significant place of worship. At a time when antisemitism is on the rise, we must show as a society that we value Jewish heritage and the practice of the Jewish faith. This project would plunge the neighbouring synagogue into darkness long-term, and would cause great disruption to worship in the short term during construction, as well as destroying the character of this historically and religiously significant building. We must ensure that we value buildings like this, and the significance they hold for their community, in order to build a diverse society which values every member of the community.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Leo Schindler
Address: 46 Fitzjohns Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This would have a severely detrimental effect on a grade on wished house of worship, which is of extreme historical and cultural importance not only to the Community it serves but to the weirder heritage of The City of London, the capital as a whole and the nation.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Calvin Smith
Address: 7 Weir Avenue Glasgow

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This is an abhorrent oversight on the conservation and precedence of Jewish culture in this country. A location elsewhere that does not demerit the already withstanding infrastructure would be better suited.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Elise Goodman
Address: 257 Métro Central Heights 119 Newington Causeway London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Please be aware of the effect on the synagogue of blocking access to light. Jewish people run their calendar by the sighting of the moon, sun and stars. To put the synagogue in shadow would seriously damage the experience of the community when praying and learning together.

Thank you.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Madeleine Pearce
Address: 36 Penrhyn Crescent E175bh. London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:This is the oldest shul in the UK and it's access to sunlight and space must not be blocked by new buildings, especially when plenty sit empty in the city!

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Nathan Chamberlain
Address: 2 Ruskin Lane Hitchin

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:I strongly disapprove of this egregious plan which will harm the community of this old and important building that is both an important place of worship and one of immense historical importance to all who call the U.K. home.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Miss Jamie Hathaway
Address: 23 Worple Road Isleworth

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:The proposed building will block out all natural light to one of the oldest synagogues in London. 48 stories is ridiculous.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Robert Victor Bentata
Address: 127 Abbots Gardens London

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:

Dear Sir/Madam

I am writing due to my concern for the Bevis Marks Synagogue, in the light of the application for a 48 story building at 31 Bury Street.
As a member of the Jewish community, the preservation of Bevis Marks, the oldest surviving synagogue in the UK, is an absolutely critical part of our identity and history,
The Synagogue has several concerns regarding the proposed 46-storey development. These include:
· The unique history of the synagogue including the fact that it is the only non-Christian place of

worship in the City and it is the Cathedral Synagogue of the United Kingdom.
· The sheer size of the building will have a hugely detrimental impact. The synagogue will lose much of our sunlight & daylight both to the courtyard and inside. This will negatively impact on the ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
Bevis Marks has a unique place in Jewish history, and in the development of this country as a liberal society that celebrates diversity and inclusivity. It is therefore critical that Bevis Marks is preserved for all British citizens. I would urge you not to grant permission for this development which has the potential to damage it so greatly.

Yours faithfully,

R. Victor Bentata

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Leigh Mackay
Address: Flat 3 Redcourt Athlone Grove, Armley Leeds

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Construction of this type would block out sunlight in the synagogue next door, plunging a religious community into darkness. This is unfair. Jewish people have a right to sunlight for goodness sake.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Joanna Franks
Address: 215 Goldhurst terrace London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:I object to this building because of the direct affect it will have on Bevis Marks Synagogue. The oldest working synagogue in the UK

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Jonathan Beloff
Address: 7 BECKFOOT Ampthill Square London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Hello,
I wish for my objection to the construction of the 33 Creechurch Lane. Nearby is the synagogue of Bevis Marks, which I fear will greatly be impacted by the demolition and construction of this new office block. The synagogue's old foundation cannot take the stress that will be created by this new construction. Additionally, the absence of light thanks in part to the shadow of this new building will cause significant harm to the religious practices of the synagogue. The 300 year old synagogue of Bevis Marks is a critical part of Jewish British history and of tolerance within British history.
It must be protected.
Best,
Jonathan R Beloff, PhD

[redacted] [redacted]
Subject: FW: Bevis Marks Synagogue
Date: 30 March 2021 21:47:38

From: jonathan Lane (Aurora) [redacted]
Sent: 25 February 2021 11:02
To: Barradell, John [redacted]
Cc: [redacted]
Subject: Bevis Marks Synagogue

Dear Mr Barradell,

I trust you are well. By way of an introduction my name is Jonathan Lane and I am a freeman of the Worshipful Company of Glaziers and Painters of Glass. In my professional career I advise governments on sovereign debt matters and corporations on infrastructure and real estate investments in emerging markets.

I am writing to you to you to lodge my objections to the two proposed buildings that would irreversible destroy an important and unique part of the City of London and the UK's heritage, namely the Bevis Marks Synagogue. In my work in countries as varied as Lao P.D.R, India and The Ukraine to name a few one of the saddest developments is the wanton destruction of the built environment in the name of progress. I believe what makes the City of London the special place it is, is the living breathing heritage and its unique built environment.

On a professional point, the decision to grant such large schemes permission would surprise me given the increasing vacancy rates of commercial premises and changing working practices in the wake of COV19.

Yours sincerely,

Jonathan Lane
Director
Aurora M&A Solutions
[redacted]

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From: [redacted]
To: PLN - Comments
Subject: Re: Bevis Marks Synagogue
Date: 08 January 2021 12:09:38

Thank you for your email and my details are below:-

Mr Michael Arlington
60 Rutherford Way
Bushey Heath
Hertfordshire
WD23 1NJ

Michael Arlington [redacted] 7 Jan 2021, 15:11 (20 hours ago)

to PLNComments

The unique history of the synagogue includes the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

From

Mr Michael Arlington

Member of Public

On Fri, 8 Jan 2021 at 12:01, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

> Hello,
>
> Thank you for your comments on the above Planning Application, please note we require your address.
>
> Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.
>
> Please visit our webpage for further information:
>
> https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx
>
> Kind Regards
>
> Rianne
>
> ---
>
> **From:** Michael Arlington [redacted]
> **Sent:** 07 January 2021 15:12
> **To:** PLN - Comments <PLNComments@cityoflondon.gov.uk>
> **Subject:** Bevis Marks Synagogue
>
> The unique history of the synagogue includes the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
> The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
> · The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
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>
> From
>
> Mr Michael Arlington

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Martin Collins
Address: 4 courtgate close London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:This building is an eyesore amongst the building locally and will totally block out the light to this great landmark synagogue that has been there for 100s of year's

From: [redacted]
To: PLN - Comments
Subject: 20/00848/FULEIA.
Date: 07 January 2021 12:47:50

Dear Sir/Madam

I seem to be struggling with your website sever please note the following objection.

The proposed development detrimentally impacts on the setting of listed buildings and the nature of a conservation area.

In particular the effects of loss of daylight, increased noise and loss of amenity to a listed building of national and local significance at Bevis Marks.

The propose use (retail/cafe), height and form will impact on the future use of the synagogue for daily religious worship and ceremonial use.

Best regards

Darren Isaacs

139 Friern Park, London, N12 9LR

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Nigel Macdonald
Address: 72 Brook Drive Kennington

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity

Comment:I write as a Christian living in London to object to the planning proposals regarding 31 Bury Street because of the serious adverse impact for Bevis Marks synagogue, which is a Grade 1 listed Building (Historic England Listing number 1064745). The synagogue has always enjoyed natural light with large windows at its end and sides which are an important part of the environment for worship within the building, as well as being intrinsic design features of the interior. Its courtyard is an important part of the community life and has also always enjoyed natural light.

The proposed 31 Bury Street building is of a totally different scale and concept to the existing one whose height and style blends with its environment. Instead the proposed building is many times taller and includes a substantial part that would be 46 stories high. As a result, it would deprive Bevis Marks synagogue permanently of daylight except in the early morning and late afternoon,

with consequential damaging impact on the ability of the building to provide its users with the natural light for their worship and cultural activities that they have enjoyed for more than 300 years. Artificial light cannot replace that.

From an aesthetic point of view the external effects would also be very damaging if the application were to be approved. The proposed new building will dominate the immediate area, blocking out the sky around the synagogue and completely overshadowing it from the outside approaches, as well as from the courtyard within. It would also change completely the longstanding quiet nature of the narrow Heneage Lane immediately adjacent to the eastern (prayer) wall of Bevis Marks Synagogue.

This is because the proposed new building would create a shopping arcade opening onto on Heneage Lane with parking for hundreds of bicycles, with a consequent huge increase in traffic through the lane, and because the listed building's walls are not thick, would result in intrusive noise inside the synagogue and in the Rabbi's house which is an integral part of the Bevis Marks building.

The importance of this Grade 1 listed building transcends even its important role as the only non-Christian place of worship in the City of London and the Cathedral Synagogue of the United Kingdom. I therefore urge you to reject the proposed 31 Bury Street building and to seek different proposals which respect this building which remains in active use as well as being of such historical and spiritual importance to the City of London.

Comments for Planning Application 20/00848/FULEIA

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Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Miss Marissa Salad
Address: 867 North Longfellow Street Arlington

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Jewish services are dependent on sunlight, to tell which way is Israel. By covering up the light entering the synagogue, you are ruining a historical building, without even touching it. Don't do this. Don't be yet another casual attacker on our community.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Mark Attan
Address: 45 Village road LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The height and proximity of the tower would result in an over-bearing built form that would damage the historic setting of the Grade I listed Synagogue. It would also reduce the natural light through the eastern windows and thus harm the daytime experience of the Synagogue's interior.
The tower would result in a substantial reduction in natural light and privacy in the surrounding historic courtyard thus diminishing its attractiveness for the many daytime events and celebrations held throughout the year.
The construction of such a large building so close may cause structural damage to the Synagogue's 300-year-old foundations. The demolition and construction works would also cause unacceptable noise and vibration disturbance to the Synagogue's daily prayers, services and many other events.
During the construction period there would be no access to the Synagogue for people with

disabilities.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Dr Hannah Holtschneider
Address: 261 Dalkeith Road Edinburgh

Comment Details
Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to Jews and Jewish history in Britain.

The sheer size of the building will have a hugely detrimental impact. We will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.

The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4

PM.

The proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

I urge you to protect this historically important building, so that it can continue to thrive and serve its congregation.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Dr Alan Mendoza
Address: Millbank Tower London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I am opposed to this development on account of its damaging impact on the neighbouring Bevis Marks Synagogue:

· The unique history of Bevis Marks is endangered by this development: it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith

· The sheer size of the building will have a hugely detrimental impact. Much of the sunlight & daylight will be lost both to the courtyard and inside in the synagogue. This will negatively impact on congregants' ability to pray and to celebrate weddings and other events of national importance.

· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.

· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.

· The proposal creates a shopping arcade on Heneage Lane and provides parking for hundreds of bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Alfred Magnus
Address: 5 The Hall 23A Grove End Road London

Comment Details
Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:The proposed development is entirely inappropriate. It will severely impact on Bevis Marks Synagogue which is the premier Synagogue of Anglo-Jewery. This sort of building massing should not be allowed

The high rise proposed development will completely overshadow the synagogue and will block out sunlight and daylight from 9AM to 4 PM every day. The open space around the synagogue will be ruined and become unusable for public events and wedding receptions etc.

The proposed shopping arcade on Heneage Lane and the bicycle traffic along the Lane will severely impact on the synagogue with intolerable noise.

I request the committee to reject this planning application.

Alfred Magnus - Former President of the Board of Elders of the Spanish & Portuguese Synagogue

From: [redacted]
To: PLN - Comments
Subject: RE 18/00305
Date: 18 November 2020 13:26:56

To the case officer:

I realise that there is a typo in the final sentence of my objection. I have sent a second correct version.

Please delete the first objection and keep the second one or the version below.

Thank you

Nicola Garcia

Bevis Marks is a Grade 1 listed building of immense historical significance to the city of London and more broadly to British society. As the first place of worship for the Jews after their return under Oliver Cromwell, it marks the first steps along the route to the multi-cultural/multi-faith society of modern Britain. Therefore it is essential that developments in the surrounding area do not pose any threat to the structure or character of this unique building.
The current proposal would have a major impact; in addition to the practical consideration of a reduction of daylight into the Synagogue and its courtyard, the height and proximity of the proposed tower building, would substantially alter the character of the Synagogue and its immediate surroundings. Furthermore during the construction period, daily worship (including on the Sabbath) would be disturbed and there would be no access to the Synagogue for people with disabilities. Of equal concern is the considerable damage that such works would cause to the foundations of this synagogue.
I have a personal attachment to the synagogue: I was married there (as were my parents and my son), my own family and my husband's family have been associated with Bevis Marks synagogue for 300 years.
As explained at the outset, the issue is not only of personal connection and Jewish heritage but of much wider interest; this building has a special cultural and religious significance. In the same way as such a project would not be contemplated so near to St Paul's Cathedral or The Tower of London this project should be deemed inappropriate due to its close proximity to Bevis Marks Synagogue.

N R Garcia
48 Hamilton Gardens
NW8 9PX

[redacted]

N R Garcia
48 Hamilton Gardens
NW8 9PX

[redacted]

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr raymond dinkin
Address: 46 norrice lea london

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Please consider the following concerns
The unique history of the synagogue including the fact that it is the only non-Christian place of worship in the City of London and it is the Cathedral Synagogue of the United Kingdom. One cannot begin to imagine this kind of encroachment being permitted on the doorstep of St Paul's, despite Bevis's similar importance to people of the Jewish faith
· The sheer size of the building will have a hugely detrimental impact. It will lose much of our sunlight & daylight both to the courtyard and inside in the synagogue. This will negatively impact on our ability to pray and to celebrate weddings and other events of national importance.
· The building will become the new backdrop to the synagogue, especially when first seeing it when entering the courtyard, blocking out any sky around the synagogue.
· The cumulative effect of this and other proposed buildings. The entire backdrop of the synagogue will be made up of these buildings and they will block out the sun all day from 9 AM-4 PM.
· The proposal creates a shopping arcade on Heneage lane and provides parking for hundreds of

bicycles, which means there will be a very large increase in traffic up and down Heneage Lane, along the synagogue's eastern wall, causing disruptive noise inside the synagogue and in the rabbi's house.
Overall, this proposal seems out of proportion, ill-conceived and contributes little to society.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Michael Mail
Address: 20 Neeld Crescent London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Residential Amenity
- Traffic or Highways

Comment:The London-based Foundation for Jewish Heritage which campaigns on behalf of Jewish heritage https://www.foundationforjewishheritage.com/ is very concerned regarding this Bury Street development which is substantial in scale and will have a major adverse impact on the surrounding area. In particular, the development will badly affect the historic grade I listed Bevis Marks Spanish & Portuguese synagogue overshadowing and dominating this remarkable synagogue site, the oldest and most important functioning synagogue in the UK, and damaging its setting within the City of London. There will be less light, and increased traffic in what is already a busy street. The synagogue has an iconic place within the City and this development will cause great harm. We object in the strongest terms to this planning application and hope it will be denied.

The Montefiore Endowment
2 Ashworth Road, London W9 1JY · [redacted]

From Rabbi Dr Abraham Levy OBE
Hon principal Montefiore Kollel
Emeritus Spiritual Head
Spanish & Portuguese Jews Congregation

18th January 2021

To whom it may concern,

It is with the greatest of concern that I write this objection, as not only one, but now two towers threaten the beauty, grandeur, and tranquillity of Britain's oldest synagogue Bevis Marks Synagogue. I served as Senior Rabbi of the Spanish & Portuguese Jews of Great Britain for over four decades, of which Bevis Marks is the crown jewel. I often said that Great Britain has been good to the Jews, and the Jews have been good to Great Britain. This sentiment is particularly true when reflecting on our relationship with the City of London over the course of the past three and a half centuries.

Over my tenure we celebrated multiple thanksgiving prayers for Jewish Lord Mayors, hosted Prime Minister Tony Blair in 2006 to mark the 350th anniversary of readmission of the Jews to England and Prince Charles in 2001 to celebrate the synagogue's tercentenary. Bevis Marks Synagogue is the Cathedral Synagogue of British Jewry.

HRH The Prince of Wales has since added further acknowledgment and support by becoming Royal Patron to the synagogue's new Heritage Centre, a place for people of all faiths and none to learn more about Jews, Judaism, and the longstanding relationship between the Jewish community and the City of London. The erection of two overbearing towers over Bevis Marks Synagogue surely diminishes that message, and a relationship which Bevis Marks Synagogue and the City of London have always celebrated.

I therefore encourage and insist that the planning committee reject these proposals and instead reaffirm the City of London's longstanding and trusted relationship with Bevis Marks Synagogue and Britain's Jewish community.

With best wishes,

[redacted]

Rabbi Dr Abraham Levy OBE

From: [redacted]
To: PLN - Comments
Subject: Bevis Marks
Date: 07 January 2021 16:49:37

I understand that there is, or will be, a planning pplication to build a 48 storey building within 30 meters of the grade 1 listed Bevis Marks Synagogue.
There will, of course, be a number of planning objections, some valid some not, but I am sure that, unike in some London Boroughs, the City of London planners are both competent and incorruptible.
But, in judging the appliction, if and when it comes, I trust that the planners and those others whose agreement is sought will bear in mind the damage that will be done to Britain's image should the application be granted is far greater than that which will undoubtedly be suffered by Bevis Marks.

Solomon Green
261, Sheen Lane, London, SW14 8RN

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Siena Golan
Address: 31 Milton Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other

Comment:The proposed development will prevent natural light from reaching the synagogue, darkening the interior and courtyard throughout the day. The proposals will also increase pedestrian and bicycle traffic on the adjacent street, disrupting worship and the peace of the site. The synagogue forms a key part of Jewish heritage in the UK today, just as it did over 300 years ago, and deserves to be protected.

From: [redacted]
To: PLN - Comments
Subject: 20/00848/FULEIA
Date: 31 December 2020 15:37:45

TO WHOM IT MAY CONCERN
Re:- CREECHURCH LANE
31 BURY STREET

I have been made aware of the fact that a planning application has been submitted for yet another skyscraper building. This application being 51 storey in height. Both are within the immediate vicinity of The Bevis Marks Synagogue, a LISTED Grade 1 Heritage building.
Having served almost 50 years as a Council member of the City Corporation, serving as Sheriff and Chief Commoner - also having spent my professional career in the City as a Chartered Surveyor I am deeply conscious of the fact that the City has relatively few historic buildings. As such we have always used every endeavour and sensitivity to protect those historic buildings and their immediate surroundings.
The reasons why in my view this application should be refused:-
1). The height and bulk of the proposed building is overwhelming.
2). This additional vast building would have a hugely detrimental impact environmentally: 2a. Due to the increased pedestrian and cyclist traffic causing disruptive noise
2b. Dramatic loss of light within this historic building from 9.00am to 4.00pm.
2c. Bevis Marks is not only an international House of Prayer visited by people from all corners of the world - but also by visitors interested in its internal architecture,
therefore this loss of light and social amenity will have a very serious impact on the present unique atmosphere so valued by thousand attributed to this historical, listed building.

Please take into consideration the above points.
I have always been conscious of the great appreciation and sensitivity that the City Fathers have taken when considering a new development regarding the impact it might have on an ancient City Church - such as Bevis Marks Synagogue - or an historic Livery Company building. Immense care must be taken to ensure that these valued buildings are not be overwhelmed or disturbed by vast skyscraper constructions being erected within close proximity to any building of historic or architectural interest. Their environment should be protected.
Your faithfully
Anthony N. Eskenzi., CBE. DSc., F.R.I.C.S City Councillor - 1970-2017
Woodcroft Totteridge Green
London
N20 8PE

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mrs Henrietta Ferguson
Address: 127 Rylston road London

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:Bevis Marks is an historical building. The oldest synagogue in london and needs natural daylight with peace and quiet for people to visit and have space to sit and reflect and pray.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details
Name: Mr Scott Lebon
Address: 44 Dobson Close London

Comment Details
Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:I support this impressive proposal for a slender building at 31 Bury Street. It will fit in nicely with the other consented tall buildings in the City.

Heritage groups such as Historic England have consistently undermined the City's development. If one listened to NIMBY objections nothing would ever get built.

The City is the UK's premier business district and this needs to be actively supported. With Brexit threatening London's status, the City should re-double its efforts to continue its development. It's important to send out the message that London is open for business. This building will contribute to the City's status as a global financial centre.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Christopher Gazzard
Address: 26 Hunter House King JamesStreet London

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:I support this development. And feel that it is appropriate for the location. I also think it's important to state that London Heritage need to start working WITH developers. Instead of refusing Because it is London Heritage who are affecting the City's future aesthetics.

"The only thing we can rely on is Change"

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Jimmy Aldrich
Address: 1 great ellshams London

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
- Other

Comment:The design and form of this building looks very complimentary to the local surroundings. It will help make London continue it's 21st century transformation and provide a nice backdrop for the local area

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Mandeep Dhaliwal
Address: Flat 607 9 steedman st London

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:I think this is a great scheme and badly needed in to help revitalise inner London. Aesthetically it a very attractive building and in my opinion adds to the skyline. I feel new amenity space will add to the area and the office jobs support and build the local economy

ALDGATE CONNECT BID

8 January 2021

Primera Corporation Ltd

38-39 St Johns Lane

London

EC1M 4BJ

[redacted]

[redacted]

To whom it may concern,

On behalf of the Aldgate Connect BID, I am writing in support of the application by Bentall Green Oak for the redevelopment of 31 Bury Street, EC3A 5AR – Ref. 20/00848/FULEIA

We have had a number of meetings with the applicant in recent months, as the plans have developed for the future of the site. The applicant has been engaging, responsive and supportive of the BID's ambitions, and has sought to reflect these in the proposals.

In particular, we very much welcome the improvements to the public realm and wayfinding around the site which is a stated ambition of the Partnership. At present, Creechurch Lane has a back-of-house character with little animation and relatively poor public realm.

We believe this will be significant improved through the redevelopment of Bury House, with the creation of new improved retail at ground floor, an attractive pocket-park and a new pedestrian route through the site from Heneage Lane to the north which will significantly enhance connectivity in this area and the pedestrian experience.

The Aldgate Connect BID also supports the sustainability credentials of the proposals. All developers should now be targeting the highest levels of sustainability and the application surpasses this high bar in many ways, from the choice of materials to opportunities for additional planting.

The economic benefits are also significant, with the creation of smaller office floorplates helping to bridge a gap in the market and support a greater mix of businesses to locate in the Aldgate area and this part of the City of London Corporation. We believe that there may be ever greater demand for these types of floorplates in the future, as businesses consider their optimal space requirements post Covid-19.

Having reviewed the proposal, the context has also been clearly considered, with the proposed height helping to create a clear step between the cluster and the more domestic scale of buildings further to the East.

Finally, we understand that the applicant has engaged extensively with local groups to ensure that communities, CSR, employment, skills and new enterprises will benefit from the proposed redevelopment, including access to the mezzanine and first floors of the proposed redevelopment.

The BID therefore supports the application and hopes that the City of London Corporation grants planning permission for the redevelopment of 31 Bury Street.

Kind regards,

ALDGATE CONNECT BID

[redacted]

Ruth Duston

ED of the Aldgate Connect BID

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
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Case Officer: Bhakti Depala

Customer Details

Name: Mr Martin Ray
Address: 5 Phillips Close Dartford Kent

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
- Other

Comment:I'm in favour. It looks great. Much better than what is there.

Comments for Planning Application 20/00848/FULEIA

Application Summary
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Case Officer: Bhakti Depala

Customer Details
Name: Mr Edward Smith
Address: 84 MALTINGS PLACE Tower Bridge Road london

Comment Details
Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:I walk through this area often, and believe this building will be a real asset the the office needs of the city.

I have never thought that this area should be low rise, and cannot understand how anyone could expect a location so close to the heart of the city to be anything but tall.

Many part of the world have religious building that exist in harmony to neighbouring highrises, this juxtaposition is what makes cities such exciting, vibrant places to live and visit. In fact many of the old churches in the city already demonstrate this.

This building looks high quality, and it is clear that great care has been taken to make sure it is a positive addition to the cities skyline.

If a high rise cannot be built here, I'm at a loss to where people expect offices to be located.

Once this building is completed, it will help the city maintain its appeal and relevance to new businesses - something that is greatly needed at this point in time.

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Adam Caddy
Address: Flat 8, Sequoia House 18 Quebec Way London

Comment Details

Commenter Type: Member of the Public
Stance: Customer made comments in support of the Planning Application
Comment Reasons:
Comment:Stiff & Trevillion have a great reputation, this is a beautiful looking tower with fantastic proportions. The details and use of facades is innovative for the square mile.

It's a refreshing change to the all glass facades that we have seen in recent years. I look forward to seeing this addition to the CoL in a time where investment is so badly required.

BOARD OF DEPUTIES OF BRITISH JEWS
ADVOCACY FOR THE COMMUNITY

The Rt Hon.The Lord Mayor, Alderman William Russell
Mansion House
Walbrook
London
EC4N 8BH

24 February 2021

Dear Lord Mayor,

I hope you are keeping well in these difficult times. I write to you concerning the fate of the Bevis Marks synagogue, the mother synagogue of the UK Jewish community.

As you may know, there are currently two planning applications that would affect the synagogue if they were approved. A development on Creechurch Lane may undermine the foundations of the synagogue, as well as block incoming light. During the building works, disabled access may be severely hindered to Bevis Marks. Meanwhile, the proposed Bury House development would block out light. To be clear, as a 300-year-old building, it was designed with natural light in mind and any severe restriction to that would be detrimental to worshippers.

I would urge you to impress upon those who will make the decision concerning these developments to understand the importance of Bevis Marks as a living symbol of the place of British Jews in this country. Since it was built in 1701, the Jewish community has not once been the victim of an organised programme of state violence, unlike the vast majority of our sister communities in Europe. Bevis Marks Synagogue stands testament to that.

It is also a symbol to wider society, of how diversity is integral to London. Before the first red bus or tube train; before pearly kings and queens; before even Buckingham Palace, there was Bevis Marks Synagogue, proclaiming cosmopolitan values at the heart of London.

Worship has been held there continuously for more than 300 years, through blitzes and political upheavals. Attendance has been a tradition passed on through generations and links all British Jews to those who came before and built the community. Like most British Jews, I have Ashkenazi (Eastern European) heritage. But as President of the Board of Deputies of British Jews, I am aware that my organisation emerged out of the Sephardi tradition or those with Spanish and Portuguese heritage such as the founders of the Bevis Marks Synagogue. The synagogue is a link to those who came before me in leading the community, and whenever I am there I am humbled by that fact.

1 Torriano Mews,
London NW5 2RZ
[redacted]
www.bod.org.uk
Registered Charity No. 1058107

The notion that we would wish to risk the synagogue's foundations, shroud it in darkness or restrict disabled access is heart-breaking. It would be a terrible wound to a living monument of British support for Jewish life and the Jewish contribution to British life.

Bevis Marks Synagogue is of such enormous significance that we urge the City of London to consider explicit long term protection for the building and its surrounds so that they no longer have to fight each development individually.

I would urge you to share with those who will finally make the relevant decisions, how important the Bevis Marks Synagogue is to the UK Jewish community and the UK as a whole so they can come to the best decision regarding our shared heritage.

Best wishes,

Marie van der Zyl
President

1 Torriano Mews,
London NW5 2RZ
[redacted]
www.bod.org.uk
Registered Charity No. 1058107

Raymond Burton House
Albert Street
Camden Town
London NW1 7NB

[redacted]

Royal Patron: HRH The Prince of Wales

23 February 2021

Howard Martin, Chair, Bevis Marks Synagogue Heritage Foundation

Dear Howard,

I am writing to you to vocalise our support to Bevis Marks Synagogue in reference to the risks you are facing from developers on your doorstep.

Bevis Marks Synagogue is a place of outstanding significance both to the City of London and to the nation. It represents the re-birth of the Jewish people in the UK following the re-admission in the mid-17th Century. It is much more than a Grade 1 listed building. It is the 'Cathedral' Synagogue to Anglo Jewry and should be protected in its cultural, historical and religious significance in the same vein that St Paul's Cathedral or Westminster Abbey could expect from its local and national government.

The City of London should feel a position of pride to institute protections around the Synagogue to preserve not only the building itself but the context of its location. This historically significant building does not exist within a vacuum and its relation to the proximity of other buildings and most importantly the light that fills the Synagogue, brings with it the symbolic meaning as it was designed. The Synagogue deserves the protection that ought to be afforded to it in ensuring that the building and its community are able to exist as intended which includes streaming natural light through its beautiful windows and being a place of private reflection for worshipers.

The Jewish Museum London has been in a long term partnership with Bevis Marks Synagogue for several years. We will be playing our part in delivering the multi-million pound investment from the National Lottery Heritage Fund to both protect and preserve the heritage within this unique space and also build a centre for learning for people of all faiths and none. Together with the Foundation, we will be delivering an activity programme designed to increase visitors, particularly school children, to the Synagogue to understand the importance of the unique aspects of our shared heritage and history. The experience of visiting the Synagogue is based on the awe that can be inspired by visiting a place of splendour and understanding the importance of beautifying worship, a fundamental commandment in Judaism. By being able to see the Synagogue with natural light illumining the sanctuary through the windows and reflecting on the symbolism behind this message from the architect, students will understand the shared belief systems between faiths when it comes to our relationship with the natural world and how we create space that compliments and works with it even in urban areas.

Chairman: Nick Viner
Museum Director: Frances Jeens Honorary Life President: The Lady Levene of Portsoken
Registered limited company no 2655110, England & Wales. Registered office as above.
Registered Charity no 1009819. VAT registration no. 215 1252 66. Accredited Museum no 31.

Raymond Burton House
Albert Street
Camden Town
London NW1 7NB

[redacted]

Royal Patron: HRH The Prince of Wales

The Synagogue is a living, breathing community space that is readying to welcome more visitors than ever before and act as a place for interfaith and inter-community understanding. The City of London welcomed the Jewish community back to London over 360 years ago and has maintained positive relationships with the Jewish community ever since. This is the moment in time for the City of London leaders to demonstrate their understanding of the cultural, historical and religious significance not only of the Bevis Marks Synagogue building but of the context of its surroundings and the importance of privacy and light within the faith and the architecture.

Ensuring the Synagogue is protected in this way ought to be a point of pride and I sincerely hope that we see this demonstrated and our heritage preserved by those with the power to do so.

With kind regards,

[redacted]

Frances Jeens
Museum Director

Chairman: Nick Viner
Museum Director: Frances Jeens Honorary Life President: The Lady Levene of Portsoken
Registered limited company no 2655110, England & Wales. Registered office as above.
Registered Charity no 1009819. VAT registration no. 213 1252 66. Accredited Museum no 31.

Historic Royal Palaces

24th February 2021

To The Rt Hon. The Lord Mayor, Alderman William Russell

Historic Royal Palaces is the charity that looks after:
Tower of London
Hampton Court Palace
Banqueting House
Kensington Palace
Kew Palace
Hillsborough Castle and Gardens

We help everyone explore the story of how monarchs and people have shaped society, in some of the greatest palaces ever built.

We raise all our own funds and depend on the support of our visitors, members, donors, sponsors and volunteers.

Dear Sir

Bevis Marks Synagogue

The Bevis Marks Synagogue has an important place in the long history of Jewish communities and the City of London, a history that is also bound up with the Tower of London. The Constable of the Tower was the main official for administering the affairs of all the Jews of England, the Constables' Court dealing with all Jewish legal cases. The Tower served as a place of refuge for the Jewish community during violent pogroms, as their prison when they refused to pay taxes and as their port of exile when they were expelled from England in 1290.

As the Grade 1 Listing status attests, the Bevis Mark Synagogue in Heneage Lane is a building of *exceptional* historic interest. It was the 2nd synagogue erected in England after the resettlement of Jews here in the 1650's when the Commonwealth allowed their faith to be practised openly, is the oldest surviving synagogue in the UK and likely the longest continually operating synagogue in the world. As the 'Cathedral Synagogue' of British Jewry it continues to hold many special services in celebration and/ or commemoration of significant national events.

Importantly, the building and its fittings survive in almost unaltered state. The architecture reflects non-conformist chapels of the period and its two tiers of large arched windows, glazed in plain glass, flood the interior with light. The intangible qualities that contribute to the significance of the synagogue as both a historic building and a continuing place of worship include the ambience of the interior and the serenity of the courtyard setting, which are both at substantial risk of harm through the ever encroaching nature of the tall buildings of neighbouring development.

Although the synagogue does not sit within a Conservation Area, its exceptional historic importance demands careful consideration and planning to protect and preserve both the tangible and important intangible aspects of its significance including its rights to light and the serenity of its setting, for the long term.

Yours faithfully

Adrian Phillips
Palaces & Collections Director

[redacted]

Historic Royal Palaces
Hampton Court Palace, Surrey, KT8 9AU
[redacted]

INVESTORS IN PEOPLE | Gold

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

Foundation for Jewish Heritage

20 Neeld Crescent
London NW4 3RR
[redacted]

[redacted]

1 February 2021

Trustees
David Bearman
The Lord Finkelstein OBE
Stephen Goldman
Dame Helen Hyde DBE
The Rt. Hon. Jim Murphy
Daniel Peltz OBE
Esther Robinson Wild
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The Lord Sassoon
Simon Sebag Montefiore
Timothy Snyder
Edmund de Waal OBE
Jimmy Wales
Debbie Wiseman MBE
The Rt. Hon. Lord Young CH

Planning Application for Bury House, 31 Bury Street, London (ref: 20/00848/FULEIA)

The Foundation for Jewish Heritage would like to present the following comments on the planning application for Bury House, 31 Bury Street, London (ref: 20/00848/FULEIA) and register our **strong objection** to the proposed development.

Our response only addresses the potential impact of the proposed development on the significance and setting of the Grade I listed (NHLE List Entry Number: 1064745) Bevis Marks Synagogue.

The synagogue is notable for being the oldest synagogue in the country and the only synagogue in Europe that has held regular services continuously for over 300 years. It was constructed between 1699 – 1701 to the designs of Joseph Avis, a master builder and Quaker who had previously worked with Christopher Wren. It was the second synagogue to be erected in England after the resettlement of 1656. Historic England state in the list entry description that *"in its little altered state (it) is of exceptional historic interest*" and its listed status is a formal recognition of the building's heritage value and high significance. The **'Townscape, Built Heritage and Visual Assessment' (Montagu Evans, 2020)** submitted with the planning application also acknowledges the building's high significance and states that it is "*one of the few buildings in the City where most of the original early 18th century fabric survives.*" (s8.49).

Historic England in 'Conservation Principles, Policies and Guidance' (2008) identify four principal heritage values: Evidential (deriving from the potential of a place to yield evidence about past human activity), Historical (deriving from the ways in which past people, events and aspects of life can be connected through a place to the present), Aesthetic (deriving from the ways in which people draw sensory and intellectual stimulation from a place), and Communal (deriving from the meaning of a place for the people who relate to it, or for whom it figures in their collective experience and memory) which might be taken into account when assessing the significance of heritage assets, whether they are statutorily listed or not. The 'National Policy Planning Framework' ("NPPF") (2012, Revised 2018, Updated 2019) suggests that for planning purposes, the significance of heritage assets should be assessed under the headings of archaeological, architectural, artistic, or historic which are essentially the same as the Historic England values. The NPPF also points out that significance derives not only from a heritage asset's physical presence, but also from its setting, being the surroundings in which it is experienced.

The NPPF directs that for planning purposes, local planning authorities should require an applicant to describe the significance of any heritage assets affected by a proposed development.

Foundation for Jewish Heritage
Reg. Charity No: 1162111

Sections 5.26 – 5.33 of the **'31 Bury Street, Environmental Statement Volume 2: Townscape, Built Heritage and Visual Impact Assessment' ("TBHVIA") (Montagu Evans, 2020)** address the synagogue and provide an assessment of significance. The assessment as presented in these sections is incomplete as it does not evaluate the Communal or Evidential values of the synagogue when these are to be expected, especially the former given that the synagogue has been a focus for community activity from the date of its construction to date. These are marked and concerning omissions and, in our opinion, lead to a flawed impact assessment which is unreliable. A thorough and sound understanding of significance is the baseline for managing change to significant places and the absence of such will not allow for informed decision-making as directed under national and local planning policy.

Although essentially an archaeological measure, Evidential value can also derive from above–ground physical remains which have been inherited from the past. In this regard, our ability to understand and interpret the evidence relies upon the intactness of the extant remains. As noted above, it is acknowledged that the synagogue is little altered and substantially retains original fabric. The synagogue is used for the purpose for which it was originally constructed and the retention of important fixtures, fittings and features evidence historic and prevailing aspects of religious practice and use of space. Historic legibility therefore remains intact and uncompromised.

The synagogue was constructed to facilitate communal worship and provide educational and welfare facilities. Notwithstanding the loss of the congregation's school, almhouses and orphanage, it remains a community-focused building. It continues to serve the congregants, but it also continues to serve an educational purpose with the hosting of tours and events. Both congregants and visitors therefore may have collective memories of their experiences of the synagogue and strong associations with it.

The synagogue is situated within a secluded courtyard and although now surrounded by modern development, it is experienced as a place of calm and contemplation set aside from the frenetic activity of the City. It is acknowledged that the setting of the synagogue has undergone irreparable change and it is somewhat compromised by the proliferation of modern and unsympathetic development in the immediate area. Notwithstanding this, and the attendant impact on the visual experience of the synagogue, it is considered that its immediate setting and how it is experienced is considered a positive contributor to its significance. Furthermore, it is important to highlight the contribution of environmental factors to religious practices in the building, specifically the availability of good, natural light for the reading of the Torah Scrolls. It is considered that the proposed development will have an impact on daylight amenity and in turn, may impact on religious observance and by default, impact significance. The continuing use of the building for religious purposes, which may be impeded by the proposed development, is an important component of Communal value which in turn is a key contributor to significance. The proposed development therefore has the potential to result in harm to significance.

The assessment of impact associated with the operational phase of the proposed development is set out in sections 8.53 – 8.57 and reflects the absence of consideration of the Evidential and Communal values which contribute to the significance of the synagogue.

The assessment concludes that the magnitude of impact of the proposed development on the significance of the synagogue will be Negligible Neutral which is defined as, "*Barely discernible change to the value of the receptor. Very minor loss of or alteration to one or more key elements / features / characteristics of the baseline.".* We fundamentally disagree with this conclusion and believe that an adequate assessment of significance would result in a different conclusion on the magnitude of impact on significance. It therefore follows that we disagree with the statements made in the 'Executive Summary – Heritage' that the proposed development does not adversely impact the synagogue and that it would preserve its significance by virtue of replacing Bury House with a high-quality piece of architecture. The 'Summary' (sections 8.113 – 8.116) expands on impact and the perceived benefits of the proposed development on the setting of the synagogue. From these narratives, it is implied that Bury House has a negative impact on setting and that the proposed development will enhance it. However, there does not appear to be an explicit reference to, or assessment of, the impact of Bury House on the synagogue's setting and therefore the absence of written context does not allow for a full evaluation of the extent of enhancement to setting attendant with the proposed development. Based on the visual impact assessment, specifically view 45: Bevis Marks Synagogue Courtyard which comprises of existing and emerging views, we are of the opinion that the proposed development is not an appropriate replacement for Bury House and would not enhance the setting of the synagogue.

In summary, we expect a robust and thorough assessment of the significance of a Grade I listed heritage asset which may be impacted by a major development of this nature and are concerned by the absence of such.

We also have comments on the following documents,

31 Bury Street Environmental Statement Non-Technical Summary (TRIUM, 2020)

Part 7 - Section 'Townscape, Built Heritage and Visual'

We disagree with the statement in paragraph 169 (p.37), specifically that the impact of the proposed development on the setting and significance of heritage assets in the wider area has been assessed. For the reasons outlined above, we are of the opinion that this is a statement that cannot be applied to the Bevis Marks Synagogue.

Paragraph 172 notes that two minor adverse effects have been identified for built heritage during the demolition and construction phase. These effects, it states, will be temporary and it has therefore concluded that they will be minor adverse in scale. It then goes on to state that "*The most significant adverse effect would be the presence of construction equipment, such as tower cranes*." Given these

(contradictory) statements of adverse effect associated with the presence of tower cranes of a temporary nature, we are rather surprised by the statement in paragraph 175 that "*For the completed development, no significant effects have been identified with regard to the built heritage assets*." This appears to be a rather confused and illogical summation that temporary tower cranes may have an adverse effect, but a permanent building of 48-storeys will not. There is a complete absence of reference to the effect on the synagogue where reference is to be expected.

Paragraph 172 further states that, "*Due to the proximity of these receptors to the Site of the Proposed Development, they are considered to experience larger effects than the other built heritage receptors."* We fully concur with this acknowledgement of the potential for adverse impact on the synagogue and given this, it is expected that a robust and thorough assessment of significance would be undertaken. We are therefore disappointed and concerned that based on the information submitted this appears not to be the case.

31 Bury Street, Environmental Statement Volume 1: Main ES. Chapter 14: Likely Significant Effects and Conclusions (TRIUM, 2020)

The conclusion presented in the section 14.6 'Likely Significant Effects, Demolition and Construction' that there will be *"No significant demolition and construction effects are likely to arise in respect to any of the topic areas which have been the subject of this EIA."* does not accord with the statement in paragraph 172 noted above that references a significant adverse effect of the presence of tower-cranes. There is according to this paragraph a significant adverse effect associated with the demolition and construction phase.

We also highlight the statement in section 14.8 that "*No significant effects have been identified as being likely as a result of the completed and operational Proposed Development in respect of…. Built Heritage."* This statement is unsurprising when taken in the context of, what is in our opinion, a confused and illogical assessment of effect as presented in paragraph 172 and an inadequate assessment of significance of the synagogue. In our opinion, it is a statement which is debased by these factors and is made on an unsound basis.

Health Impact Assessment (Quod, 2020)

Public Health England has recently produced guidance for local authority public health and planning teams ('Health Impact Assessment in spatial planning. A guide for local authority public health and planning teams', October 2020) which aims to provide them with the practical information needed to embed Health Impact Assessments ("HIA") in the planning system. HIAs offer planning authorities the opportunity to improve public health and wellbeing, and ultimately reduce inequalities. This guidance extends to planning applications (designing proposals for development projects) and how they can influence health and wellbeing outcomes. It recommends that a HIA is submitted as part of a planning application as it will help ensure that health and wellbeing are carefully considered in the planning process.

The guidance further suggests steps that can be taken in determining evidence-based triggers for when a HIA should be required. Amongst these, is the identification of population characteristics. To quote directly from the guidance,

"3.7 Preventing the negative impacts and maximising positive impacts of a plan, policy or planning application on population groups is key to an HIA. It is important to identify how sensitive and susceptible population groups or areas are to the impacts of a development project, whether positive or negative, for example on Black, Asian and Minority Ethnic (BAME) groups (35)." (p.22).

Paragraph 3.8 details the different characteristics to consider including religion and belief which are protected characteristics as defined by the Equality Act 2010.

It is important to highlight that the planning application relates to a major development which will be sited approximately 40m from a functioning place of worship, and in which the form of service is heavily influenced by environmental factors such as the availability of good, natural light. It is therefore expected that the HIA would follow best practice and identify local population characteristics (here it is a sensitive and susceptible population group) and address the potential impact of the proposed development on a statutorily protected characteristic.

The HIA references the factors which influence health including environmental factors, and it also lists wider determinants of health including general socio-economic, cultural, and environmental conditions and social and community influences. It would therefore follow that the HIA would consider the impact on the synagogue, its congregants, and visitors. The synagogue is usually open to visitors daily and hosts tours and events, many of which have an educational purpose.

Furthermore, the key 'Health Priorities' as set out in s3.33 (p.16) make no reference to the congregation of, or visitors to, the synagogue in the sub-points on Air Quality, Noise Exposure or Mental Health and Wellbeing. However, in s2.41 of the **'31 Bury Street Environmental Statement Volume 1: Main ES, Chapter 2: EIA Methodology'**, the synagogue is listed amongst the "Potentially Sensitive Receptors" in terms of Air Quality: E19 Bevis Marks Synagogue and Rabbi's flat (Religious (Synagogue) and Residential); Noise and Vibration: R2 Bevis Marks Synagogue (religious) (Note: the Rabbi's flat is omitted); Daylight and Sunlight: Bevis Marks Synagogue (religious) (Note: the Rabbi's flat is omitted); Overshadowing: Bevis Marks Synagogue; and Light Intrusion: Bevis Marks Synagogue (non-residential). We would therefore expect that which is set out in the Methodology to be reflected in the HIA which appears not to address the religious and educational uses of the synagogue.

It is our observation that throughout the documents reviewed, there appears to be a complete and unacceptable absence of acknowledgment and understanding of the historic and prevailing use of the Bevis Marks Synagogue. This is also carried through into, what we consider to be, the inadequate assessment of significance of the synagogue which does not reference the key contributary communal and evidential heritage values associated with the building's religious and educational use, both

historic and existing. On this basis, we believe that the impact assessment is also inadequate as it is not founded on a robust or thorough assessment of significance. It therefore follows that we disagree with the conclusion that the proposed development when constructed will have a magnitude of impact on the synagogue's significance that is Negligible Neutral. For these reasons and those set out above, we urge your authority to withhold consent and seek the information that is required for informed decision-making as directed under the NPPF, the National Planning Practice Guidance, The London Plan and the City of London planning policies, and relevant guidance.



11 FEBRUARY 2021

BEVIS MARKS SYNAGOGUE

SIGNIFICANCE & COMMUNITY IMPACT STUDY

INTRODUCTION



Bevis Marks Synagogue is recognised across the Jewish world, and throughout the United Kingdom, as both a religious and heritage site of international significance. Its importance lies in the history of its building alongside the continuity of its community. **Bevis Marks Synagogue is an historic building still being used in its original form, by the same community who built it. This is what makes it a heritage site of 'Outstanding Significance.'** However, the synagogue's survival over the centuries has only been made possible as a result of a delicate ecosystem that sustains it. Sadly, any further development around the synagogue threatens to undermine this foundation, and in doing so cause 'significant harm.'

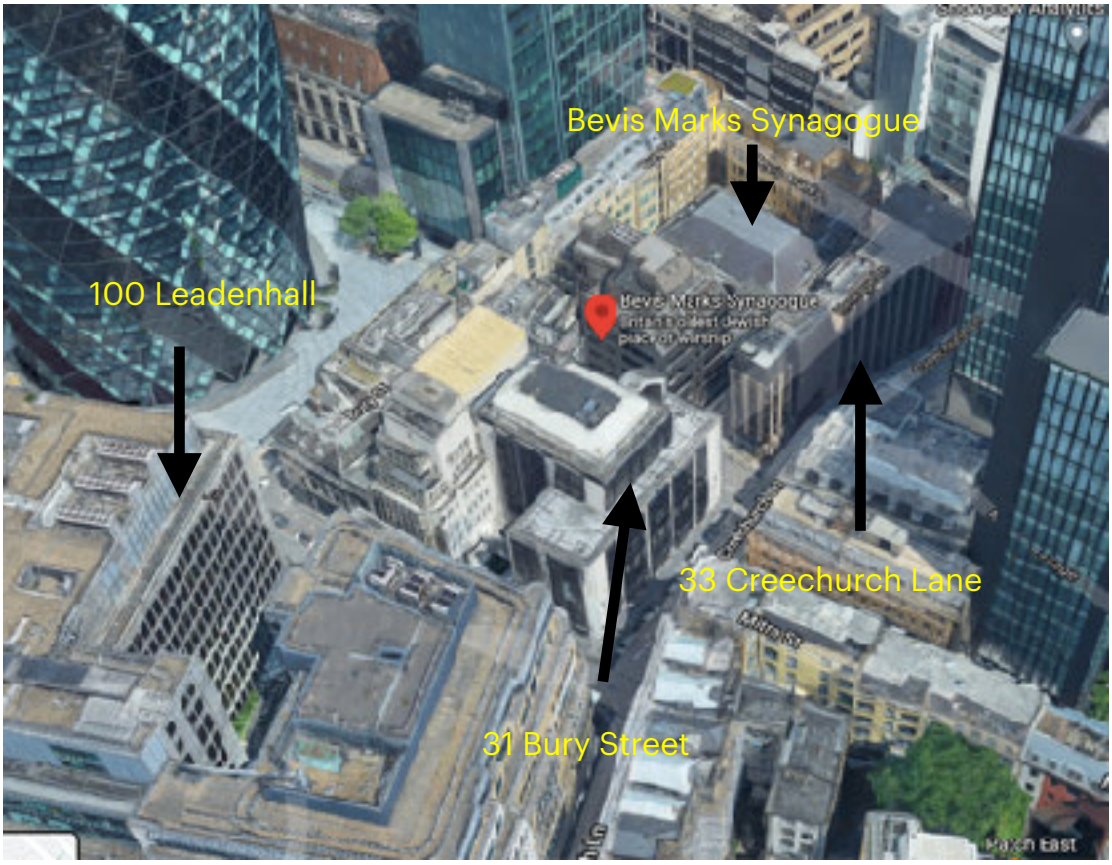
The Sephardi Trust, the synagogue's parent charity, has submitted a technical objection quantifying the detrimental impact of further development on light, wind, noise and Heritage. **What you will find in this document is a 'practical impact' objection, by those who worship daily at Bevis Marks Synagogue, that outlines what is at stake in real life terms.** It does so by first explaining why Bevis Marks



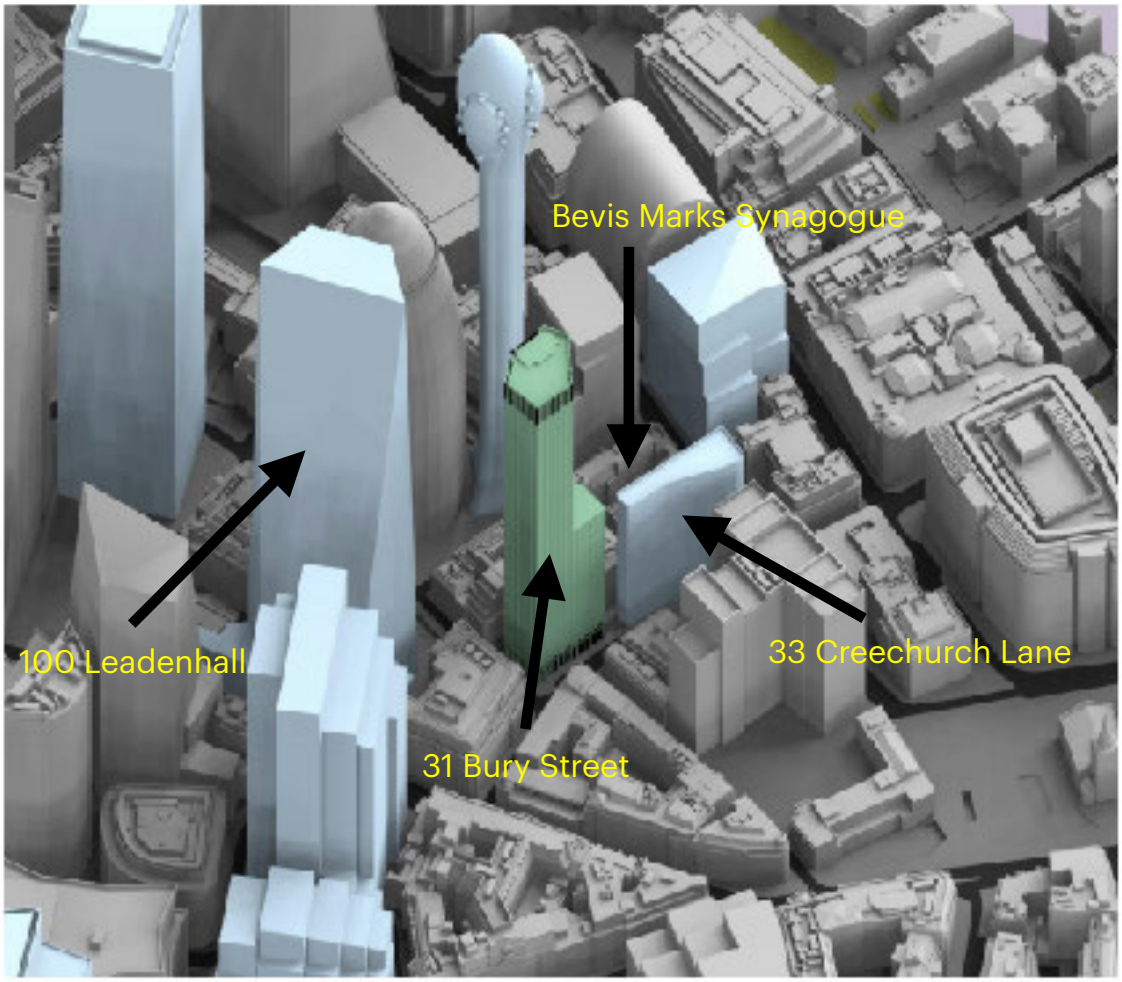
View of Synagogue Facing Southeast

Synagogue is so significant. It then shows how the site is used every day and most evenings each week, in multiple ways, for so many different demographics, demonstrating how crucial it is that the synagogue be able to continue to function as is. Finally, this document clarifies how further reductions of light will impact the ability of the community to function both practically and religiously, according to the Jewish faith, and similarly how the blocking of sky and an increase in noise will make it not only profoundly difficult, but in some ways impossible, for the congregation to continue as a worshipping community. What you will read below demonstrates that this is not unwarranted or unsupported hysteria.

We therefore believe it is of utmost importance that the building proposals at 33 Creechurch Lane and 31 Bury St are rejected, and that further protections are put in place around Bevis Marks Synagogue in the City of London Local Plan 2036.



Current Landscape Around Synagogue With Low Buildings



Proposed Landscape Around Synagogue With Tall Buildings

1 - SIGNIFICANCE

Bevis Marks Synagogue is not just another Grade 1 Listed building. It may sound flippant to speak so casually about a designation of such significance, but the importance of Bevis Marks Synagogue goes way beyond 'just another' historic building. It is significant in so many ways, to the extent that one could characterise it as a site of National Importance, and if such an official designation existed - a World Jewish Heritage Site.

This broader appreciation of the synagogue's significance is crucial, as the City of London plans require that planners consider any potential harms against a site's significance. The plan requires evidence of how the public benefit of any future development would outweigh any harms caused. The extreme significance of Bevis Marks Synagogue therefore requires ever greater demonstration of benefit to permit causing such harms to it.

Bevis Marks Synagogue is:

1. **A Grade 1 listed building**
2. **One of the only surviving examples of an intact Wren style City church with original interior**
3. **The only non-Christian house of worship in the City of London**
4. **The oldest synagogue in the United Kingdom**
5. **The 'Cathedral Synagogue' of British Jewry akin to St Paul's for Christians**
6. **The only synagogue in the world to have held continuous worship since the time of its construction in 1701**

This significance is documented in the recent Conservation Report by Caroe Architects as part of the synagogue's NLHF supported Heritage Centre project. This significance applies to the synagogue itself, its courtyard and Heritage setting, as well as to its religious heritage which will be expanded on below. This multifaceted significance is testified to by other organisations and individuals, reflecting the breadth of this appreciation across faiths, countries, and experts. These include other faith leaders, Jewish organisations, conservation groups, former Lord Mayors, and other City of London institutions.

2 - A "24/7" SITE

In order to fully appreciate the significance of the synagogue, and the many ways in which further development will harm it, it is necessary to highlight that the synagogue is a house of worship, but it is also much more. Cumulatively, it could almost be said it is a "24/7" site.

i. Synagogue Worship - In the Jewish tradition prayer takes place three times a day. Bevis Marks Synagogue therefore conducts worship services daily. During weekdays they can last up to an hour, and on the Jewish sabbath and holidays for over four hours. Different services attract different constituent groups including longstanding members, locals, City Workers, university students, and visitors. Here is a sample week:



a. Weekday Morning Service - 7:15am-8:15am

b. Weekday Afternoon Service - 1:15pm-1:30pm

c. When there are evening events we also conduct an Evening Service

d. Friday evening 7:30pm-8:30pm (Summer); 6:30pm-7:30pm (Winter)

e. Saturday morning (8:30am-12:30pm)

Most services conclude with the serving of a meal or refreshments along with teaching which adds an additional hour.

ii. Lectures - These take place in the evening, typically once or twice a week. They can cover a range of Jewish subjects from Bible, Talmud, Philosophy, History or Law. A common Monday evening will host lectures from 6:30pm-9:00pm

iii. Social Events - Approximately once or twice a month the synagogue hosts a midweek social event for Jewish city workers to mix and mingle, and connect with their Jewish roots. A typical event will last from 6:00pm-10:00pm

iv. Weddings - On average the synagogue hosts one wedding a month, with the majority in the spring and summer months. Weddings use all the synagogue spaces including the courtyard. They typically take place from 2:00pm-6:00pm on a Sunday, though at times midweek too.

v. National Commemorations - The synagogue is the site for national commemorations for UK Jewry. As such there are approximately four of these kinds of events a year. They typically take place on a Sunday from 4:00pm-8:00pm, though again they can also take place midweek too.

vi. Special Events - Invariably the synagogue is used for other special events, such as the instillation of a Jewish Master for a City Livery Company. These events also typically take place on a Sunday afternoon.



2001 Tercentenary Celebration of Bevis Marks Synagogue

vii. Visitors/Heritage Centre - The synagogue is open to visitors every day outside of Jewish and Bank holidays, including Open House London with approximately 40,000 visits per annum. Visitors include school groups, adults and children, British citizens and international visitors. Sundays 10am-5pm. Monday-Thursday mornings are school visits and then the site opens to the public from 12.30pm-5.30pm. Fridays are open to the public from 10am and close at about 2.30 in the winter and 4pm in the summer.

TYPICAL WEEK

The chart below shows how the synagogue site is used on a typical week; however should there be a Jewish festival or other special occasion additional evening and morning services would be scheduled. There are approximately 30 such days in the Jewish calendar, and these can happen any day of the week.

	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
7am		Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	
8am	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers	Morning Prayers
9am	Morning Prayers						Morning Prayers
10am	Visitors	School Visits	School Visits	School Visits	School Visits	Visitors	Morning Prayers
11am	Visitors	School Visits	School Visits	School Visits	School Visits	Visitors	Morning Prayers
12pm	Visitors	Visitors	Visitors	Visitors	Visitors	Visitors	Morning Prayers
1pm	Visitors/ Prayer	Visitors/ Prayer	Visitors/ Prayer	Visitors/ Prayer	Visitors/ Prayer	Visitors/ Prayer	
2pm		Visitors	Visitors	Visitors	Visitors	Visitors	
3pm	Special Events	Visitors	Visitors	Visitors	Visitors	Visitors	
4pm	Special Events	Visitors	Visitors	Visitors	Visitors		
5pm	Special Events						
6pm	Special Events/ Prayer	Lectures/ Prayer	Social Event/Prayer			Sabbath Prayers	Sabbath Afternoon Prayers
7pm	Special Events	Lectures	Social Event			Sabbath Prayers	Sabbath Afternoon Prayers
8pm		Lectures	Social Event			Sabbath Prayers	
9pm			Social Event				

3 - HISTORY OF THE SYNAGOGUE SETTING AND LIGHT



Isaac Mendes Belisario, 1818

A primary area of harm, amongst others, is the impact of light within the synagogue and across its heritage setting. The City Plan protects both heritage sites and their settings, and Historic England guidelines call on planners to not only avoiding detracting from a site, but to seek ways to enhance it. What follows is a history of degradation to the light of the synagogue, as well as efforts that have historically been made by neighbouring developers to improve it. As will be shown, increasing the height of neighbouring buildings will reverse course and cause further detriment again.

Over the past three centuries the built environment around Bevis Marks Synagogue has changed. This has impacted on the way light enters into the synagogue. Built in 1701, the synagogue relies on natural light to illuminate its interior as with most City

Churches of the period designed by Wren and his students. Toward that end large windows circle the synagogue, both on its ground floor and along its gallery. (Note: The synagogue's chandeliers are used in the evening when it is dark outside. Their limited light, and expense, was never intended to be useful for daytime use. Indeed, even today when they are lit on special occasions, the are never sufficient for reading and must be supplemented.)

Originally, the synagogue would have been surrounded by one storey buildings, much as its mother synagogue in Amsterdam (built in 1675) was and remains to this day. Evidence to this are the pelmets remaining along the eastern and southern gallery windows. No doubt there was a time when direct sunlight permeating the interior, requiring the use of blinds to mitigate its blinding effect.



In the nineteenth century surrounding buildings increased in height. blocking direct sunlight, and darkening the interior. This may have played a role in the debates in the 1880s whether to demolish the synagogue as it was no longer fit for purpose. However, the invention of electricity, and its adoption within the synagogue alleviated this plight with the addition of limited artificial lighting along the gallery's supporting pillars in the 1920s.

In the 1970s new buildings were constructed around the synagogue's perimeter. They were built in such a manner as to allow light to continue to enter the synagogue. This was achieved by limiting their heights to that of the synagogue and sloping their upper stories so that light would continue to enter the interior of the synagogue. These buildings currently remain, and when looking out from the synagogue gallery windows, one can still see above them to the sky. Any further increase in building height will make that impossible, further degrading the synagogue's light, and putting the synagogue's ability to function at risk once again.

4 - EVIDENCE OF DEGRADATION AND HERITAGE RESTRICTIONS

Despite these surrounding alterations, over the centuries the synagogue has been able to continue to function as per its original function. However, any further changes threaten to make this no longer possible. This is because as a result of historic changes to the surrounding built environment the current light levels are already minimal, and as a result any further reductions will place the synagogue at risk of becoming unusable. Light studies have been carried out by several bodies which demonstrate that any new buildings constructed around Bevis Marks Synagogue will cause light levels to drop within the synagogue. Some of those decreases will be substantial, others nominal. However, with light levels already low, the synagogue can't sustain any further darkening.

33 Creechurch will block the sun from 9am-12pm and 31 Bury St from 12:30pm-2:30pm, and the previously approved 100 Leadenhall from 3:00pm-4:00pm. While each on their own is unacceptable due to detriment, all of them together would be catastrophic. All together these buildings would essentially form a solid wall around the entire eastern and southern perimeter of the synagogue, becoming its backdrop and blotting out sun and sky up to 20 to 50 storeys! The independent analysis carried out by the City of London on the potential effects of 33 Creechurch on synagogue light concluded that its impact would be 'major adverse.' This impact would be felt during our hugely important morning hours of prayer.

A report by David Robertson of DHA Designs, available in the addendum, attests to this point, highlighting that current light levels are dangerously low already. The report further testifies that no further increases can be made to artificial lighting. As a Grade 1 listed building such adaptation is not allowed, nor would such changes be sympathetic to maintaining the heritage experience of worshipping in a late 17th century synagogue.

5 - RELIGIOUS IMPACT



i. Reading Light

As already stated, the current low levels of lighting within the synagogue mean that any further reductions must be considered substantial. Jewish worship requires each individual to read their prayers from a prayer book. On a typical Jewish sabbath morning (Shabbat), this amounts to 150 pages, and on other Jewish festivals and fast days many more. Worshippers also read along in a printed Bible when the Torah Scroll is read each Shabbat, Monday and Thursday mornings, and other festival and fast days.

Elderly members of the community are particularly vulnerable to any further light reductions. If lighting is further reduced, they will find it difficult to read, and therefore no longer attend. To lose our elderly members would be both shameful and devastating. On a Sabbath morning this demographic can make up over 50% of our worshippers. We have a religious duty to care for the elderly and ensure that they can maintain their dignity into old age. And fundamentally they are the bearers of our unique traditions and without them we risk losing the 300 year long continuity of our congregation.

ii. Ritual Symbolism and Jewish Law

In a Jewish house of prayer light and windows are not just an amenity but a religious requirement. The Talmud (Tractate Berakhot 31a) rules: Rabbi Hiyya bar Abba said: One should always pray in a house with windows, as it is stated regarding Daniel 6:11: "And when Daniel knew that the writing was signed, he went to his house. In his attic there were open windows facing Jerusalem and three times a day he knelt upon his knees and prayed and gave thanks before his G_d".

Rabbi Joseph Dweck, Senior Rabbi of the S&P Sephardi community explains, "It is clear that the windows are meant to allow light in and to have a sense of the world's beauty rather than being stuck in an enclosed space that causes a feeling of isolation."

This point is crucial because Judaism and its rituals are rooted in nature, particularly those related to prayer and the calendar. More specifically, these rituals are connected with the positions of the sun and moon in the sky across the day, month and year. For example, Jewish prayer times are determined by the daily course of the sun. The sun's position going from east to west over the southern horizon determines the times of our prayers, and is the inspiration for much of our liturgy.

The morning service (*Shahrit*) begins with the blessing, 'Blessed are you God who is sovereign over the universe, who fashions light and creates darkness...who brings light over all of the land and refreshes creation each day...Blessed are you God who creates the luminaries.' Indeed, it is just around that time in our prayers (10 am) when light currently shines into our courtyard and penetrates into our sanctuary, casting its glow across our pews, creating warmth upon our faces, and lifting our thoughts skyward. Blocking out the sun is therefore a form of religious vandalism, forcing us to dislocate our worship from its original meaning and setting.

iii. Courtyard Views - A Matter of Religion

The original historic Hebrew name of Bevis Marks Synagogue is 'Sha'ar Hashamayim' which means 'Gate of Heaven.' These are the Hebrew words carved in stone above our entrance gate, and painted above the synagogue doors. The experience of 'heaven' is currently felt upon entering the quiet courtyard of Bevis Marks Synagogue, and seeing the sky all around it. How sad and painful it would be for that meaningful symbolism and experience to be lost, with the heavens obscured by steel and glass. Remarkably, despite changes to the surrounding buildings over the past centuries the view of sky

around the synagogue until now has remained mostly unscathed and this is how it should remain.



Furthermore, many other Jewish rituals are determined by views of the sky. The Jewish Shabbat concludes at the appearance of three stars, which of course first appear in the darkening eastern sky. The new Jewish (lunar) month is marked by the appearance of the new moon in the sky. In fact, a special prayer (*kiddush lebana*) is recited each month only upon seeing the moon in the night sky, something we won't be able to do if buildings block out our views of the eastern and southern sky (Talmud, Tractate Sanhedrin 42a).

iv. Courtyard Light and Amenity





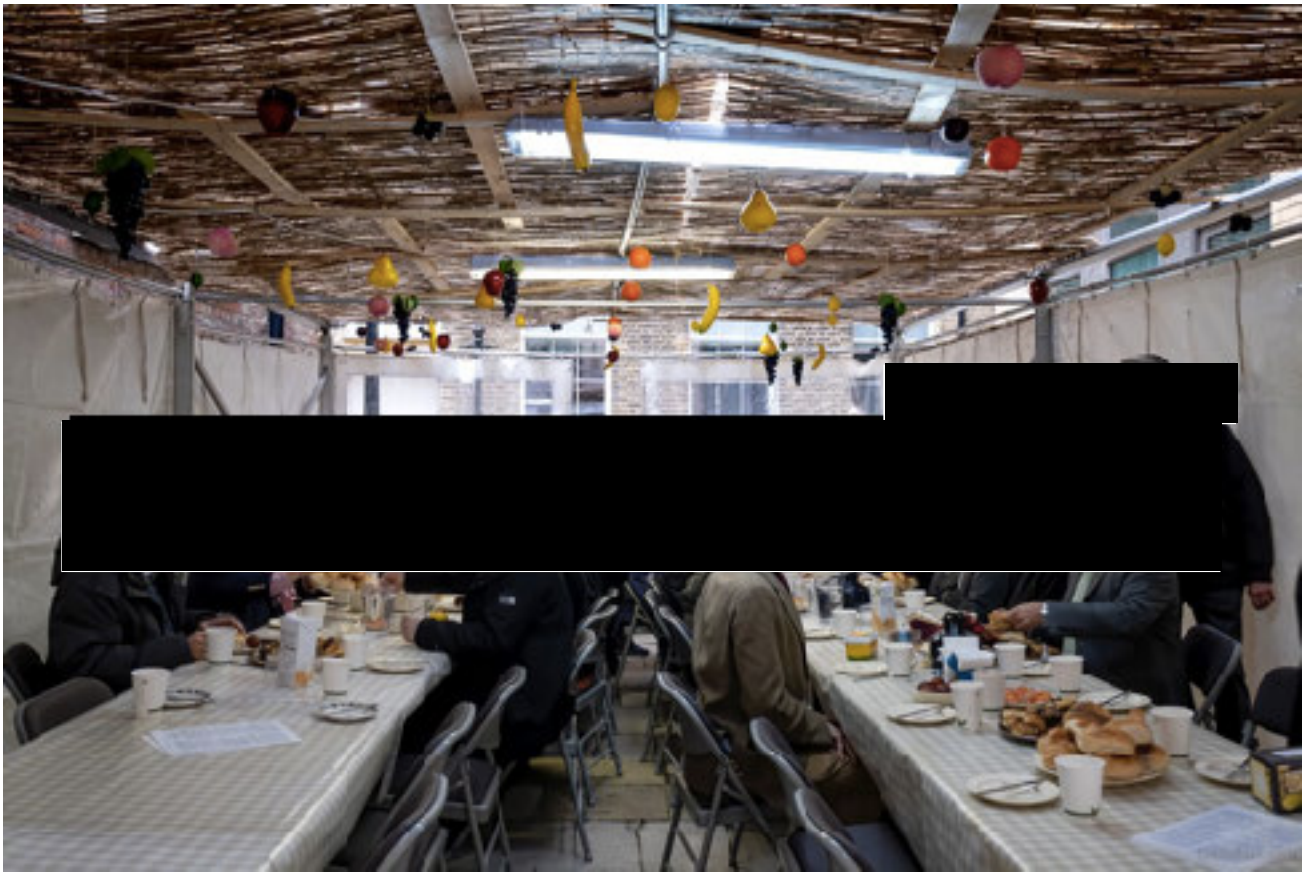
The sunlight received in the courtyard adds an important amenity to its use and contributes to its historic function. Sunlight appears in the early afternoon when the

space is most likely be enjoyed either for gatherings after services, before weddings, or for an outdoor afternoon prayer service during the week for City Workers. That there already is limited time of direct sunlight makes what remains all the more precious. In fact, our rabbi and his family make a point to enjoy time in this limited sunlight on Sabbath afternoons in the spring and summer. Removing it would cause real detriment to their lives as local residents and the use of the courtyard as their garden.

v. Courtyard Privacy



Finally, the courtyard is a place where our community shares special private moments, celebrates Jewish festivals, and takes photographs at weddings. It is well documented that the synagogue was built in a private courtyard setting for this very purpose, so that the Jewish community could conduct their affairs discreetly, away from the public street. This historic setting would be completely altered should towers of 20 or 50 storeys be constructed above our courtyard. It is distressing to imagine what the outdoor festival of Succot (Tabernacles/Booths) or wedding receptions would feel like in such an exposed setting, with thousands of eyes peering down upon us. We suspect



this would also pose a security risk, a concern the Jewish community must unfortunately always be on guard against.

vi. Noise Disruption

Jews face east during prayer, toward the direction of Jerusalem. Heneage Lane runs along our eastern wall and is typically a quiet lane with few people ever going down it. However, the proposed buildings, with a pedestrian mall and cycle parking bays, would increase noise from footfall and cycling along the narrow lane. This would disrupt the meditative experience of our prayers, and ruin the sublime beauty of our cantor's song.

At each of the three daily services we recite the *amidah* (standing) prayer. It is recited silently, and one can hear a pin drop. The *amidah* is a prayer of intense religiosity when one speaks directly to the Divine, praising, beseeching and offering thanksgiving. It is the climax of the service when one is to picture themselves 'standing' before God. The meditation required to maintain concentration throughout would be disrupted by external noise, sullying one's prayers. This concentration is called '*kavanah*' and is essential to Jewish prayer (Talmud, Tractate Berahot 34b).

The Talmud (Tractate Ta'anit 2a) calls Jewish prayer '*abodah shebeleb*,' 'service of the heart,' which means it is supposed to be an emotional experience. Our melodies are therefore integral to our worship as they lift the spirit and set the emotional tone of each prayer. If outside noise was to disrupt these melodies, our religious service would be harmed. Indeed, whenever road works happen in our area, we always must request that they are suspended during prayer times - a request always followed.

Furthermore, our community maintains unique and rich musical traditions. Many of these melodies have been written over the centuries by the religious leaders of our synagogue and can only be heard in Bevis Marks Synagogue. If ongoing noise causes our prayers to be interrupted many of these melodies and our cultural oral heritage will be lost.

6 - CONCLUSION

Much like the city, our synagogue is maintained by a delicate ecosystem. As the City of London is no longer a residential city, we maintain a relatively diverse community. It is a community which is made up of elderly members with ancestry dating back centuries in our synagogue, as well as by others who live, work, study and visit in the area. If anything is done to the detriment of this balance, we risk knocking our sustainability off balance, making it impossible for us to continue.

As a religious site of international significance, maintaining our viability, and through that our heritage, is our number one priority. We therefore must implore that the City of London not allow any developments to take place that put our heritage at risk. As we are the experts on Bevis Marks Synagogue, we can confidently say that permitting developments on our doorstep would do just that, irrevocably destroying what we are working so hard to maintain. This would surely be 'significant harm.' The City of London must therefore heed our warning and protect Bevis Marks Synagogue from any further encroachment.

7 - USEFUL VIDEOS ABOUT SYNAGOGUE IMPACT

Synagogue Objection



Windows & Light



Synagogue Ventilation



DHA Designs

Jonathan Solomans, Chairman
Bevis Marks Synagogue Committee
4 Heneage Lane
London
EC3A 5DQ

20th February 2021

Dear Jonathan

Objection to Planning Application 20 / 00848 / FULEIA - Bury House, 31 Bury Street, EC3A 5AR
And Planning Application 18 / 00305 / FULMAJ - 33 Creechurch Lane, EC3A 5EB

I am writing on behalf of DHA Designs, the Museum and Heritage Lighting Specialists that were appointed to review (and potentially redesign) the electric lighting for Bevis Marks Synagogue.

Firstly, we understand from Chris Maltby's summary for EdgePlan (their ref: EP1223 for Bury St and Creechurch Lane) which cites Caroe's heritage concerns that no adequate daylight and sunlight study showing the raw data of daylight levels in the Synagogue from *both* these developments has been commissioned. However, the cumulative effect of both developments is a significant VSC reduction of 45%.

The Synagogue was designed for daylight. Daylight plays a hugely significant part in Jewish faith, and the Synagogue also has a significantly elderly congregation. As you are aware, Jewish services are read and followed throughout on prayer books (held by the whole congregation); these are historic books of small text and it is crucial to have good lighting.

It is scientifically accepted that a 60-year-old eye lets in a third of the light of a 20-year-old eye [1], so effective daylight levels need to be three times as bright to achieve the same legibility for this group [2]. These buildings not only reduce the amount of daylight to an unacceptable level, but all but obscure certain windows, making the distribution of daylight across the space very uneven. It is not relevant for the Creechurch Lane development's engineers (GIA - ref: 12109) to quote that "some windows would be unaffected" since these are the ones that already suffer from external development; and it is disingenuous to the use of the building to assume that every window's use or importance is 'equal'. The amount of light on the key area of the Bimah for example, where services are read from, is particularly affected by these external obstructions.

We have been commissioned to review the electric lighting to see if we could increase the lighting level to allow these services to continue. As heritage specialists, internal lighting for Grade 1 listed spaces is always challenging, and more so when these are of such religious significance that need to be preserved for future generations.

The main area of seating is beneath the double-height, vaulted space. The chandeliers suspended from here are candles - part of the listed interior - and any visible downlights would be out of keeping with a building from 1701. In any case, there is no way of installing or maintaining lighting at this ceiling since there is no access above the Ark or the Bimah (since both are raised areas) and no access above the pews which cover the rest of the ground floor.

DHA Design Services 6/8 Cole Street, London, SE1 4YH [redacted]
www.dhadesigns.com

The gallery above is ramped and there is no way that the underside of ceiling can be accessed under health and safety guidelines - there would be no way of bringing access to this level and the stepped pews mean there is no area of flat floor for the maintenance of high level lighting.

In the side aisles on the ground floors there are fewer pews, and the congregation relies on the windows behind at both sides. It is not possible to mount to this historic ceiling as any cabling would be visible and the historic ceiling is solid and free of mechanical / electrical services.

Indirect lighting in a space of this size cannot improve illumination levels given the height - even with enormous floodlights (which would anyway not be allowed in this listed interior) the distances for reflected lighting schemes are much too great.



View of Bevis Marks Grade 1 listed interior showing access and cabling limitations:
- the windows behind the Ark (shown above), which is a key focal point of services, would be completely obscured by the Creechurch Lane development.

To conclude, the amount of daylight in the Synagogue has already been impacted by several previous developments, and any further reduction will mean the building cannot operate in the manner it was designed for. Unfortunately, in a Grade 1 listed interior of this type, electric light cannot be installed to compensate for this loss.

Kind regards,

David Robertson BA MSc MCIBSE MSLL
Director, DHA Design Services
[redacted]

[1] *National Centre for Biotechnical Information* - https://www.ncbi.nlm.nih.gov/books/NBK218971/

[2] *International Journal of Science and Technology* - https://www.researchgate.net/publication/321917087_LIGHTING_DESIGN_FOR_THE_AGING_EYES

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Gady Gronich
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SECRETARY
Rabbi Aharon Baskin
[redacted]

March 5, 2021

Dear Lord Mayor,

We are writing to express our deep concerns and serious reservations concerning the development around Bevis Marks Synagogue located within the boundaries of the City of London.

I would like to take the opportunity to introduce our Organization. The Conference of European Rabbis (CER) is the primary Rabbinical Alliance in Europe. It unites more than 700 religious leaders of the mainstream synagogue communities in Europe. It was founded in 1956 on the initiative of British Chief Rabbi Sir Israel Brodie, in order to revive the vanquished Jewish communities on the European mainland. Chief Rabbi Sir Brodie was supported by the Chief Rabbi of France, Jacob Kaplan, the Chief Rabbi of Amsterdam, Aharon Schuster and the British Sephardic Spiritual Leader, Hacham Gaon.

We are sure you aware of Bevis Marks Synagogue's historical significance to the British Jewish community, as the oldest synagogue in the UK, but you may not be aware of its importance to all of European Jewry. While there are synagogues across Europe, there are none which have been in continuous use since 1700, save for one, Bevis Marks Synagogue. While there are older synagogue buildings, none of them have been worshipped in throughout due to the horrors of the Holocaust when six million European Jews were slaughtered by the Nazis. Britain remained one of the few countries in Europe to withstand Hitler's onslaught and to protect its Jewish inhabitants. As a result, the UK's Jewish community remains robust, perhaps the most vibrant in Europe. For that reason, Britain has always been looked to by Europe's other Jewish communities as a safe haven for Jewish people. And the symbol of that home is Bevis Marks Synagogue. It alone connects all of Europe's Jews to its earlier roots, a place where Jews have lived for millennia.

You can therefore understand why we are keenly watching to see what will transpire. Should further development be allowed, currently with towering proposals at 33 Creechurch Lane and 31 Bury St, the synagogue will come to be enveloped in shadow, its necessary light blocked, its privacy lost, and its prayers disturbed by noise. These things will cause serious detriment to the functioning of this historical community, and in some respects, make it simply impossible for them to carry out their religious duties. Let us, therefore, be clear, from our perspective, causing harm to a Jewish community's function is not only tantamount to bulldozing a synagogue building; it is worse. That after this past century's horrors, that Europe's most historic Jewish community would face a threat to its very existence, is simply unbelievable.

Conference of European Rabbis

PRESIDIUM

PRESIDENT
Chief Rabbi Pinchas Goldschmidt

ASSOCIATE PRESIDENT
Chief Rabbi Ephraim Mirvis

PRESIDENT OF
THE RABBINICAL COURT OF EUROPE
Dayan Chanoch Ehrentreu

CHAIR OF STANDING COMMITTEE
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RABBINICAL DIRECTOR
Rabbi Moshe Lebel
[redacted]

CEO & CHIEF OF STAFF TO THE PRESIDENT
OF THE CER FOUNDATION
Gady Gronich
[redacted]

SECRETARY
Rabbi Aharon Baskin
[redacted]

We, therefore, urge you and the City of London to immediately take steps to ensure protections are put in place around Bevis Marks Synagogue - that it's light, views, privacy, and very future are protected. No doubt other cities in Europe will follow the City of London's example on whether or not to protect their historic synagogues too.

On behalf of Europe's Jewish communities, we implore you to learn from the mistakes of the past and to halt all further development plans immediately. Any development on this site would be a profound desecration for the United Kingdom that would resonate throughout history.

As in the past, we pray that Britain will lead and ensure the survival of Bevis Marks Synagogue and its worshipping community.

I look forward to hearing from you.

With Blessings,

[redacted]

Chief Rabbi Pinchas Goldschmidt
President of the Conference of European Rabbis

בס"ד

Office of The
CHIEF RABBI

305 Ballards Lane
London N12 8GB

[redacted]

The Rt Hon. The Lord Mayor, Alderman William Russell
Mansion House
Walbrook
London
EC4N 8BH

By email: william.russell@cityoflondon.gov.uk

3rd March 2021

My Dear Lord Mayor,

I hope this letter finds you well during this exceptionally challenging time.

I write in relation to the special significance the Bevis Marks Synagogue in Aldgate has to the Jewish community in London, and right across the UK.

As I imagine has been drawn to your attention, Bevis Marks is the oldest synagogue in the UK in continuous use, and a deeply resonant symbol of the history of British Jewry. In the 320 years since the synagogue was built, the UK Jewish community has become a valued part of the fabric of British society. Bevis Marks Synagogue was one of the first major synagogues to be constructed following the resettlement of Jews in England in 1656. It has stood as a reminder of that history, and of how much has been achieved since members of the Jewish faith were permitted to return to this country.

I have been greatly concerned to read that there is a proposed development on the doorstep of the synagogue, with the potential to significantly affect the natural light that can reach the building and, in turn, disrupt prayers taking place inside.

This would have a notable impact on the atmosphere that Bevis Marks is so famed for around the Jewish world, to the detriment of those worshipping there, especially when coupled with a separate planned development on Creechurch Lane.

The synagogue is considered to be a cherished landmark of our community, and a source of great spiritual sustenance to British Jews. I believe it is essential that it be carefully protected, as any other place of worship so steeped in history would. I hope that the views of the local community will be received with the utmost seriousness, and that the necessary arrangements can be made to ensure that this new development does not cause lasting damage to Bevis Marks Synagogue.

With my very grateful thanks and best wishes,

Chief Rabbi Ephraim Mirvis
Chief Rabbi of the United Hebrew Congregations of the Commonwealth

Adjei, William

From: PLN - Comments
Subject: FW: About the Bury Street and the effect on the Bevis Marks Synagogue

To Members of the Planning Department of the City of London

I write to you as President of the Jewish Historical Society of England (JHSE). JHSE has had a long-standing relationship with Bevis Marks Synagogue going back to the establishment of the Society in 1893. This relationship included the publication of many of the Bevis Marks' vital historical records, as well as co-sponsorship of events. As you know, Bevis Marks is the first synagogue built after the resettlement in 1656 of Jews in England (resettlement following the expulsion of 1290). Bevis Marks has played an important role in the development of Anglo-Jewry, by hosting key events in the life of British Jewry, and as an architectural gem as I am sure you know well. For these reasons we object strongly - and respectfully - to the proposed development.

The Bury Street development will be profoundly detrimental to the unique heritage of the Bevis Marks Synagogue. It is clear that the development would result in the Synagogue losing much of its light, both to its courtyard and to its interior, and that this would affect significantly the experience of worshippers in the sanctuary, and of those visiting this important site of Jewish History from the UK and abroad.

It is deeply concerning to members of the JHSE as it should be to other Londoners, that the disruption of this unique site is being considered. What will be lost simply cannot be replaced, or reconfigured.

Members of the JHSE are of course aware how difficult and fine are the decisions you are asked to take almost daily. We beseech you to consider the significance of the development for a site that is uniquely historical, an elegant trace of a formative moment of English history - as well as that of English Jews - as a Jewish community was reconstituted in Cromwell's England, and ultimately was able to build its synagogue - Bevis Marks.

With best wishes and most sincerely,

Miri Rubin FRHistS FMAA Fellow of the Academia Europea
President of the Jewish Historical Society of England
Professor of Medieval and Early Modern History
Queen MAry University of London
17 Hardwick St,
Cambridge
CB3 9JA.

From:	Depala, Bhakti
To:	PLN - Comments
Subject:	FW: 33 Creechurch Lane (18/00305/FULMAJ) & 31 Bury Street (20/00848/FULEIA)
Date:	10 March 2021 15:10:28
Attachments:	image001.png

From: Master [redacted]
Sent: 05 March 2021 17:02
To: Barradell, John <[redacted]
Cc: Richard Winstanley <[redacted]
Subject: 33 Creechurch Lane (18/00305/FULMAJ) & 31 Bury Street (20/00848/FULEIA)

Dear Mr Barradell,

On behalf of the Drapers' Company, I would like to register our disquiet over these two proposed developments and, in particular, their likely effect on Bevis Marks Synagogue.

As you know very well, Bevis Marks Synagogue is not only an exquisite Grade 1 listed building, but is also the only non-Christian place of worship in the City. Indeed, it has been used continuously for worship longer than any other synagogue in the world and occupies a crucial place in the history of the Jewish religion in this country. By any objective measure it is a building of huge historical significance. Given the Synagogue's importance for both the City and this country's Jewish community, the Drapers' Company is anxious that the building should be protected.

The proposed 20-storey development in Creechurch Lane will encroach within a few yards of the eastern wall of the Synagogue and is likely to block all light through that wall's window for most of the day. There will also be an adverse impact on levels of light in the courtyard of the Synagogue. The proposed 50-storey development at 31 Bury Street would also have the effect of reducing light to the courtyard of the Synagogue. Neither development seems to take account of these issues.

Bevis Marks Synagogue is unique – by dint of its location, its history and its architectural, cultural and religious significance. The Drapers' Company urges the City to give due consideration to these factors when the proposed developments in Creechurch Lane and Bury Street come up for decision.

Yours sincerely,

Tim Orchard

Tim Orchard
Master

The Drapers' Company
Drapers' Hall / Throgmorton Avenue / London EC2N 2DQ

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JONATHAN DJANOGLY MP

HOUSE OF COMMONS

LONDON SW1A 0AA

Email: [redacted]

Alderman William Russell
The Rt Hon The Lord Mayor
City of London Corporation

19 March 2021

Dear Alderman Russell,

Re: Bevis Marks Synagogue

I understand that in connection with the City's new Local Plan, there are proposals to allow development of tower buildings that could have the effect of blocking light and degrading the privacy and integrity of the Grade 1 listed Bevis Marks Synagogue.

The cultural and historical importance of this institution, and I imply more than as a beautiful place of worship, is in my view of the highest rank to the Anglo Jewish community. It was this building which represented the resettlement of Jews in this country and it could only have been this same building which was used, in 2006, to hold the ceremony attended by the Prime Minister to celebrate the 350TH anniversary of that resettlement.

I had the honour of attending that ceremony myself, and it was a memorable occasion. But I am also keen to preserve this heritage site given my Commons seat being that of the Lord Protector Oliver Cromwell, who permitted the readmission.

The synagogue is itself a gem of a building, whose beauty and spiritual preserve has for generations, amidst the hurly burly of the City, provided succour and peace, to both congregants and visitors to the City. This has included, from the poorest of immigrants, to some of the most successful of the City – and even a future Prime Minister.

I do accordingly sincerely hope that when the new Local Plan is drawn up, full consideration will be given towards protecting this unique synagogue.

Yours faithfully,

[redacted]

Jonathan Djanogly MP

cc: Catherine McGuiness, Carolyn Dwyer, Alasdair Moss, Rabbi Morris, David Arden
Rt Hon Robert Jenrick MP

The
FURNITURE
HISTORY
SOCIETY

c/o Department of Furniture,
Textiles and Fashion,
Victoria & Albert Museum
London SW7 2RL

17 March 2021

The Rt Hon. The Lord Mayor, Alderman William Russell

My Lord,

I am writing on behalf of the Furniture History Society, which was founded in 1964 'to study furniture of all periods, places and kinds, to increase knowledge and appreciation of it, and to assist in the preservation of furniture and its records'. A third of its membership is overseas and it has extended its reach to include interior decoration. The Society publishes a learned journal, *Furniture History*, which is recognised as the international authority on the subject. Its lively and informative newsletters contain reports of the Society's visits to study furniture and historic interiors. The Society was fortunate to have visited Bevis Marks Synagogue in 2018 to study the remarkable survival of its furniture and woodwork in the untouched interior.

The significance of light in the design of Bevis Marks synagogue, which has already been impaired by the development of high-rise buildings in the area, is fundamental both to the architecture and to the appreciation of its historic contents. The proposed structures at 33 Creechurch Lane and at 31 Bury Street will reduce the light considerably within the building and will dwarf both the synagogue and the Rabbi's House. This is a sad example of lack of consideration for the historic environment of the financial centre of the capital.

Happily, by contrast, the seventy-four windows of the monumental Sephardi synagogue in Amsterdam, completed in 1675, whose surviving interior, bathed in light, was painted by Emmanuel de Witte in *c*.1680, still receive the same amount of daylight as they did in the seventeenth century. The Amsterdam synagogue is of the greatest rarity in terms of its original furniture, some

constructed with exotic woods brought from Brazil. Bevis Marks is the most complete historic synagogue in Britain – its design based on the Amsterdam equivalent – and needs to be treated with the greatest respect as an embodiment of Jewish worship in the City of London following its reconstruction after the Great Fire. The changing light during the day is fundamental not only to the proper appreciation of its historic fittings but plays a part in the spiritual purpose of the building.

Little has changed since the synagogue was inaugurated in 1701 and elements of its design are comparable to the churches built by Sir Christopher Wren. Its furniture includes the oak benches of the previous synagogue in Creechurch Lane, which are now placed in the back rows. Apart from some improvements and additions in 1787 and 1830, the interior is unchanged. The dark oak of the furniture and woodwork is complemented by the brasswork including chandeliers and candelabra, which glitter in the light. The chandeliers are comparable in style to those in the Sephardi synagogue in Amsterdam. The survival *in situ* of all its different elements, which even include the hinged bar behind the choir seats to prevent the ingress of intruders, makes any alteration of its historic ambience undesirable.

The Furniture History Society hopes that the City of London will take its objections into account and protect the Bevis Marks synagogue, a Grade I listed building, from these unsympathetic proposals to create buildings so markedly out of scale with their surroundings.

Yours faithfully

Christopher Rowell, FSA

Chairman

The Furniture History Society

From: Depala, Bhakti
To: PLN - Comments
Subject: FW: Planning Permissions for 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA
Date: 08 March 2021 12:21:08

From: John Biles [redacted]
Sent: 08 March 2021 09:55
To: Barradell, John [redacted]
Cc: Charlie Knaggs [redacted]
Subject: Planning Permissions for 33 Creechurch Lane (18/00305/FULMAJ) and 31 Bury Street (20/00848/FULEIA

Dear Mr Barradell,

I am writing on behalf of the Ironmongers' Company to oppose two large buildings seeking Planning Permission in very close proximity to Bevis Marks Synagogue. Your Planning reference numbers are shown in Subject above.

I was shown around this famous Grade 1 Listed Synagogue three years ago and as you are well aware it is the only non-Christian place of worship in the City and has been open for worship since 1701, longer than any other Synagogue in the world. It is a building of huge historical significance and occupies an important place in the Jewish religion in this country.

One application is for a 50-storey building at 31 Bury Street and if this proceeded it would massively reduce the light in the historic courtyard of the Synagogue. The proposed building at 33 Creechurch Lane appears to have 22 storeys above ground and is proposed to be just 4m from the eastern wall of the Synagogue so will completely block all light from the window at that end of the Synagogue for most of the day. This proposed building replaces a 1978 building where the Planning Committee adjusted the proposal to preserve the level of light in the Synagogue. Neither of the proposed developments appears to have taken any account of these issues.

Bevis Marks Synagogue is unique by virtue of its location, history, architecture and its cultural and religious significance. I am told that if these developments proceeded they would impact severely on the continuance of Bevis Marks as a functioning Synagogue. The Ironmongers'

Company urges the Corporation and the Planning Committee to give due consideration to these factors when the proposed developments are discussed and brought forward for a decision.

Your sincerely,

John Biles

John Biles

Master, The Worshipful Company of Ironmongers

[redacted]

Dr. W. W. Apedaile MSc PhD CEng MICE FRSA
Chartered Civil Engineer

10, Princess Mary Court
Abbotsford Terrace
Jesmond
Newcastle upon Tyne NE2 3BG
[redacted]

March10, 2021.

The Town Clerk
City of London Corporation
Guildhall
London EC2P 2EJ

Dear Sir

Proposed buildings adjacent to the Bevis Marks Synagogue

I have learned with utter dismay that plans are under consideration to develop two multi story buildings in very close proximity to the Bevis Marks Synagogue. Should these projects go ahead I would suggest this is tantamount to vandalism on the grand scale.

Some years ago I had the privilege of attending a service at Bevis Marks Synagogue. I am an active Anglican and have to say that Jewish service is a treasured memory among the many great religious events in which I have participated in many countries e.g. singing for Pope John Paul II in the Vatican. It was not just the service in Bevis Marks but the wonderful building itself.

I have travelled widely, lived and worked in different countries where I have been responsible for a lot of building design. Although a northerner I have never doubted that London is my favourite city. However the great treasures of London like the Bevis Marks Synagogue are being steadily submerged under wretched high rise modern rubbish. It was hardly a joke when it was observed that 'the Planners have done more damage than the Luftwaffe'.

I would like to think your Corporation might see sense and preserve the environs of the Bevis Marks Synagogue so that the Jewish community may continue their three hundred years or more of worship in a wonderful building.

Yours faithfully
[redacted]
Dr. W.W. Apedaile

From: Depala, Bhakti
To: PLN - Comments
Subject: FW: Bevis Marks Synagogue
Date: 24 March 2021 20:54:51

From: Patricia Wilkey [redacted]
Sent: 24 March 2021 09:33
To: [redacted]
Subject: Bevis Marks Synagogue

Dear Sir,

I am writing to lodge an objection to the proposed 2 huge developments very close to The Bevis Marks Synagogue. I fear that these developments will make a horrendous impact on The Bevis Marks Synagogue.

The Synagogue is a Grade 1 listed building dating from 1701 that we should be celebrating not squeezing and hiding behind 2 huge buildings. Bevis Marks Synagogue has received quite recently funding from the National Lottery Heritage fund which has enabled repairs and help towards a museum and an education/exhibition centre.

I would very much like my objection to be made a note of against these particular developments, I feel more needs to be done to not hide this fabulous place of worship away.

Kindest regards,

Mrs P K Wilkey

21 Winter Folly,
Laindon,
Basildon.
Essex.
SS15 5GL

[redacted]

8th February 2021

edgeplan
16 Upper Woburn Place
London
WC1H 0BS
[redacted]
www.edgeplan.co.uk

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

Our ref: EP1223
Your ref: 20/00848/FULEIA

Dear Bhakti,

OBJECTIONS TO PLANNING APPLICATION 20/00848/FULEIA - BURY HOUSE, 31 BURY STREET, LONDON, EC3A 5AR

I write further to the above matter and I am submitting this letter of objection on behalf of the London Sephardi Trust (the Trust) and the Spanish & Portuguese Sephardi Community (the Community).

The Trust and the Community are custodians of the Bevis Marks Synagogue which is located approximately 40m to the north of the proposed development on Heneage Lane. The Synagogue is a Grade I listed building of the greatest architectural, spiritual, historical and cultural significance. Its statutory listing is only a partial reflection of the importance this synagogue holds for British and global Jewry.

Bevis Marks has been in daily use for worship and major public civic events since it was constructed in 1701. It is no exaggeration to say that Bevis Marks Synagogue is the most important Jewish site in the UK and one of the most special synagogues in the world. It represents the place of worship in longest continuous use for British Jewry, and in particular for the Spanish and Portuguese Sephardi community, since the readmission of Jews to this country by Oliver Cromwell. This makes it a 'neighbour' of the highest sensitivity in the context of this planning application for what is, in essence, an ordinary tall office building.

The wider Synagogue complex comprises the Main Synagogue Building, Beadle's House (no.2 Heneage Lane) which is the Rabbi's house, the historic courtyard that extends to the north and west of the Synagogue building, the glass roofed extension attached to the south of the Synagogue building and a basement meeting hall which extends under 4 Heneage Lane.

The description of the proposed development at 31 Bury Street is:

> *Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E*

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offices, 62sq.m GEA flexible retail/cafe of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).

We note that the application was submitted and validated on the 28th October 2020. The representations in this letter are based on the most up to date information provided by the Applicant. We reserve the right to provide further representations should new information become available.

Representatives of the Trust have met with the Applicants and their team a number of times in the Spring and Summer of 2020 prior to the application being submitted and continue to be in correspondence.

Notwithstanding this engagement, the Trust objects to the proposals due to the significant adverse impacts the proposed development will have on various aspects of the historic, cultural and religious significance of this unique Synagogue. Most notably those include:

a) the impacts on the heritage significance of the synagogue;
b) the daylight and sunlight impacts on the synagogue building and courtyard;
c) sense of enclosure and encroachment on the Synagogue courtyard

all of which will compromise religious worship and the reasonable enjoyment of the building by congregants and visitors alike. Each of these points gives rise to conflicts with the development plan and both individually and together justifies refusal of this application. In addition, the Trust raises concerns about servicing and access which will need to be addressed by suitable planning conditions if the development is approved (but without prejudice to the Trust's position that permission should be refused).

The impacts of the proposed development need to be viewed individually but also, critically, they must also be viewed **cumulatively** in conjunction with the impacts of recently approved developments and other proposed developments (whether approved or under consideration including the application for a further tall office building at 33 Creechurch Lane) which are envisaged in the immediate vicinity of the Grade I synagogue. When taken together the impact is even more severe and will encroach upon the synagogue's setting and erode its significance and ability to appreciate this unique heritage asset.

In formulating its representations, the Trust is being advised by independent consultants Caroe Architecture Ltd (heritage), Point2 Surveyors Ltd and Paragon Building Consultancy Ltd whose expert reports are appended to this letter.

The Trust and Community object to the proposed development on the following grounds.

Harm to the heritage significance of the Grade I listed Synagogue complex and its setting

Caroe Architecture Ltd have reviewed the application documents provided. They are concerned that these do not present a full picture of the proposal's impacts on the Synagogue and its setting. In particular, Caroe highlight that more robust 3-dimensional modelling and CGI views are required in order for Officers and Members to appreciate the impact on the north and west facades of the Synagogue and Beadles House from within the courtyard. The Trust considers this further information is required to make a reasonable and informed assessment of the application scheme and requests that this work is done. Caroe's detailed findings are included as Appendix 1 to this letter.

On the basis of what has been provided, the Trust's heritage experts conclude:

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- The proposed development will have a significant impact on the heritage significance of the Synagogue and its historic Courtyard setting as well as Beadle's House due to its proximity and scale. The proposal's impact both individually and cumulatively will result in a detrimental impact on the setting and the ability to appreciate the historical significance of the Synagogue complex. Policy D7 of the New London Plan and para.28 of Historic England 'Managing Significance in Decision-Taking in the Historic Environment both set out the importance of considering the cumulative impacts of development on heritage assets.

- The proposed building will significantly reduce the visible sky in the south-eastern view from inside the Courtyard and detract from the viewer's ability to clearly discern the historic character and aesthetic and architectural qualities of the Synagogue building.

- Caroe consider that given the harm caused by existing development to the setting of the Synagogue, the synagogue's setting cannot withstand further harm and the harm resulting from this proposal is incapable of being justified. The extent and harm caused by previous development has reduced the synagogue's prominence and harmed its setting. Only development that is respectful and sensitive to the Synagogue should now be considered. The current proposal is not that. It will result in additional harm and when considered against the existing context is the straw that will break the camel's back.

- Caroe's view is that we are at the point where the cumulative effects of consented and proposed developments, including those proposed by this application and 33 Creechurch Lane, represent harm at the very upper end of the 'less than substantial harm' spectrum to Bevis Marks Synagogue. Given the extent of cumulative impacts on the synagogue's setting, Caroe's regard there as being a very fine line between the harm that will arise and substantial harm.

Caroe conclude that the proposed development will have a considerable negative impact on the heritage significance of the Synagogue and its historic Courtyard setting due to its proximity and scale. Furthermore it is considered that the cumulative effects of this development together with consented schemes further exacerbates the harm and will add to the degree of less than substantial harm. The harm caused is approaching the point at which substantial harm will be caused.

When one considers the significance of the asset, which is of the very highest significance imaginable, it is clear that the "less than substantial harm" (of whatever degree) but certainly harm at the upper end of that spectrum should be given great weight and creates a strong presumption against the development.

The Applicant has not provided a clear and convincing case to justify the harm to the heritage asset which is a key requirement of New London Plan policy D9 (Tall Buildings). Nor are the public benefits capable of outweighing the harm that will be caused. The public benefits promoted by the applicant are at best minor and are not unique to this development. The scale of development proposed is not necessary to secure public benefits of a similar magnitude. Whilst there is policy support for office space in the City there is already a significant pipeline of offices both under construction and with permission within the City of London. Other benefits of the scheme are private in nature and will only accrue to the developer.

Daylight/sunlight impacts

The Trust's daylight/sunlight consultants Point2Surveyors (Point2) have reviewed the daylight/ sunlight and overshadowing impacts of the proposed development on the Synagogue and their

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detailed findings are included in Appendix 2. Point2 advise that in accordance with Building Research Establishment (BRE) guidance, the Synagogue as a religious building should have a reasonable expectation of daylight. This is reinforced by Policy DM 10.7 of the City of London Plan that confirms development will be resisted if it *"would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels taking account of the BRE guidelines"*

The starting point is that we are dealing with a Grade I building of acute sensitivity which already experiences poor light levels. The most vulnerable part of the synagogue is the Bimah – the raised platform from which prayers are led. This requires adequate light and the entrance courtyard which currently benefits from adequate sunlight levels which contribute greatly to its amenity.

The natural lighting of the Synagogue has religious significance. As Rabbi Dweck – head of the Spanish and Portuguese community explains:

> *"There is an important passage in the Talmud that requires a synagogue to have windows as an essential part of a house of worship. It is obviously so that light can enter. and the sense of the world outside is felt. The passage is from (Tractate Berakhot 31a) which has been codified into law:*
>
> *Rabbi Hiyya bar Abba said: One should always pray in a house with windows, as it is stated regarding Daniel 6:11: "And when Daniel knew that the writing was signed, he went to his house. In his attic there were open windows facing Jerusalem and three times a day he knelt upon his knees and prayed and gave thanks before his G_d".*
>
> *It is clear that the windows are meant to allow light in and to have a sense of the world's beauty rather than being stuck in an enclosed space that causes a feeling of isolation."*

The existing low levels of light within the Synagogue mean that the building cannot withstand further substantial losses of daylight. It is no answer to say this is a non-residential property and that installation of artificial light can overcome the problem. The Synagogue and its worshipers rely on natural daylight, which is how it was designed to be experienced. It is very difficult and intrusive to install electric lighting.

Point2 confirm that the proposed development would reduce the daylight and sunlight available to the Synagogue and the courtyard to levels significantly below BRE guidelines as summarised below.

In respect of daylight Point2 conclude that:

- The windows in the south façade of the Synagogue which face Bury House will experience a noticeable alteration of vertical sky component (VSC). The proposed development will result in reductions of VSC of up to circa 32% to the windows directly facing the development in the south elevation. In the cumulative scenario, where 33 Creechurch Lane is also developed the impacts will be even more severe resulting in VSC reductions of 45%.

- These losses are exacerbated by the fact these windows already receive low levels of light and therefore the light that is currently retained is precious. The existing light is so low that any further reduction in light has a large effect necessitating electric lighting at most times during the day. There is an attritional and incremental loss and the synagogue cannot afford any further loss because the last bits of light are central to the Bimah (raised platform with a reading desk).

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- Further reductions will be seriously harmful to the overall light levels received and will force the Synagogue to rely on the use of artificial lighting (which is not easily retro fitted due to the Grade 1 listed nature of the Synagogue) during most times of the day to permit use of the building.

- When no skyline (NSL) is considered in the cumulative scenario the proposed development will result in transgressions to the No Skyline (NSL) and further impacts on the Average Daylight Factor (ADF).

In respect of overshadowing the Trusts concerns relate principally to the courtyard at the entrance of the Synagogue. The Courtyard is a special space which forms part of the Synagogue and its setting and is vital to the appreciation of the Synagogue building's significance. The courtyard is integral to Synagogue's communal functions and religious significance and represents the only place where worshippers of all sexes can gather before and after worship. It is where dignitaries and worshipers alike are welcomed to the sanctuary of the building and where after rituals (e.g. dancing with the Torah scrolls on Simchat Torah) and celebrations such as weddings the community congregates and celebrates. The sunlight to this very important space – the only open-air space in the complex – is vitally important to the function and amenity of this space. An overshadowed courtyard is less inviting, if substantial sunlight losses are permitted, then in combination with the sense of encroachment from the tall buildings, the experience of the Courtyard will be severely diminished making it less usable for congregants and visitors alike and resulting in a real loss of significance to the building.

Point2 conclude in respect of overshadowing that:

- The Courtyard amenity space will experience significant overshadowing as a result of the proposed development in the summer months when the space is most used. The Synagogue's existing courtyard is already poorly lit and receives low levels of sunlight due to the surrounding development. If the proposed development is approved it will suffer even greater reductions of direct sunlight which will harm its usability, its amenity value and its contribution to the setting of the synagogue.

- Based on the transitory overshadowing assessment, all direct sunlight to the Courtyard amenity space from 12:30 to 14:00 in the height of summer will be materially impacted and effectively lost as a result the proposed redevelopment of 31 Bury Street. To understand a more nuanced impact upon the courtyard, the applicant is requested to provide a time in sun study for the equinox and summer months with the existing and proposed cumulative scenarios.

- This significant impact on the amenity of the Courtyard at the time of year when it is most used is further compounded in the cumulative scenarios which take into account the approved development at 100 Leadenhall and the proposed development at 33 Creechurch Lane. When considered cumulatively with those development, the proposed development would result in significant overshadowing of the Courtyard for a large part of the day during the height of summer as set out below:
  - The proposed development at 33 Creechurch Lane will result in over shadowing of the majority of the Courtyard from 09:00-11:30
  - The proposed development at 31 Bury Street will result in over shadowing of the majority of the Courtyard from 12:30-14:00
  - The proposed development at 100 Leadenhall will result in over shadowing of the majority of the Courtyard from 14:00-15:00
  - Thereafter there remains no direct sunlight due to the remaining buildings in the eastern cluster lying to the Courtyards west.

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In other words, in the height of summer when the Courtyard should receive the greatest amount of sunlight, there will be effectively a complete loss of sunlight to the courtyard. This will reduce its amenity substantially and coupled with the sense of encroachment and intrusion from the surrounding tall buildings will render this special space unusable save as a functional entrance way to the Synagogue building.

The high-rise nature of 31 Bury Street coupled with its proximity to the Synagogue would result in yet further reductions in ambient light to levels which would be incredibly problematic for the pattern of use of this property. The idea that religious rituals, celebrations and wedding entrances and exits would continue to take place in such a degraded space in light of these cumulative harms is fanciful.

Point 2 conclude that the Synagogue has experienced cumulative degradations in its access to daylight and sunlight over recent years due to the increased density of high-rise properties in the locale. The Synagogue site cannot withstand any further daylight/sunlight losses and increased encroachment and overshadowing. This proposal is, as in the case of the heritage impacts, the straw that would break the camel's back. Point2's consideration of the submitted information clearly demonstrates the detrimental impact the proposed development will have on the availability of daylight and sunlight within the Synagogue itself and the associated Courtyard.

These losses would compound the existing low daylight and sunlight levels that are currently received. The impact this would have on the use of the Synagogue is significant and the Trust considers this unacceptable and in breach of development plan policies Policy DM10.7(1) of the *City of London Local Plan (2015) and D9 3) a) of the New London Plan.* The Trust asks that the City refuse the development on this ground alone.

Servicing, Deliveries and Access

There are number of aspects of the proposed buildings access and servicing strategies that cause the Trust considerable concern. In general terms the proposed strategies will lead to a significant increase in pedestrian, cycle and vehicular movements along Heneage Lane that would cause noise disturbance to the Synagogue. These impacts, unless properly controlled, would have a detrimental impact on religious services and other activities within the Synagogue.

Access

The proposed layout of the scheme introduces a new pedestrian and cycle route through the application site connecting with Heneage Lane and Bevis Marks to the north. Introducing this through route from Bevis Marks to Bury Street is likely to significantly increase the number of pedestrians and cyclists using Heneage Lane. At present the Lane is a quiet passageway in keeping with the setting of Synagogue which represents something of an oasis within the busy City. By making Heneage Lane a through route this will generate significant additional activity both from the proposed development itself but also from pedestrian and cyclists travelling to destinations to the south of Bury Street. Heneage Lane abuts the eastern wall and windows of the Synagogue and is currently a pedestrianised road that provides the main pedestrian access to the Synagogue.

Heneage Lane is not suitable for the proposed intensification of its use and the increased use particularly by cyclists will cause a danger for members of the Community accessing the Synagogue and particularly those with mobility difficulties.

The proximity of the road to the Synagogue and particularly its proximity to the Synagogue's primary window, beneath which is the Ark holding the sacred and ancient scrolls which are focus of the services, makes any increased noise and disturbance that will occur particularly sensitive and

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detrimental. Additional noise disturbance will impact on the religious use of the Synagogue. For this reason, the Trust objects to the layout of the development which would lead to the considerable intensification of the use of Heneage Lane and the resultant noise and disturbance.

Servicing and Deliveries

The proposed development's Servicing Strategy relies on a proposed servicing bay located in the same location as a similar facility which currently serves the existing building occupying the site. The Applicant relies on what they describe as a "legal right of way" which comprises of a vehicular route through an undercroft beneath Valiant House, traditionally known as Heneage Place. The Trust owns the freehold to Valiant House and in turn to the right of way to the service yard within the application site. The trust objects to any intensification of this right of way as proposed by the scheme.

Due to the significant uplift in floor area over the current situation proposed by this development the proposed servicing bay and access to it will also be subject to a significant intensification of its use. The Applicant's Transport Statement suggests that there will be 43 servicing vehicle trips per day made by vehicles of various sizes, the largest being a 7.5T box van. The Applicant relies on 'consolidating servicing' to reduce the proposed servicing vehicle trips by 50%. However, no details are provided with regard to how 'consolidating servicing' would operate. Given the likely multiple tenanted nature of the proposed accommodation and without details relating to how this would work in practice it is considered unrealistic, and overoptimistic, to predict a reduction in the number of servicing vehicles by 50% as set out.

The Trust is concerned therefore that the proposed development will lead to a significant increase in vehicles accessing the service yard via the right of way. Based on the Applicants figures without the unjustified reduction due to consolidation there will be an increase of 33 servicing vehicles per day.

In addition to the trips identified in the Applicant's Transport Assessment it is considered there will be a significant number of 'other deliveries' such as dot com deliveries and other deliveries to individuals working within the building. The Trust is concerned that the significant increase in all deliveries both via the service yard or by vehicles stopping kerbside will lead to significant increases in the level of activity and vehicular movements which will cause a disruption to the activities within and access to the Synagogue. This will be exacerbated by the significant increase in pedestrian and cycle traffic some of which will be concentrated on Heneage Lane itself that will lead to significant increased noise and disruption that will have a detrimental impact on the use and enjoyment of the Synagogue.

Construction impacts

Of significant concern to the Trust and the Community are the impacts associated with the demolition and construction process. The Synagogue is in proximity to the application site and there are significant concerns with regard to how the site will be developed without causing irreversible damage (and therefore substantial harm) to the Grade I listed Synagogue. It is also a significant concern for the Community in respect of how normal Synagogue life will be able to continue whilst construction is ongoing.

Impacts arising from the construction process should planning permission be granted are set out in the Demolition and Construction Review which forms part of the 31 Bury Street Environmental Statement prepared by Trium and the Construction Environmental Management Plan. Both documents have been reviewed by Paragon Building Consultancy Ltd on behalf of the Trust and their comments are set out below.

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Due to the fragile nature of the Synagogue, all building operations need to be carried out with upmost caution and assurances with regard to the methods of construction and the associated management of the construction process will need to be secured by planning condition.

We are aware that the construction methodology and the management of its environmental impacts would be the subject of further detailed approval by the City of London including of a Construction and Environmental Management Plan. However, we wish to bring to the early attention of the Applicant and the City of London the important matters raised in Paragon's assessment which include:

- **Ground heave and movement** - due to the delicate nature of the Synagogue there must be no construction activities carried out likely to cause ground movement. Real-time 24-hour monitoring will be required.
- **Vibration** – there is some potential for damage and disturbance from vibration during the works. We would expect to, but have not seen a vibration strategy for keeping the levels to no higher than 1mm per second.
- **Noise** – the submitted Construction Environmental Management Plan confirms the developers intention to work to approved statutory working hours. We will need to secure additional restrictions to ensure there is no noise and disturbance during prayer times and services including weekday mornings before 08.30. Our Rabbi will be providing you with more detailed explanation of this in due course.
- **Dust** – must be managed to ensure no penetration of the internal spaces and no health risk to users of the Courtyard.
- Mace have set out the outline proposals for temporary works sequencing to form the 3 storeys of basements including extensive de-watering using large steel props spanning the complete width of the excavation (known as cross-site propping) and a secant piled perimeter wall. We will need to assess this impact specifically for the Synagogue's structure with such large scale de-watering of the ground on the Bury House site
- Mace have made a separate statement on creating and maintain meaningful neighbourly relations with key stakeholders including the synagogue ensuring 'reasonable demands' are met which includes setting up a working group. Which we welcome.

There are many variables and potential impacts associated with a development project such as this located within a tight urban location surrounded by buildings of various constructions and uses. The Trust is concerned that should the development be approved there will need to be continual liaison both prior to and during construction between the developers and the Synagogue's Consultant Team or an appointed project manager acting on the Trust's behalf.

Cumulative Impacts

Cumulative impacts of development are an issue particularly pertinent to the Synagogue given the magnitude of change which has occurred in the streets immediately surrounding the complex in recent years. Policy D7 of the New London Plan and para.28 of Historic England 'Managing Significance in decision-Taking in the Historic Environment both set out the importance of considering cumulative impacts. The Historic England advice stating that:

> *"The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting,*

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consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape"

In terms of sunlight and daylight and heritage considerations the cumulative impact on the Synagogue is particularly acute and has been commented on earlier in this letter. The Applicant's Environmental Statement makes the following comment in respect of cumulative impacts on the Synagogue:

'Permanent Adverse effect interactions in relation to daylight, sunlight and noise amenity to existing non residential property (Bevis Marks Synagogue). The effect interaction is not considered significant on the basis that the individual daylight, sunlight and noise effects are not themselves significant and Operational Noise Management Plans can be implemented to achieve suitable rating noise limits'

Notwithstanding the Applicant's above assertion, it is questionable whether the proposal and others coming forward in the surrounding area would comply with the City of London's own Local Plan policy CS14: Tall Buildings which requires proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, which have a detrimental impact on amenity, and maintain pedestrian permeability.

The number of tall buildings in the area immediately surrounding the Synagogue including the proposals for 31 Bury Street and others under consideration will lead to all of the detrimental impacts identified by policy CS14 and will leave the Synagogue at the bottom of a 'building canyon' that policy CS14 seeks to avoid.

Clearly and most significantly the proposals for Bury House in combination with other emerging developments will lead to increased noise and disturbance in the area, some of this being focused on Heneage Lane itself. General increases in activity given the high levels of activity common to the City of London would on the whole be indiscernible but where these are focused on Heneage Lane a currently quiet, lesser used route the impact will be severe.

Conclusion

The scale of the proposed development is such that it will have multiple significant adverse impacts on the Synagogue both individually and cumulatively. The uniqueness of the Synagogue as a heritage asset of the greatest significance and greatest sensitivity means that even modest impacts (and many of the impacts in question are in fact significant) of the proposed office building are not acceptable in policy terms. The impacts on the setting, on the daylight and the sense of encroachment and loss of sunlight to the special entrance Courtyard would be overwhelmingly harmful. The balance to be struck is between the harm to a unique asset in the UK versus a serviceable but ordinary office building with limited public benefits. Accordingly, and respectfully, we ask that planning permission be refused.

Yours sincerely,



Chris Maltby BA Hons MRTPI

[redacted]

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APPENDIX 1

Heritage Impact of the Proposed Development at 31 Bury Street (Bury House) (9th December 2020) prepared by Caroe Architecture

Edgeplan Limited Registered in England and Wales No. 08077578
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Bevis Marks Synagogue - Heritage Impact of Proposed Development at 31 Bury Street (Bury House) (20/00848/FULEIA)

9 December 2020

1. Introduction and Purpose

This report aims to provide advice to the S&P Sephardi Community regarding proposals for a new office building with retail, food and beverage and community use spaces comprising 2 basement, 2 mezzanine, ground, and 48 upper floors, at a total height of just under 198 metres AOD, on the site of the existing five to seven storey Bury House, at 31 Bury Street. The site is approximately 40 metres from Bevis Marks Synagogue (to the south).



Figure 1 – Image from Design and Access Statement by Stiff & Trevillion showing the location of the proposed development with Valiant House and Bevis Marks Synagogue to the north

This paper responds to the developer's proposals submitted to the City of London's Department of the Built Environment as part of the application for planning consent. It will be developed as needed to respond to any additional information from the developers and the S&P Community's other professional advisers.

The S&P Community's main interests from a heritage impact perspective concern the significance of the Grade I listed Bevis Marks Synagogue, and the curtilage listed Courtyard and Beadle's House at Number 2 Heneage Lane, including the ability to appreciate that significance, considering the following factors:

1. The potential impact on the significance of Bevis Marks Synagogue, its historic Courtyard, and the adjoining Beadle's House and on the setting of these heritage assets.
2. The potential impact on views within and from the Synagogue, Annexe building and Courtyard.
3. The potential impact on the fabric of the Synagogue and the experience of worship and visiting inside the Synagogue, Annexe building and Courtyard.
4. The potential impact on the fabric of the Synagogue and the experience of worship and visiting during the construction period.

2. The Statutory Designation and Significance of the Bevis Marks Synagogue, Beadle's House and Courtyard

a) Statutory Designation

Bevis Marks Synagogue is Grade I listed placing it in the highest category of importance (amongst buildings designated as being of national significance). The Synagogue was first listed in 1950 with the entry on the National Heritage List for England (NHLE) subsequently amended in 1977. The brief list entry concludes that its 'little altered state is of exceptional historic interest.'[1]

Neither the Beadle's House nor the Courtyard are mentioned in the list entry. However, this does not mean they are not designated heritage assets. It is acknowledged by the City of London in text supporting Policy DM 12.3 of its 2015 Local Plan regarding proposals affecting listed buildings that 'a list description is unlikely to refer to all features of significance…'. Although the list entry for the Synagogue is slightly more than 'minimalist' as defined below, the inadequacy of some of the earlier list descriptions on the NHLE is also acknowledged in a recent report by Matthew Saunders commissioned by Historic England[2], as follows:

'"Minimalist" descriptions are generally characterised by clipped descriptions, mostly describing the front elevation only with the absence of any explanation of the reason for either the listing itself or defence of the grading chose.'[3]

One of the recommendations of the Saunders Report is that:

'There should always be a freedom in the compilation of listing descriptions but there should be examination of the potential for further codification. ALL listing descriptions should have mastheads clarifying how they are to be interpreted especially those which are likely to remain "minimalist" until their revision can be undertaken. Such mastheads would confirm, inter alia, that Listing covers the exterior and interior, structures that abut or lie in the curtilage and that descriptions cannot be presumed to be definitive.'[4]

The principle of curtilage listing is established in law. Historic England advice states:

'…the curtilage of a building (the principal building) is in general terms any area of land and other buildings that is around and associated with that principal building'

And that

'…unless the list entry explicitly says otherwise, the law (Section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990) says that the listed building includes any ancillary object or

[1] https://historicengland.org.uk/listing/the-list/list-entry/1064745

[2] The purpose of the report is described thus: 'Historic England commissioned Matthew Saunders MBE to consult with the voluntary conservation movement, collate views and report on the present state of, and future strategy for, Listing in England. The overarching purpose of the commission is to advise Historic England on how it might better deliver the delegated legislative function of compiling and maintaining the National Heritage List for England.' See Saunders, Matthew, *Towards a Strategy for the Future of the National Heritage List for England* (1 November 2019), p.1.

[3] Ibid., p.4.

[4] Ibid., p.14.

structure within the curtilage of the building, which forms part of the land and has done so since before 1st July, 1948.' [5]

Although it is for the local planning authority to determine whether or not the Beadle's House and Courtyard are within the curtilage of the Synagogue, the Beadle's House and the fabric of the Courtyard including the historic paving and lamp posts may also be considered to be curtilage listed. The late twentieth century Annexe building does not meet the criterion of having formed part of the land since before 1 July, 1948.

Historic England guidance further notes:

'A building within the curtilage may have its own special architectural or historic interest or may contribute to the special interest in the principal building as part of the group'.[6]

The Beadle's House certainly meets both of these criteria.

In practice, the S&P Community's current proposals for works to the Courtyard including a new ticketing booth and security shelter plus demountable Sukkah as part of a National Heritage Lottery Fund development project, were included in an application for listed building consent (as well as a planning application) submitted to the City of London in March 2019. A review of the planning history for the Synagogue site available on the City of London's planning portal (going back to 1996) also shows that consent for previous proposed works to the Courtyard have been subject to a Listed Building Consent application.

The heritage impact of the proposed development at 31 Bury Street on the Synagogue, Beadle's House and Courtyard – all three highly important historic survivals – and their setting, should therefore, be given due consideration.

a) Significance

Caroe Architecture Ltd's *Bevis Marks Synagogue Conservation Plan* (January 2019) written with Jeremy Musson (author and architectural historian) was commissioned by the S&P Sephardi Community as part of the NLHF funded project. Recognising the importance conferred upon the Synagogue by its Grade I listing, based on a detailed understanding of the history and development of the Synagogue, the Conservation Plan (CP) assesses the significance of the Synagogue, Beadle's House and Courtyard based on their evidential (archaeological), historical, aesthetic and communal heritage values (in line with Historic England definitions and guidance[7]). The following excerpts are from the assessments pertaining to the Courtyard and Beadle's House whose significance have not been acknowledged in the heritage impact assessments provided in support of the proposed development at 31 Bury Street:

[5] Historic England, *Listed Buildings and Curtilage: Historic England Advice Note 10* (February 2018), pp.4 & 5. Bevis Marks Synagogue was first listed on 4 January 1950. Historic England note that the law that refers to curtilage only came into effect on 1 January 1969 and 'the most logical way of dealing with buildings listed before 1969 wold be to consider the position at 1 January 1969, and apply a three part assessment of the facts to that situation: the physical layout of the listed building and the structure; their ownership, both historically and at the date of listing; and the use or function of the relevant buildings, again both historically and at the date of listing…'.

[6] Ibid.

[7] Set out in Historic England, *Conservation Principles, Policies and Guidance: for the sustainable management of the historic environment* (2008).

'The courtyard is the immediate setting to the Synagogue building and an intrinsic part of the Bevis Marks complex and historic built ensemble; and to some extent, an extension of the Synagogue itself. It is also a key contributor to the historic character of the Synagogue building, a point of departure from the modern, built environment and entry to what is palpably an historic place: all of which contribute to its illustrative historical and aesthetic heritage values. Views across and out of the courtyard, as well as visibility of the sky are important contributors to the setting of the Synagogue, as well as the courtyard's amenity value.

The courtyard is also a place of communal significance where people gather before and after services for social and religious discussions, in anticipation of weddings and for weddings (weather permitting), for social events and in preparation for tours. In many respects it is where community itself is built.

OVERALL SIGNIFICANCE OF THE COURTYARD: HIGH *[defined as considered to be of national importance or value].'*

With regard to the Beadle's House:

'It was designed by Davis & Emanuel, an architectural practice of good historical standing who also designed the synagogue at Lauderdale Road and buildings such as the former City of London School on Victoria Embankment (1880-2). The Beadle's House is of less architectural and historical significance than the Synagogue but it is one of the last remaining intact vestiges of the buildings constructed to support the life of the Synagogue and the S&P Community. It also illustrates a pivotal point in the history of the S&P Community and the Synagogue, namely the outcome of the consolidation and downscaling of the S&P Community's assets at Bevis Marks following the proposed (and opposed) 1880s demolition of the Synagogue.

There are no surviving historic interior decorative schemes and there have been some alterations to the nineteenth century layout, however, the significance of the building derives primarily from its group aesthetic heritage value and its illustrative historical and communal value as the only surviving intact community building associated with the Synagogue. This significance is expressed in its built form (including its surviving first phase domestic floorplan centred around a prominent staircase). For these reasons, we have assessed the Beadle's House to be of High (National) Significance overall.'

As noted in the assessments above, the Courtyard and Beadle's House have significance in their own right as important parts of the surviving historic fabric and an intrinsic part of the Bevis Marks complex. The Beadle's House is the Rabbi's home and the Courtyard fulfils many vital functions. For worshippers, as well as being the immediate setting of the Synagogue building, the Courtyard is used for the celebration of festivals and Holy Days. BBQs, lectures, and the weeklong outdoor festival of Tabernacles take place in the temporary booth which is erected in the Courtyard annually. As an historically and aesthetically significant part of the original designed ensemble, the Courtyard can be considered an extension of the Synagogue itself.

3. The setting of Bevis Marks Synagogue and the contribution made to heritage significance and the ability to appreciate it

In line with Historic England's advice on the setting of heritage assets[8] which recommends a staged approach to decision taking, it is important to consider the degree to which the setting of the

[8] Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition, December 2017), p.4.

Synagogue makes a contribution to its heritage significance, to assess the effects of the proposed development on the significance or the ability to appreciate it, before exploring ways to maximise enhancement and avoid or minimise harm.

We must start by defining 'setting'. The glossary of the National Planning Policy Framework (NPPF, February, 2019) defines the setting of a heritage asset as:

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

Historic England advise:

'A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.'[9]

We suggest that in the case of Bevis Marks, setting should be considered in terms of:

a) the Courtyard as the immediate setting to the Synagogue and Beadle's House; and also
b) the wider setting of the Courtyard, Synagogue and Beadle's House as a group of designated heritage assets.

As well as being the immediate setting to the Synagogue and Beadle's House, the wider setting of Synagogue, house and Courtyard, are most directly and readily experienced from within the Courtyard. This experience includes (but is not exclusively derived from) views within, across, upwards and outwards from the Courtyard. To a lesser extent it is also possible to appreciate the immediate and wider setting from within the Synagogue, Annexe building and Beadle's House themselves.

The Courtyard, is the only place where the visitor may stand back and gain a longer view of the Synagogue building from the outside, with sufficient space to understand and appreciate its relationship with the Beadle's House, to drink in the historic character, and imagine the early life of the buildings and the resettled Jewish community. Therefore, aside from being inside the Synagogue building itself, it is the only other place from which the significance of the Synagogue can be appreciated. As the CP points out, the Courtyard is also 'a key contributor to the historic character of the Synagogue building, a point of departure from the modern, built environment and entry to what is palpably an historic place.'

The experience of being in the Courtyard and the ability to appreciate the historic character and aesthetic qualities of the historic ensemble of Courtyard, Synagogue and Beadle's House is directly influenced by the sky space visible when looking upwards and outwards, and, as a consequence, indirectly by the amount of street space beyond the Courtyard and the degree to which other buildings are 'set back' around it. Experiencing that 'point of departure from the modern, built environment' is enhanced by the clear sky views which allows the viewer greater scope for imagining and appreciating the palpably historic nature of this site. The Courtyard setting does not and should not be considered to exist in an 'intimate' or 'tucked away' vacuum whereby it is unaffected by changes in the wider setting. This is plainly not the case.

[9] Ibid., p.2.

We assert that particularly given the previous high level of change to the surroundings of Bevis Marks Synagogue, Beadle's House and Courtyard (including poor quality development at No 10-16 Bevis Marks which directly abuts the Courtyard), and the resultant fragility of the historic character of the Courtyard, Synagogue and Beadle's House, **the Courtyard as the immediate setting enhances the significance of the heritage assets and the ability to appreciate them. It has a high sensitivity, and a low capacity, to accommodate further change, and is key to revealing their significance.**

The wider setting has a strong visual relationship with, and influence upon the clear sky views experienced within, the immediate setting. **This means that proposed developments in the wider setting of the Courtyard, Synagogue and Beadle's House that have an impact on the experience of the immediate setting, must also be carefully considered**.

4. Information considered in this assessment

The proposed development is set out in the *Design and Access Statement* by architects Stiff + Trevillion (October 2020) and Montagu Evans have provided a *Townscape Built Heritage and Visual Impact Assessment* (Volume 2 of the Environmental Statement, October 2020) which includes some discussion of the heritage impact on Bevis Marks Synagogue. Montagu Evans have also prepared a separate Heritage Impact Assessment report, but this focuses solely on the potential impacts on the Tower of London World Heritage Site (WHS).

We have also reviewed the existing and proposed plan and elevation drawings by architects Stiff + Trevillion.

Historic England (HE) have been consulted on the proposed development as submitted for planning consent (on 12 November 2020) but no response has been published as yet. At pre-application stage in July 2020, HE's concerns (as reported by Montagu Evans) were with harm to the Outstanding Universal Value of the Tower of London WHS in terms of the visual impact in the view from the North Bastion of Tower Bridge (London Views Management Framework View 10A.1). HE considered that clear and convincing justification for the proposed development that outweighed the harm, had not been provided. They recommended a significant reduction in height so that the proposals would no longer affect the setting of the WHS.[10]

In their pre-application response in August 2020, Historic Royal Palaces suggested 'a different approach might see a lower, broader building that is not so intrusive in local views and would not extend the eastern shoulder [of the Eastern Cluster] so definitively, providing that it would not rise above the turrets of the White Tower in LVMF View 10A.1.'[11]

We defer to the S&P Community's other specialist advisers on the potential impacts of reductions in daylight and sunlight, and increased overshadowing arising from the proposed development. Similarly we have not considered the Wind Microclimate information provided in the planning application, but note from work carried out in assessing the impacts of the proposed development at 33 Creechurch Lane, that the Synagogue roof structure was not designed 'to take into account large downward wind-induced forces'. [12]

[10] Montagu Evans, *31 Bury Street: Environmental Statement Volume 2: Townscape, Built Heritage and Visual Impact Assessment* (October 2020), p.56.
[11] Ibid. p.57.
[12] BRE, *Wind Advice Concerning Effects of Proposed 33 Creechurch Lane Development Upon Bevis Marks Synagogue* (30th November 2020), p.2

5. Assessment

The following assessment is provided in response to the *Townscape, Built Heritage and Visual Impact Assessment (October 2020)* by Montagu Evans.

TBHVIA Executive Summary
In their Executive Summary Montagu Evans (ME) state:

'At a local level the proposed development does not adversely impact on the other heritage assets in the immediate area, including Holland House, and the Bevis Marks Synagogue. The proposed development would preserve the significance of these assets…..'

And

'In all instances, the heritage assessment finds that the proposals would satisfy the statutory duties under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant parts of the Statutory Development Plan relating to heritage assets i.e. the significance of those assets would be preserved.'[13]

We disagree with both of these statements because the assessment does not take into account the contribution to significance that the Courtyard makes as the setting to the Grade I listed Synagogue, and Beadle's House within its curtilage, and the ability to appreciate their significance.

Baseline: Built Heritage
In Section 5 of the TBHVIA (Baseline: Built Heritage) ME discuss the contribution of the setting to the heritage value of Bevis Marks Synagogue as follows:

'5.32 The original setting of the synagogue has been changed. Over the last 300 years, this part of the City has seen much change. During the late 19th century and early 20th century, large Victorian and Edwardian commercial developments replaced the small-scale historic fabric that had re-emerged after the Great Fire of London of 1666. War destructions cleared the way for the reorganisation of the immediate neighbourhood. Bevis Marks turned into a broad thoroughfare for motor vehicles and from the 1970s, modern office blocks were constructed, culminating in the Swiss Re Building at 30 St Mary Axe, completed in 2004.

5.33 Located in the Eastern Cluster, most buildings in the immediate context of the synagogue are much taller than this historic building. Valiant House on Heneage Lane separates the synagogue from the Site.'[14]

Thus there is no acknowledgement here of the Courtyard as the immediate setting to the Synagogue and Beadle's House, let alone what contribution this setting makes to their significance, and the ability to appreciate that significance.

Assessment: Visual
In Section 2 (Methodology) of the TBHVIA, ME set out their approach to assessing the impact of the proposed development. In terms of Townscape and Visual impact, they acknowledge:

'Accurate visual representation is two-dimensional and cannot capture the complexity of the visual experience. It is an approximation of the three-dimensional visual experience the observer would

[13] Ibid., p.4.
[14] Ibid. p.37.

receive on site. Neither do they capture transient significant effects arising from noise or traffic on perception, or that wider range of expectations and associations that anyone in an urban scene may have.'[15]

We agree that two-dimensional representation cannot convey the complexity of the visual experience and for this reason, find the rendered proposed and cumulative views provided from the Bevis Marks Courtyard in TBHVIA Section 10 'Assessment: Visual', inadequate in conveying the impact of encroachment and reduced sky space to the south and east of the Synagogue building.

The existing, proposed and cumulative views (View 45, shown below in Figure 3) are provided from a viewpoint which does not convey the viewer's ability to appreciate the full extent of the north and west facades of the Synagogue and the Beadle's House from within the Courtyard. Figure 2 below (a photograph taken before the construction of One Creechurch Place) shows the extent to which it is possible for the viewer to step back and appreciate these against a clear sky backdrop.



Figure 2 View from the Courtyard entrance on which proposed developments at 31 Bury Street and 33 Creechurch Lane will have a significant detrimental impact (John Salmon, geograph.org.uk)

The rendered views are also closely cropped and do not allow the viewer to appreciate the full enormity of 31 Bury Street, either alone or in concert with other consented and proposed schemes including that at 33 Creechurch Lane. These effects might only be adequately represented and understood by the use of a three-dimensional model, the development of which a proposed scheme on this scale would warrant.

[15] Ibid., p.15.

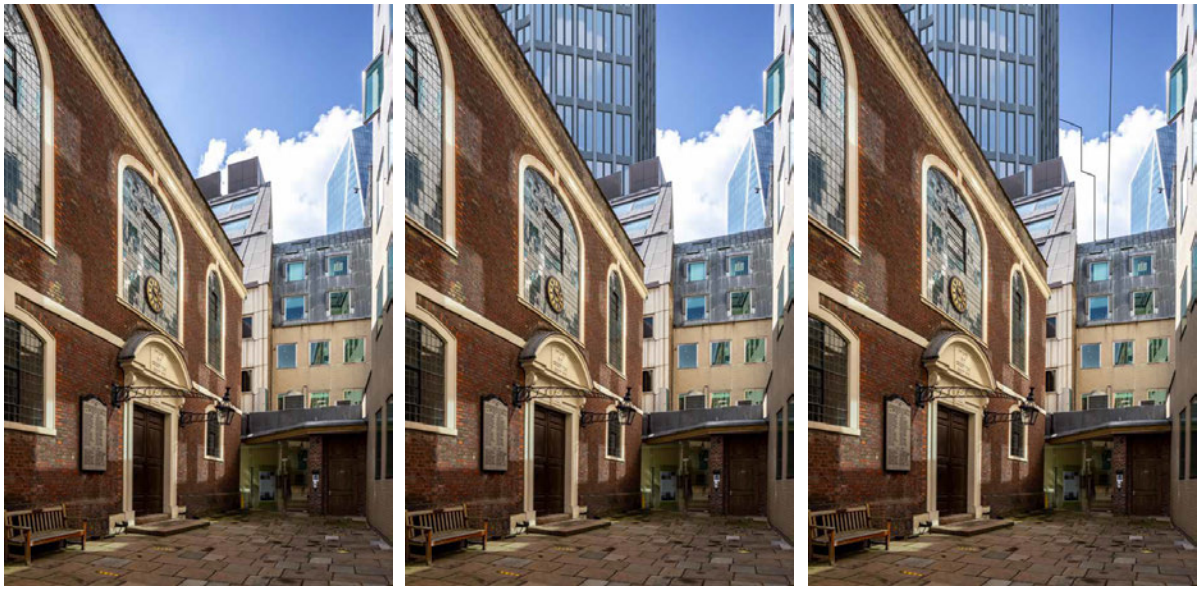

Figure 3 Existing, Proposed and Cumulative closely cropped views (View 45) facing south (Montagu Evans)

In order to appreciate the full scale and impact of the proposals, and their cumulative impact alongside other consented schemes, the images above should be re-cropped to show the *full* height of the new development. To only present this closely-cropped view is misleading as it does not demonstrate the extent of 'sky view' around and over the Synagogue, that is important to its setting; and that will be lost if the proposed scheme were to be constructed.

Baseline: Townscape and Visual

In Section 6 of the TBHVIA (Baseline: Townscape and Visual), ME have identified two Character Areas:

- Character Area 1: Traditional Urban Blocks – in which the development site and Bevis Marks Synagogue are located
- Character Area 2: Existing Tall buildings

ME further state:

'6.4 London and the City in particular are developing a new kind of urban form. There are areas with a more settled traditional character such as Character Area 1, while others have been already redeveloped and intensified with tall buildings (Character Area 2). Both areas sit within the Eastern Cluster. The juxtaposition of old and new, low and tall contributes to the special character of this part of the City. Quality of design has an important role to play in this process of change and to create a successful whole.'[16]

We agree with the characterisation of Area 1 and note ME's further observations that it is a part of the City 'where clearly defined street blocks, street frontages and a datum line of between six and eight storeys dominate'[17]. This begs the question why a building of such a height in the proposed location is considered to be in keeping with the prevailing character (a character that is sympathetic to the scale and form of Bevis Marks Synagogue) of its surroundings? Clearly it is not appropriate.

[16] Ibid., p.52.
[17] Ibid., p.54.

The impact of the proposed development on the Townscape is assessed in Section 9 of the TBHVIA (Assessment: Townscape) – see further below.

Assessment: Heritage

In Section 8 of the TVBHIA (Assessment: Heritage) ME set out their assessment of heritage impact and consider the direct and indirect effects on heritage receptors including Bevis Marks Synagogue. The impacts are considered during the demolition and construction phase, once the proposed development has been completed (described as the operational phase) and in light of other consented development schemes (described as the cumulative phase).

During the demolition and construction phase, ME acknowledge that the following indirect effects may affect heritage receptors as follows, and that the heritage sites most likely to be affected by these are Holland House and Bevis Marks Synagogue:

- An effect on heritage value arising from a change to the setting
- The noise, dust and vibration associated with the demolition and construction activity;
- Visibility of equipment associated with construction (cranes, hoarding, etc.); and/or
- The potential increase in activity affecting the local road network.

ME conclude:

'8.22 There would be no change to the ability to appreciate its heritage value arising from dust or vibration associated with the Development. The noise and increased traffic movements associated with demolition and construction activities would have a limited effect on the appreciation of its heritage value because its setting already includes the influence of modern noise including traffic and construction noise from adjoining sites.

8.23 This effect would be indirect and short term.

[Heritage] Value: High
Susceptibility: Medium
*Sensitivity: Moderate/**High***
*Magnitude of Impact: **Low***
*Significance of Effect: **Minor Adverse'***[18]

We defer to other professional advisers to the S&P Community on the likely effects of dust and vibration arising from construction on Bevis Marks Synagogue, but as articulated in our reports relating to 33 Creechurch Place, the fragility of the historic fabric, interior and fittings of the Synagogue (not least of all the Ark (*Echal*)) and the potential for irreparable damage and loss must be a paramount consideration in the construction strategy for a tall building development in such close proximity.

Once the proposed development is constructed, ME propose that the heritage impact on Bevis Marks Synagogue will be as follows:

'8.50 The building is set in a tightly enclosed courtyard, immediately to the northeast of the Site. The immediately surrounding buildings are twentieth-century and not particularly attractive or interesting. The wider setting of the synagogue is also modern in character, including both large Edwardian office buildings such as 38 St Mary Axe and Holland House at the beginning of the 20th century and more recent buildings, including 30 St Mary Axe, One Creechurch Lane and many others.

[18] Ibid., p.60.

8.51 Constant change is part of the City's history. Wartime bombing, post-war rebuilding and road widening have almost entirely removed the historic setting of the synagogue. Many of the nearest buildings are of little architectural merit, built during the post-war decades. Many of those buildings have reached the end of their life time and are in need of refurbishment. In recent years, tall buildings forming the Eastern Cluster have been completed in close proximity to the listed building, further altering its setting.'

As above, although this acknowledges the Synagogue is set in the Courtyard it does not consider the significance of the Courtyard nor the contribution this setting makes to the significance of the Synagogue and Beadle's House, and the ability to appreciate that significance. As with the development proposals for 33 Creechurch Lane, previous development which has adversely impacted on the setting and significance of the Bevis Marks complex is used here as a justification for new development which will do nothing to reveal or enhance significance.

This reliance on previous and even very recent change as a justification for the proposed development at 31 Bury Street ignores Historic England's good practice advice, which is that if the setting of a heritage asset has been compromised by what has happened previously this does not mean further impact from new development should not be considered harmful, and opportunities should be taken to improve the setting of the heritage asset:

'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.'[19]

The City of London must determine planning applications in accordance with paragraphs 193-196 of the NPPF, and its own 2015 Local Plan policies including *Development Management Policy DM12.1 Managing change affecting all heritage assets and spaces* including:

'1. To sustain and enhance heritage assets, their settings and significance' and

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.'[20]

Relevant policies set out in the Mayor of London's *London Plan* (2016) must also be considered. These include:

'7.7 Location and Design of Tall and Large Buildings which states that '…tall buildings should not affect their surroundings adversely in terms of …overshadowing…' and

7.8 Heritage Assets and Archaeology which states amongst other things that *'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.'*

Both the City and Mayor of London's policies place an emphasis on development being sympathetic to the character and scale of heritage assets and their settings. The existence of surrounding buildings and other consented schemes of a greater mass and scale are not a justification for further developments of this height in such close proximity to Bevis Marks.

[19] Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition, December 2017), p.4.
[20] City of London, *Local Plan January 2015*, p.109.

In the current planning enquiry relating to the proposed development at 20 Bury Street (known as the Tulip), in his cross examination of Mr Gwynn Richards of the City of London Department of the Built Environment, barrister Mr Hereward Philpott QC noted the above advice from HE and quoted from our report to the S&P Sephardi Community regarding the visual dominance and overhanging of the proposed structure in north and west views from the Courtyard. Mr Philpott put it to Mr Richards that just because the setting of Bevis Marks Synagogue had changed in the past and is characterised by tall buildings, this did not mean that no further harm to the setting could occur, nor did it mean that a new 'eye catching' tall building appearing in the Courtyard view could not distract viewers' attention when in the Courtyard. Mr Richards agreed this was the case.

ME continue:

'8.52 The receptor has a High value and has a Medium susceptibility to change given the low quality of the surrounding buildings in the courtyard, giving it a Moderate/High sensitivity.'

Our view is that the Synagogue complex has a High susceptibility and High sensitivity to change, not least of all because of the extent, and cumulative effects of, previous development, including the building at 10-16 Bevis Marks directly abutting the Courtyard. Again, previous harm from buildings of an inappropriate scale and proximity, or buildings of poor quality design and materials should not be used as justification for further development which will do nothing to reveal significance or enhance the setting. With each encroachment upon the Courtyard setting, the remaining sky-view, particularly as a backdrop to the Synagogue as one approaches the main entrance in contemplation of entering the sacred space, becomes even more valuable.

'8.53 The Proposed Development stands in the wider setting of the synagogue, about 40 m to the south, and will be visible in conjunction with it from within the courtyard. The Proposed Development appears behind the synagogue, creating a new, high quality backdrop. The careful elevational treatment with the channelled curved terracotta panels is an appropriate addition to this view.

8.54 The viewer's ability to appreciate the historic character of the synagogue in its courtyard setting is not compromised by the Proposed Development. While much taller than the existing buildings surrounding the synagogue, the Proposed Development does not change the appreciation of the heritage asset. The synagogue remains hidden from the street, highlighting 18th century building regulations, which did not allow synagogues to be located on the high streets. The Proposed Development will be visible from within the courtyard in association with the tall buildings of the Eastern Cluster.'

We disagree that the new building will create a 'high quality backdrop' or that the viewer's ability to appreciate the historic character of the Synagogue in its courtyard setting will not be compromised. It is difficult to imagine a higher quality backdrop than clear sky which allows the form, materials and simple, elegant lines of the Synagogue to be easily discerned and appreciated. This assessment gives no consideration to the importance of sky space above the Courtyard in allowing appreciation of its historic character and significance as set out under heading 3. The setting of Bevis Marks Synagogue, above.

ME go on to state:

'8.55 The Proposed Development also has the potential to make a positive contribution to the wider area. It introduces an active ground floor with attractive public space surrounding it which will help uplift the quality of the streetscape around Bury Street, Creechurch Street, Heneage Lane and Bevis

Marks. The uplift in activity and additional footfall in the immediate area around the synagogue will have a positive impact its setting.

8.56 Overall, the magnitude will be Negligible. It will still be possible to recognise and appreciate the synagogue and its historic character in what is already a very changed, urban setting.

8.57 The significance of effect will be Negligible and Neutral. The effect will be indirect and long-term and national in scale.
Value: High
Susceptibility: Medium
Sensitivity: ***Moderate/High***
Magnitude of Impact: ***Negligible***
Significance of Effect: Negligible Neutral'[21]

Whilst we agree there is room for improvement to the quality of the public space and streetscape in the area around the current building, we do not believe this need can only be satisfied through the proposed tall building development. For the reasons set out above, we do not agree that the significance of effect on heritage significance will be Negligible or Neutral nor that this is demonstrated by Montagu Evans in their analysis.

In the cumulative phase, regarding the heritage impact on Bevis Marks Synagogue, ME state:

'Although now surrounded by modern buildings the secluded enclave character of the court survives. The tops of 30 St Mary Axe and Heron Tower already appear within the wider setting of the listed building and do not diminish its significance. These buildings do not contribute to the significance of the synagogue but have created an established contrasting modern setting. The tall modern character of its setting to the south-west would not be altered and the elements of setting which contribute to the synagogue's heritage significance would not be altered.'

We acknowledge the presence of 30 St Mary Axe and the Heron tower in Courtyard views to the southwest but strongly disagree that the elements of setting which contribute to the Synagogue's heritage significance would be unaltered by this proposal. Closely cropped as they are, it is clear from the rendered proposed and cumulative views (View 45) that 31 Bury Street, in concert with other consented schemes (and, although not shown, no doubt also the proposal for 33 Creechurch Lane) will markedly detract from the historic character of the Courtyard setting; and diminish the contribution made by that setting to the significance of the Synagogue and Beadle's House. With the proposed and consented schemes in place, the Synagogue and Beadle's House will be almost entirely enclosed by tall buildings in their backdrop with no opportunity to experience these now diminutive historic assets against a clear sky view.

'8.109 The Proposed Development will be recognised within the context of emerging tall buildings within the Eastern Cluster. Its slender profile would be attractive and will help reduce the overall 'sky grab' of development in this area identified for significant growth. The architectural articulation, composition, elevational treatment, materials and detailing achieve the high design quality required for a tall building in this location.'

From the perspective of Bevis Marks Synagogue, this proposal does nothing to reduce the 'sky grab' of development in this area, indeed it will have the very opposite effect.

[21] Ibid., pp.62-3.

Assessment: Townscape

In terms of ME's assessment of impact on the Townscape (Section 9 of the TBHVIA), we do not refute that there is room for improvement upon the appearance of the current building, to improve access to Heneage Lane and to re-instate the historic link between Bury Street and Heneage Lane. However, there would be many ways of delivering these outcomes without the harm to heritage significance that a building of the height proposed will cause. Indeed the height of the proposed development on this site at 31 Bury Street is completely irrelevant to the delivery of street-level townscape improvements.

6. Conclusion

Stiff + Trevillion set out 16 key benefits of the proposed scheme, of which the following may be considered to be public benefits. This is based on government guidance on enhancing and conserving the historic environment which describes a public benefit as 'anything that delivers economic, social or environmental objectives', but which it also says should be 'of a nature or scale to be of benefit to the public at large and not just…a private benefit'[22]:

- Reinstatement of an historic route through the City via a new covered Heneage Arcade, 'assisting in enhancing permeability and pedestrian movement in the immediate area'
- A new pocket park
- Prioritisation of pedestrian and cycle accessibility
- Provision of small and flexible retail space
- High quality public realm, and street level spaces including those to show local artists' work; and 'internal publicly accessible connected space….expressly for the benefit of local workers, visitors and residents'
- Dedicated community space within the building for local groups including schools, charities and cultural/art groups
- Enhanced local biodiversity through extensive greening of a brownfield site.

We do not consider that these benefits offer the clear and convincing justification required by the NPPF for the harm this proposal will cause to the heritage significance and setting of the Synagogue, Courtyard and Beadle's House, nor do most of these benefits actually require a building of such excessive height in order to deliver them.

Harm in this case should be considered in terms of:

i) Harm caused to the significance and setting of Bevis Marks Synagogue, Beadle's House and Courtyard by the proposed development at 31 Bury Street
ii) The cumulative effects and harm to the significance and setting of Bevis Marks Synagogue, Beadle's House and Courtyard by the proposed development and other consented schemes
iii) The cumulative effects and harm to the significance and setting of Bevis Marks Synagogue, Beadle's House and Courtyard of the proposed development and other proposed schemes;

and possibly:

iv) Harm to significance as a consequence of physical damage to the historic building fabric caused by excessive wind loading generated by the proposed building once completed.

[22] https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment

The proposed development will have a considerable negative impact on the heritage significance of the Synagogue and its historic Courtyard setting as well as the Beadle's House, due to its proximity and scale. The existing, proposed and cumulative views (even cropped as they have been) confirm the detrimental impact on the setting and the ability to appreciate the significance of this historic ensemble and its place in the City of London.

The new building will significantly reduce the visible sky in the southeastern view from inside the Courtyard and detract from the viewer's ability to clearly discern the historic character and aesthetic and architectural qualities of the Synagogue building in particular.

Having carefully considered whether this proposal constitutes less than substantial harm or substantial harm, we conclude that this proposal does not constitute substantial harm as that term is understood following the 2012 case of Bedford Borough Council v the Secretary of State for Communities and Local Government, Luon (UK) Ltd. The proposal does, however, in our view represent a high degree of less than substantial harm.

Paragraphs 194 and 196 of the NPPF say that:

'194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.' and

'196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'[23]

The degree of previous change to the setting of the Synagogue complex, nor indeed determinations by the City of London that other consented tall building developments (including that at 24 Bevis Marks noted in the officers report to be in 'the immediate vicinity of the Synagogue') are not considered to harm the setting of the Synagogue should not dictate that no new proposal may be considered harmful nor indeed that the cumulative effects of such developments may not be considered to represent harm. We are of the view that previous consents for development proposals may not have adequately considered the setting of Bevis Marks nor given sufficient weight to the contribution it makes to significance, and the ability to appreciate that significance.

It is our view that the cumulative effects of this development in concert with consented schemes including 100 Leadenhall, One Undershaft and 24 Bevis Marks represent harm *at the very upper end* of the scale of 'less than substantial harm' to Bevis Marks Synagogue and its historic Courtyard setting.

The developer in this case has provided no modelling of the Courtyard views that takes into account the impact of this proposed scheme in concert with the proposed building at 33 Creechurch Lane. The developer should be asked to model the Courtyard views to show the effects of both proposed and consented schemes, including from a position where it is possible for the viewer to appreciate the full extent of the north and west elevations of the Synagogue in their historic Courtyard setting. We are of the view that the cumulative effects of these proposals will only add further to the degree of less than substantial harm.

[23] Ministry of Housing, Communities & Local Government, *The National Planning Policy Framework* (2019), pp.55-6.

If the development is assessed by others to risk physical damage to the Synagogue roof structure due to the effects of wind microclimate, there is potential for this to constitute substantial harm until otherwise proven.

The developer has thus far failed to provide the clear and convincing justification for any harm to the significance and setting of Bevis Marks Synagogue, Beadle's House and Courtyard. It is our view that while the overall harm is less than substantial harm, it is incapable of being outweighed by any of the stated public benefits.

APPENDIX 2

Bevis Marks Synagogue – Impact of 31 Bury Street development - Daylight and Sunlight concerns as a result of the redevelopment of 31 Bury Street (27th November 2020) prepared by Point 2 Surveyors

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27 November 2020

17 SLINGSBY PLACE
LONDON | WC2E 9AB

Chris Maltby
Edge Plan
16 Upper Woburn Place
Euston
London WC1H 0BS

Dear Chris,

RE: BEVIS MARKS SYNAGOGUE – IMPACT OF 31 BURY STREET DEVELOPMENT

Daylight and Sunlight concerns as a result of the redevelopment of 31 Bury Street

We have reviewed the proposal (20/00848/FULEIA) for the redevelopment of 31 Bury Street to understand the daylight & sunlight and overshadowing impacts to Bevis Marks Synagogue.

A number of scenarios have been tested by the developer's daylight and sunlight consultant, including the cumulative impact of buildings approved for planning. The assessments by the consultant are very thorough and provide most of the data required in order to make an assessment of the impacts of the development; the methodology is also sound.

The Synagogue is served by flank elevation windows which face onto 31 Bury Street and due to its use has a reasonable expectation of daylight. In addition, due to its listed status there is a limited ability to provide supplementary electrical lighting, thus there is a reliance on natural daylighting.

The courtyard surrounding the synagogue provides valuable amenity space primarily used for ceremonial purposes during the summer months therefore also needs to be considered.

Daylight

The synagogue is served by 23 windows arranged over each of the 4 sides with the north and south facades providing the bulk of the natural daylight.

The windows facing the site, on the south façade, are the most impacted and experience noticeable alterations of VSC of up to circa 32% in the existing scenario and 45% in the proposed scenario with 33 Creechurch Lane developed. BRE guidance provides that reductions of up to 20% will be unnoticeable, therefore the values serve to demonstrate that the reductions will be noticeable I neither scenario. The existing VSC values for these windows are already very low due to the attritional loss of direct skylight over the years due to numerous developments, this loss therefore serves to emphasise how precious light is to this property and how further reductions are detrimental to the overall light levels. When NSL is considered within this property, the synagogue experiences noticeable losses in the cumulative scenario only whilst there are, consequently, further impacts on the Average Daylight Factor within this property.

It should be noted that this building has been constructed in order to maximise the level of light received and there are therefore no compromises in its design, such as side returns, which would serve to reduce the level of light that this building receives.

Overshadowing

The amenity space, which is primarily used in the summer months, also experiences significant overshadowing as a result of the development. The BRE guidance recognises sunlight has an important impact on the overall appearance and ambience of a property.

BRE guidance states that at least half of an amenity area should receive at least 2 hours of sunlight per day on 21 March to appear adequately sunlit, and if this is not met and the area which can receive 2 hours of sun on 21 March is less than 0.8 times its former value (a reduction of 20%) then the loss is likely to be noticeable.

Although the BRE normally recommends that this test is conducted at the equinox (21 March/21 September) for spaces used all year round, as the amenity space is not used for religious purposes all of the year, the test at that time is largely irrelevant and the amenity space should be reviewed at a time of year when it is used – at the height of summer.

Regardless of the scenario assessed, the courtyard is poorly lit and suffers greater reductions of direct sunlight as a result of the development. The BRE provides that further loss of light as a result of a development should be kept to a minimum, however the overshadowing of the amenity space following the transitory overshadowing assessment demonstrates that all direct sunlight from 12:30 to 14:00 will be materially impacted which is significant considering the neighbouring property at 33 Creechurch Lane is assessed to take away direct sunlight throughout the morning until 11:30 and 100 Leadenhall from 14:00 to 15:00.

In order to understand a more nuanced impact upon the courtyard, a time in sun study is requested for the equinox and summer months with the existing and proposed cumulative scenarios.

Conclusion

The submitted data finds that daylight and sunlight reductions are noticeable and we assess that impact the amenity area will occur where it is most required.

This property has experienced cumulative degradations in its access to daylight over the years due to the increased density of high-rise properties in the locale. The high-rise nature of 31 Bury Street coupled with its proximity to the synagogue serve to provide further reductions in ambient light to levels which are considered problematic for the pattern of use of this property.

We consider daylight and sunlight amenity to this place of worship, where reading of detailed text and a well-lit daylight ambience is essential to the synagogue's use, will be detrimentally impacted.

Yours sincerely,

[redacted]

Nicholas Ealey
Senior Surveyor
For and on behalf of Point 2 Surveyors Ltd.

12th February 2021

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[redacted]

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

Our ref: EP1223
Your ref: 20/00848/FULEIA

Dear Bhakti,

OBJECTIONS TO PLANNING APPLICATION 20/00848/FULEIA - BURY HOUSE, 31 BURY STREET, LONDON, EC3A 5AR

I write further to the above matter and I am submitting this letter of objection on behalf of the London Sephardi Trust (the Trust) and the Spanish & Portuguese Sephardi Community (the Community).

The Trust and the Community are custodians of the Bevis Marks Synagogue which is located approximately 40m to the north of the proposed development on Heneage Lane. The Synagogue is a Grade I listed building of the greatest architectural, spiritual, historical and cultural significance. Its statutory listing is only a partial reflection of the importance this synagogue holds for British and global Jewry.

Bevis Marks has been in daily use for worship and major public civic events since it was constructed in 1701. It is no exaggeration to say that Bevis Marks Synagogue is the most important Jewish site in the UK and one of the most special synagogues in the world. It represents the place of worship in longest continuous use for British Jewry, and in particular for the Spanish and Portuguese Sephardi community, since the readmission of Jews to this country by Oliver Cromwell. This makes it a 'neighbour' of the highest sensitivity in the context of this planning application for what is, in essence, an ordinary tall office building.

The wider Synagogue complex comprises the Main Synagogue Building, Beadle's House (no.2 Heneage Lane) which is the Rabbi's house, the historic courtyard that extends to the north and west of the Synagogue building, the glass roofed extension attached to the south of the Synagogue building and a basement meeting hall which extends under 4 Heneage Lane.

The description of the proposed development at 31 Bury Street is:

> *Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E*

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[redacted]

offices, 62sq.m GEA flexible retail/cafe of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).

We note that the application was submitted and validated on the 28th October 2020. The representations in this letter are based on the most up to date information provided by the Applicant. We reserve the right to provide further representations should new information become available.

Representatives of the Trust have met with the Applicants and their team a number of times in the Spring and Summer of 2020 prior to the application being submitted and continue to be in correspondence. The meetings have been helpful, and the applicants have sought to listen and engage proactively and positively with the Trust and their representatives. The Applicant's have also kindly agreed to cover the costs of the Trusts professional team in reviewing the detail of their proposals.

Notwithstanding this engagement, the Trust objects to the proposals due to the significant adverse impacts the proposed development will have on various aspects of the historic, cultural and religious significance of this unique Synagogue. Most notably those include:

a) the impacts on the heritage significance of the synagogue;
b) the daylight and sunlight impacts on the synagogue building and courtyard;
c) sense of enclosure and encroachment on the Synagogue courtyard

all of which will compromise religious worship and the reasonable enjoyment of the building by congregants and visitors alike. Each of these points gives rise to conflicts with the development plan and both individually and together justifies refusal of this application. In addition, the Trust raises concerns about servicing and access which will need to be addressed by suitable planning conditions if the development is approved (but without prejudice to the Trust's position that permission should be refused).

The impacts of the proposed development need to be viewed individually but also, critically, they must also be viewed **cumulatively** in conjunction with the impacts of recently approved developments and other proposed developments (whether approved or under consideration including the application for a further tall office building at 33 Creechurch Lane) which are envisaged in the immediate vicinity of the Grade I synagogue. When taken together the impact is even more severe and will encroach upon the synagogue's setting and erode its significance and ability to appreciate this unique heritage asset.

In formulating its representations, the Trust is being advised by independent consultants Caroe Architecture Ltd (heritage), Point2 Surveyors Ltd and Paragon Building Consultancy Ltd whose expert reports are appended to this letter.

The Trust and Community object to the proposed development on the following grounds.

Harm to the heritage significance of the Grade I listed Synagogue complex and its setting

Caroe Architecture Ltd have reviewed the application documents provided. They are concerned that these do not present a full picture of the proposal's impacts on the Synagogue and its setting. In particular, Caroe highlight that more robust 3-dimensional modelling and CGI views are required in order for Officers and Members to appreciate the impact on the north and west facades of the Synagogue and Beadles House from within the courtyard. The Trust considers this further information is required to make a reasonable and informed assessment of the application scheme and requests that this work is done. Caroe's detailed findings are included as Appendix 1 to this letter.

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On the basis of what has been provided, the Trust's heritage experts conclude:

- The proposed development will have a significant impact on the heritage significance of the Synagogue and its historic Courtyard setting as well as Beadle's House due to its proximity and scale. The proposal's impact both individually and cumulatively will result in a detrimental impact on the setting and the ability to appreciate the historical significance of the Synagogue complex. Policy D7 of the New London Plan and para.28 of Historic England 'Managing Significance in Decision-Taking in the Historic Environment both set out the importance of considering the cumulative impacts of development on heritage assets.

- The proposed building will significantly reduce the visible sky in the south-eastern view from inside the Courtyard and detract from the viewer's ability to clearly discern the historic character and aesthetic and architectural qualities of the Synagogue building.

- Caroe consider that given the harm caused by existing development to the setting of the Synagogue, the synagogue's setting cannot withstand further harm and the harm resulting from this proposal is incapable of being justified. The extent and harm caused by previous development has reduced the synagogue's prominence and harmed its setting. Only development that is respectful and sensitive to the Synagogue should now be considered. The current proposal is not that. It will result in additional harm and when considered against the existing context is the straw that will break the camel's back.

- Caroe's view is that we are at the point where the cumulative effects of consented and proposed developments, including those proposed by this application and 33 Creechurch Lane, represent harm at the very upper end of the 'less than substantial harm' spectrum to Bevis Marks Synagogue. Given the extent of cumulative impacts on the synagogue's setting, Caroe's regard there as being a very fine line between the harm that will arise and substantial harm.

Caroe conclude that the proposed development will have a considerable negative impact on the heritage significance of the Synagogue and its historic Courtyard setting due to its proximity and scale. Furthermore it is considered that the cumulative effects of this development together with consented schemes further exacerbates the harm and will add to the degree of less than substantial harm. The harm caused is approaching the point at which substantial harm will be caused.

When one considers the significance of the asset, which is of the very highest significance imaginable, it is clear that the "less than substantial harm" (of whatever degree) but certainly harm at the upper end of that spectrum should be given great weight and creates a strong presumption against the development.

The Applicant has not provided a clear and convincing case to justify the harm to the heritage asset which is a key requirement of New London Plan policy D9 (Tall Buildings). Nor are the public benefits capable of outweighing the harm that will be caused. The public benefits promoted by the applicant are at best minor and are not unique to this development. The scale of development proposed is not necessary to secure public benefits of a similar magnitude. Whilst there is policy support for office space in the City there is already a significant pipeline of offices both under construction and with permission within the City of London. Other benefits of the scheme are private in nature and will only accrue to the developer.

Daylight/sunlight impacts

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The Trust's daylight/sunlight consultants Point2Surveyors (Point2) have reviewed the daylight/ sunlight and overshadowing impacts of the proposed development on the Synagogue and their detailed findings are included in Appendix 2. Point2 advise that in accordance with Building Research Establishment (BRE) guidance, the Synagogue as a religious building should have a reasonable expectation of daylight. This is reinforced by Policy DM 10.7 of the City of London Plan that confirms development will be resisted if it *"would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels taking account of the BRE guidelines"*

The starting point is that we are dealing with a Grade I building of acute sensitivity which already experiences poor light levels. The most vulnerable part of the synagogue is the Bimah – the raised platform from which prayers are led. This requires adequate light and the entrance courtyard which currently benefits from adequate sunlight levels which contribute greatly to its amenity.

The natural lighting of the Synagogue has religious significance. As Rabbi Dweck – head of the Spanish and Portuguese community explains:

> *"There is an important passage in the Talmud that requires a synagogue to have windows as an essential part of a house of worship. It is obviously so that light can enter. and the sense of the world outside is felt. The passage is from (Tractate Berakhot 31a) which has been codified into law:*
>
> *Rabbi Hiyya bar Abba said: One should always pray in a house with windows, as it is stated regarding Daniel 6:11: "And when Daniel knew that the writing was signed, he went to his house. In his attic there were open windows facing Jerusalem and three times a day he knelt upon his knees and prayed and gave thanks before his G_d".*
>
> *It is clear that the windows are meant to allow light in and to have a sense of the world's beauty rather than being stuck in an enclosed space that causes a feeling of isolation."*

The existing low levels of light within the Synagogue mean that the building cannot withstand further substantial losses of daylight. It is no answer to say this is a non-residential property and that installation of artificial light can overcome the problem. The Synagogue and its worshipers rely on natural daylight, which is how it was designed to be experienced. It is very difficult and intrusive to install electric lighting.

Point2 confirm that the proposed development would reduce the daylight and sunlight available to the Synagogue and the courtyard to levels significantly below BRE guidelines as summarised below.

In respect of daylight Point2 conclude that:

- The windows in the south façade of the Synagogue which face Bury House will experience a noticeable alteration of vertical sky component (VSC). The proposed development will result in reductions of VSC of up to circa 32% to the windows directly facing the development in the south elevation. In the cumulative scenario, where 33 Creechurch Lane is also developed the impacts will be even more severe resulting in VSC reductions of 45%.

- These losses are exacerbated by the fact these windows already receive low levels of light and therefore the light that is currently retained is precious. The existing light is so low that any further reduction in light has a large effect necessitating electric lighting at most times during the day. There is an attritional and incremental loss and the synagogue cannot afford any further loss because the last bits of light are central to the Bimah (raised platform with a reading desk).

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- Further reductions will be seriously harmful to the overall light levels received and will force the Synagogue to rely on the use of artificial lighting (which is not easily retro fitted due to the Grade 1 listed nature of the Synagogue) during most times of the day to permit use of the building.

- When no skyline (NSL) is considered in the cumulative scenario the proposed development will result in transgressions to the No Skyline (NSL) and further impacts on the Average Daylight Factor (ADF).

In respect of overshadowing the Trusts concerns relate principally to the courtyard at the entrance of the Synagogue. The Courtyard is a special space which forms part of the Synagogue and its setting and is vital to the appreciation of the Synagogue building's significance. The courtyard is integral to Synagogue's communal functions and religious significance and represents the only place where worshippers of all sexes can gather before and after worship. It is where dignitaries and worshipers alike are welcomed to the sanctuary of the building and where after rituals (e.g. dancing with the Torah scrolls on Simchat Torah) and celebrations such as weddings the community congregates and celebrates. The sunlight to this very important space – the only open-air space in the complex – is vitally important to the function and amenity of this space. An overshadowed courtyard is less inviting, if substantial sunlight losses are permitted, then in combination with the sense of encroachment from the tall buildings, the experience of the Courtyard will be severely diminished making it less usable for congregants and visitors alike and resulting in a real loss of significance to the building.

Point2 conclude in respect of overshadowing that:

- The Courtyard amenity space will experience significant overshadowing as a result of the proposed development in the summer months when the space is most used. The Synagogue's existing courtyard is already poorly lit and receives low levels of sunlight due to the surrounding development. If the proposed development is approved it will suffer even greater reductions of direct sunlight which will harm its usability, its amenity value and its contribution to the setting of the synagogue.

- Based on the transitory overshadowing assessment, all direct sunlight to the Courtyard amenity space from 12:30 to 14:00 in the height of summer will be materially impacted and effectively lost as a result the proposed redevelopment of 31 Bury Street. To understand a more nuanced impact upon the courtyard, the applicant is requested to provide a time in sun study for the equinox and summer months with the existing and proposed cumulative scenarios.

- This significant impact on the amenity of the Courtyard at the time of year when it is most used is further compounded in the cumulative scenarios which take into account the approved development at 100 Leadenhall and the proposed development at 33 Creechurch Lane. When considered cumulatively with those development, the proposed development would result in significant overshadowing of the Courtyard for a large part of the day during the height of summer as set out below:
  - The proposed development at 33 Creechurch Lane will result in over shadowing of the majority of the Courtyard from 09:00-11:30
  - The proposed development at 31 Bury Street will result in over shadowing of the majority of the Courtyard from 12:30-14:00
  - The proposed development at 100 Leadenhall will result in over shadowing of the majority of the Courtyard from 14:00-15:00

- Thereafter there remains no direct sunlight due to the remaining buildings in the eastern cluster lying to the Courtyards west.

In other words, in the height of summer when the Courtyard should receive the greatest amount of sunlight, there will be effectively a complete loss of sunlight to the courtyard. This will reduce its amenity substantially and coupled with the sense of encroachment and intrusion from the surrounding tall buildings will render this special space unusable save as a functional entrance way to the Synagogue building.

The high-rise nature of 31 Bury Street coupled with its proximity to the Synagogue would result in yet further reductions in ambient light to levels which would be incredibly problematic for the pattern of use of this property. The idea that religious rituals, celebrations and wedding entrances and exits would continue to take place in such a degraded space in light of these cumulative harms is fanciful.

Point 2 conclude that the Synagogue has experienced cumulative degradations in its access to daylight and sunlight over recent years due to the increased density of high-rise properties in the locale. The Synagogue site cannot withstand any further daylight/sunlight losses and increased encroachment and overshadowing. This proposal is, as in the case of the heritage impacts, the straw that would break the camel's back. Point2's consideration of the submitted information clearly demonstrates the detrimental impact the proposed development will have on the availability of daylight and sunlight within the Synagogue itself and the associated Courtyard.

These losses would compound the existing low daylight and sunlight levels that are currently received. The impact this would have on the use of the Synagogue is significant and the Trust considers this unacceptable and in breach of development plan policies Policy DM10.7(1) of the *City of London Local Plan (2015) and D9 3) a) of the New London Plan.* The Trust asks that the City refuse the development on this ground alone.

Servicing, Deliveries and Access

There are number of aspects of the proposed buildings access and servicing strategies that cause the Trust considerable concern. In general terms the proposed strategies will lead to a significant increase in pedestrian, cycle and vehicular movements along Heneage Lane that would cause noise disturbance to the Synagogue. These impacts, unless properly controlled, would have a detrimental impact on religious services and other activities within the Synagogue.

Access

The proposed layout of the scheme introduces a new pedestrian and cycle route through the application site connecting with Heneage Lane and Bevis Marks to the north. Introducing this through route from Bevis Marks to Bury Street is likely to significantly increase the number of pedestrians and cyclists using Heneage Lane. At present the Lane is a quiet passageway in keeping with the setting of Synagogue which represents something of an oasis within the busy City. By making Heneage Lane a through route this will generate significant additional activity both from the proposed development itself but also from pedestrian and cyclists travelling to destinations to the south of Bury Street. Heneage Lane abuts the eastern wall and windows of the Synagogue and is currently a pedestrianised road that provides the main pedestrian access to the Synagogue.

Heneage Lane is not suitable for the proposed intensification of its use and the increased use particularly by cyclists will cause a danger for members of the Community accessing the Synagogue and particularly those with mobility difficulties.

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The proximity of the road to the Synagogue and particularly its proximity to the Synagogue's primary window, beneath which is the Ark holding the sacred and ancient scrolls which are focus of the services, makes any increased noise and disturbance that will occur particularly sensitive and detrimental. Additional noise disturbance will impact on the religious use of the Synagogue. For this reason, the Trust objects to the layout of the development which would lead to the considerable intensification of the use of Heneage Lane and the resultant noise and disturbance.

Servicing and Deliveries

The proposed development's Servicing Strategy relies on a proposed servicing bay located in the same location as a similar facility which currently serves the existing building occupying the site. The Applicant relies on what they describe as a "legal right of way" which comprises of a vehicular route through an undercroft beneath Valiant House, traditionally known as Heneage Place. The Trust owns the freehold to Valiant House and in turn to the right of way to the service yard within the application site. The trust objects to any intensification of this right of way as proposed by the scheme.

Due to the significant uplift in floor area over the current situation proposed by this development the proposed servicing bay and access to it will also be subject to a significant intensification of its use. The Applicant's Transport Statement suggests that there will be 43 servicing vehicle trips per day made by vehicles of various sizes, the largest being a 7.5T box van. The Applicant relies on 'consolidating servicing' to reduce the proposed servicing vehicle trips by 50%. However, no details are provided with regard to how 'consolidating servicing' would operate. Given the likely multiple tenanted nature of the proposed accommodation and without details relating to how this would work in practice it is considered unrealistic, and overoptimistic, to predict a reduction in the number of servicing vehicles by 50% as set out.

The Trust is concerned therefore that the proposed development will lead to a significant increase in vehicles accessing the service yard via the right of way. Based on the Applicants figures without the unjustified reduction due to consolidation there will be an increase of 33 servicing vehicles per day.

In addition to the trips identified in the Applicant's Transport Assessment it is considered there will be a significant number of 'other deliveries' such as dot com deliveries and other deliveries to individuals working within the building. The Trust is concerned that the significant increase in all deliveries both via the service yard or by vehicles stopping kerbside will lead to significant increases in the level of activity and vehicular movements which will cause a disruption to the activities within and access to the Synagogue. This will be exacerbated by the significant increase in pedestrian and cycle traffic some of which will be concentrated on Heneage Lane itself that will lead to significant increased noise and disruption that will have a detrimental impact on the use and enjoyment of the Synagogue.

Construction impacts

Of significant concern to the Trust and the Community are the impacts associated with the demolition and construction process. The Synagogue is in proximity to the application site and there are significant concerns with regard to how the site will be developed without causing irreversible damage (and therefore substantial harm) to the Grade I listed Synagogue. It is also a significant concern for the Community in respect of how normal Synagogue life will be able to continue whilst construction is ongoing.

Impacts arising from the construction process should planning permission be granted are set out in the Demolition and Construction Review which forms part of the 31 Bury Street Environmental Statement prepared by Trium and the Construction Environmental Management Plan. Both documents have been reviewed by Paragon Building Consultancy Ltd on behalf of the Trust and their comments are set out below.

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Due to the fragile nature of the Synagogue, all building operations need to be carried out with upmost caution and assurances with regard to the methods of construction and the associated management of the construction process will need to be secured by planning condition.

We are aware that the construction methodology and the management of its environmental impacts would be the subject of further detailed approval by the City of London including of a Construction and Environmental Management Plan. However, we wish to bring to the early attention of the Applicant and the City of London the important matters raised in Paragon's assessment which include:

- **Ground heave and movement** - due to the delicate nature of the Synagogue there must be no construction activities carried out likely to cause ground movement. Real-time 24-hour monitoring will be required.
- **Vibration** – there is some potential for damage and disturbance from vibration during the works. We would expect to, but have not seen a vibration strategy for keeping the levels to no higher than 1mm per second.
- **Noise** – the submitted Construction Environmental Management Plan confirms the developers intention to work to approved statutory working hours. We will need to secure additional restrictions to ensure there is no noise and disturbance during prayer times and services including weekday mornings before 08.30. Our Rabbi will be providing you with more detailed explanation of this in due course.
- **Dust** – must be managed to ensure no penetration of the internal spaces and no health risk to users of the Courtyard.
- Mace have set out the outline proposals for temporary works sequencing to form the 3 storeys of basements including extensive de-watering using large steel props spanning the complete width of the excavation (known as cross-site propping) and a secant piled perimeter wall. We will need to assess this impact specifically for the Synagogue's structure with such large scale de-watering of the ground on the Bury House site
- Mace have made a separate statement on creating and maintain meaningful neighbourly relations with key stakeholders including the synagogue ensuring 'reasonable demands' are met which includes setting up a working group. Which we welcome.

There are many variables and potential impacts associated with a development project such as this located within a tight urban location surrounded by buildings of various constructions and uses. The Trust is concerned that should the development be approved there will need to be continual liaison both prior to and during construction between the developers and the Synagogue's Consultant Team or an appointed project manager acting on the Trust's behalf.

Cumulative Impacts

Cumulative impacts of development are an issue particularly pertinent to the Synagogue given the magnitude of change which has occurred in the streets immediately surrounding the complex in recent years. Policy D7 of the New London Plan and para.28 of Historic England 'Managing Significance in decision-Taking in the Historic Environment both set out the importance of considering cumulative impacts. The Historic England advice stating that:

> *"The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset*

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has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape"

In terms of sunlight and daylight and heritage considerations the cumulative impact on the Synagogue is particularly acute and has been commented on earlier in this letter. The Applicant's Environmental Statement makes the following comment in respect of cumulative impacts on the Synagogue:

'Permanent Adverse effect interactions in relation to daylight, sunlight and noise amenity to existing non residential property (Bevis Marks Synagogue). The effect interaction is not considered significant on the basis that the individual daylight, sunlight and noise effects are not themselves significant and Operational Noise Management Plans can be implemented to achieve suitable rating noise limits'

Notwithstanding the Applicant's above assertion, it is questionable whether the proposal and others coming forward in the surrounding area would comply with the City of London's own Local Plan policy CS14: Tall Buildings which requires proposals to maintain and enhance the provision of public open space around the building, avoid the creation of building canyons, which have a detrimental impact on amenity, and maintain pedestrian permeability.

The number of tall buildings in the area immediately surrounding the Synagogue including the proposals for 31 Bury Street and others under consideration will lead to all of the detrimental impacts identified by policy CS14 and will leave the Synagogue at the bottom of a 'building canyon' that policy CS14 seeks to avoid.

Clearly and most significantly the proposals for Bury House in combination with other emerging developments will lead to increased noise and disturbance in the area, some of this being focused on Heneage Lane itself. General increases in activity given the high levels of activity common to the City of London would on the whole be indiscernible but where these are focused on Heneage Lane a currently quiet, lesser used route the impact will be severe.

Conclusion

The scale of the proposed development is such that it will have multiple significant adverse impacts on the Synagogue both individually and cumulatively. The uniqueness of the Synagogue as a heritage asset of the greatest significance and greatest sensitivity means that even modest impacts (and many of the impacts in question are in fact significant) of the proposed office building are not acceptable in policy terms. The impacts on the setting, on the daylight and the sense of encroachment and loss of sunlight to the special entrance Courtyard would be overwhelmingly harmful. The balance to be struck is between the harm to a unique asset in the UK versus a serviceable but ordinary office building with limited public benefits. Accordingly, and respectfully, we ask that planning permission be refused.

Yours sincerely,

[redacted]

Chris Maltby BA Hons MRTPI

[redacted]

APPENDIX 1

Heritage Impact of the Proposed Development at 31 Bury Street (Bury House) (9th December 2020) prepared by Caroe Architecture

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APPENDIX 2

Bevis Marks Synagogue – Impact of 31 Bury Street development - Daylight and Sunlight concerns as a result of the redevelopment of 31 Bury Street (27th November 2020) prepared by Point 2 Surveyors

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12th March 2021

edgeplan
16 Upper Woburn Place
London
WC1H 0BS
[redacted]

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

Our ref: EP1223
Your ref: 20/00848/FULEIA

Dear Bhakti,

PLANNING APPLICATION 20/00848/FULEIA - BURY HOUSE, 31 BURY STREET, LONDON, EC3A 5AR

I write further to the above matter on behalf of the London Sephardi Trust (the Trust) and the Spanish & Portuguese Sephardi Community (the Community). Specifically, the first part of this letter addresses the Applicant's letter dated 17th February 2021 prepared by DP9 which in turn responded specifically to our letter of objection dated 12th February 2021. The second part of the letter responds to the additional documents submitted by the Applicant to the City of London on the 22nd February 2021.

Whilst we appreciate the effort that has been put into the response and additional information it does not address the concerns we have previously raised and therefore we maintain our objections to the proposals for the reasons detailed in our previous letter.

In summary the concerns remain as follows:

Heritage Significance - The Bevis Marks Synagogue is a heritage asset of the very highest significance; the proposed development will cause demonstrable harm to the Synagogue and its setting and the applicant has still failed to present a convincing case to justify the harm.

Daylight and sunlight impacts - The proposed development will result in the loss of daylight to important spaces within the Synagogue, these losses are exacerbated by the fact that the Synagogue already receives low levels of light. The proposed development will therefore seriously impact overall light levels affecting adversely the day to day use of the Synagogue. The proposed development will also lead to significant overshadowing of the Synagogue Courtyard resulting in further loss of direct sunlight from the courtyard during the middle of the day.

Servicing, Deliveries and Access – The general increase in activity but particularly that associated with the increased intensity of the use of the service yard and the increased use of Heneage Lane that will be encouraged by the proposed development will cause significant increase in noise and disturbance that will adversely affect religious services and festivals at the Synagogue.

Construction Impacts – as previously described the Trust and Community has significant concerns associated with the demolition and construction process and specifically the impact this will have on

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the fragile fabric of the Synagogue but also the impact the construction will have on everyday life within the Synagogue.

These concerns are all fully documented in our letter dated 12th February 2021. Having reviewed the Applicant's response with the Trust our concerns with regard to the adverse impacts that the development will cause remain. We are particularly concerned by the Applicant's general assertion that because the Synagogue is located in the 'Eastern Cluster', has been subject to significant change since it was first constructed and is already surrounded by a range of tall and modern buildings that the Synagogue and its setting has a high capacity for further change. This is not accepted; it is due to the previous extent of change that any further change particularly of the magnitude proposed by the redevelopment of Bury House will be overwhelmingly detrimental in respect of all of the key areas of concern noted above.

It is also disappointing to note that the Applicant has sought to discredit the level of objection that has been made in respect of the planning application. The fact that concerns are repeated by many of those objecting only shows how significant those concerns are and how clear they are to all those who objected. The Applicant has noted the fact that the objections come from a wider geographical area than the EC3A postcode. This goes to show how deeply people care about the Synagogue and demonstrates how significant it is to British and International Jewry and therefore that this isn't just a matter between neighbours but a much larger matter affecting the national and international Jewish Community. To dismiss the objections in this way shows a lack of understanding of the spiritual and cultural significance of this building to the Jewish community and therefore a lack of compassion in respect of the very real concerns that have been described by those objecting.

The Trust's professional advisers have reviewed the Applicant's detailed response to the Trust's Letter and provide the further additional thoughts.

Heritage Significance

The response provided by the applicant provides no new or additional information with regard to Heritage Impact. The Applicant's argument is that the Synagogue and its immediate courtyard setting are not affected or harmed by surrounding development – they say that 'the historic site is experienced as a feature apart from the surroundings, like so many of the historic churches in the Eastern Cluster' which is a distinct townscape type. The assertion being that it is necessary to look up in order to see out of the Courtyard but that visitors to the Synagogue and Courtyard do not look up, but rather focus their attention on the listed building and the lower part of the backs of the surrounding buildings. To suggest that a building of this scale will have no impact on the viewer and will not alter the experience of viewing the Synagogue is inconceivable and is at odds with Historic England who note the importance of views of the Synagogue from within the Courtyard in appreciating and understanding the listed building.

As previously set out the proposed redevelopment of Bury House will have an overbearing impact on the synagogue harmful to the significance of the heritage asset and its setting.

Daylight and Sunlight Impacts

The fundamental concern in respect of sunlight and daylight is the fact that the Synagogue and its courtyard already receive very little. We have agreed with the applicant the degree of the loss of light that will occur, but we do not agree that the losses will be insignificant based on the fact that the overall losses to the synagogue are a concern based on daylight loss through attrition. As an example, taking away a sliver of light in the courtyard is trivial if the courtyard is considered very well-lit, however when that sliver is all that is left, that sliver becomes all the more important. The same goes for the losses within the synagogue.

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Both daylight to the Synagogue and sunlight to the courtyard are important for the day-to-day operation and use of the Synagogue and the proposed development would lead to further losses that would compound an already poor situation.

It is clear that attritional losses have not been considered by the Applicant and there is a distinct lack of understanding that light is both in very short supply and is also very precious to the Synagogue. In this respect our concerns have not been addressed and our objections remain.

Servicing, Deliveries and Access
Again no additional information has been provided to address the concerns previously set out. The response sets out a number of unsubstantiated statements leading the applicant to conclude that the number of vehicles expected each day at the site will be less than the existing number. The proposed development will result in an uplift in floor area of some 280,000sq.ft, it is therefore inconceivable even with the removal of the basement car parking that that the vehicles expected at the site each day will be less than the current situation.

No further evidence has been submitted to demonstrate or justify the reduction in servicing trips associated with the proposed off site consolidation arrangements. It is also suggested personal deliveries will not be permitted but no information is provided to set out how this would be enforced.

We remain unconvinced that the vehicle trips likely to be generated by the proposed development will not have a significant adverse impact on the Synagogue from an operational and noise and disturbance perspective.

Construction Impacts
We welcome the additional information provided in respect of construction impacts and we welcome in the event planning permission is granted liaison with the Applicant's Contractors Community Liaison Team. Of critical importance to the Synagogue will be ensuring construction activities do not impact services on Shabbat and festivals and the applicants understanding in this respect is essential.

Applicants Additional Information (submitted to CoL 22nd February 2022)
A number of additional documents have been submitted by the Applicant to respond to concerns raised by various parties. Many of these additional reports have informed the DP9 letter dated 17th February 2021 and we have therefore provided our comments above. Other comments on the additional information submitted by the Applicant where relevant to our concerns are set out below:

Public Benefits Statement (PBS) – The Applicant has set out in the PBS a number of matters that they consider to be public benefits that would be delivered by the scheme and that weigh in favour of the proposed development. Whilst we accept that there are a range of public benefits that could be secured if the development went ahead it is clear the vast majority of these are not unique to this development and could be delivered by a more complementary, less harmful scheme. Therefore the public benefits described in no way justify the harm that would be caused by the proposed development.

31 Bury Street Equality Statement – The Trust and Community have prepared the 'Bevis Marks Synagogue Significance and Community Impact Study' that sets out in details of how the proposed development will adversely impact on the Community and therefore responds to the Applicant's Equality Statement. The Applicant's Statement recognises the Jewish community could experience equality related impacts and these impacts are significant and wide ranging as set out in the Communities own statement. Whilst some of these impacts are capable of being mitigated through

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further engagement others as set out in the first part of this letter are not and therefore the proposed development will lead to permanent equality related impacts.

Conclusion

As set out in this letter we still have significant concerns with the proposals for the redevelopment of Bury House, 31 Bury Street and the additional information and response still leaves many aspects unanswered. We therefore wish to confirm that we maintain our objections to these proposals as set out in our letter dated 12th February 2021. Please take our concerns as well as those of the 500+ objections into account in considering these proposals and take very seriously the significant irreversible harm that will be caused as a result of this proposed development to the Grade I listed Bevis Marks Synagogue.

Yours sincerely,

[redacted]

Chris Maltby BA Hons MRTPI

[redacted]

CC.

David Ereira and Michael Keats (on behalf of London Sephardi Trust and the Spanish & Portuguese Sephardi Community)

Peter Twemlow (DP9, on behalf of WELPUT)

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Registered Office Reedham House 31 King Street West, Manchester M3 2PJ

THE FRIENDS of the CITY CHURCHES www.london-city-churches.org.uk

Ms Beverley Bush
Principal Planning Officer
Department of the Built Environment
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

10th March 2021

By email to: PLNComments@cityoflondon.gov.uk & beverley.bush@cityoflondon.gov.uk

Dear Ms Bush,
Planning Application: 18/00305/FULMAJ - 33 Creechurch Lane London EC3A 5EB.

We wish to object most strongly to this application and its various amendments.

This hugh development will cause substantial harm to the setting and significance of the grade I listed Bevis Marks Synagogue. This is a building of international importance and as it listing states- it was "*the second synagogue erected in England after the resettlement of 1656 and in its little altered state is of exceptional historic interest*".

Any public benefits and justifications put forward for the scheme do not outweigh the harm that will be done.

For these reasons we call on the Local Planning Authority to refuse planning permission.

It cannot have escaped the Corporations notice that you are steadily eroding the significance of the City's heritage, but it is incredibly sad to see yet another example being put before you.

Will you allow such buildings to appear beside all your Grade 1 City Churches??

Look what your Corporations money has done to Norton Folgate – effectively erased it – all within a conservation area.

[redacted]

Oliver Leigh-Wood
Chairman

Adjei, William

From: PLN - Comments
Subject: FW: 33 Creechurch Lane, London EC3A 5EB (18/00305/FULMAJ) & 31 Bury Street, London EC3A 5AR (20/00848/FULEIA)

18/00305/FULMAJ 33 Creechurch Lane, London EC3A 5EB
20/00848/FULEIA 31 Bury Street, London EC3A 5AR

33 Creechurch Lane

Further to our response of 1st March 2019 to the previous application for 33 Creechurch Lane, we wish to register our objection to the revised scheme.

Having reviewed the changes to the proposal in detail, and while welcoming the additional greening of the scheme, we remain concerned that the scale and proximity of this new building will cause considerable harm to the setting and significance of the Grade I listed Bevis Marks Synagogue. Grade I listed buildings are the most nationally important historic buildings with a presumption that any harm requires careful consideration and justification. The Synagogue is little altered in over 300 years and continues with its original religious and community use. It is the oldest synagogue in the United Kingdom and the only non-Christian place of worship in the City of London.

We acknowledge the recognition of the high communal value held by the Synagogue in the Heritage Assessments, which has been underlined by the public responses to the consultation, but regret that the proposals do not respond to this in a meaningful way. We note that the 2018 Heritage Townscape and Visual Impact Assessment dated 8 November 2018 (HIA) says that the proposed development will be 'partially visible within the sky space to the east of Bevis Marks Synagogue' and that the Synagogue is 'already surrounded by buildings of a greater mass and scale'. We do not accept this as an argument for the current height of the building which we consider will adversely affect the setting of the Synagogue. Neither do we accept the argument that the compromise to the setting already effected by the building at One Creechurch Lane provides a rationale for this development, as that building sits further away from the Synagogue, whereas the 33 Creechurch Lane site is adjacent.

The changes to the north façade in the revised proposals are intended to soften the impact on the setting of the Synagogue. However, we consider that contrasting the new facade with the 'hard line' of the current building is somewhat disingenuous. The current building may be uninspiring in design with its lack of connection to the Synagogue, but the new façade treatment will only slightly lessen the adverse effect of the overall scale and massing of the new building.

The HIA says that 'in regards to the height of the new proposal, given that the synagogue is already surrounded by buildings of a greater mass and scale, it is not considered that additional height would cause harm to its setting'. We disagree. Although the Synagogue is surrounded by other tall buildings, the proximity of 33 Creechurch is such that a building of this height and scale will dominate the Synagogue.

31 Bury Street

We note that Historic England have commented extensively on the proposal for 31 Bury Street. In their letter of 11th December 2020, they say that:

the cumulative wireline assessment indicates that consented tall buildings within the Eastern Cluster already present a significant impact on the setting of Bevis Marks, and the proposed scheme will appear as part of that cluster in this view. Nonetheless, the proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building in our opinion

In our view the cumulative impact of the two developments on the Synagogue will amount to serious harm.

Policy

The Tall Buildings policy D9 of the new London Plan concerning the impacts of Tall Buildings states that:

1 (d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

Policy HC1C (Heritage, conservation and growth) states that:

Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. In addition, paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Conclusion

As the proposals currently stand, we believe that these new buildings will cause considerable harm to the setting and significance of the Synagogue and as such, they do not meet the planning requirements set out above. As a result, we do not feel able to support them.

With best wishes

Christina Emerson
Head of Casework

The Society for the Protection of Ancient Buildings
37 Spital Square, London E1 6DY
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Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Edward Waller
Address: 6 Fitzroy Square Fitzrovia London

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:08/12/20

Applications:

- 31 Bury Street, London, EC31 5AR: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).

- 33 Creechurch Lane, London, EC3A 5EB: Demolition of the existing building and redevelopment of the site to provide an office building (Class B1) and a retail unit comprising basement, ground floor, mezzanine and 19 upper floors, together with cycle parking and associated works.

LPA IDs: 18/00305/FULMAJ & 20/00848/FULEIA

Addresses: Bury House 31 Bury Street London EC3A 5AR & 33 Creechurch Lane London EC3A 5EB

Dear Ms Depala & Ms Bush,

The Georgian Group have been informed of the above applications for Planning Permission. On the basis of the information available to date, the Group offers the following advice to assist your local authority in determining this application.

Significance of Surrounding Assets

The Georgian Group's main concern in relation to the above two applications is the harmful impact that will be caused to the Bevis Marks Synagogue. The Bevis Marks Synagogue is a grade I designated heritage asset constructed in 1701 and is the oldest surviving synagogue in the United Kingdom. The only substantial works undertaken to the synagogue in its lifespan was the repairing of the roof in 1749. The building is rectangular and constructed in red brick with Portland stone dressings with two tiers of windows, with the below segmentally arched and round-arched above. The significance of the building is the sum of the heritage interests that are present, these in regard to the Bevis Marks Synagogue relate to the archaeological, architectural and artistic, and historic interests as set out within the planning practice guidance for the historic environment. On top of this and set out with Historic England's Conservation Principles, the Bevis Marks Synagogue has a high communal value both locally and nationally; and is the only synagogue in Europe which has held regular services continuously for more than 300 years.

Wrapped around the synagogue is a courtyard which forms the immediate setting and is a part of the Bevis Marks complex, playing a vital function in the practices of the synagogue; It is used for the celebration of festivals and holy days. The courtyard makes a strong contribution to the significance of the synagogue and has a high sensitivity, and a low capacity for change.

To the north-east of the synagogue is Beadle's House - home to the Rabbi of Bevis Marks Synagogue - which is of interest as a part of the surrounding complex which your local authority needs to state if it is curtilage listed and therefore under section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990 it is included within the listing of the Bevis Marks

Synagogue.

Proposals

20/00848/FULEIA: This application proposes to construct a building comprising 2 basements, 2 mezzanine, ground and 48 upper floors, with a height of just under 198 metres located to the South of the Bevis Marks Synagogue where Bury House is located. The proposed development is 40 metres to the south of the grade I designated Bevis Marks Synagogue.

18/00305/FULMAJ: This application is for the construction of a building comprising basement, ground, mezzanine and 19 upper floors, with a height of just over 93 metres, located to the East of Bevis Marks Synagogue.

The Georgian Group Advice

Considerable harm would be caused to the setting and potentially the fabric of the Bevis Marks Synagogue by the two applications for Planning Permission. The courtyard is an intrinsic part of the Bevis Marks Complex which is alluded to above and makes a strong contribution to the significance of the synagogue whilst also playing a crucial role in the on-going practices taking place on-site. The scale and massing of the two proposed structures would harm the setting of the synagogue and the courtyard, whilst also having the potential to cause substantial harm to the historic fabric from the subsequent construction and environmental conditions created by the two tall buildings within close proximity.

The cumulative harm of the two developments, along with proposed and consented schemes in the area must be considered when assessing the harm to the significance of Bevis Marks Synagogue. The extent of change to the setting of the synagogue and that to the surrounding built environment is not a justification for further encroaching development - a matter referred to within the NPPF and that published by Historic England which will be cited in the following section.

Recommendation

The Georgian Group objects to this application on heritage grounds due to cumulative harm that would be caused by the scale and massing of the two applications to the setting and therefore the significance of the Bevis Marks Synagogue.

The Group wishes to echo the concerns raised by Caroe Architecture in relation to the potential impact that any proposed development within close proximity could have on the physical fabric of the synagogue. If any damage was to occur to the synagogue then this could amount to substantial harm and therefore paragraph 195 of the NPPF would be directly relevant. More information on this matter will be available in the report which is to be produced by Arcaero.

Paragraph 193 of the NPPF directs that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of the level of harm. The more important the asset, the greater the weight should be (paragraph 193). Paragraph 194 of the NPPF stipulates that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification....'

Your Local Authority should be minded to abide by the policies set out within the London Plan - especially policy 7.7 Location and Design of Tall and Large Buildings which states that '...tall buildings should not affect their surroundings adversely in terms of ...overshadowing...' and 7.8 Heritage Assets and Archaeology which states amongst other things that 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.'

Furthermore, the following advice from the section of the planning practice guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it.'

The historic environment section of the planning practice guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'.

Finally, in determining this application special regard should be given to the desirability of preserving a building or its setting in line with section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990.

Your Authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact

us.

Yours sincerely,

Edward Waller (Conservation Adviser for South East England and London)

Begum, Shupi

From: Rabbi Shalom Morris [redacted]
Sent: 02 February 2021 01:23
To: PLN - Comments
Subject: 31 Bury St - Reference 20/00848/FULEIA.

To Whom it May Concern,

I am the rabbi of Bevis Marks Synagogue and am a PhD candidate in British History at King's College London. Over these past months I've spent a considerable amount of time studying this building plan, and speaking with congregants, specialists and City of London representatives. The result of these efforts has led me to determine that the proposed building at 31 Bury St would cause irreparable damage to the life of our historic Jewish community. My objection will therefore attempt to place that assertion in context in the hope that the Planning Committee will appreciate that they have no choice but to reject this submission. I hope they will see that doing so will not only serve the interests our synagogue, but also those of the City of London.

Bevis Marks Synagogue is not just another Grade 1 Listed building. It may sound flippant to speak so casually about a designation of such significance, but the importance of Bevis Marks Synagogue goes way beyond 'just another' historic building. It is significant in so many ways - to the extent that one could characterise it as a site of National Importance, and if such an official designation existed - a World Jewish Heritage Site.

Bevis Marks Synagogue is:

1. A Grade 1 listed building
2. One of the best surviving examples of an intact Wren style City church with original interior
3. The only non-Christian house of worship in the City of London
4. The oldest synagogue in the United Kingdom
5. The 'Cathedral Synagogue' of British Jewry akin to St Paul's for Christians
6. The only synagogue in the world to have held continuous worship since the time of its construction in 1701

As a result of the above, the significance of Bevis Marks Synagogue is of paramount importance to the history and integrity of the City of London, the United Kingdom, British Jewry, and World Jewry. I dare say that without Bevis Marks Synagogue, none of the above would be the same. Indeed, what is so important about Bevis Marks Synagogue is not the integrity of its building, but its function, historically and until today, as a place of worship, national commemorations, personal celebrations, and interfaith understanding.

It should therefore cause alarm to know that the construction of this building places all of that at risk. Allow me to explain:

1. 31 Bury St, with its 50+ storeys just to the south of the synagogue, would create a new backdrop to Bevis Marks Synagogue immediately upon entering our courtyard from the north off of the street, forever framing with its facade a house of worship which has been framed by the heavens since its inception. The very Hebrew name of Bevis Marks Synagogue is 'Sha'ar Hashamayim' which means 'Gate of Heaven.' How sad and painful it would be for that meaningful symbolism to be lost, the heavens obscured by steel and glass.
2. Furthermore, this proposed building, with its hundreds of windows peering down, will erase the sense of escape and tranquility which currently pervades the synagogue courtyard, a place where our community shares special private moments, celebrates Jewish festivals, and takes iconic photographs at weddings. I can't imagine what the outdoor festival of Succot (Booths) or wedding receptions would feel like in such an exposing setting.
3. The increased noise from footfall and cycling down the currently quiet Heneage Lane, along our eastern wall, the direction of our prayers, would disrupt the meditative experience of our silent prayers, and ruin the sublime beauty of our cantor's song.

4. And most destructively, the building's height would further diminish the light entering into the synagogue, making an already challenging situation worse - risking our very ability to read our prayers, especially for our more elderly members. On a Sabbath morning we typically read over 150 pages of prayer, and many more on days like Yom Kippur, the Day of Atonement.
5. Finally, Jewish worship is intertwined with the daily course of the sun, as the sun's position going from east to west over the southern horizon determines the times of our prayers, and is the inspiration for much of our liturgy. Blocking out the sun is therefore a form religious vandalism, forcing us to dislocate our worship from its original meaning and setting.

The City of London's local plan states that it will consider the impact of tall buildings on Heritage sites and their settings. If this current circumstance is not the situation which the City Plan envisioned and protected against I can't imagine what else it could have had in mind. Indeed, I'd say this proposed situation already goes way beyond that. Surely then, no proposed amount of public amenity space could possibly undo and override the public harm and detriment that this building would do to a house of worship of such profound meaning and significance to the Jewish community, the City of London and the Nation itself.

Furthermore, Bevis Marks Synagogue with its soon coming NLHF supported Heritage Centre with patronage from HRH the Prince of Wales, is set to welcome people of all faiths and none, school groups and adults, and British and International visitors, to learn about the City of London, Bevis Marks Synagogue, Judaism, and diversity - bringing in 40k+ visitors a year to the synagogue and the City of London. These visitors will patronise local shops, stay in local hotels, and contribute to the future vitality of the City of London. At a time when the City of London is concerned with how the hospitality sector will be able to generate enough income to support the needs of the city's workforce, with a likely decrease in the number of days that workers will attend their offices in person, it is a site like Bevis Marks Synagogue which could help to alleviate these pressures. Why harm our site when we are trying to do so much? To privilege an office block over a Heritage site of our significance would be short-sighted to say the least.

Bevis Marks Synagogue has been a City of London institution for over three centuries. Built in the years after the Great Fire when the City of London was residential, and remaining open throughout to when it became a major financial centre, Bevis Marks Synagogue and the Jewish community have always done their part to contribute to the vitality and prosperity of the City. We therefore only ask that as we set out to continue this story with you, that you don't do anything to undermine that ability, or our faith in the City. We need your care to be able to be an active, thriving place of faith and friendship - and to contribute as we always have to the City of London and society.

On a personal note, as a City of London resident at 2 Heneage Lane (where I also work), the impact of this building on my personal life and that of my family will be profoundly detrimental and harmful, with increased noise along Heneage lane, and with loss of privacy in our garden in the synagogue courtyard.

I therefore ask that you see the bigger picture, one which looks to the past and to the future, and values the lives of individuals and communities, and withhold planning permission from 31 Bury St.

Thank you.

Yours Truly,

Rabbi Shalom Morris

the S&PHARDI community Bevis Marks

Rabbi Shalom Morris

t: [redacted]
e: [redacted] | w: www.bevismarks.org.uk
a: 4 Heneage Lane, London, EC3A 5DQ

Bevis Marks Synagogue is a National Trust Partner
Registered Charity no. 212517

Begum, Shupi

From: Peter Rose [redacted]
Sent: 01 March 2021 20:34
To: PLN - Comments
Subject: Bury House 31 Bury Street London EC3A 5AR

Dear Sir/Madam

As a local resident I consider that this proposal would be another instance of serious overdevelopment in a small area which has already suffered from a concentration of tall office developments.

This is putting an unreasonable stress on the provision of utilities and all forms of transportation and amenities. It is also damaging an attractive and historic environment.

Yours faithfully,

Peter Rose

Jamaica Buildings
St Michael's Alley
London, EC3V 9DS

5 Christchurch Road

Winchester

SO239SR

3 March 2021

Dear Lord Mayor

I write as a Jew who has visited Bevis Marks Synagogue many times.

It is the Cathedral of Anglo-Jewry and a spiritual place.

The proposed developments in its vicinity will damage it through considerable light reduction for many hours each day, both into the synagogue and its courtyard.

The sheer likely volume of bicycle traffic using the thoroughfare immediately outside will also irrevocably change the atmosphere.

I believe in prosperity but not at the cost of damaging the soul. Plunging Bevis Marks synagogue into gloom and noise will be a cultural and religious mistake indicating profound philistinism.

Yours sincerely

William Carver

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.|cr||cr|FURTHER INFORMATION RECEIVED: Environmental Statement additional material (relating to ES Volume 2: TBHVIA Addendum; updated ES Volume 1: Chapter 13: Effect Interactions; and Non-Technical Summary) and Public Benefits Statement; Building Ecosystem Paper; Energy Strategy Note; Equality Statement and Thermal Comfort Assessment.
Case Officer: Bhakti Depala

Customer Details

Name: Mr Leon Meyer
Address: 43 Hurstwood Road LONDON

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:The proposed building in Bury Street is wholly detrimental to the unique amenity of the unique Grade I Listed building and heritage site of Bevis Marks Synagogue.

The Synagogue has survived for over 300 years, and is in constant use for religious services. Would such a tall building be allowed to be constructed adjacent to a Wren church or St Paul's Cathedral.

Furthermore pertinent questions have to be raised in the light of the Covid-19 pandemic as to the future needs of office accommodation in this precise area of the City of London, and also shopping and cafes premises in the vicinity, where so many have closed down this past year.

The cityscape of the eastern part of the City of London (namely the Bishopsgate and Leadenhall Steeet areas) has already been been ruined over the past decade by the vastly overscaled and crowded tall and bulky developments.

Perhaps in the meantime there should be a moratorium by the City Planning Department on ALL new office building applications, until a fair assessment can be made on the future needs of this office space.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Ms Eileen Hauptman
Address: Flat 42 Young Court, 175 Willesden Lane, London NW6 7YX

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Noise
- Other
- Traffic or Highways

Comment:I express dismay that in contrast to what happened I believe over 40 years ago when other businessess were considering to be constructed great consideration was taken into account regarding the Historic and Grade 1 listed building The Bevis Marks Synagogue does not seem to be regarded with the same consideration. Your proposed construction appears to obliterate the view and ignore the importance of this building.

I would be obliged if you would answer with your comments. Unlke a Church which invariably has

a Spire The Bevis Marks Synagogue in accord with its character and traditions is not a high building and it is important that it can be easily seen.

It cannot be obscured from sight and not have its environment blocked. It needs to have easy visual and physical entryI would
I would like to know if you have a model of your proposed construction so that I would be able to view this prior to construction.

Thank you
Eileen Hauptman

Comments for Planning Application 20/00848/FULEIA

Application Summary

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Kenneth Robinson
Address: 49 Brigadie Ave Ballymena

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:I am very concerned about the major impact that the development would have on the historic setting of the Bevis Marks Synagogue along with the reductions in daylight and sunlight into the Synagogue and the courtyard. The proposed construction will change this unique place of worship and threaten the atmosphere of the Synagogue and its immediate surroundings. I live in Northern Ireland but visit Bevis Marks and churches in this area whenever I come to London. It never fails to astonish me how churches and other unique buildings can be treated with such disdain in London and in Northern Ireland, where commerce, business and construction, masquerading as development, is always seen as the right way forward. I have watched this area of London being destroyed, tramped upon and anonymised by construction that dwarfs and blights

earlier buildings, buildings which have helped shaped the character of the City and East London. I object from across the Irish Sea.

Comments for Planning Application 20/00848/FULEIA

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Case Officer: Bhakti Depala

Customer Details

Name: Mr Stanley Roth
Address: 34 Western Road Sutton

Comment Details

Commenter Type: Other
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:Construction may cause damage to Bevis Marks Synagogue which is Grade 1 listed building.

Comments for Planning Application 20/00848/FULEIA

Application Summary

Application Number: 20/00848/FULEIA
Address: Bury House 31 Bury Street London EC3A 5AR
Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.|cr|(The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).|cr|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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.|cr||cr|FURTHER INFORMATION RECEIVED: Environmental Statement additional material (relating to ES Volume 2: TBHVIA Addendum; updated ES Volume 1: Chapter 13: Effect Interactions; and Non-Technical Summary) and Public Benefits Statement; Building Ecosystem Paper; Energy Strategy Note; Equality Statement and Thermal Comfort Assessment.
Case Officer: Bhakti Depala

Customer Details

Name: Mrs Caroline MacDonald-Haig
Address: 32 Emanuel Avenue London

Comment Details

Commenter Type: Member of the Public
Stance: Customer objects to the Planning Application
Comment Reasons:
- Other

Comment:An outrageously tall development in an historically very rich part of the City: do we we really need any more monstrously tall buildings in the City, especially with the experience of Lock down and the likely hood of people not wanting to come to their offices 5 days a week. Think the proposal should be shunted to one side until we see the pattern of work emerging after lock down.

EVERSHEDS SUTHERLAND

Eversheds Sutherland (International) LLP
One Wood Street
London
EC2V 7WS
United Kingdom

[redacted]

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

Date: 11 March 2021
Your ref: 20/00848/FULEIA
Our ref: 303118-000016
[redacted]

By Email to PLNComments@cityoflondon.gov.uk and by Special Delivery

Dear Sirs

Planning Application 20/00848/FULEIA – Bury House, 31 Bury Street London EC3A 5AR

1. **Introduction**

1.1 We are instructed by The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London to advise in relation to the above planning application.

1.2 We are writing in response to your consultation letter issued on 25 February 2021.

1.3 Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the application site:

(a) 3, 5, 6, 7, 15, 16 and 17 St Helen's Place;

(b) 33 Great St Helens;

(c) 52-68 and 88 Bishopsgate;

(d) 12/20 Camomile Street; and

(e) 25-51 and 61 St Mary Axe.

1.4 We have undertaken a review of the available information relating to the above planning application and we have substantive concerns as to the potentially adverse effect the proposed development could have on the levels of available light to the above properties. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues.

1.5 We also have concerns regarding the planning merits of the proposed development and the potentially adverse impact it could have on surrounding built environment, important heritage assets and public services. These concerns are set out below.

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2. **Impact on the St Helen's Place Conservation Area and the setting of nearby heritage sites and listed buildings**

2.1 As the applicants makes clear the City Council is under an important statutory duty to have regard to the requirements of the Planning (Listed Building and Conservation Areas) Act 1990 (the **"Act"**) in determination of this application. The principle statutory tests of relevance within the Act are:

Section 66(1) which states that:

"in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"

and

Section 72(1) which states that:

"in the exercise, with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

2.2 Paragraphs 193 to 197 of the NPPF explain how the Act is expected to work in practice and makes clear that the City Council must consider the impact of the proposed development on the significance of the designated heritage asset and that *"great weigh to should be given to the asset's conservation"*.

2.3 In this context, any substantial harm should lead to the refusal of planning consent in the absence of substantial public benefit (paragraph 195) and where there is likely to be less than substantial harm a *"balanced judgement will be required having regard to the scale of the harm or loss and the significance of the heritage asset"* (paragraph 197).

2.4 As is made clear in the Court of Appeal decision in *Catesby Estates Ltd -v- Peter Steer and Secretary of State for Communities and Local Government [2018] EWCA Civ 1697*, this assessment of harm requires careful consideration having regard to the particular facts and circumstances of each case. This is reflected at paragraph 29 of the judgement which indicated that:

"Under current national planning policy and guidance in England, in the NPPF and the PPG, the decision-maker has to concentrate on the "surroundings in which [the heritage] asset is experienced", keeping in mind that those "surroundings" may change over time, and also that the way in which a heritage asset can be "experienced" is not limited only to the sense of sight. The "surroundings" of the heritage asset are its physical surroundings, and the relevant "experience", whatever it is, will be of the heritage asset itself in that physical place."

2.5 As the Townscape, Built Heritage and Visual Impact Assessment (dated October 2020) makes clear the proposed development has a direct impact upon the setting of a series of significant heritage assets within the immediate vicinity of the application site and, more particularly, in respect of the scheme's relationship with the Tower of London World Heritage Site (ToWWHS). The importance and sensitivity of this relationship is reflected in the more specific supplemental report entitled 'Tower of London Heritage Impact Assessment' (dated October 2020) and in the emphasis and language used in both submissions. In the former submission it is noted that the application site is within 550m of the ToWWHS and that the development would be visible from the assessment point. The assessment (on page

3 in respect of River prospect 10A.1)) recognises the *"fine"* consideration needed in assessment the impact of a proposal that adds to the existing cluster and moves it closer to the White Tower. It is, in this context, that the assessment emphasises the efforts have been made to shape and *"reduce the scale impact"* of the building to lessen this impact on the ToWWHS.

2.6 Importantly, the subtlety of that assessment is not supported by the judgement of Historic England in their correspondence of 11 December 2020 in which it is made clear that:

"The development would also erode the appreciation of the Tower of London's strategic siting on the River Thames set apart from the mercantile City of London by blocking part of the skyline between the Eastern Cluster and the White Tower. In our view this would result in harm to an attribute of the Tower of London World Heritage Site's Outstanding Universal Value."

2.7 This submission is reinforced and summarised in the concluding remarks of Historic England that:

"On the basis of the information provided we consider that the development would cause a high level of harm to a designation of outstanding significance, principally due to the impact on the Tower of London, particularly evident in LVMF View 10A.1. We therefore object to this application, and continue to strongly recommend that a reduction in height of the proposed development is explored in order to avoid this harm."

2.8 Historic England raise further concerns as to the assessment of the impact of the proposed development upon heritage assets within the more immediate vicinity of the application site and place particular emphasis on the relationship with the Grade I listed Bevis Marks Synagogue. The assessment made by Historic England identifies a:

"major juxtaposition in scale between Bevis Marks and the proposed development which encroaches on the secluded courtyard setting of the synagogue" and that *"the proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building in our opinion."*

2.9 Further concerns are raised by Historic England in response to the relationship of the proposed development with the Grade II* listed Holland House and, here again, the Government's advisors on heritage matters concludes that:

"The proposed development would be highly visible in both views, and would rise up directly behind Holland House in View 43, breaking its clear roofline. We consider that this would diminish the appreciation of the striking architectural form of the building, therefore causing some harm to its significance."

2.10 We are, in this context, unable to agree with the findings of the Townscape, Built Heritage and Visual Impact Assessment and have serious concerns that the balanced and objective consideration of the findings of the assessment cannot reasonably conclude that the application proposal *"would be at the low end of less than substantial harm under the terms of paragraph 196 of the NPPF"* (page 276).

3. Daylight and Sunlight Impacts

3.1 Our client's property at 15 and 16 St Helen's Place, 12/20 Camomile Street and 61 St Mary Axe have been identified in the baseline for assessment purposes *"owing to their proximity and orientation to the Site/surrounding receptors"* at paragraph 10.142 of Chapter 10 (Daylight, Sunlight, Overshadowing, Light Intrusion and Solar Glare) of the Environmental Statement submitted with the application. Notably, none

of these properties are the subject of any detailed sensitivity assessment for daylight/sunlight impacts, overshadowing, solar glare or light intrusion.

3.2 The basis upon which these properties are identified in the baseline assessment and are then the subject of no further analysis or assessment is not explained in the Environmental Statement. The absence of any explanation of this approach leaves us in doubt that the assessment is complete for the purposes of the relevant Building Research Establishment Guidelines and the requirement of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. We must, in the circumstances, reserve our position to make further submissions in response to this inconclusive approach.

3.3 We have yet to conclude our detailed impact assessment of the proposed development and reserves our position in relation to these issues. We do, however, have serious concerns that 15 and 16 St Helen's Place, 12/20 Camomile Street and 61 St Mary Axe will experience a significant adverse impact as a result of the construction of another tall building in this area.

For the reasons set out above, our client objects to the planning application and would ask that these concerns are brought to the attention of the relevant Planning Committee.

Yours faithfully

[redacted]

EVERSHEDS SUTHERLAND (INTERNATIONAL) LLP

Historic England

LONDON OFFICE

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

Direct Dial: 020 7973 3763

Our ref: P01305330

11 December 2020

Dear Ms Depala

T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

BURY HOUSE 31 BURY STREET LONDON EC3A 5AR
Application No. 20/00848/FULEIA

Thank you for your letter of 12 November 2020 regarding the proposed redevelopment of Bury House subject to planning permission. Historic England was briefly involved in pre-application discussions regarding these proposals earlier this year, and I attach a copy of our advice at that stage for your information. I repeat the main points set out in that letter here for completeness.

Historic England Advice

Summary

The development of a building of the height proposed at Bury House would cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site in our opinion. This is principally because of the visual impact presented by the proposed development in the view from the North Bastion of Tower Bridge (LVMF View 10A.1) which would reduce the ability to appreciate the Tower of London's strategic and dominant position along the river, set apart from the mercantile City.

We have not seen clear and convincing justification for this harm or evidence that the harm would be outweighed by public benefits, and we therefore cannot support the proposals. We are disappointed that the concerns we raised at pre-application stage have not been addressed. We continue to recommend that a significant reduction in height is explored so that the proposals would no longer affect the setting of the World Heritage Site from this viewpoint, avoiding the harm identified.

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Significance of the Historic Environment

Bury House is a modern office building located at 31 Bury Street in the City of London. The building is not listed or in a conservation area; however it is physically attached to the Grade II* listed Holland House – a progressive steel-framed office building of 1914 designed by renowned Dutch architect Hendrik Petrus Berlage. It is a very rare and important example of Berlage's work in England.

The building is also located very close to the Grade I Bevis Marks Synagogue (1699-1701) which is the oldest synagogue in England in continuous use. The synagogue is located at the eastern fringe of the City of London near Aldgate, and accessed via a secluded courtyard. The deliberately enclosed surroundings contribute to the setting and therefore significance of the listed building. However, the courtyard has been encroached upon by recent tall building development in the area which has caused some harm to the significance of Bevis Marks through development within its setting.

The Tower of London World Heritage Site (WHS) is located approximately 550 metres south-east of the development site. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, Scheduled Monument, collection of listed buildings, and conservation area.

At its centre is the White Tower – an example *par excellence* of a Norman castle, standing as a symbol to the successful invasion of England and illustrating the architectural innovation of the era. With its layers of later defences and associated palace buildings, the Tower of London is also a major reference for the history of European military and royal architecture.

The UNESCO inscription explains that the Outstanding Universal Value (OUV) of the WHS is partially derived from the Tower of London's strategic and landmark siting on the River Thames to protect and control the City of London. Sited strategically at a bend in the River Thames, it has been a crucial demarcation point between the power of the developing City of London, and the power of the monarchy.

Today this juxtaposition continues in the Tower's physical relationship to both the River Thames and the evolving City of London, as a fortress and gateway to the capital. The inscription does, however, acknowledge that "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. It explains that "such development could limit the ability to perceive the

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Tower as being slightly apart from the City, or have an adverse impact on its skyline as viewed from the river."

The site is within the City of London's local plan policy area of the Eastern Cluster defined for tall buildings and a number of existing and consented tall buildings are located in the vicinity including The Gherkin (194.90 metres AOD) and 100 Leadenhall Street (263.4m AOD) which was approved in 2018. If approved, the "Tulip" development site (Land Adjacent to 20 Bury Street London EC3A 5AX, application ref: 18/01213/FULEIA) would be located approximately 50 metres to the north-west. The proposals for that site are subject to a live public inquiry at which Historic England has recently attended as a Rule 6 Party opposing that development.

The Proposals and their Impact

The proposals by Stiff + Trevillion Architects seek to replace Bury House with a tall, two-tiered, office building rising to a height of 197.94 metres AOD (ground plus 48 storeys). The building would be slender in its form with orderly fenestration and vertically ribbed cladding.

The submitted Townscape, Built Heritage and Visual Impact Assessment (Montagu Evans, October 2020) assesses the impact of the proposed development on a wide range of heritage assets. It concludes that no harmful impacts to any heritage asset in the study area would result from these proposals. However, on the basis of this assessment, we disagree with this conclusion.

The proposed development would be particularly noticeable in View 9: LVMF 10A.1 Tower Bridge: upstream (p114-117). In this view the proposed tall building would diminish the visual dominance of the Tower by significantly exceeding the height of its corner turrets. The development would also erode the appreciation of the Tower of London's strategic siting on the River Thames set apart from the mercantile City of London by blocking part of the skyline between the Eastern Cluster and the White Tower. In our view this would result in harm to an attribute of the Tower of London World Heritage Site's Outstanding Universal Value.

The proposals would also appear also appear in cross-river views of the Tower of London, in particular LVMF 25A.1, 25A.2 and 25A.3 (Views 16-18, p142-153) from the Queens Walk at City Hall. In these views, the development's height and form would appear as a more coherent part of the developing Eastern Cluster in relation to the Tower of London. Whilst the development of a prominent tall building in this location would present further encroachment on the strategic riverside setting of the Tower of London, we consider the harm to be relatively minor in this view.

The proposed development would also be visible within the Tower of London Inner Ward. It would be particularly noticeable in the view towards the Grade I listed Chapel Royal of St. Peter ad Vincula as set out in View 23 of the submitted views assessment (p170-173). In this view, the proposed development would appear above the roofline of the Chapel, adding to the modern visual intrusions of various tall building developments within the Eastern Cluster.

The appearance of modern tall buildings above this roofline is undesirable as it further diminishes the self-contained ensemble of historic buildings. Although not a pristine view, further encroachment contributes to a diminution of the impact of the sense of history in this special place and its separation from the modern city beyond. We therefore consider that a degree of cumulative harm would result from these proposals.

Following our pre-application advice, visualisations have now been prepared in the report in relation to the impact on the Grade I listed Bevis Marks Synagogue (View 45 from within the courtyard, p258-261) and the Grade II* listed Holland House (View 42 from Bury Street and View 43 from Bury Court, p246-253).

View 45 as proposed illustrates a major juxtaposition in scale between Bevis Marks and the proposed development which encroaches on the secluded courtyard setting of the synagogue. However, the cumulative wireline assessment indicates that consented tall buildings within the Eastern Cluster already present a significant impact on the setting of Bevis Marks, and the proposed scheme will appear as part of that cluster in this view. Nonetheless, the proposed development would be closer to the synagogue and would therefore further diminish the sense of seclusion within the courtyard, causing a small degree of incremental harm to the listed building in our opinion.

Views 42 and 43 demonstrate that Burlage's sleek and progressive steel-framed west elevation of Holland House can be appreciated against a clear skyline. The proposed development would be highly visible in both views, and would rise up directly behind Holland House in View 43, breaking its clear roofline. We consider that this would diminish the appreciation of the striking architectural form of the building, therefore causing some harm to its significance. We do, however, consider this harm to be low due to the wider tall building context in the area.

Policy

Sections 16 and 66 of the **Planning (Listed Buildings and Conservation Areas) Act 1990** impose a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings.

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Government guidance on how to carry out this duty is found in the **National Planning Policy Framework** (NPPF, February 2019). At the heart of the framework is a presumption in favour of 'sustainable development' where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at Paragraph 193 that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. Any harm or loss should require clear and convincing justification and substantial harm or total loss should be exceptional. In the case of Grade II* or Grade I listed or registered assets or World Heritage Sites, substantial harm or loss should be wholly exceptional (Para 194).

In considering applications, local planning authorities should also require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance (Para 189).

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, Paragraph 196 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

The draft New **London Plan** (2019) has robust policies to protect London's WHSs. Draft policy HC2 states that "development proposals in WHSs and their settings … should conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes (Intend to Publish Version [clean], p326).

This approach to WHSs is also evident in draft policy D9 (Tall Buildings). This requires that "buildings in the setting of a WHS must preserve, and not harm, the OUV of the WHS, and the ability to appreciate it" (p150).

The Tower is identified in the new London Plan as one of three Strategically-Important Landmarks for London, and the importance of managing its setting is recognised in the strategic views policies HC3 and HC4, and the **London View Management Framework** (LVMF SPG, Mayor of London, 2012).

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Of the views identified in the London Plan, river prospect view 10A.1 from the North Bastion of Tower Bridge, and view 25A.1-3 from the Queen's Walk are most relevant. While these do not capture all elements of the Tower's setting, they are two of the best locations to appreciate the Tower and its relationship with its setting. The LVMF provides management guidance for both views relevant to the development of tall buildings in the City.

The LVMF requires that new development in the views "should be of appropriate height" and "should safeguard the setting of landmarks [including WHSs] and, where tall, should ideally contribute to the development or consolidation of clusters of tall buildings that contribute positively to the cityscape (Para 57). It reinforces that "new development should not harm a viewer's ability to appreciate the OUV of a WHS" (Para 57).

For view 10A paragraphs 183, 186 and 187 of LVMF are crucial for protecting the OUV of the WHS. They state that "the Tower of London should not be dominated by new development close to it" and that "some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the background" (Paras 183 and 186). While noting that the City Cluster will be 'consolidated' paragraph 187 states that "any proposed building which would add to the skyline, must take account of the way it relates to existing skyline features.

For view 25A, the LVMF states that all "new development in the setting of the Tower of London should be of appropriate height, scale, massing and materials" and "should respect the setting of the Tower of London and should not dominate the WHS" (Para 414-415).

The **Tower of London World Heritage Site Management Plan** (WHSMP, Historic Royal Palaces, 2016) seeks to ensure the effective management of the WHS. It states that "the greatest challenge to the WHS… remains the impact on its setting of development and tall buildings" (p4). Key elements of the Tower's setting that are sensitive for the management of its OUV are highlighted in paragraphs 7.3.17-18 (p99) and 7.3.27 (p101), namely the potential of new development to change the relative scale of the Tower in views, and the degree to which the Tower's relationship with the City can be understood by the sky space around the White Tower.

The WHSMP acknowledges the expansion of the cluster has "reinforced its identity, verticality and scale and begun to change its relationship with the Tower" (p100), with tall new buildings in the eastern part of the City eroding the OUV of the Tower to some extent (p37). The WHSMP states that to effectively manage this part of the Tower's setting, proposals "will continue to need to consider their effect on the

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established eastern cluster, the space between it and the Tower and the effect on the ability to recognise, understand and appreciate the OUV of the Tower" (p101).

Underpinning the WHSMP is the **Local Setting Study** (2010), which supports the management of the Tower's local setting, identifying key views of and from the Tower. Representative views include the freely accessible LVMF views from Tower Bridge and the Queen's Walk, and from within the Tower's Inner Ward.

The development site falls within the Eastern Cluster area as set out in the **City of London Local Plan** (2015, p72). The vision for this area is to "provide a cluster of attractive, sustainably designed tall office buildings, providing an iconic image of London that will help to attract significant global investment" (p22). Tall buildings in this area are supported where they would "support the City's reputation as an international financial and business centre" p26-7). However, the Local Plan also aims to resist proposals that "detract from heritage assets and their settings, or adversely affect significant views, especially of the Tower of London" (p23).

Historic England's advice note on Tall Buildings (HEAN 4, 2015) advises that "in a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications" (p4).

In relation to clusters of tall buildings it states that "where a proposal is promoted as part of a cluster, a successful design will have a positive relationship within the cluster; the altered impact of a cluster itself needs to be considered" (p8).

Historic England's advice on The Setting of Heritage Assets (GPA3, 2017) sets out guidance, against the background of the NPPF and PPG, on managing change within the settings of heritage assets. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting.

Notwithstanding the policy and guidance framework described above, it should be noted that the World Heritage Committee and its cultural heritage advisor ICOMOS (the international body based in Paris) interpret the World Heritage Convention in a way that places great weight on the need to avoid any harm to OUV. Only if it is clear that proposed development is essential and cannot occur without harm to OUV does ICOMOS concede in its 2011 Guidance on Heritage Impact Assessment that balancing harm against benefit is acceptable.

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Position

Historic England's guidance recognises that city skylines evolve and that tall building development can make a positive contribution to urban life as part of a planned approach. The Tower of London WHSMP also acknowledges the expansion of the Eastern Cluster and provides guidance for its future development. We therefore accept the redevelopment of the site with a building of increased height in principle as part of the established and evolving Eastern Cluster area. We also have no in-principle issue with the proposed design of the building, in terms of its architectural approach and materiality.

However, and from our perspective, more importantly, the policies and guidance set out in this letter, including those relating to further expansion of the Eastern Cluster in the City of London Local Plan are clear that new development should avoid harm to designated heritage assets. For the purposes of this scheme this principally relates to the Tower of London – one of the world's great historic monuments. The WHS-specific policies and guidance set out in London Plan, the LVMF and the Tower of London WHSMP, make clear that new development should preserve or enhance the ability to appreciate the OUV of a WHS, which reflects the heritage-related policies of the NPPF.

As set out in this letter, the OUV of the Tower of London as a World Heritage Site is partly derived from its strategic and dominant position along the river, set apart from the mercantile City, and LVMF Views 10A.1 and 25A.3 are two of the best locations to appreciate this aspect of OUV.

For the reasons set out in this letter, we consider that these proposals would cause harm to this aspect of OUV due to the impact as demonstrated in the visual assessment of LVMF View 10A.1 (View 9), and to a small degree LVMF Views 25A.1-25A.3 (Views 16-18 in the visual assessment). As previously expressed, some incremental harm to the Tower of London would also result from the impact presented in View 23 from the Inner Ward.

In our view, this scheme is an example of the type of development proposal highlighted in the inscription of the WHS that threatens the ability to perceive the Tower of London as being slightly apart from the City. This impact is also at odds with the guidance in the LVMF SPG and The Tower of London WHS Management Plan as set out in this letter.

A small degree of additional harm would also result from these proposals to the significance of the Grade I Bevis Marks Synagogue and the Grade II* Holland House as previously set out.

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Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

The Planning Act 1990 and the NPPF indicate that heritage assets as significant as a WHS or a Grade I listed building, should be afforded the greatest weight in terms of their conservation. The NPPF also states that any harm to the significance of a designated heritage asset should require clear and convincing justification, and that any harm should be weighed against the public benefits of a proposal. In light of the extraordinary significance attributed to the Tower of London as set out in this letter, we are unconvinced that this harm has been justified or demonstrably outweighed by public benefits. We are therefore unable to support these proposals in their current form.

Please note that due to the physical connections to Holland House, the works are very likely to require listed building consent. The City of London would be required to consult us on any such application. Further details of the work affecting Holland House should be provided at an early stage.

Recommendation

On the basis of the information provided we consider that the development would cause a high level of harm to a designation of outstanding significance, principally due to the impact on the Tower of London, particularly evident in LVMF View 10A.1. We therefore object to this application, and continue to strongly recommend that a reduction in height of the proposed development is explored in order to avoid this harm.

As we have identified harm to a World Heritage Site, your Authority is required to notify State Parties (DCMS in this case) who will make a decision on whether to notify the World Heritage Centre.

Finally, we note from the submitted documents that an associated listed building consent application will be submitted for the underpinning of the adjoining wall to the Grade II* listed Holland House. These works would be subject to Historic England's authorisation and so we await consultation in due course.

I hope this advice is helpful but I would be happy to clarify any of the points raised with you. Please note that this letter does not cover any potential impact on unscheduled archaeology. Please contact your Council archaeologist directly regarding these matters.

Yours sincerely

Alasdair Young
Inspector of Historic Buildings and Areas
[redacted]

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Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

Our ref: GLA/2020/6850/S1
Your ref: 20/00848/FULEIA
Date: 15 February 2021

Bhakti Depala
City of London Corporation
Development Management
Department of the Built Environment
EC2P 2EJ

By email

Dear Bhakti

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Bury House, 31 Bury Street, London
Local Planning Authority reference: 20/00848/FULEIA

I refer to the copy of the above planning application, which was received from you on 1 December 2020. On 15 February 2021 the Mayor considered a report on this proposal, reference GLA/2020/6850/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not fully comply with the London Plan and Publication London Plan for the reasons set out in paragraph 156 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

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

Please note that the Transport for London case officer for this application is Emily Hindle, e-mail [redacted]

Yours sincerely

[redacted]

John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Danny Calver, TfL
Peter Twemlow, DP9, 100 Pall Mall, St. James', London SW1Y 5NQ

planning report GLA/6850/S1

15 February 2021

Bury House, 31 Bury Street, London

in the City of London

planning application no. 20/00848/FULEIA

Strategic planning application stage 1 referral

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

The proposal

Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys including office use, flexible retail/café use, publicly accessible amenity space and community space; new and improved public realm; ancillary basement cycle parking, servicing and plant; and other works and highway improvements associated with the development.

The applicant

The applicant is **BentallGreenOak** and the architects are **Stiff + Trevillion.**

Strategic issues summary

Principle of development: The redevelopment of the site for an office-led development within the CAZ, recognising its importance as an internationally and nationally significant office location is supported in principle. Further discussions are required regarding affordable workspace and how the proposed mezzanine space and pocket park would operate in synergy as a legible and functional public space.

Historic Environment: The development would compromise the ability to appreciate the Outstanding Universal Value and setting of the Tower of London World Heritage Site and would cause less than substantial harm to the significance of a number of Listed Buildings and Conservation Areas. The Heritage Impact Assessment does not include a number of heritage assets that will be impacted, and the Townscape, Built Heritage and Visual Impact Assessment lacks sufficient detail to enable a comprehensive assessment of the heritage impacts of the proposal. Further information is required to enable GLA officers to consider the impact of the proposals upon the historic environment prior to Stage 2 and to carry out the required planning balance.

Design: A tall building is acceptable in principle given the site is located within the Eastern Cluster but requires a sensitive design approach given its location in the setting of a number of heritage assets and the Tower of London WHS - in particular the materiality of the upper part of the building should be reconsidered to ensure the building reads as being familial to the Eastern Cluster and more different from the WHS. The applicant should also ensure that active frontages are achieved on Creechurch Lane and consider the height and proportions of the arcade, ensuring that the retail/café frontage is not perceived as an internalised lobby.

Strategic views: The height, scale and appearance of the proposed development within LVMF view 10A.1 would cause harm to this strategic view.

Transport: Proposed car and cycle parking is acceptable. Future impacts on station capacity and crowding should be considered. Widening of footways should be secured via s278 or s106 agreement to ensure pedestrian comfort levels are acceptable. Access through Heneage Lane should be conditioned. The applicant should consider how cyclists would be segregated from servicing vehicles using the same street. A contribution of £220,000 has been requested for a new Cycle Hire station. A full Travel Plan, Delivery and Servicing Plan and full Construction Logistics Plan should be secured by condition.

Further information is required in relation to **Heritage, LVMF views, Energy, Whole Lifecycle Carbon,** and **Circular Economy.**

Recommendation

That City of London Corporation be advised that the application does not fully comply with the London Plan and the Publication London Plan, for the reasons set out in paragraph 156 of this report; however, the possible remedies set out in that paragraph could lead to the application becoming acceptable in strategic planning terms.

Context

1 On 1 December 2020, the Mayor of London received documents from City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan and the Publication London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under category 1C(b) of the Schedule to the 2008 Order:

Category 1C(b): *Development which comprises or includes the erection of a building that is more than 150 metres high and is in the City of London.*

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

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

Site description

5 The site measures 0.1 ha and currently comprises Bury House, a seven-storey office building along with areas of public highway, parts of Heneage Place and footways north, south and east of Bury House. It is located within the Central Activities Zone (CAZ) and identified within the City Local Plan as part of the Eastern Cluster. The site is bound by Creechurch Lane to the east, Bury Street to the south and west, and built form to the north. Heneage Lane is located on the site's boundary to the north east.

6 The surrounding area is predominantly in office use, comprising tall buildings including 30 St Mary Axe (ground plus 40-storeys), 122 Leadenhall Street (ground plus 51-storeys), 110 Bishopsgate (ground plus 45-storeys), 52 Lime Street (ground plus 38-storeys) and 22 Bishopsgate (ground plus 61 storeys). There are a number of buildings that are under construction, have recently been granted planning permission or have a resolution to grant planning permission. These include, 150 Bishopsgate (ground plus 40-storeys), 1 Undershaft (ground plus 72-storeys), 6-8 Bishopsgate (ground plus 51-storeys), and 100, 106 and 107 Leadenhall Street (ground plus 56 storeys).

7 Bury House is not listed, however immediately adjacent to the site lies Holland House, a Grade II* Listed Building. Bevis Marks Synagogue situated approximately 30 metres north of the site, Church of St Katherine Cree, Church of St Botolph and Church of St Andrew Undershaft are all Grade I Listed Buildings. 2-6 Creechurch Lane and 38 St Mary Axe are both Grade II Listed Buildings located within 100 metres of the site. There are a number of other Listed Buildings in the surrounding area.

8 The site is not situated within a conservation area, however there are a number of conservation areas located in the surrounding area. These include Lloyd's Avenue Conservation Area and St Helen's Conservation Area located within 250 metres of the site. Bank Conservation Area, Bishopsgate Conservation Area, Leadenhall Conservation Area, and Fenchurch Street Conservation Area are also located close to the site. The site is also in close proximity to the Tower of London World Heritage Site (WHS) which contains a number of highly graded Listed Buildings and is a designated conservation area.

9 The PTAL rating of the site is 6a, on a scale of 0-6b where 6b is the most accessible. The A10 Bishopsgate is the nearest section of the Transport for London Road Network (TLRN) approximately 300 metres northwest of the site. The nearest part of the Strategic Road Network is Bevis Marks approximately 50 metres north of the site. Aldgate is the nearest London Underground Station, 300 metres from the site and is served by the Circle and metropolitan lines. Liverpool Street Station is located approximately 400 metres north west of the site providing access to the Central, Circle, Hammersmith & City and Metropolitan lines, TfL Rail and national rail services. It will also be served by the Elizabeth Line in future. The nearest bus stops are on Leadenhall Street, Bevis Marks and Bishopsgate. The nearest Cycle Hire docking stations are at St Mary Axe, Aldgate, Houndsditch, and Jewry Aldgate. Cycle Superhighway 2 is located 175 metres from the site on Whitechapel High Street.

Details of the proposal

10 The proposal would involve the demolition of the existing building and construction of a new building to provide office floorspace, flexible retail/café, a publicly accessible amenity space and community space, new and improved public realm and other associated works.

11 The breakdown of the proposed floorspace is as follows:

Use	**GIA (sq.m.)**	**GEA (sq.m.)**	**Comparison to existing (GIA) (sq.m.)**
Office (Class E)	25,460 sq.m.	27,815 sq.m.	+ 22,202 sq.m.
Retail/café (Class E)	60 sq.m.	62 sq.m.	+ 60 sq.m.
Publicly accessible amenity (Sui Generis)	421 sq.m.	460 sq.m.	+ 421 sq.m.
Community (Sui Generis)	507 sq.m.	546 sq.m.	+ 507 sq.m.
Ancillary (Basement/BoH)	3,722 sq.m.	4,596 sq.m.	+ 2,937 sq.m.
Total Floorspace	**30,170 sq.m.**	**33,479 sq.m.**	**+ 26,126 sq.m.**

Case history

12 On 3 September 2020, a pre-application meeting was held with GLA officers which discussed proposals for the redevelopment of the site to provide an office-led redevelopment of the site, including publicly accessible amenity space, community space and improvements to the public realm.

Strategic planning issues and relevant policies and guidance

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of the City of London Local Plan (2015) and the 2016 London Plan (consolidated with alterations since 2011).

14 The Report of the Examination in Public of the draft London Plan was published in October 2019, and the Intend to publish London Plan version (December 2019) was subsequently submitted to the Secretary of State. On the 13th March and 10th December 2020, the Secretary of State issued the Mayor with directions under Section 337 of the Greater London Authority Act 1999.

15 On 21 December 2020 the Mayor submitted to the Secretary of State his Publication London Plan with amendments designed to address these directions. This is the most up to date version of the Mayor's London Plan and should be given significant weight in the consideration of this application.

16 On 29 January 2021 a letter from the Secretary of State to the Mayor of London formally confirmed that the version of the London Plan that was sent to him on 21 December 2020 contains the modifications necessary to conform with all the previously issued directions under section 337 of the GLA Act 1999.

17 The following are also relevant material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance;
- London View Management Framework SPG;
- Tower of London World Heritage Site Management Plan; and
- Tower of London Local Setting Study: An Assessment of the Local Setting of the Tower of London and Guidelines for its Management (August 2010).

18 The relevant issues and corresponding policies are as follows:

• Central Activities Zone	*London Plan; Publication London Plan;*
• Economy	*London Plan; Publication London Plan;*
• Office	*London Plan; Publication London Plan;*
• Urban design	*London Plan; Publication London Plan; Shaping Neighbourhoods: Character and Context SPG;*

• Strategic views	*London Plan; Publication London Plan; London View Management Framework SPG;*
• Heritage	*London Plan; Publication London Plan; World Heritage Sites SPG;*
• Inclusive design	*London Plan; Publication London Plan; Accessible London: achieving an inclusive environment SPG;*
• Transport and parking	*London Plan; Publication London Plan; Mayor's Transport Strategy.*
• Sustainable development	*London Plan; Publication London Plan; Sustainable Design and Construction SPG; London Environment Strategy;*

Principle of development

Offices

19 London Plan Policy 4.2 encourages the renewal and modernisation of existing office stock in viable locations to improve quality and flexibility and seeks to meet the distinct needs of the central London market, recognising the dynamic clusters of specialist functions and business functions of a 'world city'. Similarly, Policy E1 of the Publication London Plan supports improvements to quality, flexibility and adaptability of office space of different sizes, and highlights the specialist functions of the central London office market including the Central Activities Zone (CAZ).

20 Publication London Plan Policy E1 supports increases in London's office stock where there is evidence of sustained demand. Table 6.1 demonstrates that demand for offices will remain highest in the CAZ with 59% growth in demand expected between 2016-2041. Development proposals for large office development (over 2,500 sq.m. of new office floorspace) should consider the scope to provide flexible workspace or smaller units for micro, small and medium-sized enterprises in accordance with Policy E2. In accordance with Policy E3, consideration should be given to the need for affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.

21 The significance of the CAZ is recognised in London Plan Policy 2.10 and Publication London Plan Policy SD4. The nationally and internationally significant functions of the CAZ should be supported and enhanced, meeting demand for a range of office occupiers. At a local level, the site is located in the Eastern Cluster where, according to the City's Local Plan (2015), 50-60% of the City's office floorspace is to be distributed. Policy CS7 of the City Local Plan encourages the provision of high-quality office floorspace in the Eastern Cluster, promoting it as a location for inward investment and enhancing the area's public realm.

22 The proposals would provide 25,460 sq.m. of office floorspace, an uplift of 22,202 sq.m. on the existing provision. This would comprise smaller floorplates of approximately 300 to 500 sq.m. to cater for small and medium sized enterprises. Space of this type is not usually found in the Eastern Cluster and would complement the existing offer of this part of the City. The proposed development would include

642 sq.m. of affordable workspace to be made available as incubator space intended for small and predominantly local start-ups. This would be offered for a period of 10 years and at 50% of market rents. This is welcomed as a starting point but the applicant is encouraged to increase the covenant period and further discussions are required to ensure that the offer would meet the needs of SMEs in terms of affordability and management.

23 The principle of an office-led mixed-use redevelopment of the site, providing an uplift of some 22,202 sq.m. of office floorspace in the CAZ, is supported in principle, subject to addressing the issues set out below. Provision of flexible, affordable workspace in line with policies E1 and E2 of the Publication London Plan is welcomed.

Other commercial uses

24 Policy HC5 of the Publication London Plan encourages large scale mixed-use proposals to include new cultural venues and/or facilities and spaces for outdoor cultural events. Furthermore, Policy SD4 of the Publication London Plan seeks to enhance and promote the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions in the CAZ.

25 The proposals include provision of retail and community uses, designed for office tenants and the local community. These uses would activate the ground and first floors of the building together with provision of an arcade, pocket park and new pedestrian routes traversing the site.

26 The applicant has engaged with community groups, key stakeholder within the City of London, neighbouring boroughs and the GLA's Culture team which is welcomed. The proposals would include cultural space on the first floor to accommodate a range of uses and functions from charity events, to cultural talks/lectures, to education functions to rehearsal space. The applicants' community outreach programme has identified specific organisations to help ensure local groups can make the best use of this space. The Statement of Community Involvement (SCI) states that this would be secured via a series of bespoke Community Use Agreements.

Public access

27 London Plan Policy 7.7 and Policy D9 of the Publication London Plan require free to enter publicly accessible areas to be incorporated into tall buildings, particularly those that are more prominent such as the proposed development. The proposed development would provide public spaces at lower levels, including the public realm at street level, internal public amenity space, at mezzanine level and community space at level one. The applicant considers that this, together with the extant provision of high-level viewing galleries in the Eastern Cluster would comprise a better offer and is more appropriate to the development.

28 The proposed development includes the creation of a new pocket park and pedestrian route through the site measuring 321 sq.m. These areas have been designed to be accessible and activated and are also proposed to be used to present local artists' work.

29 The proposals would provide 421 sq.m. of internal publicly accessible amenity space at the mezzanine level, as an extension to the public realm. This would be located above the newly created pedestrian route through the site with a dedicated entrance from the ground floor off Creechurch Lane.

30 Community space provided on level one would measure 507 sq.m. and would be made available to community groups, schools, cultural/arts groups and charities. It would have capacity for up to approximately 480 people but has been designed flexibility to accommodate a range of uses and functions. The applicant has confirmed that this space would be available for use, free of charge, for specific community-based groups between 10:00 and 21:00 daily on weekdays, and between 09:00 and 17:00 on Saturdays and will be secured via s106.

31 In order to accord with the above policies, the proposals should include free to enter publicly accessible viewing spaces that provide panoramic views. Part D of Publication London Plan Policy D9 makes clear that such provision should normally be made at the top of buildings, where the opportunities for views are typically greatest. However, this has not been proposed in this case - given the relatively tight nature of the site and compact footprint of the building, and the usable floorspace impact of delivering an additional publicly accessible lift core up to the top floor of the building. Instead, the applicant proposes the abovementioned 421 sq.m. of internal publicly accessible amenity space at mezzanine level, as an extension to the 321 sq.m. pocket park at ground floor level. Whilst GLA officers acknowledge that there are challenges with delivering a publicly accessible rooftop viewing space in this case, further information is sought on how the proposed mezzanine space and pocket park would operate in synergy as a legible and functional public space. A full understanding of this public space offer, and the public benefit that would be derived from it, is crucial before the weight of this provision can be determined and balanced against the presumption for rooftop viewing space within part D of Publication London Plan Policy D9.

Urban design

32 London Plan Policies 7.1 and 7.4 and Publication London Plan Policies D1 and D2 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhance the historic environment. London Plan Policy 3.4 and Publication London Plan Policy D3 also seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services.

Public realm

33 Publication London Plan Policy SD4 states that the attractiveness and inclusiveness of the CAZ should be enhanced, including through public realm improvements.

34 As set out above, the applicant is proposing to provide a range of improvements to the public realm, including a pocket park and activation of the ground floor with an

arcade, which is welcomed. In addition, Heneage Lane would be re-instated with priority given to pedestrian movement.

35 The site's CAZ location in the Eastern Cluster means that footfall in the area is particularly dense, and these measures would help to alleviate pressure on the surrounding streets, increasing permeability to, from and within the site. Whilst this is considered a positive aspect of the proposals, the applicant should ensure that active frontage onto Creechurch Lane would not be limited. In addition, the northern end of the arcade would open onto the egress/entry to the loading bay. The applicant should ensure that this arrangement would not pose pedestrian conflict.

Heights and massing

36 Building heights within the surrounding area vary significantly ranging from 4/6 storeys to tall towers. The proposed development would provide 48 floors, increasing the height on this site by some 42 storeys. Given the site's location in the CAZ and the Eastern Cluster together with the City of London's identification of the site and its surrounding area suitable for tall buildings as set out in Policy CS7 of the City's Local Plan, a tall building in this location is acceptable in principle, subject to the highest architectural quality, a rigorous townscape and heritage assessment and meeting the other associated criteria within London Plan Policy 7.7 and Publication London Plan Policy D9.

37 The relatively small footprint creates a slender building form and a potentially elegant addition to the cluster and wider skyline. However, given the site's location at the eastern edge of the Eastern Cluster, it is important that an appropriate balance is struck to ensure the building reads as an integral part of the cluster and not an 'outlier' building. This is particularly critical in the most heritage sensitive views (LVMF 10A and 25A). As proposed, the tower's height and slender form create an awkward relationship with 30 St Mary Axe and the WHS in these views, stepping up in scale between the two, rather than terminating the edge of the cluster and tapering down towards the WHS. It is also noted that the relative proportions and solidity of proposed materials clash with those of the White Tower's turrets in these views. Alternative heights and massing arrangements should therefore be tested with the aim of achieving a more successful composition that addresses the form of the wider cluster and is sensitive to the setting of the WHS. This process should also include further consideration of the materials palette of the upper portion of the building, to ensure the building reads as being familial to the cluster, and more different from the WHS.

Layout

38 The proposed internal open plan layouts are rational and functional, well-proportioned and allow for flexibility of uses which is welcomed. However, the height and proportions of the arcade appear constrained in some of the street level views and a double height space would be more generous and inviting. In addition, the retail/café frontage appears limited such that it may be perceived as an internalised lobby serving the office space. The applicant should consider a further refinement of the arcade space to address these concerns.

39 The proposed development would provide community space with associated external space which appears legible and easily accessible from street level; which is welcomed.

Materiality

40 Policy D9 of the Publication London Plan considers tall buildings and their impacts and requires architectural quality and materials that are of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained throughout its lifespan.

41 The location of the proposed building on the edge of, and detached from, the Eastern Cluster and within the setting of the WHS of Tower of London, requires a sensitive design approach. As proposed, the design and articulation of the building is of high quality and responds well to its immediate context. The lower portion of the building meets the ground successfully and responds well to the character of existing streetscape and neighbouring heritage assets. As detailed above, in longer range views, particularly LVMF 10A and 25A, the solidity of facades is less successful and risks clashing with the predominant character of the cluster, while also setting up an awkward visual relationship with the White Tower's turrets. The mid-level 'shoulder' setback provides an opportunity to introduce a contrasting material treatment to the upper portion of the building that is more aligned with the glazed/faceted character of the cluster and less intrusive/heavy on the skyline. The applicant should explore alternative materials and façade compositions to achieve a more successful and appropriate composition.

Fire safety

42 A fire safety strategy has been submitted. The applicant should confirm that this has been prepared by a suitably qualified third-party assessor in accordance with Policy D12 of the Publication London Plan.

Inclusive design

43 London Plan Policy 7.2 and Policy D5 of the Publication London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design. Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and is designed to incorporate safe and dignified emergency evacuation for all building users.

Future Occupiers

44 With regards to overshadowing, the assessment acknowledges that the proposed development would result in negligible and minor adverse effects overall. The assessment highlights that given the tightly constrained existing context, effects are likely but that absolute changes are very small and/or relate to parts of areas that do not appear to be able to utilise sunlight amenity. In addition, the assessment states that any additional overshadowing would be limited and fleeting – confined to

1 to 2 hours in the morning or afternoon – with much of the area left unaffected for the majority of the day. The Corporation will need to ensure that the proposed development would not give rise to unacceptable adverse impacts relating to overshadowing.

Strategic views

45 The site is not within any strategic viewing corridors, however, given the scale of the proposals, the building would be visible in a number of strategic view panoramas, river prospects and townscape views defined within the London View Management Framework SPG. As part of the environmental statement that accompanies the scheme, the applicant has presented a wide range of verified view studies (including visualisations of the proposal from LVMF views 1A.1, 1A.2, 2A.1, 3A.1, 4A.1, 5A.2, 6A.1, 10A.1, 11B.2, 15B.1, 16B.1, 17B.1, 19A.1, 25A.1, 25A.2, 25A.3, and 26A.1).

46 With respect to strategic views, London Plan Policies 7.11 and 7.12 and Policies HC3 and HC4 of the Publication London Plan identify strategically important views of the Tower of London WHS and state that development should not harm and seek to make a positive contribution to the characteristics, composition and landmark elements of these views.

LVMF panoramas

47 The proposals would be visible in a number of LVMF London Panoramas. These include Parliament Hill, assessment point 2A.1; Kenwood 3A.1; Primrose Hill 4A.1; Greenwich Park 5A.2; and Blackheath Point 6A.1. From the majority of these distant viewing points, the proposed building would appear alongside or be largely occluded by existing and consented buildings and would be perceived as part of an established grouping of tall buildings within the City of London's Eastern Cluster. However, the building would be visible from View 6A.1, within the foreground and rising above 30 St Mary Axe and therefore altering the existing skyline. As such, the proposed building would largely preserve the ability to appreciate the various strategic landmarks identified within the LVMF SPG and the Views 2A.1, 3A.1, 4A.1 and 5A.2 but would be perceptible and have an impact on the view from Blackheath Point.

LVMF river prospects

48 The proposals are shown in the context of a number of LVMF River Prospects. These include Tower Bridge upstream 10 A.1; London Bridge downstream 11B.2; Waterloo Bridge downstream 15B.1; The Southbank Gabriel's Wharf viewing platform 16B.1; Golden Jubilee/Hungerford Footbridges downstream 17B.1; and Lambeth Bridge downstream 19A.1. In the majority of the views, the proposed buildings would be occluded by or sit within, the cluster of existing and consented buildings in the Eastern Cluster, however the applicant should provide a winter view of 19A.1 from Lambeth Bridge downstream to allow for a more comprehensive assessment to be undertaken. More detailed analysis of View 10A.1 is set out in the following paragraphs.

LVMF View 10A.1

49 This is an upstream view from the Grade I Listed North Bastion of Tower Bridge, adjacent to the Tower of London World Heritage Site (WHS). The location enables the fine details and layers of history of the Tower of London to be readily understood.

50 The WHS Management Plan Setting Study notes that views from this area *'exemplify many of the cultural qualities that give the Tower its OUV, particularly its landmark siting alongside the River Thames and in relation to the City beyond, its representation of Norman Power in the White Tower and its association with State institutions by the presence of the Wakefield Tower and Traitor's Gate.*'

51 From this viewing location, the free sky space around the White Tower is important to the understanding and appreciation of the Tower. The view also includes the relationship between the Tower of London and the City in the background. Despite existing development in the City, the Tower of London has retained its landmark value and to a large extent, a high level of visual dominance on the skyline.

52 The Tower of London is located in the foreground of the view and is in close proximity to the viewer, allowing the detail of the building to be clearly visible; the White Tower appears as a stand-alone element due to the retention of clear sky behind its distinctive corner towers and retention of a clear gap between its west elevation and the cluster of existing and consented taller buildings within the City of London and; the solid stone elevations of the Tower of London contrast with the emerging glazed and faceted form of the modern buildings within the emerging City of London cluster.

Impact of the proposals on View 10A.1

53 The applicants' TBHVIA states that the building's architectural articulation, elevational design and materiality make it very clearly part of the composition of the Eastern Cluster, however, GLA officers consider that, its proximity to the Tower would alter the appreciation of the landmark in this view. Paragraph 186 of the LVMF SPG clearly states that '*development should not breach the skyline of the four towers of the White Tower or its castellations'*. In addition, '*some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the background*.'

54 The proposed building would be a distinct feature in the skyline by reason of its separation from the rest of the Eastern Cluster and its use of contrasting materials compared to most of its other tall neighbours. Visible to the left of the White Tower, the proposal would rise above the turrets of the White Tower and reduce the visual dominance of the World Heritage Site, contrary to the visual management guidance set out in the LVMF SPG which states that the '*Tower of London should not be dominated by new development close to it*', and the aims of the WHS Management Plan Setting Study which seeks to '*create views in which the Tower of London is perceived as a riverside gateway to the City, lying at the edge of the City, not 'lost' in the City; views in which the White Tower appears more prominent than the buildings surrounding it; and views in which the military architecture of the Tower and its defences can be appreciated.'* The proposed development would detract from the appreciation and understanding of the WHS OUV.

<u>LVMF townscape views</u>

55 The proposals are shown in the context of two townscape views; The Queen's Walk to Tower of London; 25A.1, 25A.2 and 25A.3 and St. James' Park 26A.1. The images illustrate that the proposed building would be highly visible in views 25A.1, 25A.2 and 25A.3, appearing in the context and setting of the Tower of London WHS. The proposals would not be visible from view 26A.1. More detailed analysis of Views 25A.1, 25A.2 and 25A.3 is set out in the following paragraphs.

LVMF Views 25A.1, 25A.2 and 25A.3

56 This collection of views encompasses a series of viewing locations on the south bank of the River Thames close to two areas of public open space either side of City Hall. These locations provide good views of the Tower of London with a relatively clear background setting to the White Tower.

57 The WHS Management Plan Setting Study notes that views from these locations *'exemplify many of the cultural qualities that give the Tower its OUV, including its landmark siting on the River Thames, its representation of Norman power (represented in this view by the dominance of the White Tower) as an outstanding survival of Norman keep architecture in England and as a model example of a medieval fortress palace (including the Inner and Outer Curtain Walls and the Wakefield and St. Thomas' Towers), and its association with State institutions by the presence of the White Tower, Wakefield Tower and Traitor's Gate.*'

58 The juxtaposition of the WHS with the modern city is the central characteristic of this view which includes a rich variety of landmark elements such as 30 St Mary Axe, Tower 42, Heron Tower and the former Port of London Authority building. A key objective of the Tower of London WHS Management Plan is to maintain clear sky behind the White Tower – a protected silhouette – from 25A.1 so that White Tower remains distinct and legible in the view. The Management Plan is clear, that developers *'respect the ability to recognise and appreciate the strategic landmark and contribute to its legibility.'*

59 As set out in the WHS Management Plan Setting Study, its aim with regards to the view from Queen's Walk is to *'create views in which the White Tower appears dominant in its setting as a recognisable landmark and symbol of national identity; is seen to lie at the edge of the City, not 'lost' in the City and as an outstanding example of concentric castle design; and whose defences are visible.'*

Impact of the proposals on Views 25A.1, 25A.2 and 25A.3

60 From this view, the proposed building would appear to the west of the White Tower, increasing the building height on the edge of the Eastern Cluster from that currently set by 30 St Mary Axe, immediately west of the proposal. The proposal would be visible from this view, would maintain a separation distance and be perceived as part of the Eastern Cluster.

61 The view is further altered by cumulative development within the Eastern Cluster particularly 1 Undershaft and 100 Leadenhall. The proposed development would assist in reducing the stark variation in heights on the edge of the Eastern Cluster in the consented position, stepping down towards the Tower of London from 100 Leadenhall. Any townscape benefit however is only considered against the Eastern Cluster itself

and on the basis of the consented position. In the existing situation, the proposal would rise above the Gherkin, however, only marginally when considered from this view. On balance, the proposal would not have a harmful impact on this view.

62 The proposal would not have a detrimental impact on the White Tower when seen from this view. The clear sky is maintained behind the protected silhouette of the White Tower retaining the distinct and legible view as set out in the WHS Management Plan. The Management Plan also requires developers to *'respect the ability to recognise and appreciate the strategic landmark and contribute to its legibility.'*. The proposal is not considered to have an impact upon the ability to recognise the Tower as a strategic landmark, but it also does not make a positive contribution to the legibility of the Tower of London. This because of the visual prominence of the building and its position in close proximity to the White Tower and the WHS as an ensemble in this view.

63 The White Tower would remain a dominant feature of the skyline from these views which are considered some of the best places from which to see the Tower of London in its riverside context and to understand the complex historic relationship between the Tower of London and the City of London. In the consented position the stepping up of heights to 1 Undershaft would be respected and in the existing situation the proposal would only be marginally higher than the Gherkin. On balance, the proposal would not result in a detrimental impact on view 25A.

Heritage

64 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, planning decisions "should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". The NPPF defines the setting of a heritage assets as the surroundings in which a heritage asset is experienced, where its extent is not fixed and may change as the asset and its surroundings evolve, and that elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

65 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and, the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is defined within the NPPF as the value of the heritage asset, to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

66 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a

development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

67 London Plan Policy 7.7 and Policy D9 of the Publication London Plan state that tall buildings, such as the proposal, should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternative have been explored and there are clear public benefits that outweigh that harm.

68 With respect to heritage assets, London Plan Policy 7.8 and Policy HC1 of the Publication London Plan require that developments affecting the setting of heritage assets - including conservation areas, listed buildings, scheduled monuments and WHS - should conserve their significance. London Plan Policy 7.10 and Policy HC2 of the Publication London Plan state that development should not cause adverse impacts on WHS or their settings, and, in particular, should not compromise the ability to appreciate Outstanding Universal Value (OUV), integrity, authenticity or significance.

69 The submitted Townscape, Built Heritage and Visual Impact Assessment (TBHVIA) sets out to consider the impact of the proposal on the WHS and its OUV, as well as a number of other designated heritage assets in close proximity to the application site. However, the document is limited in terms of the views and heritage assets that are assessed and a number of findings within the document, particularly with respect to the impact on the setting of the WHS are queried, as discussed further below.

70 Furthermore, it is not clear that the applicant has sought to explore other alternatives for the site or mitigate the current harm by reducing the height of the building. The applicant should consider alternative heights, massing and materials as set out in paragraph 37 above. It is noted that Historic England have advised the applicant that the proposed development would cause harm, however it appears that no consideration has yet been given to establish whether their concerns can be addressed. This matter requires further justification having regard to Policy HC1 of the Publication LP which requires that “development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.”

<u>World Heritage Sites</u>

71 The verified views within the TBHVIA demonstrate that the proposal may be seen in the wider setting of Maritime Greenwich WHS, however, its impact is most significant on the Tower of London WHS which is situated approximately 550 metres to the southeast of the application site.

72 The Tower of London is one of London’s four WHS, and its history, development and significance are widely recognised and form the basis of the site’s Outstanding Universal Value (OUV). This OUV is derived from several attributes which include but are not limited to; the Tower of London’s status as an internationally famous monument; its strategic and landmark siting, built as a demonstration and symbol of Norman power; the physical dominance of the 11th century Norman White Tower at of centre of the site; the concentric defences around the site; the surviving 11th to 16th century ruins at the site and their symbolism of royal power; and the site’s historical

association with the institutions of the state. The WHS Management Plan sets out the OUV for each of the cultural qualities, forms part of the site's significance and is relevant to the consideration of this application.

73 View 10 of the TBHVIA is of the WHS from Tower Bridge, however the view is obscured by a tree. Other viewpoints have not been assessed that would allow for a better appreciation and understanding of the WHS, its setting and OUV, particularly moving from the bridge northwards. The applicant should provide additional viewpoints from various aspects and approaches to the site to enable a comprehensive assessment of the proposals' impacts on the relevant attributes of the OUV of the WHS.

74 View 6 is from Greenwich Park – the General Wolfe Statue to St Paul's Cathedral and is also a strategic view within the LVMF (viewpoint 5A.2). Its visibility from this view is limited given the distance, however, it would result in incremental change of the view, increasing the built form within the Eastern Cluster. Its impact on the WHS however is not considered significant.

Heritage impact from within the Tower of London

75 The setting of the Tower of London is assessed as part of the applicants' TBHVIA. The proposals would be visible in views 23 (Tower of London, the Inner Ward, 24 (Tower of London – southern side of the Inner Ward), 25 (Tower of London, Inner Wall, East of Devereux Tower), 26 (Tower of London View 2 Inner Curtain Wall (North)), 27 (Tower of London View 4 – Inner Curtain Wall (south)), and 28 (Tower of London, Byward Tower entrance) and as discussed above these are not the only important views when considering the impact.

76 The proposed development would be visible above the roofline of the Royal Chapel of St Peter ad Vincula. Also visible are 22 Bishopsgate, 52 Lime Street and 122 Leadenhall which are seen collectively within the Eastern Cluster. Notwithstanding future proposed development coming forward, including 1 Undershaft and 100 Leadenhall, the proposal would be seen to stand apart from the Eastern Cluster in a number of views, causing a detrimental impact on the Chapel.

77 The proposal would also be visible over the roof of No.2 Tower Green, however, because the views provided by the applicant are taken in the summer months, trees obscure the view of the proposed development. The applicant should provide a view of the proposal from this viewpoint in the winter months to allow a better understanding of the building's impacts upon the WHS. Taking into consideration the proposed developments coming forward in the Eastern Cluster, it is likely that the development subject of this application would have a lesser impact on this asset, however this cannot be fully assessed against the views currently submitted.

78 From TVBHIA viewpoint 25, the proposals would be appreciated as being more part of the cluster compared to other views. Its impact on the WHS however, would be considered as having a cumulative, negative effect from this view.

79 Views from the Inner Curtain Wall looking north towards the City of London would also be impacted. The proposed development would be viewed adjacent to 30 St Mary Axe as a separate group from the existing Eastern Cluster and although the proposed

development becomes more part of the cluster in the consented position, the proposal is still considered to have a cumulative, negative impact on the WHS.

80 In views from the Inner Curtain Wall, located to the south of the White Tower, the proposed development would be read together with 30 St Mary Axe and separate to the existing Eastern Cluster but would appear to be more consolidated with the cluster in the consented position. The proposal would be clearly visible from these views and would be a distracting element to some degree particularly in the extant position. As such, the proposal would have a cumulative negative impact.

81 From views from the Byward Tower Entrance looking towards the City, the proposed development would appear between the Port of London Authority building and 30 St Mary Axe and would be a prominent feature in the skyline from this view. The proposed development is considered to have a cumulative negative impact on the WHS.

82 The above assessment is not exhaustive. Additional views are requested, and further discussions are required with the applicant, City Corporation and GLA to ensure a thorough assessment of impact on the Tower of London WHS takes place.

Other heritage assets

83 The HIA considers a number of heritage assets in the surrounding area which are set out in the following paragraphs. This is not an exhaustive list and consideration should also be given to the heritage assets identified in paragraph 92 below.

Church of St. Botolph

84 The first church on the site of the Church of St Botolph is thought to have been founded sometime in the 10th-11th centuries and was gifted to the Holy Trinity Priory in 1115. It was rebuilt in 1741-1744 to designs by George Dance Elder. The churchyard was converted into a public garden in the late 19th century. The church has a plain, neoclassical design, mainly comprising brick with minimal stone dressings. The 1980s extension obscures the west elevation of the church and detracts from the significance of the earlier phases of the building. Most of the buildings surrounding the church are mid-rise post-war and modern commercial buildings, in marked contrast to the historic church. The applicants' TBHVIA assesses the view from Aldgate High Street and acknowledges the church as the focal point of this view. The church spire is prominent against the skyline backdrop. Whilst some views are already compromised by modern buildings, the proposed development is considered to cause harm to the setting of the Grade I Listed church.

Church of St Katharine Cree

85 The Church of St Katherine Cree originally founded in 1208 and rebuilt in 1628-31, is the only surviving Jacobean church in London and one of the few buildings in the City that survived the Great Fire. View 46 is located on the eastern pavement of Creechurch Street and the junction of Leadenhall Street adjacent to the church. The proposed development would significantly alter the scale of built form and reduce the level of open sky on the street, causing harm to the setting of the Grade I Listed building.

Bevis Mark Synagogue

86 View 45 of the TBHVIA, is one view that illustrates the impact on the Grade I Listed Bevis Marks Synagogue – the oldest synagogue in Britain. Whilst some modern development is visible to the west, namely The Scalpel at 52 Lime Street, the majority of the synagogue's roofline is set against a clear backdrop of the skyline. The applicants' TBHVIA sets out that the proposal would not compromise the courtyard setting of the synagogue, however it does not consider how the current experience of the enclosed character of the courtyard would be affected, nor how any changes would be experienced taking into account the proposed development at 100 Leadenhall and 20 Bury Street. The character of the building as well as the interior space would be affected by the proposals with regards to loss of light. The proposed development, together with the future proposed development of 1 Undershaft and 100 Leadenhall, would alter the setting of the synagogue and result in harm.

Holland House

87 Immediately adjacent to the site lies Holland House which is a Grade II* Listed building. It is said to illustrate an interesting point in the architectural transition between Art Nouveau and Art Deco and was designed to be seen in oblique views along a very narrow street. Whilst the applicant states that the setting of Holland House has changed dramatically following the construction of 30 St Mary Axe within a large, open plaza, the impacts of the proposed development should be considered in the context of the heritage asset's current setting. The proposed development would increase the sense of scale of development in the streetscape and though it is offset to the rear of the building, the proposed development would have an impact upon the ability to appreciate the heritage asset. From views adjacent to 30 St Mary Axe Holland House has a clear backdrop of open sky. GLA officers consider that it would clearly have an impact on the setting of the heritage asset and the contribution it currently makes to the ability to appreciate the architectural significance of Holland House.

Church of St Helen at Bishopsgate

88 The Grade I Listed Church of St Helen at Bishopsgate is a rare survival of a medieval building in the City of London and was founded in 1210. It is located within the St Helen's Place Conservation Area. Much of its architectural significance lies in the age of the fabric and that it is one of two surviving gothic churches in the City of London. Whilst the applicants' TBHVIA acknowledges that the setting of the church is characterised by long-established contrasting modern buildings, the proposal would alter the viewer's ability to appreciate the setting of the heritage asset. However, in consideration of the future development of 1 Undershaft, it may be likely that the proposal would not constitute change such that it would further impact on the setting or the wider conservation area. View 44 illustrates the view in the summer months and as such the tree occludes much of the view. The applicant should provide a revised view showing the proposed development in the winter months to allow a fuller assessment of the impact on the setting of the heritage asset and wider conservation area.

Trinity Square Gardens

89 View 47 is of Trinity Square Gardens, set within a conservation area, and orientated north towards the site and is dominated by the former Port of London

Authority (PLA) building. Most of the architecture and detailing of the structure reflects the associations with the PLA for example through sculpture, statuary, enrichments to the interiors, functional and decorative fixtures. The building's original commissioning, association and use by the PLA is of historic interest and significance. This was an important building in a prime location in the City of London. The Eastern Cluster is prominently visible above the building, looking north from Tower Hill and in designated views across the river. The applicants' TBHVIA states that the proposed development would be peripheral to the viewer's experience of the receptors, and that whilst noticeable, would appear as part of the built-up urban fabric of the City. GLA officers consider there would potentially be some negative impact on the setting of the heritage asset and the conservation area, however, the applicant should provide a winter view of the proposal to enable a comprehensive assessment.

Lloyd's Avenue

90 The buildings along Lloyd's Avenue form a conservation area and some are listed. The uniform appearance gives the view an introverted character, however the skyline forms part of the intimacy of the view from street level, drawing the view towards 30 St Mary Axe. The proposed development would be visible and dominant next to 30 St Mary Axe, rising significantly taller and impacting the views from the conservation area. Taking into consideration future proposed development, the proposals would further diminish the view and have a negative impact on the conservation area and its setting.

Other heritage assets to consider

91 There are, at least, three heritage assets that have not been considered in the applicant's TBHVIA where it is likely the development would have an impact. These are; 72-75 Fenchurch Street/Lloyd's Avenue which is Grade II* Listed, Church of All Hallows which is Grade I Listed, and Bishopsgate Institute including 2 Brushfield Street which is Grade II* Listed. Views 37 and 40 illustrate that the proposals would rise above both 75-77 Fenchurch Street/Lloyd's Avenue and Bishopsgate Institute and therefore should have been considered within the assessment. With regards to the Church of All Hallows, whilst it is outside the defined study area, it is situated between the proposed development and the Tower of London WHS and as such should be assessed. The above assessment on other heritage assets is not exhaustive and as stated previously there are a number of Listed Buildings and Conservation Areas in the vicinity which will need to be fully considered.

92 The Heritage Impact Assessment is limited in scope, assessing only the impacts on the WHS and places a heavy reliance on LVMF views, whilst the proposal would be seen from many locations and in the setting of a number of Listed Buildings.

93 A full assessment of the impacts on the following heritage assets should also be provided along with any others which are impacted by the proposal:

Church of St Andrew Undershaft;
Church of St Helen's Bishopsgate;
Sir John Cass School Aldgate;
38 St Mary Axe;
Bishopsgate Institute;

Tower Bridge – views from Shad Thames;
Church of All Hallows;
72-75 Fenchurch Street/1Lloyds Avenue;
Bishopsgate Institute; and
2 Brushfield Street Grade II*

Conclusion

94 Having special regard the desirability of preserving the setting of listed buildings, as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, and in light of the harm resulting from the proposed tall building to the setting of heritage assets, including the WHS and its OUV the proposals would not accord with London Plan Policies 7.7, 7.8 and 7.10 and Policies D9, HC1 and HC2 of the Publication London Plan.

95 With specific regard to the impact of the proposals on the setting of the Tower of London WHS, GLA officers conclude that the proposals would result in harm to the significance of the Tower of London WHS. The level of harm is considered to be less than substantial in NPPF terms and further consideration will be given to the extent of harm following receipt of the City Corporation's assessment and additional information from the applicant. The proposals would diminish the ability to appreciate the OUV of the Tower of London.

96 The proposal would also impact negatively on a number of Listed Buildings and Conservation Areas to various degrees within the spectrum of 'less than substantial' harm. A number of the impacted Listed Buildings have been considered above, however, the GLA will fully consider the impact of the proposals upon the historic environment at Stage 2, before applying the associated planning balance. In carrying out that assessment it will require the Council's assessment and the submission of any further information from the applicant provided in response to the concerns identified in this report.

Environment

Impacts of the development

97 As part of the environmental statement, the applicant has assessed daylight, sunlight, overshadowing, light intrusion and solar glare. It states that, with regards to daylight and sunlight, the proposed development would result in negligible, minor adverse and moderate adverse effects. It sets out that where moderate adverse effects have been recorded, windows/rooms have existing low levels of light and are subsequently susceptible to large percentage alterations, experiencing very small absolute changes that would in reality be imperceptible, or that these windows would serve less sensitive spaces, or serve rooms that benefit from other mitigating windows therefore maintaining good levels of amenity. The surrounding context is one which is both compact and high-rise, therefore, sunlight to the public realm is already very limited. The public realm which surrounds 30 St Mary Axe would inevitably be impacted during morning hours, however future proposed development in the area would eliminate any light. GLA officers are broadly satisfied that the

impacts in this regard would be generally consistent with other similar settings within the Eastern Cluster. Nevertheless, with its thorough understanding of the local context the City Corporation will undertake it's own rigorous assessment of local environmental impacts (including daylight and sunlight and over shadowing). GLA officers will update the Mayor accordingly at stage 2.

98 The effects of the proposed development are also assessed within the environmental statement. It concludes that in most tested configurations, all thoroughfares and entrances in and around the proposed development would achieve the desired wind conditions for their intended uses. It acknowledges that considering the proposals together with the existing surrounding buildings, that mitigation would be required and that this mitigation would result in the wind conditions being suitable for the intended uses. Therefore, it states that the effects on amenity spaces are expected to range from moderate beneficial to negligible and not significant. In addition, it finds that with the exclusion of the proposed future development of 100 Leadenhall, the wind conditions would exceed the targeted occasional sitting condition, however, with the inclusion of this development, the area is suitable for occasional sitting throughout the year. This raises no strategic concern; however, the Corporation will need to ensure that the proposed development would not give rise to unacceptable adverse impacts with respect to wind microclimate.

Energy

99 The energy strategy is generally complaint with the Publication London Plan and London Plan policies. The applicant will be assessing the CO2 emission performance against London Plan policies using the SAP 10 emissions factors which is supported. The applicant should submit the GLA's spreadsheet which has been developed to allow the use of the updated SAP10 emission factors alongside the SAP 2012 emission factors.

Be lean

100 The non-domestic element of the proposed development is estimated to achieve a reduction of 8 tonnes per annum (2%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. The applicant should note that the London Plan includes a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency which applicants will be expected to meet. The applicant should therefore model additional energy efficiency measures to meet the target. The specification appears to generally be high performance; the applicant should clearly explain any constraints to improving key energy efficiency measures.

Overheating

101 The applicant is proposing mixed mode ventilation. An optimised glazing ratio of 40% glass to solid is proposed following analysis of daylighting and energy demand which is welcomed.

102 The applicant has demonstrated that the actual building's cooling demand is lower than the notional.

Be clean

103 The applicant has carried out an investigation and there are no existing district heating networks within the vicinity of the proposed development. Relevant stakeholders should be contacted including the borough energy officer, local heat network operators (e.g. Citygen) and nearby developers and ask whether they know of any local heat network connection opportunities.

104 The applicant has provided a commitment that the development is designed to allow future connection to a district heating network. Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network have been provided.

105 The applicant is proposing a communal heat network supplied by a centralised energy centre. It should be confirmed that all non-domestic building uses will be connected to the heat network. A drawing showing the route of the heat network linking all buildings/uses on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre.

Be green

106 The applicant is not proposing to install any renewable energy technology for the development; however, they have provided a roof layout which confirms the lack of roof space for PV, due to roof top plant. They have noted they considered facade mounted PV however, cite fire safety concerns, accessibility for servicing and over-shading as a constraint. Further detail should be submitted on these points to justify the omission and they are encouraged to further consider the potential for facade mounted or other innovative PV. The GLA expects all major development proposals to maximise on-site renewable energy generation, where feasible. This is regardless of whether the 35% on-site CO2 emission improvement target has already been reached through earlier stages of the energy hierarchy.

107 Heat pumps are being proposed in the form of a centralised hybrid ASHP and direct electric top-up for DHW system. Further information on the heat pumps should be provided.

Carbon performance and offsetting

108 The carbon dioxide savings meet the on-site target set within Policy 5.2 of the London Plan and Policy SI2 of the Publication London Plan. The applicant should provide the full version of the relevant modelling output sheets (i.e. BRUKL) for the Be Lean stage of the energy hierarchy. Only selected pages have been submitted, but the full output is required. On publication of the Publication London Plan the zero-carbon target will apply to non-residential development.

<u>Whole Lifecycle Carbon</u>

109 The applicant has provided a WLC report and demonstrated that WLC reduction measures have been considered, however the spreadsheet has not been provided to date to enable a comprehensive assessment of the proposed measures. This must be provided prior to Stage 2.

Circular Economy

110 It is welcomed that the applicant has provided a Circular Economy Statement (CES) however, this must be revised in advance of Stage 2 to incorporate the following comments.

111 The Bill of Materials and Recycling and Waste Reporting Table should be provided. The applicant should also provide a notification of the likely destination of all waste streams and written confirmation that the destination landfill(s) have capacity for this waste.

112 An Operational Waste Strategy should be provided and include information on how waste performance will be monitored and reported once the proposed development is operational. The applicant should commit to ensuring no biodegradable or recyclable waste is sent to landfill and demonstrate that a recycling rate of 65% will be achieved by 2030 for municipal waste, and a recycling rate of 75% will be achieved by 2030 for businesses. Further consideration should be given to consolidated smart logistics, and community-led waste minimisation schemes for operational waste.

113 The applicant is required to provide plans for implementation for achieving short and medium-term targets, and a brief End-of-Life Strategy to set out how the building material, components and products will be disassembled and reused at the end of their useful life.

114 The applicant should also provide an independent pre-demolition audit, site waste resource management plan, municipal and operational waste management plan, cut and fill calculations, scenario modelling, circular economy workshop notes, a lean options appraisal and reused or recycled content calculations. Finally, the applicant should confirm agreement to condition the production of a Completion Report.

115 Full detailed, technical comments have been provided to the applicant and the City Corporation.

Air quality

116 The proposed development is air quality neutral and would not lead to adverse impacts on existing air quality, with predicted air quality for future occupants considered acceptable. Therefore, the proposals comply with London Plan Policy 7.14 and Publication London Plan Policy SI1.

117 The application is subject to an Environmental Impact Assessment and as such, the applicant should outline how the development maximises benefits to air quality

and reduces exposure to poor air quality through design to ensure the development is air quality positive, in line with Policy SI1 of the Publication London Plan.

118 The City Corporation should ensure that a potential future connection to the proposed City2 district heat network is secured.

119 Compliance with the Non-Road Mobile Machinery Low Emission Zone for London, and measures to control emissions during construction should be secured by condition in accordance with Policy SI1 of the Intend to Publish London Plan and Policy 7.14 of the London Plan.

Flood risk

120 The site is located in Flood Zone 1, and a flood risk assessment has been submitted. The approach to flood risk management generally complies with London Plan Policy 5.12 and Publication London Plan Policy SI12.

Sustainable drainage

121 The surface water drainage strategy does not comply with London plan Policy 5.13 and Publication London Plan SI13 as it does not give appropriate regard to providing a sustainable drainage solution. The applicant should revise the drainage strategy to incorporate a gravity discharge and the proposed SuDS should be consistent with other submitted documents.

122 Green roofs are proposed, including a green wall which is proposed to be partially sourced from the roof/facade drainage and is welcomed. A range of SuDS are proposed including permeable paving in the public realm, rain gardens and rainwater harvesting. The drainage strategy should be revised to reflect these SuDS measures. In addition, the green wall should be shown on the scheme plan.

Water efficiency

123 The proposed development generally meets the requirements of London Plan Policy 5.15 and Publication London Plan Policy SI5; however, a water recycling system should be included where possible. The sustainability statement sets out that water meters and a leak detection system would be incorporated in line with Publication London Plan Policy SI5. This should be secured by condition.

124 Full detailed, technical comments have been provided to the applicant and the City Corporation.

Green infrastructure

125 Policy G5 of the Intend to Publish London Plan and Policy 5.10 of the London Plan seek to enhance urban greening Policy G5 of the Intend to Publish London Plan introduces an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments.

126 The application documents demonstrate a biodiversity net gain of 416.71. The proposed development is therefore complaint with the biodiversity policy in the Publication London Plan.

127 The proposed development presents a well-considered approach to integrating green infrastructure and urban greening across the masterplan which is strongly supported and should be brought to fruition.

128 The applicant has calculated the UGF of the proposed development as 0.39, which exceeds the target set by Policy G5 of the Publication London Plan and the City of London Target. The ambition of the scheme in this regard is strongly supported. The proposed development is therefore compliant with Policy G5 of the Publication London Plan.

Transport

Trip generation

129 The Transport Assessment (TA) should include analysis of the stations that would be most affected, taking into consideration current levels of crowding. No assessment has been made on train service capacity. Given the scale and location of the proposed development, a full assessment of likely impacts on all affected station assets, including capacity and crowding, should be provided. TfL would welcome further discussions on this.

Healthy Streets and Vision Zero

130 Analysis of Pedestrian Comfort Levels (PCL) for local footways has been provided which is welcome. The footways around the proposed development should achieve the minimum PCL score of C+ recommended as acceptable for the 'Office and Retail' area type in the Pedestrian Comfort Guidance for London. This is required by Publication London Plan policy T4 and TfL's online guidance for planning applicants. A minimum score of B is recommended as comfortable for such areas in the PCL guidance and is strongly encouraged, especially given the location of the proposed development in a busy part of the CAZ.

131 Final expected PCL scores for local footways assessed in a future baseline 'with development' scenario should be provided. Where footways are particularly constrained with a PCL score of F, such as the pinch point at Bury Street West, the applicant should help to deliver widening under S278 or S106 as appropriate. Proposed widening of the footways adjacent to the site would improve the pedestrian environment in line with Policy T2 of the Publication London Plan.

132 Access through the new covered pedestrian route, Heneage Arcade, would be publicly accessible from 07:00-23:00 each day and should be secured by condition or via s106 agreement.

133 There is the potential for conflict or collisions between servicing vehicles and pedestrians given that pedestrian access is proposed adjacent to the servicing

vehicle access point off Heneage Lane. This specific proposal should be subject to a Stage 1 RSA and Designer's Response prior to determination.

134 A Stage 1 Road Safety Audit should be carried out in accordance with Policy T4 of the Publication London Plan

Cycling

135 Cyclists are required to use the same street as service vehicles for access. The applicant should consider how cyclists would be segregated from servicing vehicles and how cycle safety will be maintained. Policy T2 of the Publication London Plan seeks to reduce vehicle dominance and the applicant should explore the opportunity to reduce car parking on Creechurch Street together with the City Corporation.

136 The use of service access by motorised vehicles should be restricted to night-time or out of peak hours only and restrictions of larger vehicles would be welcomed.

137 The applicant is encouraged to work with the City of London to connect the proposed development with the local cycling and walking networks in line with Policy T5 of the Publication London Plan.

138 The cycle route between the site and Cycle Superhighway 2 should be assessed using the TfL Cycle Route Quality Criteria and should take place prior to Stage 2.

Cycle hire

139 It is likely the proposed development will increase the demand for TfL Cycle Hire in the local area. TfL therefore requests a S106 contribution of £220,000 for a new Cycle Hire station. If space cannot be provided within the development site, the applicant should work with TfL to find a suitable location within the public realm nearby, subject to City of London approval.

Cycle parking

140 The proposed levels of cycle parking meet the requirements of Policy T5 of the Publication London Plan.

141 Long and short stay cycle parking at basements levels will be accessed via stairs with a wheeling channel or dedicated cycle lift. Lifts are expected to be large enough to accommodate all types of cycles. Some short stay cycle parking may be provided in the public realm which would be strongly supported.

Car parking

142 The development is car-free but for disabled person's parking and as such complies with Policy T6 of the Publication London Plan. One car parking space is proposed to be retained within the site to serve Holland House. This must be allocated and clearly marked for blue badge use only in order to comply with policy.

143 The area is within the Controlled Parking Zone (CPZ). Future occupants should be restricted from obtaining permits to park on surrounding streets. This should be secured by condition.

144 There are three on-street disabled parking spaces on Creechurch Land and Mitre Street within 50 metres of the site. This is acceptable in principle however; the applicant should provide clarification that these spaces are accessible from the proposed development by all users.

Travel Plan

145 A framework Travel Plan has been provided and a full Active Travel Promotion Plan should be secured by condition in line with Policy T4 of the Publication London Plan. Baseline employee travel surveys are to be undertaken within 6 months of occupation or at 75% occupation which is acceptable.

Delivery and servicing

146 A Delivery and Servicing Plan (DSP) has been submitted and should be secured by condition and implemented from the outset.

147 The DSPs commitment to encourage all occupiers of the proposed development to schedule deliveries outside of 07:00-10:00, 12:00-14:00 and 16:00-19:00 should be strengthened and the City Corporation may wish to restrict deliveries within these hours by condition.

148 The DSP also proposes a ‘smart’ courier policy to be introduced within the first year of occupation. This should be implemented at the earliest possible stage. To aid this, dedicated cargo cycle parking should ideally be provided within the public realm close to the building entrances. If space on site cannot be allocated for this, the applicant should work with the City of London to identify an appropriate space within the public realm.

Construction

149 An outline Construction Environmental Management Plan (CEMP) has been submitted, which contains a Construction Logistics Plan (CLP). A full CLP should be secured by condition and produced following TfL guidance.

150 The site is in a busy part of the CAZ. Therefore, during construction, safe routes for walking, fully accessible for people of all ages and abilities, should always be provided around the site. The temporary highway alterations and parking suspensions proposed in the outline CLP should be discussed in detail with the City of London as the local highway authority.

151 The applicant should ensure all freight movements associated with construction vehicles are safe and support the Mayor’s Vision Zero approach. TfL supports the commitments given to appoint a silver or gold FORS accredited contractor where possible and use of traffic marshals.

152 Full detailed transport comments have been provided to the applicant and the City Corporation.

Local planning authority's position

153 Planning officers at the City of London Corporation have been involved in pre-application discussions on the scheme however a date has not currently been confirmed for the City of London Corporation to formally consider the application at a planning committee meeting.

Legal considerations

154 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

155 There are no financial considerations at this stage.

Conclusion

156 London Plan and the Publication London Plan policies on the central activities zone, employment, urban design, strategic views, heritage, inclusive design, transport and sustainable development are relevant to this application. The application does not fully comply with the London Plan as set out below:

- **Principle of development:** The redevelopment of the site for an office-led development within the CAZ, recognising its importance as an internationally and nationally significant office location is supported in principle. Further discussions are required regarding affordable workspace and how the proposed mezzanine space and pocket park would operate in synergy as a legible and functional public space.
- **Historic Environment:** The development would compromise the ability to appreciate the Outstanding Universal Value and setting of the Tower of London World Heritage Site and would cause less than substantial harm to the significance of a number of Listed Buildings and Conservation Areas. The Heritage Impact Assessment does not include a number of heritage assets that will be impacted and the Townscape, Built Heritage and Visual Impact Assessment lacks sufficient detail to enable a comprehensive

assessment of the heritage impacts of the proposal. Further information is required to enable GLA officers to consider the impact of the proposals upon the historic environment prior to Stage 2 and to carry out the required planning balance.

- **Design:** A tall building is acceptable in principle given the site is located within the Eastern Cluster but requires a sensitive design approach given its location in the setting of a number of heritage assets and the Tower of London WHS – in particular the materiality of the upper part of the building should be reconsidered to ensure the building reads as being familial to the Eastern Cluster and more different from the WHS The applicant should also ensure that active frontages are achieved on Creechurch Lane and consider the height and proportions of the arcade, ensuring that the retail/café frontage is not perceived as an internalised lobby.
- **Strategic views:** The height, scale and appearance of the proposed development within LVMF view 10A.1 would cause harm to this strategic view.
- **Transport:** Proposed car and cycle parking is acceptable. Future impacts on station capacity and crowding should be considered. Widening of footways should be secured via s278 or s106 agreement to ensure pedestrian comfort levels are acceptable. Access through Heneage Lane should be conditioned. The applicant should consider how cyclists would be segregated from servicing vehicles using the same street. A contribution of £220,000 has been requested for a new Cycle Hire station. A full Travel Plan, Delivery and Servicing Plan and full Construction Logistics Plan should be secured by condition.
- Further information is required in relation to **Heritage**, **LVMF views**, **Energy**, **Whole Lifecycle Carbon**, and **Circular Economy**.

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for further information, contact GLA Planning Unit (Development Management Team):
Therese Finn, Senior Strategic Planner (case officer)
email: [redacted]
Graham Clements, Team Leader
email: [redacted]
Allison Flight, Deputy Head of Development Management
email: [redacted]
John Finlayson, Head of Development Management
email: [redacted]
Lucinda Turner, Assistant Director – Planning
email: [redacted]

Historic Royal Palaces

19th November 2020

Development Division
City of London
PO Box 270
Guildhall
London EC2P 2EJ
FAO Ms Bhakti Depala

Historic Royal Palaces is the charity that looks after:

Tower of London
Hampton Court Palace
Banqueting House
Kensington Palace
Kew Palace
Hillsborough Castle and Gardens

We help everyone explore the story of how monarchs and people have shaped society, in some of the greatest palaces ever built.

We raise all our own funds and depend on the support of our visitors, members, donors, sponsors and volunteers.

Dear Sirs

Bury House, 31 Bury Street, London EC3A 5AR

Planning Ref: 20/00848/FULEIA

Thank you for your letter of 12th November notifying Historic Royal Palaces of this planning application and inviting us to submit observations within 21 days.

The applicant's Design Team consulted with us in August and presented to us the design proposals and images illustrating the likely impacts of the proposals on the views to and from the Tower of London World Heritage Site (WHS).

As guardians of the Tower of London WHS, Historic Royal Palaces believes that the proposed development would have a damaging visual effect on aspects of the 'Outstanding Universal Value' (OUV) of the Tower WHS. On the basis of the information available on the City's website, our comments on the proposal, which reflect the comments we offered at pre-application stage, are set out below: we would ask that these are taken into account in the Council's determination of the application.

We recognise that the aim of the design approach is to cut back at high level the upper part of the proposed tower, in order to maintain some visual separation from the White Tower silhouette in the London View Management Framework (LVMF) view 10A.1 from the north bastion of Tower Bridge (TGHVIA view 9). Without the cut back from the 84m high 'base', the upper part of the tower would appear visually to 'touch' the western side of the White Tower in this view. With the cut back, there remains just a sliver of sky space to separate it, but of course this view, like any other, is not static: move a few metres north and the proposal would appear to rise directly out of the White Tower.

The LVMF guidance for view 10A.1 states that: *The location enables the fine detail and the layers of history of the Tower of London to be readily understood. This understanding and appreciation is enhanced by the free sky space around the White Tower. Where it has been compromised its visual dominance has been devalued*.

INVESTORS IN PEOPLE | Gold

Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583).
The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU

Historic Royal Palaces

Regarding the background to the Tower, the LVMF guidance notes, *Views from this place include the relationship between the Tower of London and the City in the background. It is important that the background of the landmark in these views is managed sensitively and should not compromise a viewer's ability to appreciate the Outstanding Universal Value of the World Heritage Site.*

It should be borne in mind that the LVMF was written in 2011-12, when the only existing tall buildings in the emerging Cluster were the Gherkin (30 St Mary Axe), the Willis Towers and Tower 42. The expansion of the Cluster since, in both scale and height, has been beyond anything that was envisaged when the LVMF was published. The proposal for Bury House, despite the designer's ingenuity, would now inevitably increase the existing compromise of the free space around the White Tower.

In Historic Royal Palaces' view, the attention given to this particular LVMF view does not mitigate the more damaging visual impacts that are evident in the dynamic journey across Tower Bridge and in the local views from within the inner ward and the northern ramparts of the Tower identified in our *Local Setting Study 2010*. These impacts would be particularly apparent in the view north-west from the centre of Tower Green over the roof of St Peter ad Vincula (TBHVIA view 22) and in the view from the northern wall walk east of the Devereux Tower (TBHVIA view 25), as well as from the causeway between the Byward and Middle Towers (TBHVIA view 28). In these important views, the proposed building would rise like a narrow finger, standing apart from the existing and consented buildings of the Cluster and increasing the visual intrusion of the modern city skyline into the inner ward and important outward views, an intrusion that would not be softened or screened when the trees are not in leaf.

A key impact of the proposed development would be that it would inevitably extend the eastern shoulder of the Cluster toward the Tower, further reducing the crucial separation between the Tower and the burgeoning City. Although relatively modest in height, the proposal would be high enough to suggest a further continuation of the downward slope of the Cluster towards the White Tower - pushed increasingly up and out in the easterly direction from the consented 100 Leadenhall scheme.

Historic Royal Palaces therefore objects to the proposed development, which we believe would be harmful to the OUV of the Tower of London WHS and we ask the City of London to refuse the application.

Yours faithfully

[redacted]

Adrian Phillips
Palaces & Collections Director

[redacted]

Transport for London

To: Bhakti Depala
From: Emily Hindle – TfL Spatial Planning
Your ref: 20/00848/FULEIA
Our ref: CITY/20/44
Date: 22.02.2021

RE: 31 Bury House, Bury Street- TfL comments
The comments below summarise Transport for London's (TfL) views on the proposed development. Please note that these comments represent the views of TfL officers and are made entirely on a "without prejudice" basis.

Summary

- Stage 1 Road Safety Audits (RSAs) to be carried out prior to determination for all local highway works proposed.
- Contribution of Section 106 (S106) funding, Section 278 (S278) works or works in kind to the City Cluster Liveable Neighbourhood project, to mitigate poor expected Pedestrian Comfort Levels (PCLs) close to and partially caused by the proposed development. Further discussions should take place between the applicant, TfL and the City Corporation to resolve this issue prior to determination.
- The covered pedestrian route is to be publicly accessible from 07:00-23:00 each day and the pocket park will be open to the public 24 hours a day, both of these should be secured by condition or in the S106 agreement.
- Investigation on the removal of general car parking on Greechurch Street, to provide more space between cyclists and service vehicles would be supported.
- S106 contribution of £220,000 for a new Cycle Hire station.
- A full Active Travel Promotion Plan to be secured by condition.
- Delivery & Servicing Plan and Construction Logistics Plan to be submitted and secured by condition.

Site Description and Location
The site is located on Bury Street within the City of London and the Central Activities Zone in an area with a Public Transport Access Level (PTAL) of 6a, on a scale of 1-6b in which 6b represents the highest.

The site is bounded by Bury Street to the southwest, Creechurch Lane to the east and Holland House to the northwest. The A10 Bishopsgate is the nearest section of the Transport for London Road Network (TLRN), approximately 300 metres northwest. The nearest part of the Strategic Road Network (SRN) is Bevis Marks, roughly 50 metres north.

Aldgate is the nearest London Underground (LU) Station, located approximately 300 metres from the site, served by the Circle and Metropolitan lines. Liverpool Street station is roughly 400 metres northwest of the site and is served by Central, Circle, Hammersmith & City and Metropolitan lines, TfL Rail and National Rail services. Liverpool Street will also be served by the Elizabeth Line in future.

The nearest bus stops are on Leadenhall Street, Bevis Marks and Bishopsgate with access to 10 routes. Aldgate bus station, 360 metres away and Wormwood Street, 400 metres away, provide access to a wide range of bus services within walking distance.

The nearest Cycle Hire docking stations are at St Mary Axe, Aldgate, Houndsditch, Aldgate and Jewry Aldgate. The closest TfL Cycleway to the site is Cycle Superhighway 2 (CS2), 175 metres away on Whitechapel High Street.

Trip Generation and Public Transport Impacts
The Transport Assessment only gives percentage increases in public transport trips expected to be generated, compared against total usage of local stations. Analysis should be provided demonstrating which stations will be most affected, taking into consideration their current levels of crowding.

No assessment has been made on train service capacity. Given the scale and location of this development, TfL expects a full assessment of likely impacts on all affected station assets, in accordance with TfL's standard station planning standards and formulas, with publicly available data used for baseline crowding.

An assessment should be undertaken of capacity and crowding impacts within all stations expected to get busier due to the proposed development. Further discussion is welcomed about this matter. This should consider Base; Base + Development Demand; and Base + Development + relevant Cumulative Consented Local Development Scenarios. Line Load data publicly available on the TfL website should be used to assess line capacities for all of the same scenarios.

Overall, the Underground is expected to account for 80% of all trips from this development. Given the upgrading of Bank station and the future opening of the Elisabeth line, it is likely walking pressure on walking routes to the east of the site will be greatest.

Healthy Streets and Vision Zero
Analysis of Pedestrian Comfort Levels (PCL) for local footways has been provided in the TA which is welcome. The footways around the proposed development should achieve the minimum PCL score of C+ recommended as acceptable for the 'Office and Retail' area type in the Pedestrian Comfort Guidance for London. This is required by Publication London Plan policy T4 (Assessing and mitigating transport impacts) and TfL's online guidance for planning applicants. A minimum score of B is recommended as comfortable for such areas in the PCL guidance and is strongly encouraged, especially given the location of the proposed development in a busy part of the CAZ.

The City of London Transport Strategy (adopted May 2019) recommends a minimum PCL score of B+ on 'any footway' in the City (Proposal 2, p. 30 and Table 3, p. 113). It is supported by the City Cluster Vision neighbourhood strategy, which specifically identifies streets surrounding 31 Bury Street as 'city streets and lanes to be enhanced' (p. 23). The Vision also refers to PCLs acknowledging that "The City's Transport Strategy aims for all pavements to have a minimum pedestrian comfort level of B+" (p. 11) but additionally stating that: "It is recognised that this may not be achievable in the Cluster so a proposed level of C+ is suggested."

This area of City Cluster is part of a TfL Liveable Neighbourhood which is now being implemented. The project aims to reduce through traffic given the high density of business activity and apply the Healthy Streets Approach to improve the environment for people walking, spending time and moving through the area.

The submitted TA has not specified the final expected PCL scores for the local footways assessed in a future baseline 'with development' scenario. These must be provided prior to determination for further comment by TfL and the City Corporation. The growth factor used for the future baseline 'without development' appears to be satisfactory, as it matches the

growth in pedestrian activity expected in the City of London Transport Strategy and used recently for PCL analysis in similar applications nearby.

Where footways are particularly constrained with a PCL score of F, such as the pinch point at Bury Street West, the applicant should help to deliver widening under S278 or S106 as appropriate.

The TA acknowledges that TfL Pedestrian Design Guidance on calculating Pedestrian Comfort Levels (PCLs) and its accompanying spreadsheet calculator automatically assigns a score of 'F' to any footway with clear space for pedestrian movement of less than 1.5m, and a total width of less than 1.9m. The incomplete PCL analysis already submitted identifies and acknowledges 6 such footways pedestrians would use to access the proposed development from surrounding streets.

All of the F scoring footways should be widened to improve expected future PCLs in support of the proposed development except where it is physically impossible to do so. Most concerningly the pinch point identified at 'Bury Street (West)' already has insufficient capacity to cater for current pedestrian demand and would clearly be unable to cope with additional pedestrian demand likely to be generated by the proposed development whilst maintaining a minimum PCL score of B. This impact fails to comply with policies T1 (Strategic approach to transport), T2 (Healthy streets), T4 and D8 (Public Realm) of the Publication London Plan, which must be addressed. It could be mitigated by the proposed development contributing S106 funding, S278 works or works in kind to the City Cluster Liveable Neighbourhood project. Further discussions should take place between the applicant, TfL and the City Corporation prior to determination to resolve this issue and agree appropriate mitigation.

Stage 1 Road Safety Audits (RSAs) should also be carried out prior to determination for all local highway works proposed, to demonstrate and ensure compliance with Publication London Plan policy T4 part 'F' which states new development must not increase road danger. This is essential due to Vision Zero, the Mayor's goal to eliminate all death and serious injuries from London's transport networks by 2041.

Notwithstanding the comments above on expected PCLs on surrounding streets, the proposed widening of footways immediately adjacent to the site will clearly improve the pedestrian environment in line with the Healthy Streets Indicators, in compliance with policy T2 (Healthy streets), part D of the Publication London Plan.

Part of the existing footways outside the site at its south west corner, fronting Bury Street, is completely absent and improvements are also required in this location. 0m wide due to a vehicle crossover. The same applies at the vehicle crossover at the bend in Bury Street adjacent to Brown's Buildings. These clearly must be widened and improved to support the proposed development and the highway improvements proposed there are therefore very welcome.

A new covered pedestrian route, Heneage Arcade, is proposed between Heneage Lane and Bury Street, running north to south through the site, proposed to be publicly accessible from 07:00-23:00 each day. This should be secured by condition or in the Section 106 agreement.

As pedestrian access is proposed adjacent to the servicing vehicle access point off Heneage Lane, there is potential for conflict or collisions between servicing vehicles and pedestrians. TfL supports works proposed to introduce a raised crossing, which would give priority to pedestrians on Heneage Lane. This specific proposal should be subject to a Stage 1 Road Safety Audit (RSA) and Designer's Response prior to determination.

A new part open, part covered space, James Court Pocket Park, is proposed to the southern end of the site. This introduces an area of trees and planting to a site that is currently lacking in greenery, which would support the Healthy Streets indicators in line with policy T2 and D8 of the Publication London Plan. The new pocket park proposed is therefore very welcome.

The park will be open to the public 24 hours a day, which should also be secured by condition or a S106 obligation.

Cycling
Access to the cycle parking is proposed via Creechurch Lane to the north east of the building. This will require cyclists to use the same street as service vehicles for access. This is a narrow street, constrained further by existing on-street parking and the dominance of motor vehicles under the current proposed highway layout; therefore, the applicant should consider how cyclists will be segregated from servicing vehicles and how cyclist safety will be maintained. Motor vehicle dominance should be reduced by all new development in London as specified by Publication London Plan policy T2. Further investigation focusing on the removal of general car parking on Creechurch Street, to provide more space between cyclists and service vehicles by the applicant and City Corporation would therefore be supported.

A condition or other planning obligations restricting use of the servicing access by motorised vehicles to night-time or out of peak hours only, and restrictions on use by larger vehicles would be supported. As recommended in the TfL Streetscape Guidance part E (Physical design and materials), section 8 (Carriageways) potential options for more formal segregation between cycles and vehicles within the carriageway could include a segregated lane/track; stepped tracks; light segregated lane; mandatory cycle lane; or advisory lane.

Policy T5 (Cycling) of the Publication London Plan requires new developments to create environments in which people choose to cycle. The applicant is therefore encouraged to work with the City of London to connect the proposed development with the local cycling and walking networks.

Whilst the route between the site and CS2 has been assessed in the TA's Active Travel Zone (ATZ) Assessment, no improvements are proposed to make cycling to it from the site more safe and pleasant. Given the site's proximity to CS2, it is likely that many users of the new development proposed will cycle to and from the site using these routes. Street changes may be required to protect the safety of these cyclists and encourage increased cycling in accordance Publication London Plan policy T1. The cycle route between the site and CS2 should therefore be assessed using the TfL Cycle Route Quality Criteria. This should take place prior to Stage 2; relevant guidance can be found here: https://tfl.gov.uk/corporate/publications-and-reports/cycling

Cycle Hire
As destination retail uses are proposed in Heneage Arcade, it is likely the proposed development will increase demand for TfL Cycle Hire in the local area. The area already suffers from significant capacity pressures, with the nearby St Mary Axe Cycle Hire station often empty, despite frequent re-distribution trips to manage the demand. Casual cycling using Cycle Hire would support the proposed development and new infrastructure would cater for the new demand likely to be generated by new visitors, TfL therefore requests a S106 contribution of £220,000 for a new Cycle Hire station. If space cannot be provided within the development site, the applicant should work with TfL to find a suitable location within the public realm nearby, subject to City of London approval.

Cycle Parking

430 long stay and 16 short stay cycle spaces are proposed for the office uses. This is in line with the minimum requirements set out in policy T5 of the Publication London Plan. Two long stay and 10 short stay spaces are proposed for the sui generis and retail uses, which also complies with relevant strategic policy.

22 long stay cycle spaces are proposed as Sheffield stands, 44 as folding bike lockers and 377 in two-tier racks. Where two-tier racks are provided, they should have a mechanically or pneumatically assisted system for accessing the upper level and the product must allow for double locking. Minimum aisles widths defined in the London Cycling Design Standards (LCDS) should be provided between the stands to ensure they will be useable. All cycle parking should be designed and laid out in accordance with the LCDS and secured by condition.

Long and short stay cycle parking at basement levels will be accessed via stairs with a wheeling channel or a dedicated cycle lift. Lifts expected to be used for cycling access must be large enough to take all types of cycles with sufficient lift capacity to operate without significant delay even at peak times for cycling arrivals and departures. Two lifts are proposed for cycling access to the basement, which should prevent the cycle store being inaccessible if one lift is already in use or fails.

Some of the short cycle parking may be provided within the public realm surrounding the development. This would be strongly supported by TfL and should be implemented by the City Corporation where possible.

Cycling welfare facilities, inducing showers and lockers will be provided. This will allow cycling to be a viable option all year round and will provide the opportunity for cyclists to refresh before starting their working day. This will remove barriers and encourage more people to cycle in line with policy T5, part A of the Publication London Plan.

Car Parking
The development is proposed as car free in line with policy T6 (Car Parking) of the Publication London Plan. This means the development should have no general car parking, save for disabled persons parking. However, one car parking space is proposed to be retained within the site adjacent to the servicing area, to continue serving Holland House. The proposed retained car parking space must be allocated and marked clearly for blue badge use only, or it is not policy compliant and should therefore be removed from the application.

The area is within a Controlled Parking Zone (CPZ). Future occupants should be restricted from obtaining permits to park on the surrounding roads. This should be secured by condition.

3 on-street disabled car parking spaces exist on Creechurch Lane and Mitre Street within 50 metres walking distance. This disabled car parking proposal is acceptable in principle. However, clarification should be provided prior to determination to demonstrate robustly that the on-street spaces are accessible from the proposed development without crossing any steps, kerbs or other features that could prevent the journey being made pleasantly, safely and easily by people of all abilities including wheelchair users and those who use other mobility aids.

Travel Plan
A framework Travel Plan has been provided and a full Active Travel Promotion Plan should be secured by condition in line with policy T4, part B of the Publication London Plan. Baseline employee travel surveys are proposed to be undertaken within 6 months of occupation or at 75% of occupation which is acceptable.

By the 5th year, the sustainable and active mode share target for the Class E office use proposed is 99%. This is welcomed by TfL as it will support the Mayor's Transport Strategy (MTS) in accordance with policies T1 (Strategic approach to transport) and T4 of the Publication London Plan.

Delivery and Servicing
A Delivery and Servicing Plan (DSP) has been submitted. This should be secured by condition and implemented from the outset.

Publication London Plan policy T7 (Deliveries, servicing and construction) requires new development to provide adequate space for servicing, with storage and deliveries made off - street, and on-street loading bays only used where this is not possible. This would be supported by the creation of a new on-site servicing area directly off Heneage Lane, equipped with electric charging facilities, able to accommodate one vehicle at a time.

The DSP's commitment to encourage all occupiers of the proposed development to schedule deliveries outside of 7am-10am, 12pm-2pm and 4pm-7pm should be strengthened and the City Corporation may wish to restrict deliveries within these hours by condition, to help reduce congestion on the local highway network and improve safety for pedestrians and cyclists coming to and from the site.

The DSP also proposes a 'smart' courier policy to be introduced within the first year of occupation. This should be implemented at the earliest possible stage. To aid this, dedicated cargo cycle parking should ideally be provided within the public realm close to the building entrances. If space on site cannot be allocated for this, the applicant should work with the City of London to identify an appropriate space within the public realm. This will support proposal 81 of the MTS in ensuring new developments facilitate efficient and sustainable freight and servicing, including cargo deliveries.

Construction
An outline Construction Environmental Management Plan (CEMP) has been submitted, which contains a Construction Logistics Plan (CLP). A full CLP should be secured by condition and produced following TfL guidance.

The site is in a busy part of the CAZ. Therefore, during construction, safe routes for walking, fully accessible for people of all ages and abilities, should always be provided around the site. The temporary highway alterations and parking suspensions proposed in the outline CLP should be discussed in detail with the City of London as the local highway authority.

The applicant should ensure all freight movements associated with construction vehicles are safe and support the Mayor's Vision Zero approach. TfL supports the commitments given to appoint a silver or gold FORS accredited contractor where possible and use of traffic marshals.

PLNComments@cityoflondon.gov.uk

13 November 2020

Crossrail Ref: CRL-IP-1534

Dear Bhakti Depala,

20/00848/FULEIA : Bury House 31 Bury Street London EC3A 5AR

Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460 sqm GIA] (Class E), flexible retail / cafe use [60sqm GIA] (Class E), publicly accessible internal amenity space [421 sqm GIA] (Sui Generis) and community space [502 sqm GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E offices, 62 sq.m GEA flexible retail/caf¿ of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460 sqm GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479 sq.m GEA; overall height 197.94 AOD).

Transport for London administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 12 November 2020, requesting the views of the Crossrail on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

The implications of the Crossrail proposals for the application have been considered and I write to inform you that Crossrail Limited does not wish to make any comment on the application as submitted.

If you require any further information or assistance please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Crossrail)

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN
……

Please note: please send, by email, all planning application consultations that are captured by the SoS Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
……

Crossrail (The Elizabeth Line) is a proposed new railway that will link Heathrow and Maidenhead in the west to Shenfield and Abbey Wood in the east using existing Network Rail tracks and new tunnels under Central London.

The Crossrail Bill which was introduced into Parliament by the Secretary of State for Transport in February 2005 was enacted as the Crossrail Act on the 22nd July 2008.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24th January 2008. The Direction was extended on 29th April 2009 (Maidenhead to Reading) and 14th October 2009 (Abbey Wood to Gravesend and Hoo Junction).

You may inspect copies of Plans, Sections, Environmental Statements, Explanatory Notes and Non-Technical Summaries pertaining to Crossrail at specified Libraries, Local Authority Offices or directly from Crossrail Limited. For further information contact CRL_Safeguarding@tfl.gov.uk

PLNComments@cityoflondon.gov.uk

26 February 2021

Crossrail Ref: CRL-IP-1722

Dear Charlie O'Sullivan,

20/00848/FULEIA : Bury House 31 Bury Street London EC3A 5AR

Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD). 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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

FURTHER INFORMATION RECEIVED: Environmental Statement additional material (relating to ES Volume 2: TBHVIA Addendum; updated ES Volume 1: Chapter 13: Effect Interactions; and Non-Technical Summary) and Public Benefits Statement; Building Ecosystem Paper; Energy Strategy Note; Equality Statement and Thermal Comfort Assessment.

Transport for London administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Thank you for your letter dated 24 February 2021 requesting the views of the Crossrail on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

The implications of the Crossrail proposals for the application have been considered and I write to inform you that Crossrail Limited does not wish to make any comment on the application as submitted.

If you require further information please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Crossrail)

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

……

Please note: please send, by email, all planning application consultations that are captured by the SoS Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

……

Crossrail (The Elizabeth Line) is a proposed new railway that will link Heathrow and Maidenhead in the west to Shenfield and Abbey Wood in the east using existing Network Rail tracks and new tunnels under Central London.

The Crossrail Bill which was introduced into Parliament by the Secretary of State for Transport in February 2005 was enacted as the Crossrail Act on the 22nd July 2008.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24th January 2008. The Direction was extended on 29th April 2009 (Maidenhead to Reading) and 14th October 2009 (Abbey Wood to Gravesend and Hoo Junction).

You may inspect copies of Plans, Sections, Environmental Statements, Explanatory Notes and Non-Technical Summaries pertaining to Crossrail at specified Libraries, Local Authority Offices or directly from Crossrail Limited. For further information contact CRL_Safeguarding@tfl.gov.uk

Hackney Council
Planning Services
2 Hillman Street
London E8 1FB
www.hackney.gov.uk
Hackney Reference:2020/3514

Mr Bhakti Depala
Po Box 270, Guildhall, London Ec2p 2ej

18-01-2021

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015

Application Number: 2020/3514

Site Address: Bury House 31 Bury Street London EC3A 5AR

Development Description: Notification from the City of London of application 20/00848/FULEIA for the demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460 sqm GIA] (Class E), flexible retail / cafe use [60sqm GIA] (Class E), publicly accessible internal amenity space [421 sqm GIA] (Sui Generis) and community space [502 sqm GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.

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

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

Yours sincerely

[redacted]

Natalie Broughton

Head of Planning and Building Control
Neighbourhoods and Housing

PLANNING DECISION NOTICE

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

Agent:	Bhakti Depala Po Box 270, Guildhall, London Ec2p 2ej Ec2p 2ej EC2P 2EJ	**Applicant:**	Bhakti Depala Po Box 270, Guildhall, London Ec2p 2ej Ec2p 2ej EC2P 2EJ

Part 1- Particulars of the Application

Application No:	2020/3514
Date of Application:	12-11-2020
Date Validated:	
Application Type:	Adjoining Borough Observations

Proposal: Notification from the City of London of application 20/00848/FULEIA for the demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460 sqm GIA] (Class E), flexible retail / cafe use [60sqm GIA] (Class E), publicly accessible internal amenity space [421 sqm GIA] (Sui Generis) and community space [502 sqm GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.

Location: Bury House 31 Bury Street London EC3A 5AR

Part 2 – Particulars of Decision: **No Objection**

Date of Decision: 18-01-2021

Yours sincerely

[redacted]

Natalie Broughton

Head of Planning and Building Control
Neighbourhoods and Housing

Director of the Built Environment
Development Division
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

PLACE

Tel 020 7364 5009

www.towerhamlets.gov.uk

18 December 2020

Dear Bhakti Depala,

CITY OF LONDON REF: 20/00848/FULEIA

TOWER HAMLETS REF: PA/20/02417

ADDRESS: Bury House 31 Bury Street London EC3A 5AR

PROPOSAL: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460 sqm GIA] (Class E), flexible retail / cafe use [60sqm GIA] (Class E), publicly accessible internal amenity space [421 sqm GIA] (Sui Generis) and community space [502 sqm GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E offices, 62 sq.m GEA flexible retail/cafe of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460 sqm GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479 sq.m GEA; overall height 197.94 AOD).

INTRODUCTION

Thank you for your letter of 12 November 2020 notifying the London Borough of Tower Hamlets of the City of London's receipt of the above-mentioned planning application.

The advice contained within this letter sets out the Council's assessment and conclusions which will inform the response to the request for observations.

Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

PROPOSED DEVELOPMENT

The demolition of the existing buildings on the site does not cause concern for the London Borough of Tower Hamlets and as such comments are provided on the basis of the proposed building.

HERITAGE

Location

The application site is located to the north-west of the Tower of London, which is a World Heritage Site (WHS) containing a number of listed buildings as well as being located within Tower Hill Conservation Area. The Outstanding Universal Value (OUV) of the WHS is based on, amongst other things, a demonstration and symbol of Norman power, reflecting the last military conquest of England. The strategic location of the site in its prominence is the townscape is a key component of this value.

The proposed development raises serious concerns about the degree of visual separation between the eastern cluster and the Tower of London. The proposed development is a tall building in terms of the City of London's planning policy (in excess of 70m AOD).

Strategic views

Relevant strategic views are set out in the London View Management Framework SPG (2012). The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. Policies 7.11, 7.12 of the London Plan (2016) and the LVMF SPG outline the views of strategic importance to London, and detail how these views should be managed.

LVMF view 10A.1 is a River Prospect, looking upstream, and originates from the North Bastion of Tower Bridge, a Grade I listed building of national significance. The elevated view enables the fine detail and layers of history of the Tower of London WHS to be readily understood. The significance of this viewing place is also highlighted within the World Heritage Site Management Plan Setting Study as being one of the best places from which to view the WHS.

The proposed building would appear to the right-hand side of the Gherkin. While slim, the proposed development marks a further extension of the City Cluster eastwards, reducing the visual separation between the City and the WHS with its simple yet stark form standing out from the faceted from of the existing cluster and potentially drawing the eye away from the set piece views of the WHS. The cumulative effect of existing and consented developments from this view is already severe and, although shorter than the consented 1 Undershaft and 100 Leadenhall, the building's relationship with the WHS is uncompromising, posing a clear and unmistakable additional challenge to this backdrop.

Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

This would serve to challenge the dominance of the Tower of London as a key feature in the view, altering the composition of the view and fail to give appropriate context to the Tower of London, harming the viewers' ability to appreciate this important aesthetic and cultural landmark.

LVMF Views 25A 1, 2 and 3 are a kinetic set of views encompassing a series of viewing locations on the south bank of the Thames close to the two public open spaces on either side of City Hall. These locations provide good views of the Tower of London with a relatively clear background setting to the White Tower. The WHS Management Plan Setting Study notes that views from these locations 'exemplify many of the cultural qualities that give the Tower its OUV, including its landmark siting on the River Thames, its role as a symbol of Norman Power, as an outstanding survival of page 10 Norman keep architecture in England, as a model example of a medieval fortress palace, and its associations with State institutions.

In these views, the proposed building would appear to have a close relationship to the City cluster and to retain a clear sky gap between the City and the Tower of London. However, the building would rise steeply on the eastern side of the cluster, competing with the WHS. This would present further encroachment to the riverside setting of the WHS. As such, the proposals are considered to cause harm to the setting of the Tower of London WHS and to be contrary to the Visual Management Guidance in the LVMF, which states that 'new development should respect the setting of the Tower of London and should not dominate the World Heritage Site'.

The Tower of London World Heritage Site

With respect to heritage assets, Policy 7.8 of the London Plan (2016) and Policy HC1 of the Intend to Publish London Plan require that developments affecting the setting of heritage assets, including conservation areas, listed buildings, scheduled monuments and World Heritage Sites, should conserve their significance. Additionally, Policy 7.10 of the London Plan (2016) and Policy HC2 of the Intend to Publish London Plan state that development should not cause adverse impacts on WHS or their settings, and, in particular, should not compromise the ability to appreciate OUV, integrity, authenticity or significance.

The International Council on Monuments and Sites (ICOMOS) advised in their consultation response to the refused application for a 305.3m AOD tall building (serving as a visitor attraction) at land adjacent to 20 Bury Street in the City of London (GLA/4868/02 and City of London ref: 18/01213/FULEIA) (dated March 2019), the following:

> *"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*

Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

allow further negative visual impact on the property's integrity when it is already threatened".

The London Borough of Tower Hamlets concurs with the assertion that the Tower of London WHS has already reached its limit in terms of visual intrusions and expresses concern about the continuing and seemingly iterative process of diminishing the expanse of clear sky in backdrop views of the WHS..

As set out, the proposals cause concern for strategic views as set out within the LVMF. However, the proposed development is considered to be potentially more visually intrusive in local views from Tower Bridge and the inner ward of the Tower of London WHS itself. The proposals are particularly intrusive in Views 22 and 23 which are taken from Tower Green over the roof of St Peter ad Vincula, View 25 taken from the northern wall walk east of the Devereux Tower and View 28 taken from the causeway between the Byward and Middle Towers.

In all of these views, the proposed development rises behind the WHS. This has the visual imposition of standing significantly apart from the City Cluster. The prominence of the proposal would draw increased attention to modern development outside of the Inner Ward affecting the sense of intended enclosure at the centre of the concentric defences which culminate in the White Tower.

This would result in harm to the setting and thereby significance of the Tower of London WHS and would adversely affect the following attributes of the physical prominence of the White Tower; the concentric defences and; the site's strategic and landmark setting.

CONCLUSIONS

The London Borough of Tower Hamlets is of the view that the proposals would result in a significance adverse impact on the Grade I listed Tower of London WHS including its setting and townscape views.

The proposals would diminish the ability to appreciate the OUV of the Tower of London WHS. As illustrated in LVMF views and views from within and around the WHS, the height and location of the proposed development in relation to the Tower of London WHS are considered to adversely affect the following attributes of the OUV; the physical prominence of the White Tower; the concentric defences; the site's strategic and landmark setting; and the site's status as an internationally famous monument.

Yours sincerely,

Adam Garcia

Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

Principal Planning Officer (West Area Team)

For and on behalf of the Divisional Director for Planning and Building Control, London Borough of Tower Hamlets

Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

The best of London in one borough

PLANNING DECISION NOTICE

ISLINGTON

Development Management Service
Planning and Development Division
Environment & Regeneration Department
PO Box 3333
222 Upper Street
LONDON N1 1YA
Case Officer: Joseph Hennessy
T: 020 7527 3776
E: planning@islington.gov.uk

Issue Date: 19 March 2021
Application No: P2021/0660/OBS

(Please quote in all correspondence)

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

Dear Sir or Madam

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:	**Bury House , 31 Bury Street , London , EC3A 5AR**

Application Type:	**Observations to Adjoining Borough**		
Date of Application:	24 February 2021	**Application Received:**	24 February 2021
Application Valid:	24 February 2021	**Application Target:**	17 March 2021

DEVELOPMENT:

Observations to City of London for Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/cafe of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).

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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

FURTHER INFORMATION RECEIVED: Environmental Statement additional material (relating to ES Volume 2: TBHVIA Addendum; updated ES Volume 1: Chapter 13: Effect Interactions; and Non-Technical Summary) and Public Benefits Statement; Building Ecosystem Paper; Energy Strategy Note; Equality Statement and Thermal Comfort Assessment.

OBSERVATIONS: No Comment

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

Tel: 020 8921 5222

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

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

20/3494/K

23 February 2021

DECISION NOTICE – RAISE NO OBJECTION

Dear Bhakti Depala,

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

Site:	**Bury House, 31 Bury Street, London, EC3A 5AR**
Applicant:	**WELPUT**
Proposal:	**Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460 sqm GIA] (Class E), flexible retail / cafe use [60sqm GIA] (Class E), publicly accessible internal amenity space [421 sqm GIA] (Sui Generis) and community space [502 sqm GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.(The proposal would provide 27,815sq.m GEA of Class E offices, 62 sq.m GEA flexible retail/caf¿ of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460 sqm GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479 sq.m GEA; overall height 197.94 AOD).** **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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.**
Drawings	

I refer to your letter dated 12 November 2020 enclosing details in respect of the above.

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

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

Thank you for consulting me on this matter.

Yours faithfully

Assistant Director

SOUTHWARK COUNCIL

LBS Registered Number: 20/OB/0065

Date of issue of this decision: 07/01/2021

www.southwark.gov.uk

LBS Reg. No.: 20/OB/0065 **Date of Issue of Decision:** 07/01/2021
Your Ref No.:

Applicant Bhakti Depala
City of London

With reference to your consultation on the following development:

Demolition of existing building and construction of a new building comprising 2 basement
levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use
[25,460 sqm GIA] (Class E), flexible retail / cafe use [60sqm GIA] (Class E), publicly
accessible internal amenity space [421 sqm GIA] (Sui Generis) and community space [502
sqm GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm;
ancillary basement cycle parking, servicing and plant.
(The proposal would provide 27,815sq.m GEA of Class E offices, 62 sq.m GEA flexible
retail/cafï¿½ of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460 sqm GEA of
Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479 sq.m GEA; overall
height 197.94 AOD).
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 contact hello@triumenv.co.uk or
Tel: +44 (0) 203 887 7118.

At Bury House 31 Bury Street London EC3A 5AR

In accordance with your letter received on 16 November 2020 and supporting documents.

The Council's formal response is

DECISION NOTICE

LBS Registered Number: 20/OB/0065

Date of issue of this decision: 07/01/2021

www.southwark.gov.uk

"No formal objection is raised to the proposed development but the Council wishes to make the following comment[s]:

1. The proposed development would not harm any strategic views or any borough views within Southwark. In LVMF 25A1-3 the proposal does not affect the viewer's ability to recognise and appreciate the Strategic Landmark of the Tower of London World Heritage Site. In the view from the South Bascule of Tower Bridge the proposal will be in close proximity with the White Tower at the edge of the established City cluster which forms the backdrop of the Tower Environs to the west.

2. The proposal does have the potential to generate additional traffic within Southwark, including construction traffic, therefore the Transport Assessment for the development should include the following:
- Base traffic survey to be undertaken not only in a neutral month but also on neutral days like Tuesdays, Wednesdays and Thursdays.
- Estimation of generated vehicular/public transport trips using TRICS database.
- Consideration of existing/proposed uses and sizes of the buildings on the site.
- Cumulative impact of this development.
- Road safety encompassing an analysis of at least the last 3years traffic accidents occurring in the vicinity of this development, identifying the associated contributory factors and suggesting ameliorative measures where there is any specific pattern.
- The evaluation of the impact on highway/public transport and pedestrian/cyclist conditions taking into account Transport for London's 'Healthy Street' criteria and, suggested improvement measures where deficiencies are identified.
- The scope of the Transport Assessment and Travel Plan reports to be in accordance with Transport for London's guidance and must include measures to assist the mobility-impaired pedestrians/cyclists and the ultimate cycle parking provision must meet the New London Plan standard.

The following supplementary documents would also need to be provided:
- Construction management plan;
- Delivery and service management plan and;
- Car parking management plan detailing the provision of adequate disabled car parking spaces equipped with active electric charging points.

Signed: *Simon Bevan* Director of Planning

DECISION NOTICE

LBS Registered Number: 20/OB/0065

Date of issue of this decision: 07/01/2021

www.southwark.gov.uk

Site address: Bury House 31 Bury Street London EC3A 5AR

Reference: 20/OB/0065

Planning Division
Southwark Council
Chief Executive Department
PO Box 64529 London SE1 5LX

Planning.applications@southwark.gov.uk ;

Westminster City Council

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref:
My ref: 20/07263/OBS

Please reply to: Nikki Mitchell
Tel No: 07866037846
Email: southplanningteam@westminster.gov.uk

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

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

3 December 2020

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 20/07263/OBS **Application Date:**

Date Received: 12.11.2020 **Date Amended:** 12.11.2020

Plan Nos: Letter from city of London dated 12 November 2020.

Address: 1 To 6 Bury Court 14 To 34 St Mary Axe And, 19-28 Bury Street, City Of London, City Of London

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460 sqm GIA] (Class E), flexible retail / cafe use [60sqm GIA] (Class E), publicly accessible internal amenity space [421 sqm GIA] (Sui Generis) and community space [502 sqm GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant.

(The proposal would provide 27,815sq.m GEA of Class E offices, 62 sq.m GEA flexible retail/cafe of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460 sqm GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479 sq.m GEA; overall height 197.94 AOD).

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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

Yours faithfully

Deirdra Armsby

Westminster City Council

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

westminster.gov.uk

City of Westminster

Your ref: 20/00848/FULEIA
My ref: 21/01141/OBS

Please reply to: Nikki Mitchell
Tel No: 07866037846
Email: southplanningteam@westminster.gov.uk

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

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

2 March 2021

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 21/01141/OBS **Application Date:**

Date Received: 24.02.2021 **Date Amended:** 24.02.2021

Plan Nos: Letter from City of London dated 24 February 2021.

Address: 1 To 6 Bury Court 14 To 34 St Mary Axe And, 19-28 Bury Street, City Of London, City Of London

Proposal: Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).

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 contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

FURTHER INFORMATION RECEIVED: Environmental Statement additional material (relating to ES Volume 2: TBHVIA Addendum; updated ES Volume 1: Chapter 13: Effect Interactions; and Non-Technical Summary) and Public Benefits Statement; Building Ecosystem Paper; Energy Strategy Note; Equality Statement and Thermal Comfort Assessment.

Yours faithfully

[redacted]

Deirdra Armsby
Director of Place Shaping and Town Planning

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms ‘you’ and ‘your’ include anyone who owns or occupies the land or is involved with the development.
- The terms ‘us’ and ‘we’ refer to the Council as local planning authority.

Crystal Mark
Clarity approved by Plain English Campaign

Application ref: 2021/1161/P
Contact: Raymond Yeung
Tel: 020 7974 4546
Email: Raymond.Yeung@camden.gov.uk
Date: 26 March 2021

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

Bhakti Depala
City Of London

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
Bury House
31 Bury Street
London
EC3A 5AR

Proposal: Request for observations by City of London for the demolition of existing building and construction of a new building comprising 2 basement levels and ground floor plus 48 upper storeys (197.94 AOD) for mixed use purposes. City of London application reference 20/00848/FULEI).

Drawing Nos: Letter from City of London Corporation dated 24th February 2021.

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

Informatives:

1 Reason for no objections.

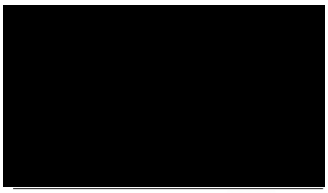
The proposal within the City of London Corporation, is for the demolition of existing building and construction of a new building comprising 2 basement levels and ground floor plus 48 upper storeys for mixed uses. It would be approximately 200 metres tall from ground level.

The site of the above works is approximately 2.5 KM away from the most southern tip of London Borough of Camden's boundary line near Farringdon Road. The buildlng would be largely screned from northwest views by its position amongst taller buildings within the City and does not sit in any LVMF corridors.

The request for observations arises from additional information received by the

City of London. No objection was previously raised by Camden, so with the above points taken into consideration, Camden maintains no objection to the proposals.

Yours faithfully



Daniel Pope
Chief Planning Officer

Begum, Shupi

From: [redacted]
Sent: 15 March 2021 09:28
To: PLN - Comments
Subject: FW: Planning Application Consultation: 20/00848/FULEIA
Attachments: ufm37.pdf

Good morning,

The CAA has no comment to make on this proposal itself but please see below for regulatory guidance relevant for the application.

The proposed build is within the safeguarding zone of the following aviation stakeholders who should be consulted if they have not been already.

London City - safeguarding@londoncityairport.com
London Heliport - s.hutchins@londonheliport.co.uk London Heathrow - Safeguarding@heathrow.com Defence Geographic Centre (DGC) - dvof@mod.uk

Any crane operations associated with this project should be in accordance with the CAA's guidance, available at https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpublicapps.caa.co.uk%2Fmodalapplication.aspx%3Fappid%3D11%26mode%3Ddetail%26id%3D5705&data=04%7C01%7C%7C514331c8e13b4e59ad9c08d8e7949b49%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637513972760197365%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=D34l%2FEWDfh9xGG8LeBUTIpe59A9MD90ZMTMttW62ALc%3D&reserved=0

Please do let me know if further advice is required.

Kind regards,
Ashley

Ashley Dawkins
Airspace Regulation
Safety & Airspace Regulation Group
Civil Aviation Authority

[redacted]

https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.caa.co.uk%2F&data=04%7C01%7C%7C514331c8e13b4e59ad9c08d8e7949b49%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637513972760207366%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=HchxspyGJ9hHPlZFNyYpkQOLhlVzTqVZ7qgj29ee8Eo%3D&reserved=0
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-----Original Message-----

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 24 February 2021 14:47
To: AROps <AROps@caa.co.uk>
Subject: Planning Application Consultation: 20/00848/FULEIA

Dear Sir/Madam

Please see attached consultation for Bury House 31 Bury Street London EC3A 5AR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Bhakti Depala
Department of the Built Environment
City of London
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****

From:	NATS Safeguarding
To:	PLN - Comments
Subject:	RE: Planning Application Consultation: 20/00848/FULEIA [SG30645]
Date:	25 November 2020 08:51:56
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png

Our Ref: SG30645

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 12 November 2020 15:01
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: Planning Application Consultation: 20/00848/FULEIA

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Dear Sir/Madam

Please see attached consultation for Bury House 31 Bury Street London EC3A 5AR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Bhakti Depala
Department of the Built Environment
City of London
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From: DD - Airport Safeguarding/BAA
To: PLN - Comments
Subject: RE: Planning Application Consultation: 20/00848/FULEIA
Date: 13 November 2020 14:59:15
Attachments: image001.png

Classification: Public

Dear Bhakti Depala

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

Kind regards

Lawrence Melkowski
Aerodrome Safeguarding Specialist
Airside Operations

Heathrow

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

m:
w: heathrow.com | t: twitter.com/heathrowairport I a: heathrow.com/apps
i: instagram.com/heathrow_airport I l: linkedin.com/company/heathrow-airport

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Begum, Shupi

From: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Sent: 28 February 2021 12:58
To: PLN - Comments
Subject: RE: Planning Application Consultation: 20/00848/FULEIA

Classification: Public

Dear Bhakti Depala

We have now assessed the application in light of the additional information submitted against safeguarding criteria. I can confirm that we have no safeguarding objections to the proposed development.

Kind regards

Lawrence Melkowski
Aerodrome Safeguarding Specialist
Airside Operations

Heathrow

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

m: +44 (0)7736 119025
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-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 24 February 2021 14:48
To: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 20/00848/FULEIA

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Dear Sir/Madam

Please see attached consultation for Bury House 31 Bury Street London EC3A 5AR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Bhakti Depala
Department of the Built Environment

City of London
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LPA Ref: 20/00848/FULEIA

London City Airport Ref: 2020/LCY/275

Date: 30/11/2020

Dear Bhakti Depala,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found not to conflict with London City Airport's current safeguarding criteria.

LPA Reference	20/00848/FULEIA
Proposal	Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD).
Location	Bury House 31 Bury Street London EC3A 5AR
Borough	City of London
Case Officer	Bhakti Depala
Maximum Proposed Height AOD	198m

London City Airport Ltd
City Aviation House
Royal Docks, London E16 2PB
Registered in England & Wales
Registered Number: 1963361
+44 (0)20 7646 0000
+44 (0)20 7511 1040
londoncityairport.com
@londoncityair
/londoncityair

London City Airport suggests the following condition/s are added to this application. London City Airport's response must change to an objection unless these conditions are applied to this planning permission:

No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. If any of the proposed cranes are infringing London City Airport`s Obstacle Limitation Surfaces, they must be assessed against against LCY's Instrument Flight procedures (IFPs) by a CAA approved procedure designer.

Reason: The use of cranes or tall equipment in this area has the potential to impact LCY operations, therefore they must be assessed before construction.

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,
Szilvia Turcsik
Technical Operations Coordinator

London City Airport Ltd
City Aviation House
Royal Docks, London E16 2PB

Registered in England & Wales
Registered Number: 1963361

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creating a better place

Environment Agency

Bhakti Depala
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2020/132525/01-L01
Your ref: 20/00848/FULEIA

Date: 26 November 2020

Dear Bhakti,

Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460sq.m GIA] (Class E), flexible retail/cafe use [60sq.m GIA] (Class E), publicly accessible internal amenity space [421sq.m GIA] (Sui Generis) and community space [502sq.m GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sq.m GEA of Class E offices, 62sq.m GEA flexible retail/caf? of Class E; 546sq.m GEA of Sui Generis Community Floorspace; 460sq.m GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479sq.m GEA; overall height 197.94 AOD). This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Bury House, 31 Bury Street, London, EC3A 5AR.

Thank you for consulting us on the above application which we received on 12 November. As part of the consultation we have reviewed the documents submitted in line with our remit.

Environment Agency Position
The Environment Agency is a statutory consultee on all development projects subject to Environmental Impact Assessment. There are however, no environmental constraints within our remit on this site and we therefore have no comments at this time.

Final Comments
Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us. Please provide us with a decision notice for our records.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

George Lloyd
Planning Advisor
Direct dial: +44 20302 54843
Direct e-mail: HNLSustainablePlaces@environment-agency.gov.uk

End

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creating a better place

Environment Agency

Bhakti Depala
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2020/132525/02-L01
Your ref: 20/00848/FULEIA

Date: 4 March 2021

Dear Bhakti,

Demolition of existing building and construction of a new building comprising 2 basement levels (plus 2 mezzanines) and ground floor plus 48 upper storeys (197.94 AOD) for office use [25,460 sqm GIA] (Class E), flexible retail / cafe use [60sqm GIA] (Class E), publicly accessible internal amenity space [421 sqm GIA] (Sui Generis) and community space [502 sqm GIA] (Sui Generis); a new pedestrian route and new and improved Public Realm; ancillary basement cycle parking, servicing and plant. (The proposal would provide 27,815sqm GEA of Class E offices, 62 sqm GEA flexible retail/cafe of Class E; 546sqm GEA of Sui Generis Community Floorspace; 460 sqm GEA of Sui Generis Publicly Accessible Amenity Space (total floorspace 33,479 sqm GEA; overall height 197.94 AOD). This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Further information received: Environmental Statement additional material (relating to ES Volume 2: TBHVIA Addendum; updated ES Volume 1: Chapter 13: Effect Interactions; and Non-Technical Summary) and Public Benefits Statement; Building Ecosystem Paper; Energy Strategy Note; Equality Statement and Thermal Comfort Assessment.

Bury House, 31 Bury Street, London, EC3A 5AR.

Thank you for consulting us on the amendments for this full EIA application for the proposed development.

We are a statutory consultee on all development projects subject to Environmental Impact Assessment. There are however, no environmental constraints within our remit on site and we therefore have no comments at this time.

Should you have any queries regarding this response, please do not hesitate to contact me.

Yours sincerely,

George Lloyd
Planning Advisor

Number: +44 20302 54843
E-mail: HNLSustainablePlaces@environment-agency.gov.uk

End

INVESTOR IN PEOPLE

From: Seana Heaney
To: PLN - Comments
Cc: TownPlanningAnglia
Subject: Network Rail Consultation Response: 20/00848/FULEIA - Bury House 31 Bury Street London EC3A 5AR
Date: 02 March 2021 15:18:28
Attachments: image001.png

OFFICIAL

Dear Sir/Madam,

Thank you for consulting Network Rail regarding the above application.

After reviewing the associated information, I would like to inform you that Network Rail have no objections to the proposals.

Kind regards,

Seana Heaney
Town Planning Technician
Network Rail Property (Eastern Region - Anglia)
A: 1 Stratford Place | London | E15 1AZ
M: 07395 390449
E: seana.heaney@networkrail.co.uk
W: www.networkrail.co.uk/property

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****

From: BCTAdmin@thameswater.co.uk
To: PN - IE - Development Dc
Subject: 3rd Party Planning Application - 20/00848/FULEIA
Date: 10 December 2020 14:08:52

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 66875
Your Ref: 20/00848/FULEIA

10 December 2020

Dear Sir/Madam

Re: BURY HOUSE- 31, BURY STREET, LONDON, EC3A 5AR

Waste Comments
With the information provided, Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://ghr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdeveloping-a-large-site%2Fplanning-your-development%2Fworking-near-or-diverting-our-pipes&data=04%7C01%7C%7Cd743001bc4d944dc2549508d89d151e8a%7C96e658cdb3ced4056851932225ffe96be8%7C1%7C0%7C637432061315194399%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=6%2FSlaIYrQpdL5x0pvUwAMALayTG7iR7T5P4PAbUIoR0%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://ghr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2Fdeveloping-a-large-site%2Fplanning-your-development%2Fworking-near-or-diverting-our-pipes&data=04%7C01%7C%7Cd743001bc4d944dc2549508d89d151e8a%7C96e658cdb3ced4056851932225ffe96be8%7C1%7C0%7C637432061315194399%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=72NG%2Fxp4%2B1X%2FL36Jkb9AURxhMcIq3t6ibAQE3OY7Mw0%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://ghr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7Cd743001bc4d944dc2549508d89d151e8a%7C96e658cdb3ced4056851932225ffe96be8%7C1%7C0%7C637432061315194399%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=3HX%2BdFlgSm33GFcYLWNdRaZ7bVOYSvo4fUWDMLz1Yic%3D&reserved=0.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://ghr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7Cd743001bc4d944dc2549508d89d151e8a%7C96e658cdb3ced4056851932225ffe96be8%7C1%7C0%7C637432061315194399%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=3HX%2BdFlgSm33GFcYLWNdRaZ7bVOYSvo4fUWDMLz1Yic%3D&reserved=0.

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.https://ghr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7Cd743001bc4d944dc2549508d89d151e8a%7C96e658cdb3ced4056851932225ffe96be8%7C1%7C0%7C637432061315194399%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=3HX%2BdFlgSm33GFcYLWNdRaZ7bVOYSvo4fUWDMLz1Yic%3D&reserved=0. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Water Comments
Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://ghr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7Cd743001bc4d944dc2549508d89d151e8a%7C96e658cdb3ced4056851932225ffe96be8%7C1%7C0%7C637432061315194399%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=3HX%2BdFlgSm33GFcYLWNdRaZ7bVOYSvo4fUWDMLz1Yic%3D&reserved=0

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://ghr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7Cd743001bc4d944dc2549508d89d151e8a%7C96e658cdb3ced4056851932225ffe96be8%7C1%7C0%7C637432061315194399%7CUnknown%7CTWFpbGZsb3dEeyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=3HX%2BdFlgSm33GFcYLWNdRaZ7bVOYSvo4fUWDMLz1Yic%3D&reserved=0. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

With regards to surface water the proposed discharge rate is not given, and the foul water pump rates are also not given. Can it be confirmed that it will progress as per agreed with Thames Water in Appendix 7, with a surface water discharge of 0.4l/s.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

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Committee(s): Policy & Resources Committee – For Decision Planning & Transportation Committee – For Decision	**Dated:** 8 April 2021 13 April 2021
Subject: Recovery Taskforce – Final Report	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	**2, 5, 6, 7, 8, 9 and 10**
Does this proposal require extra revenue and/or capital spending?	**N**
If so, how much?	**N/A**
What is the source of Funding?	**N/A**
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: Damian Nussbaum, Director of Innovation & Growth	**For Decision**
Report author: Giles French, External Affairs Director, Innovation & Growth	

Summary

This is the final report of the Recovery Taskforce. The Recovery Taskforce was initiated by Members of the Policy & Resources Committee and the Planning & Transport Committee in November 2020, to recommend the actions to be taken to ensure the medium-term economic recovery of the City of London.

Recommendation(s)

Members are asked to:

- Approve the recommendations of the Recovery Taskforce (Appendix 1).
- Approve the proposed governance arrangements for the ongoing implementation of the recommendations (paragraph 21).
- Note that any additional funding required for implementing the recommendations would be subject to approval by the relevant Committees.

Main Report

Background

1. The prosperity of cities across the world is under threat. Those able to adapt to the new environment, and help shape it, will thrive. The City of London

Corporation has a crucial role to play not only in helping the City of London to adapt and meet changing demands, but also in turbo-charging its recovery following losses from the pandemic. This it will do with partners across London, and with an eye to supporting the recovery of the whole of the capital and the country.

2. The Recovery Taskforce (RTF) was commissioned by the Policy & Resources Committee and the Planning & Transportation Committee in November 2020. Its task is to identify objectives and actions to ensure the Square Mile remains internationally competitive and locally vibrant. The mission of the RTF is to ensure the Square Mile is the world's most innovative, inclusive and sustainable business ecosystem, an attractive place to work, live and visit.

3. By delivering the long-term success and recovery of the Square Mile, we can ensure the City plays its full part in driving the recovery across London and the rest of the UK.

4. The Recovery Taskforce has built on existing work from the City Corporation including the Culture and Commerce Task Force; the Climate Action Strategy; the draft City Plan 2036; the Transport Strategy and the report *London Recharged*, published in October 2020. The RTF focuses on three dimensions:

    i. World-class business ecosystem (i.e. thriving businesses with innovation and growth opportunities)
    ii. Vibrant offer (retail, hospitality, culture, heritage and recreation)
    iii. Outstanding environments (i.e. the right workspaces, environment, and infrastructure)

5. The recommendations of the RTF are not an exhaustive list of all actions being taken by the City Corporation to ensure the continued attractiveness of the Square Mile. They are the priority actions required to deliver the a thriving future.

6. The actions identified in the RTF have been designed to be delivered in partnership with stakeholders in business, the arts and culture, the retail and hospitality sectors, academia, regulators, local and national government. From the extensive engagement and consultation we have had with these audiences, we know how keen they are to work with the City Corporation to deliver the outcomes of the RTF.

7. The Recovery Taskforce is the third leg of the City Corporation's response to the Covid-19 pandemic:

    - Urgent Response: Work on short-term measures and activity to support the Square Mile's initial recovery will continue to be led by Gold group, and the relevant Silver Groups.
    - Reopening: a campaign to encourage a return to the Square Mile (next 6 months)
    - Recovery Taskforce focusing on the Square Mile's success in the medium term (next 5 years).

Current Position

8. The project has been led by a small core team from Innovation & Growth (IG), Department of the Built Environment (DBE), Cultural Services, Corporate Strategy & Performance, and Chamberlain's. It is supported by cross-cutting working groups and external consultants (Oliver Wyman).

9. The project has been overseen by the Chairs of the Policy & Resources and Planning & Transportation Committees, supported by their deputies, and with input from the Lord Mayor and Senior Alderman Below the Aldermanic Chair (SABTAC).

Engagement

10. Since late January 2021, the RTF team has been engaging widely on the proposals. Conversations have taken place with over 200 businesses (financial, professional and legal services, and technology), property developers, BIDs and business partnerships, retail and hospitality providers, livery companies and civil society organisations, visitor attractions and cultural institutions employing thousands of people in the Square Mile.

11. Engagement has also taken place with the Chairs of relevant major Committees and two all-Member briefings were held in February. Together these meetings have tested and validated our proposals, and the final report reflects the feedback we have received from these important audiences.

12. In addition, over 4,600 members of the public contributed to an online survey regarding how they intend to use the Square Mile when rules allow. The survey was open from 1 to 25 February. This reflects high levels of interest and uptake, though lower levels of representation of some City stakeholder groups. A summary of who responded, in what numbers and what was said is shown at Appendix 2.

13. Key findings include:

- 50% of all respondents had travelled to the Square Mile every working day before March 2020. This falls to 15% intending to do the same when rules allow.
- 70% of City workers responding intend to come to the Square Mile on some working days when rules allow.
- The top reason for staying away was working practices. This was closely followed by the journey to the Square Mile.
- Overall, respondents were as likely, if not more likely to want to use the Square Mile for eating and drinking out, arts and culture, visiting tourist attractions and shopping compared to prior to March 2020. Sub-group analysis indicates that this is, at least in part, due to turnover rather than

people who undertook these activities pre-Covid saying they intend to do them in future.

14. Further sub-group analysis offers interesting insights into barriers, incentives and potential behaviour changes. More analysis of these results and will be shared with Members and Officers to help inform the implementation of the RTF's recommendations.

Proposals

15. Three themes run though the recommendations: innovation, inclusion and sustainability. These reflect the priorities we've heard from businesses and stakeholders in the City. They are the qualities they prize and which they believe will continue to make the Square Mile an attractive place to locate and grow business.

16. Innovation is crucial to the City's continued success and competitiveness. Businesses still want to be located alongside their clients, customers and competitors, and bring together their employees to create the products and services their customers want. The last year has demonstrated the importance of adaptability, resilience and technological adoption. We will cultivate and nurture high potential businesses to start up, scale up, and adapt. The City Corporation is uniquely placed to broker partnerships between incumbents and disruptors: providing an ecosystem for businesses to access talent, capital, workspace and advice. We will identify the right actors to participate in this ecosystem and bring them together, physically or virtually, to create the conditions for business growth.

17. The importance of being able to recruit and retain a talented workforce was raised at almost every meeting we had with businesses. Businesses large and small said that it was the factor that sets the City apart from international competitors. We will continue to advocate for a world-class visa system that attracts the highest quality talent into the UK. However, it is equally important to be widening the domestic talent pool, attracting more people from different backgrounds that have not traditionally seen the City as a place to use their skills and abilities. We will work with public and private sectors to scale the work we do to improve the domestic skills base, tackle issues inhibiting socio-economically diverse groups progressing within our sector, widen access of under-represented groups into financial and professional services, and making the visa regime as efficient a process as possible.

18. The strength and attractiveness of the City's ecosystem was raised repeatedly. We will want to build on its existing strengths, with a focus on encouraging those businesses and technologies that will drive future growth, such as FinTech, LawTech, green finance, AI and the creative industries. Underpinning all of this is data. We want data driven businesses to use the City as their ecosystem to test ideas, develop new products, raise capital and attract talent. We should seek to attract a wider range of these types of businesses that don't currently see the City as an integral part of their ecosystem.

19. The experience of workers, visitors, residents and others when in the City is crucial to the on-going attractiveness of the Square Mile with each community essential to the on-going viability of retail, hospitality and culture. Businesses can control the environment in the workplace, but expect a high standard of these services for their employees and clients. Many international businesses use their City of London office as an international hub for conferences and employee training. That is in large part due to the overall experience of what being in the City provides.

20. We will aim to ensure that those living, working and visiting the City want to spend more time here. If more flexible working patterns mean workers coming in to the City for fewer days of the week, we want them to maximise the time spent meeting clients, collaborating with colleagues and socialising. We also want to attract visitors to spend money in our shops, restaurants, bars and attractions when the workforce is absent, supporting the infrastructure that serves the business community in the working week. The fundamental question the RTF has sought to answer is: what is it going to take for people to come to the Square Mile? Simply put, it has to be an attractive and engaging place to spend time. If workers want to be there, so too will firms. We envision a City brimming with life. We wil work with partners to animate public space and promote the cultural offer of the City.

21. The physical infrastructure and public environment are also crucial to the City's attractiveness. We will work with partners in the property and development sector to provide flexible and adaptable commercial workspace for businesses of all sizes. This will be underpinned by excellent digital infrastructure, renewable energy networks and a sustainable and resilient built environment across the Square Mile.

22. The City's streets, gardens and public spaces will be attractive places to spend time. We will accelerate our plans to rebalance vehicle use, prioritise walking, enable cycling, improve air quality and provide more public space. The experience of travelling through and spending time in the Square Mile must be world class, for the benefit of residents, visitors and workers alike.

Implementation

23. If the RTF recommendations are approved, a cross-Corporation steering group will monitor implementation of the RTF proposals and will report quarterly to Members of the Policy & Resources Committee and Planning & Transportation Committee.

24. Where necessary, approvals for activities, projects and resources will be sought from the relevant Committee.

Corporate & Strategic Implications –

25. Strategic Implications - The RTF is focused on delivering the Corporation Plan (2018-23) ambition of having a vibrant and thriving City. Specifically, it aims to impact the following corporate outcomes:

    - Outcome 3: People have equal opportunities to enrich their lives and reach their full potential.
    - Outcome 5. Businesses are trusted and socially and environmentally responsible.
    - Outcome 6. We have the world's best legal and regulatory framework and access to global markets.
    - Outcome 7. We are a global hub for innovation in finance and professional services, commerce and culture.
    - Outcome 8. We have access to the skills and talent we need.
    - Outcome 9. We are digitally and physically well-connected and responsive.
    - Outcome 10. We inspire enterprise, excellence, creativity and collaboration.

26. Resource and financial implications – The RTF has been designed to be delivered within existing resources. However, where it is proposed that options are explored, any additional funding resulting would need to be taken to the relevant Committee in the usual way. Consideration may need to be given to the terms in which commercial workspace is offered to potential occupiers, and this would need to go to the relevant Committee.

27. Legal Implications – No legal implications have been identified.

28. Risk Implications – No risk implications of the RTF project. Risk is if no action is taken and the City fails to remain an attractive place for workers, residents and visitors.

29. Equalities Implications – No equalities risks have been identified in relation to the recommendations in this report. A major strand of work of the RTF will be to widen access to the City.

30. Analysis of responses to the public survey shows that female workers (especially female City Corporation workers) and persons of minority religions and BAME groups were intending the most significant shift to working fewer days in the Square Mile. If this were to happen, it would have a negative impact on the diversity of people in the Square Mile. This could impact negatively on career progression within these groups and on diversity of the talent pipeline. As stated in paragraph 12, these insights will be used to inform the implementation of the RTF's recommendations.

31. Climate Implications – The RTF is fully in line with the City Corporation's Climate Action Strategy and provides an additional catalyst to progress this programme of work.

32. Security Implications – No new security implications identified by the RTF. We will continue to work with the City of London Police to ensure safety and security as people return to the Square Mile.

Conclusion

33. The RTF proposals are the City Corporation's opportunity to respond to the extraordinary challenges presented by the last 12 months. It provides clear ambition for how the City remains successful well into the future. It is supported by businesses, workers, residents, visitors and others, and can help to drive a successful recovery not just in the Square Mile, but across London and the UK.

Appendices

- Appendix 1 – Recovery Taskforce Vision and Action Plan
- Appendix 2 – Key findings from public survey

Giles French
External Affairs Director, Innovation & Growth

E: giles.french@cityoflondon.gov.uk

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Recovery Taskforce

Recommendations and actions

April 2021

The Taskforce focuses on a critical mission

*Ensure the Square Mile is **the world's most innovative, inclusive and sustainable business eco-system**, an attractive place to invest, work, live and visit.*

Vision overview and how we will deliver (1/4)

Dimension	'Big move'	Target outcome	Headline workstreams
World-class business ecosystem (i.e. thriving businesses with innovation and growth opportunities)	**1.** Enable high potential businesses to start, adapt, and grow	**A.** Square Mile is the **best place to establish, grow, and transform your innovative, high growth business**	i. Work with private sector partners to provide workspace, advice, digital skills, access to networks, a cyber secure environment and capital.
	2. Open London's opportunities to everyone	**B.** The Square Mile **fosters talent and equips people to succeed**, especially within FPS and tech	ii. Continue our leadership role on the Socio-Economic Diversity Taskforce iii. (Continue to) maintain an emphasis on attracting and retaining talent from across the UK and around the world
	3. Curate thriving innovation ecosystems in strategic sectors	**C. Square Mile is London's (and the world's) innovation and thought leadership hub**, esp. for green finance, fintech, the creative industries, and AI	iv. Act as a global 'testbed' for data driven technologies, such that businesses of all sizes see the City as a place to start, grow and develop data-driven products and services
Vibrant offer (leisure offer i.e. retail, hospitality, culture, tourism and recreation)	**4.** Create and sustain a vibrant and engaging City offer	**D. Workers and business visitors return and remain** in the City, encouraged by the Vibrant Offer	v. Execute a marketing campaign and complementary activities programme over 5 years to promote the City as an inclusive and exciting place to be.
		E. Leisure visitors return and remain in the City, encouraged by the Vibrant Offer	vi. Enable and animate the City's weekend and night-time offer as part of a strategic review of the City's Vibrant Offer
		F. Leisure-sector organisations across retail, hospitality, tourism and culture return and remain in the City, encouraged by COL Corp. support	vii. The City Corporation will help leisure businesses to thrive
Outstanding environments (i.e. workspaces, environment, infrastructure)	**5.** Shape the future City	**F. Sustainable and resilient buildings and infrastructure allow the Square Mile to grow and adapt** to changing social, environmental and economic circumstances.	viii. Work with the property industry to enable and promote buildings that provide a low environmental footprint; high quality, convivial spaces for workers and the wider community; and opportunities for cultural uses and distinctive retail and hospitality ix. Work with providers and operators to ensure the Square Mile's communications and energy infrastructure and transport connections are best-in-class and future proofed x. Work with public and private sector providers and academic institutions to enhance anonymised data collection and analysis capabilities to improve policy development and planning
	6. Provide world-class streets and public spaces	**G. The City's streets, gardens and public spaces are great places to spend time and are seen as a key part of the Square Mile's offer**. The Square Mile is known as an attractive, enjoyable and safe place to walk and cycle.	i. Provide new and improved public spaces that include opportunities for culture and exercise, and incorporate seating and greening climate resilience measures. xi. Accelerate our plans to make our streets more accessible, prioritise people walking and improve the experience of cycling

Vision overview and how we will deliver (2/4)

Dimension	Headline workstreams	Activities
World-class business ecosystem (i.e. thriving businesses with innovation and growth opportunities)	i. Work with private and public sector partners to provide workspace, advice, digital skills, access to networks and capital for high potential, high growth tech enabled SMEs.	• Curate an ecosystem that provides a range of tech focused SMEs with access to workspace, advice, capital, talent, cyber secure and networks to grow and adapt their businesses. • Agreement of a partnership with potential providers • Explore options for provision of workspace, including from the Corporation's property portfolio • Promote the innovation ecosystem to relevant businesses and providers within the Square Mile and across London
	ii. Deliver the HMG-commissioned Socio-Economic Diversity Taskforce iii. Maintain an emphasis on attracting and retaining talent from across the UK and around the world	• Responsibility for running and delivering the Socio-Economic Diversity Taskforce and all three working groups. • Publish taskforce recommendations to improve socio-economic progression within financial and professional services. • Widen access to under-represented groups to financial and professional services. • Work with Home Office to implement recommendations of the 2020 report by City Corporation on how to improve the process for business visas.
	iv. Act as a global 'testbed' for data driven technologies, such that businesses of all sizes see the City as a place to start, grow and develop data-driven products and services	• Join London Data Charter • Curate an ecosystem that provides a range of data focused SMEs with access to workspace, advice, capital, talent and networks to grow and adapt their businesses. • Collate and publish data on the numbers of workers returning to the City in 2021

Vision overview and how we will deliver (3/4)

Dimension	Headline workstreams	Activities
Vibrant offer (leisure offer i.e. retail, hospitality, culture, tourism and recreation)	v. Execute a marketing campaign and complementary activities programme over 5 years to promote the City as an inclusive and exciting place to be.	• Deliver activities and events that foster a sense of inclusion and shift perceptions around belonging in the City • Deliver marketing targeting the City's and London's workforce, fostering inclusion and celebrating the "Unseen City", while encouraging participation in leisure activities outside of work hours • Deliver outdoor fitness and leisure initiatives that contribute to the physical and mental wellbeing of the City's workforce (noting workforce respond best to sport, food and drink (alcohol) based activities)
	vi. Enable and animate the City's weekend and night-time offer	• Deliver strategic review to plan for a successful and thriving visitor destination for all London communities (and longer term: national and international markets) • Deliver bold event programming to include major weekend and night-time events that respond to shifting work patterns and potential low-use periods; support with community-led content • Deliver marketing activity to drive domestic and London audiences to the City • Facilitate planned or potentially new attractions and programmes coming to the City, driving audiences
	vii. The City Corporation will help leisure businesses to thrive	• Deliver selected recommendations of the Culture and Commerce Taskforce enabling creativity through mutually beneficial commerce and civic support • Support the City's leisure sector by articulating value and providing targeted support • Support the City's business events offer by positioning the City as the place to do business post-Covid

Vision overview and how we will deliver (4/4)

Dimension	Headline workstreams	Activities
Outstanding environments (i.e. workspaces, environment, infrastructure)	viii. Work with the property industry to enable and promote buildings that provide a low environmental footprint; high quality, convivial spaces for workers and the wider community; and opportunities for cultural uses and distinctive retail and hospitality ix. Work with providers and operators to ensure the Square Mile's communications and energy infrastructure and transport connections are best-in-class and future proofed x. Work with public and private sector providers and academic institutions to enhance anonymised data collection and analysis capabilities to improve policy development and planning	• Ensuring high quality, sustainable developments progress quickly through the planning system • Ensuring developments are built and operate to the highest environmental standards • Ensuring new developments deliver community benefits • Supporting the delivery of more residential development • Creating new opportunities for culture, retail, hospitality and start ups • Supporting new uses for vacant space within buildings • Delivering comprehensive 5G coverage • Ensuring the City's energy network is world-class, smart and green • Delivering in electric vehicle charging infrastructure • Championing improved transport connections to the Square Mile • Informing and influencing future development by sharing data and knowledge of working patterns and trends • Improving data collection, sharing and analysis on travel behaviours and the use of streets and public spaces • Driving innovation and collaboration on transport and built environment challenges
	xi. Provide new and improved public spaces that include opportunities for culture and exercise, and incorporate seating, greening and climate resilience measures. xii. Accelerate our plans to make our streets more accessible, prioritise people walking and improve the experience of cycling	• Providing high quality gardens and public spaces • Enabling unique opportunities to exercise • Introducing climate resilience measures into the City's streets and spaces • Ensuring streets, gardens and public spaces are clean, safe and well maintained • Ensuring the Square Mile's streets accessible to all • Creating the best urban walking experience • Enabling more people to choose to cycle • Reducing motor traffic volumes, noise and emissions

Appendix X: Key findings from public survey

Platform used: Give My View

23,123 Votes

4,670 Voters

2,040 Free-text comments

Voter Segmentation

- 60% I am a worker
- 23% I am a visitor
- 11% I'm in a livery company
- 9% I live in the Square Mile
- 9% I'm a City Corporation Officer
- 4% I'm a business owner
- 2% I'm a City Corporation Member
- 2% I'm a student

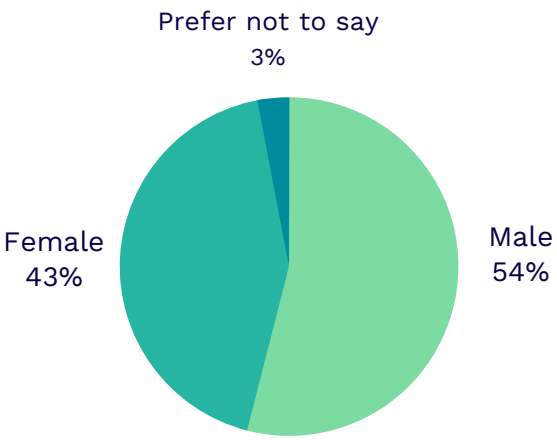
Key Insights

Pre-March 2020, 50% of voters said they would work in the Square Mile every working day. When rules allow this drops to just 15%.

Pre-March 2020, just 17% of voters said they would work in the Square Mile some days. When rules allow, the number of voters increases to 52%. Perceptions have switched and flexible working is now the new normal.

Interestingly attitudes to leisure activity have stayed the same. Eating & drinking out scored 81% and 85%. This indicates that when people are in the Square Mile they will enjoy the City's sights in the same way as pre-March 2020.

Gender breakdown



Digital Engagement

11,635 website visits

5,567 Social clicks

1st – 25th Feb 2021

Voter locations



How did/would you use the Square Mile for work?

Before March 2020


Every working day 2292 50%


Some working days 760 17%


I do not work here 720 16%


For some meetings & events 699 15%


For regular meetings & events 678 15%



Not applicable 457 10%


To study or carry out research 161 4%


I own a business here 117 3%

When rules allow


Some working days 2239 52%


For some meetings & events 1376 32%


For regular meetings & events 747 17%


Every working day 674 16%


I did not work here 498 12%



Not applicable 482 11%


To study or carry out research 206 5%


I own a business here 111 3%

Data-Driven Insight:

The two questions above allow us to see a clear intention to change the frequency people are in the Square Mile for work. ‘Some working days’ and ‘for some meetings & events’ rose to the top 'when rules allow’. ‘Every working day’ dropped from first place at 50% to fourth place at 16%.

How did/would you use the Square Mile for leisure?

Before March 2020


Eating & drinking out 3456 81%


For arts, culture & events 1911 45%


To visit tourist attractions 1644 39%


For shopping 1481 35%


Health & wellbeing 694 16%


I live in the Square Mile 384 9%

When rules allow


Eating & drinking out 3437 85%


For arts, culture & events 2255 56%


To visit tourist attractions 1677 42%


For shopping 1274 32%


Health & wellbeing 616 15%


To live in the Square Mile 322 8%

The leisure results are very different from the working activity of the Square Mile's voters in that the order of answers does not change. It seems that people are just as, if not more, keen to use the Square Mile to enjoy themselves, whether eating, drinking or seeing art and culture. Therefore, it seems that people still want to utilise the City’s offer and attractions. Sub-group analysis shows that the groups using the Square Mile for leisure are likely to change, with some less likely and more likely, with no net effect.

N.B. The percentages quoted on this page relate only to those who chose to answer these questions, rather than all survey respondents. Percentages quoted in the paper however relate to all survey respondents.

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Committees: Corporate Projects Board Planning and Transportation Committee *[for decision]* Projects Sub Committee *[for decision]*	**Dates:** 31 March 2021 13 April 2021 14 April 2021
Subject: City Streets: Transportation response to support Covid-19 recovery (Phase 1 and 2) **Unique Project Identifier:** *12217*	**Gateway 6: Outcome Report** **Choose an item.**
Report of: Director of the Built Environment **Report Author:** Leah Coburn – City Transportation	**For Decision**
PUBLIC	

Summary

1. Status update	**RAG Status:** Amber (Amber at last report to Committee) **Risk Status:** Medium (Medium at last report to committee) **Costed Risk Provision Utilised:** N/A **Final Outturn Cost:** **Total Estimated Cost of Project (excluding risk):** *£1-2M* *Phase 1 - £116,500* *Phase 2 - £932,244* *Phase 3 - £568,500* (to be closed at a future date) 1.1 Since July 2020 a large number of streets in the City have had temporary changes made to their operation and layout in response to the Covid-19 pandemic. 1.2 Phases 1 and 2 of this programme implemented temporary traffic management measures on City streets to provide safer spaces for people walking and cycling,

	to help facilitate social distancing and to support businesses and City workers in their return to work. 1.3 Since the initial rollout over July and August 2020, a number of changes have been made to the various interventions in response to feedback from businesses and individuals. This has included amendments, changes in restrictions and total removal in some locations. 1.4 These temporary measures were implemented using Temporary Traffic Orders (TTRO's) using powers amended by the Government in light of the Covid 19 pandemic. 1.5 It is expected that measures to support walking and cycling will still be required in the medium term to provide space for people walking and cycling as they return to the office. 1.6 Government guidance on the Traffic Management Act 2004: Network Management Response to Covid 19 sets out the uses of these powers to support ensure pedestrians have the additional space they require and to support active travel (with consequential benefits to health and resilience) The guidance also considers that Authorities should monitor and evaluate any temporary measures that they install with a view to making them permanent, and embedding a long-term shift to active travel as we move from restart to recovery. 1.7 Many of the proposals were based on outcomes identified in the Transport Strategy and support the Corporations approach to providing space for people walking and cycling. 1.8 The guidance emphasises the need to consider access for blue badge holders (for parking, pick up and drop off) and for access by taxis. There is also an emphasis on undertaking effective consultation with affected parties. Before taking any decisions about retaining these measures longer term (such as by considering promoting the restrictions through Experimental Traffic Orders (ETOs) or permanent traffic orders) we would need to carry out further engagement with stakeholders, evaluate

	the impact on our Network Management Duties to secure convenient, safe and expeditious use of the road network and ensure that any adverse equalities implications (eg for people needing vehicular access due to mobility difficulties) are justified and proportionate. This may also mean that future proposals include changes to the layout or restrictions of some of these measures or that they are no longer recommended to be retained. 1.9 It is therefore recommended to close Phases 1 and 2 of this Covid-19 Transportation response project and move proposals for potential retention of measures currently on street into existing and new Transportation and Public Realm programmes.. The further assessments and engagement exercises set out above would then be completed and reported as part of those projects or programmes. 1.10 If these measures are considered beneficial to be retained the intention would be to take various programme reports to Streets and Walkways Committee for Gateway 3/4 approval to propose transferring the measures into Experimental Traffic Orders with associated monitoring strategies and public consultation processes as required. 1.11 The remaining measures will be removed. Having regard to our Network Management duties it is proposed to cease and remove those measures which we believe may impact unnecessarily on the safe and expeditious movement of the traffic once the return to the office begins over Spring. Details of the measures to be removed or retained are provided in Appendix 2. 1.12 The project primarily consists of on-street changes to provide additional space for walking and cycling. These changes include: • Timed closures to motor vehicles (24/7 or 7am – 7pm, where necessary allowing limited access to premises for essential vehicles) • Reallocation of carriageway to space for walking, queueing and cycling and providing priority for buses

	• Point closures or other changes in operation (e.g. switching to one-way) 1.13 The changes were initially laid out using temporary materials such as barriers. Over the Autumn, the majority of these have been replaced with 'temporary plus' materials using plastic wands and bolt down kerbs. Several adjustments to layouts have also been made in response to feedback received. On some streets, interventions have also been removed or not installed as they are longer considered necessary given the current volumes of people in the City. All of these changes were reported to Committees in various Update and Issues Reports. 1.14 The project also included a "School Street" outside Charterhouse Square School. The scheme, using an Experimental Traffic Order, closes a section of Charterhouse Square to motor vehicles at the start and end of the school day, reducing road danger and supporting children walking and cycling to and from school. A Gateway 5 report – authority to start work and to seek formal agreement from the London Borough of Islington was approved by the Streets and Walkways Sub-Committee in December 2020. With the London Borough of Islington's agreement signed and completed the scheme has been programmed to be delivered at the start of the new school term. The outcomes of this experiment will be reported back to Streets and Walkways Committees. 1.15 As part of the Phase 3 Covid-19 recovery works approved in July 2020 (Planning & Transportation Committee), it was agreed up to 50 parking spaces in carparks, up to 81 parking bays on-street and up to 65 other locations on underutilised carriageways and pavements space would be converted to experimental cycle and dockless vehicle parking to accommodate the expected increase in people cycling to the City during the Covid-19 recovery period. 1.16 Following internal consultation and design stages to evaluate revenue, safety and strategic risks and benefits associated with reallocation, approximately 450 additional temporary cycle parking and 150 temporary dockless

	vehicle parking spaces were taken forward and implemented in November 2020. 1.17 When this programme was first approved, the intention was to report back to December Committees on the outcome of the monitoring of the interventions. It was anticipated that the need for social distancing would be reduced or no longer required towards the end of 2020. December would have therefore been an appropriate time to review whether to retain some of the temporary measures on a permanent or experimental basis. 1.18 A report to Committees in January 2021 agreed to retain the measures on street pending this further report to be bought to Committees in March or April. Some of the measures will now be removed and decisions on the timings for this will be taken by the Bronze Officer group which is chaired by the interim Director of Transportation and Public Realm. 1.19 The transition of the Phase 1 and 2 interventions into other Transportation projects and programmes will occur over the next few months. 1.20 This programme also delivered some outdoor seating and greening interventions to provide outdoor spaces for safe social interaction. This formed Phase 3 of the Programme which was funded separately, and for which a future Gateway 6 report will be bought forward in due course.
2. Next steps and requested decisions	**2.1 Requested Decisions:** a) Agree that the Covid-19 Phase 1 and 2 transport measures set out in Table 1 in Appendix 2 will be removed after this report is approved. Timings for this will be determined by the Transport and Public Realm Covid-19 Bronze Group in consultation with the Chair of the Planning and Transportation Committee and the Chairman and Deputy Chairman of the Streets and Walkways Sub Committee.

	b) Agree that Covid-19 transportation measures set out in Table 2 in Appendix 2 remain on street (for the short term under the existing temporary traffic orders) c) Note that these interventions will move into existing or new programmes (as set out in Table 2 Appendix 2) within the next few months. Within these programmes further assessment of measures for retention is proposed to be undertaken through Spring and early Summer and an assessment of whether these should be retained longer term and promoted through Experimental Traffic Orders is proposed to be reported to Streets and Walkways Sub Committee for approval. d) To retain the temporary cycle parking spaces for continued use for cycle parking, dockless bikes and e-scooters until May 2022, as a minimum, for the reasons set out in the report paragraphs 4.5 to 4.6 below. e) To note that a future report will be taken to Planning and Transportation Committee by May 2022, seeking permission to make the cycle and e-scooter parking places permanent or remove as appropriate. d) Agree that Phase 1 and 2 of this project can be closed. Final finances as set out in Tables 1 and 2 will be verified and closed. Costs associated with the removal of the measures should recommendation (a) be approved are expected to be and will covered by local risk budgets. No further costs will be incurred following the closure of Phases 1 and 2 of this project. e) Note the lessons learnt in Appendix 3.
3. Key conclusions	3.1 The Phase 1 and 2 measures were delivered on time using temporary barriers and signage. There were some delays to the transitioning into the 'temporary plus' measures with some of these only being delivered recently due to supply chain issues. The impact of this delay has been minimised however given the Government's continual message to work from home where possible which has limited the number of people in the City.

	3.2 Delivery of cycle parking was intended to be for the beginning of September 2020 with the anticipated return to offices. There were a number of internal delays on finalising locations due to conflicts with potential events at preferred locations and use of staff to work on more urgent measures. Implementation of the on-street locations took place in November 2020. 3.3 The primary objectives of the Covid-19 Transportation Response were set out in the May 2020 report as: a. Residents, workers and visitors are safe and feel comfortable travelling into and within the Square Mile, particularly when travelling on foot, by cycle and on public transport. b. City businesses are supported in their Covid-19 recovery and the City remains an attractive location for business. c. We will also aim to ensure that the experience of walking, cycling and spending time on the City's streets post Covid-19 is better than what came before; recognising that the unprecedented challenges and disruption caused by Covid-19 require delivery of some elements of the Transport Strategy quicker than originally planned. 3.4 In May when the Gateway 1/2 was approved it was anticipated that a large-scale return to the office would be occurring over the Summer months and that significant space would be needed on street to enable social distancing for people walking and cycling as capacity on public transport would be diminished. 3.5 We had also anticipated that with an almost usual volume of people coming into the City we would be able to gather useful feedback on the measures from a range of street users. Our expectation was that traffic levels would also return to usual, and we would be able to gauge the impact of the changes on the wider highway network. 3.6 Throughout the rest of 2020 and early 2021 London and the rest of the United Kingdom was subjected to a series of national lockdowns and localised tier restrictions. This

	had the impact of limiting the number of people returning to work in the City with the highest level of workers reaching an estimated 25%. While this figure is very low, we have recorded comparatively high levels of cycling. 3.7 Given the ongoing prospect of incremental increases in people returning to work, the comparatively high cycle use, and the statutory guidance[1] concerning ongoing need for new space and active travel in the "new world",it was not considered effective or efficient to consider removal or suspension of the measures over the past months, notwithstanding the numbers of people returning to work being significantly lower than anticipated when the measures were initially authorised 3.8 Moving these interventions into other programmes will enable us to consider retaining these interventions for people walking and cycling, subject to consideration of responses following a fuller period of monitoring and consultation. <u>Main learning and recommendations on improvement</u> 3.9 This was a challenging project to deliver both due to the many unknowns related to project scope and the very short time frame. We have never delivered a project of this scale so quickly before, with everyone also working remotely. It was the first time that we have used temporary materials on this scale, and we used a number of new materials when the changes were made semi-permanent. 3.10 We have had to be reactive in terms of dealing with complaints and with other third party works such as Transport for London's Bishopsgate and London Bridge Streetspace changes. 3.11 A full lessons learnt report is attached at Appendix 3. 3.12 New smart objectives will be set out in the individual programmes for the retained street changes.

[1] Traffic management Act 2004:network management in response to Covid-19 updated 25 February 2021

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Main Report

Design & Delivery Review

4 Design into delivery	Highways Layout Changes 4.1 Because of the circumstances of the pandemic requiring home working, and the pace of delivery required, a lot of the design work for the interventions relied on OS base mapping which has low level accuracy. A lot of changes and adjustments needed to be made on site in response to local conditions that did not align with the client's original design objective. The changes were initially made in temporary materials (barriers and signage) to enable changes to be made where necessary. 4.2 These interventions were then transitioned into 'Temporary Plus' materials such as wands, and bus boarders. This was to reduce short to medium term maintenance costs, to look more fitting in the City context and to be easier for street users to understand. 4.3 This was the first time that these materials had been used in the City and the costs and delivery timeframe were unknown. We did experience some procurement issues for the stick down kerbs for the bus boarders as the demand for these had grown exponentially given all other Local Authorities were trying to deliver similar measures. Cycle Parking 4.4 Locations for fixed and dockless cycle parking were identified based on likely requirement to support more cycling, likely locations for higher demand and suitable safe locations to install temporary cycle parking. It was noted that in some locations there would be an impact on loss of parking income. The (on-carriageway) cycle parking was therefore introduced under an experimental traffic order exercising powers under Section 9 of the Road Traffic Regulation Act 1984. Approved under delegation by the Director of the Built Environment in consultation with the Chair and Deputy Chairman of Planning & Transportation Committee and the Chairman and Deputy Chairman of the Streets & Walkways Sub Committee in September 2020.

	4.5 The City is participating in TfL's pan-London rental e-scooter trial commencing in Spring 2021 as supported by Planning and Transportation Committee. [14.07.2020]. To facilitate E-Scooters in the City designated parking areas would be provided. It is therefore proposed that the (on-carriageway) dockless cycle hire bays introduced as part of the COVID 19 response are modified to allow mixed use enabling dockless cycles and e-scooters hire parking. As a result the current experimental traffic order would be restarted to accommodate the change. 4.6 It is therefore recommended that Members approve the retention of all the temporary spaces and the proposed changes to allow E-Scooters to park in (on-carriageway) dockless cycle hire bays under an experimental traffic order for a minimum of six months and a maximum of 11 months before deciding whether to make the experimental changes permanent or revert the street back to its original layout. 4.7 The process of reviewing and deciding whether to make any changes permanent will be moved into business as usual activities within the City Transportation team. <u>Charterhouse School Street</u> 4.8 The main purpose of School Street scheme is to reduce road danger and to support children walking and cycling to and from school. As this aim would also be beneficial the school community in the long term, an Experimental Traffic Order, has been used to deliver the scheme. This would allow it to be made permanent if, following a period of monitoring and feedback, it is found to be successful. To ensure the greatest level of compliance, advance signage and CCTV enforcement cameras have been incorporated in the design.
5 Options appraisal	5.1 There were a number of workshops between Highways, Transportation and Public Realm to identify which streets required changes at the outset of the project. This was a data led exercise which considered pedestrian flows, pavement widths, cycling demand and connections to destination, retail and transport hubs.

	5.2 The on-street changes were designed to be flexible and adaptable. Since they have been in place, we have made a number of changes and removed some elements. These changes were reported back to Committees throughout the year.
6 Procurement route	6.1 The highways changes were designed and supervised by the Highways team. For highways works these were procured and delivered using the City Corporation's term contractor – JB Riney.
7 Skills base	7.1 The project management, design and monitoring work was all undertaken by officers in Transportation, Highways, City Public Realm and Open Spaces. 7.2 Given the short time frame from concept to delivery, and the unique nature of the project, we drew in resources from a number of teams and from many officers. Although this meant that a range of skills were bought together, in hindsight the number of people involved meant that the project was less efficiently run than other similar sized Transportation projects. This is covered in more detail in Section 18.
8 Stakeholders	8.1 We liaised regularly with our neighbouring Boroughs and Transport for London, given we were all looking to implement complementary projects at the same time. 8.2 Engaging with affected stakeholders was challenging given the Covid-19 related lockdowns and restrictions. We utilised our established communication channels to ensure the widest level of awareness for any changes to City streets. This included using CPAT, CPA and BIDs/partnerships to ensure our business community was engaged and via resident groups and transport modal groups. We met regularly with the taxi and private hire industry to outline the proposals and to make their drivers aware of the changes. 8.3 We also used press and social media to ensure a wider reach out to other street users.

	<u>Feedback on Highways Changes</u> 8.4 Emergency legislation came into force on 23 May 2020 which enabled local authorities to speed up making emergency Traffic Orders that may be needed to, for example, widen pavements or install cycle lanes. We followed this process and also set up an online public consultation portal for people to provide feedback on individual street changes. 8.5 The feedback from this was limited due to the low number of people moving through and within the City over the past 9 months. 8.6 Feedback from the public on the transport recovery measures continues to be obtained though an online map-based platform. Respondents can provide feedback on streets where temporary changes have been implemented by answering questions on how well specific measures for each street are working. Respondents can also state if they would support any measures being retained long term. 8.7 As of 16 March 2021, 430 respondents had left feedback on the platform for at least one street. The average respondent provides feedback for seven streets. The low response rate is reflective of the lower than anticipated return of workers to the City as a result of Covid-19 restrictions. 8.8 Just under one quarter (101) of respondents who provided feedback stated that they live in the City, while 88% (378) stated they usually work in the City. This shows that there is an imbalance in the sample compared to the pre-pandemic daytime population of the City. 8.9 The most selected form of travel (both to/from and around the City) was walking, selected by 44% of respondents (190). This is closely followed by taxi or private hire vehicle driver (41% of respondents – 175 responses). Rail or underground (39% or 167 of respondents) and taxi or private hire vehicle passenger (31% or 133 of respondents) were the next largest choice for form of travel. Cyclists have made up 18% of all respondents (79). Respondents were able to select multiple modes of travel.

	8.10 The consultation portal was set up to allow a detailed feedback on each of the interventions. This means that respondents can comment on an individual element of a scheme or comment on several, or all the interventions, as they wish. This approach is best suited to analysis of a particular scheme. However, given the relatively low response to date and the fact that the consultation is still underway, a more strategic approach to analysis has been undertaken. This provides an overview of the general 'feeling' of the responses to date. 8.11 Based on responses to the question 'Would you support any of these measures being retained long term?': ○ 82% of responses said 'No', ○ 14% said 'Yes', and ○ 4% said 'Yes, with changes'. 8.12 It should be noted that this question is asked in relation to each individual change within each scheme, so there could be five changes in a location and the respondent could say yes or no to one or all of those five changes. The above percentages show an aggregate position of all these individual responses. 8.13 Respondents were asked to provide qualitative feedback in three free text questions, the most popular points are summarised below. 8.14 Detail on what is working well: • Environment • Pedestrian space • Reduced pollution 8.15 Detail on what is not working well: • Increased traffic & congestion • Access • Increased pollution 8.16 Although the measures have been in place for nine months, the number of City workers and visitors able to experience the interventions and provide feedback has been limited.

	8.17 For most of this time, workers have been told by the Government to 'work from home if you can do so'. This guidance has been adhered to as the volume of people traveling into the City has not been greater than 25% of the pre-pandemic levels. 'Higher' volumes generally occur Tuesday to Thursday. Currently, across the City vehicle volumes are at 40-50% of their pre-pandemic levels, whilst pedestrians are at only 10%. This is considered to be the main reason why vehicular modes are over-represented in the consultation response rates. 8.18 The majority of stakeholders who it was anticipated would gain greatest benefit from the measures, namely City workers moving around the City on foot, have not returned in the numbers anticipated when the measures were approved and those benefits have not therefore been as fully experienced as was initially expected. 8.19 We have had responses from some businesses that their ability to service and receive deliveries to their businesses has been made more difficult by the walking and cycling measures. In many cases we have been able to adapt these on street or provide information about routing and timed closures. 8.20 With a number of businesses not being open yet, it is also difficult to understand fully the impact of the interventions on them and their workers and visitors. While it is expected that some businesses may find servicing and deliveries impacted by some of the interventions, we also expect that their workers and visitors may have positive experiences for journeys to and from work, particularly if they walk or cycle all or some of their journey. 8.21 If a decision is taken by future Committees to retain any of these measures for the longer term under ETOs (subject to further assessments) then this will enable engagement and a higher level of consultation responses alongside a wider assessment of monitoring. <u>Feedback on cycle space use:</u> 8.22 The use of temporary cycle and dockless vehicle parking will be monitored in June and September 2021 with a view to making these spaces permanent if these spaces are used

	at similar rates to our existing permanent cycle parking (as utilisation will depend on the rate of the return to offices). Otherwise, these spaces will be kept under review to take into account cycle parking demand and manage the impact on vehicle parking and associated reduction in parking income. A report will come to committee with recommendations after a 12-month period at the latest. 8.23 Should the pan-London rental e-scooter trial extend beyond its anticipated 12-month duration it may be necessary to retain reallocated spaces for longer. Officers will bring a report to this Committee prior to May 2022 to update on the progress of the trial and make further recommendations for retaining or reverting dockless vehicle parking spaces as needed. 8.24 Officers will keep all cycle and scooter parking spaces under open review based on usage data collected through periodic monitoring and will bring a report to Members at an earlier date in the event these spaces become significantly under- or oversubscribed.

Variation Review

9 Assessment of project against key milestones	9.1 The initial rollout of highway measures using temporary barriers, cones and signs was delivered on time in June and July 2020. The transition into Temporary Plus materials followed on from this and for streets where wands only were deployed these changes were made by the end of November. Streets which required bus boarders (build outs of footways with stick on kerbs) were delayed due to availability of materials and issues with bus stop suspensions. Given the further local Covid-19 restrictions, and national lockdown, the late delivery of these elements does not appear to have resulted in any issues for street users. 9.2 Delivery of cycle parking was intended to be for the beginning of September 2020 with the anticipated return to offices. There were internal delays on finalising locations due to conflict with anticipated events at preferred locations and use of staff to work on more urgent measures. Implementation of

	the on-street locations took place in November 2020. A total of 276 spaces with cycle hoops and 147 dockless spaces were installed on-street. It is recommended that these are retained for a minimum of a further 6 months, as we are anticipating a return to the office and wish to accommodate greater numbers of cyclists. 9.3 Delivery of the School Street scheme took much longer than originally envisaged, mostly due to the extended timescale to obtain agreement from the London Borough of Islington but also due to the Covid-19 national lockdown affecting data collection. This added over 6 months of delay.
10 Assessment of project against Scope	10.1 It was difficult to have a clear scope and programme for this project given the uncertainty around the impact of the pandemic in May when the project was initiated. Given this we had designed the on-street changes to be flexible and able to be altered or removed at short notice. 10.2 A number of measures have been rationalised or removed and we are now proposing that the bulk of the existing measures are retained and taken forward as experimental traffic orders via other Transportation and Public Realm projects and programmes.
11 Risks and issues	11.1 The majority of the risks were associated with obtaining third party approvals and supply of materials given every London borough was trying to deliver similar projects in the same timeframe. Our initial phases of approvals and delivery of the changes in temporary materials was met. This was due to good working relationships and regular meetings we already have with Transport for London and neighbouring boroughs. The supply of barriers and signs were quickly procured by our term contractor JB Riney and implemented on site. 11.2 There were delays to the supply of some of the temporary plus materials of scan kerbs for bus stop build outs. Because of the continued national and local lockdown restrictions this didn't transition into an issue.

12 Transition to BAU	12.1 At the commencement of the project it was highlighted that the temporary measures might provide an opportunity to accelerate delivery of the Transport Strategy. We are now proposing that a number of these are retained as experimental traffic orders under other projects. 12.2 Highways have developed a process for utilities companies to follow where measures such as the bolt down wands need to be removed and reinstated. A similar approach is being taken for events and this will be detailed in the future relevant programme reports. 12.3 We are monitoring the issues related to maintaining these new material and whether it is appropriate to consider adding them to the City's Public Realm Manual (for temporary use only) .

Value Review

13 Budget

Estimated Outturn Cost (G2)	Estimated cost (including risk): £1,048,744 Estimated cost (excluding risk):£1,026,149

Table 1: Spend to Date - City Streets COVID-19 Recovery Ph 1&2 - 16800431

Description	Approved Budget (£)	Expenditure (£)	Balance (£)
Env Servs Staff Costs	95,317	95,316	1
Legal Staff Costs	4,800	4,426	374
P&T Staff Costs	283,330	283,329	1
P&T Fees	55,051	55,051	0
Env Servs Works	610,246	588,027	22,219
TOTAL	**1,048,744**	**1,026,149**	**22,595**

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Table 2: Spend to Date - City Streets COVID-19 Recovery Charterhouse School Street - 16800439			
Description	**Approved Budget (£)**	**Expenditure (£)**	**Balance (£)**
Legal Staff Costs	2,500	473	2,027
P&T Staff Costs	6,300	29,398	(23,098)
Camera Fees	13,045	13,045	-
P&T Fees	8,000	2,820	5,180
Enforcement Cameras	23,200	23,200	-
Env Servs Works	5,155	5,097	58
TOTAL	**58,200**	**74,033**	**(15,833)**

	At Authority to Start work (G5)	*Final Outturn Cost*
Fees	*£116,000*	*£ 55,015*
Staff Costs (P&T	*£ 113,500*	*£283,329*
Staff Costs (Highways)	*£ 63,500*	*£95,316*
Staff Costs (Legal)		*£4,426*
Works	*£755,744*	*£58,027*
Total	***£1,048,744***	***£1,026,149***

13.1 Phase 1 & 2 of the project were funded by the Department for Transport grant (Emergency Active Travel fund) - £100K, and the balance by Transport for London Streetspace Programme (LSP) £926,149.

13.2 There is a significant change in allocation of staff costs and construction (works) costs compared to that estimated at Gateway 5. The Covid-19 Phases 1 and 2 workstream is unique, in that at the start of the project scope and timeframes were unknown. We made the best estimate of what type of interventions we would be putting out on street and the extent of those works and how long they would need to be in place.

	13.3	Initially the intention was to deliver these in temporary materials (barriers, cones, signage). Some of the initial assumptions were that people would be returning to work in the Summer, in the same or close to the same volumes, but with social distancing requirements still being in place.
	13.4	Given new ways of working, and using materials such as wands for the first time, some of our assumption and estimates from May were incorrected. We expended less cost on temporary-plus materials that estimated but considerable more staff time resulting from amending layouts and responding to queries from street users.
	13.5	And increase in the length of time of the project being on street resulted in additional staff costs from additional committee reports being required, increased communication tasks being undertaken, and working remotely was less efficient that office working particularly around deployment of materials.
	13.6	This increase in staff costs and reduction in budgets for works has been reported to Committee since June but we have been waiting for the final invoices for the works to be submitted to determine the amount of underspend on the works allowing the relocation of funding to staff costs. A budget adjustment was processed in February once all final costs were known.
	13.7	No additional costs will be incurred once this report is approved. Any costs associated with removal of measures from Table 1, Appendix 2, will be paid for from local risk budgets. All other costs will be met by the individual programmes.
	13.8	Removal of all temporary cycle and dockless parking spaces is estimated to be approximately £4,000.
	13.9	Note that the implications of the continued use of the reallocated bays for on-street cycle parking may be the possible reduction of up to £275,590 of parking income being transferred to the Parking Reserve Account. This is on the basis of the temporary cycle parking being in place for 12

	months assuming normal levels of parking activity and that parking is not simply displaced to other City parking bays. **Please confirm whether or not the Final Account for this project has been verified. No**
14 Investment	*N/A*
15 Assessment of project against SMART objectives	The following Aims and Objectives were set out in the Gateway 2 report <u>Aims</u> The City Corporation's transport response will focus on achieving two main aims: a. Residents, workers and visitors are safe and feel comfortable travelling into and within the Square Mile, particularly when travelling on foot, by cycle and on public transport. b. City businesses are supported in their Covid-19 recovery and the City remains an attractive location for business. • Aim to ensure that the experience of walking, cycling and spending time on the City's streets post Covid-19 is better than what came before; recognising that the unprecedented challenges and disruption caused by Covid-19 require delivery of some elements of the Transport Strategy quicker than originally planned. <u>Short-term objectives</u> • Ensure Covid-19 recovery is primarily based on walking, cycling and the managed use of public transport, seek to minimise the use of private vehicles, private hire vehicles and taxis for travel to and within the Square Mile. • Provide people with the space they need to comfortably and safely maintain social distancing while walking and spending time on the City's streets. • Enable more people to feel safe and comfortable when cycling and provide the space needed to accommodate the increase in cycling levels. • Support City businesses by providing them with the information they need to plan for the safe return of their staff and to help manage demand on public transport.

	• As far as possible ensure any recovery projects and initiatives are aligned with the Transport Strategy. • Deliver change as quickly and efficiently as possible and in ways that are flexible and can adapt to changing circumstances. • Minimise disruption while recognising some potential negative impacts, e.g. potentially longer motor vehicle journeys to access or service properties and businesses. Because of the nature of the project, and the challenges in obtaining detailed data and monitoring information it has not be possible to assess this in a quantitative way. However initial feedback from businesses and BIDS has been positive, and if the proposal to consider progressing with many of the interventions longer term then extensive consultation and data collection will be undertaken and reported back to relevant Committees.

Lessons Learned and Recommendations

16 Positive reflections	16.1	The project has delivered some really positive changes to our streets to support people walking and cycling. The deployment of the temporary plus materials was a first for the City and has demonstrate how we can make changes relatively quickly and easily using these types of materials and this learning will be taken forward into other projects.
	16.2	The decision making around what streets required changes was also a good example of collaborative working across teams and departments. The Transport Strategy provided a good basis on where changes for people walking and cycling needed to be made which shortened the decision-making process. The Bronze meetings held every Friday were an opportunity for officers from a range of teams to meet and review the project and take decision decisions collectively.
	16.3	Working with Transport for London and neighbouring Boroughs was really positive and we coordinated our various proposals.

17 Improvement reflections	17.1 Because of the pace of delivery required for this project a large number of officers were involved and the pace of delivery was quick. Although this was mostly a positive experience, there were challenges with communicating changes in design to officers responsible to deploying the materials on the ground. A clearer process and chain of communication would have been beneficial. Officers were also working on this project alongside their existing programmes of work which were already challenging. If we were to deliver a project like this again, we would recommend pulling together a core project team and putting some other schemes on hold. 17.2 The designs were undertaken largely on OS Mapping which didn't always accurately reflect the situation on the ground. 17.3 We didn't have a clear process for updating plans for when changes were made on site by contractors or others. Consequently it was challenging to know what exactly was on the street at particular times. This problem was exasperated due to the majority of officers involved all working from home and the lack of detailed information on which to base the design. If we were to deliver any similar project a design update process and decision recording process would be initiated. Alongside this we would be quicker at pulling together plans showing the changes for external consultation with stakeholders.
18 Sharing best practice	We held a lessons learnt session with officers that were involved in the project which is detailed at Appendix 3. Officers are also attending a London Boroughs conference on Covid-19 response programmes to share best practise.
19 AOB	N/A.

Appendices

Appendix 1	Plan showing measures to be removed and retained
Appendix 2	List of measures to be removed and to be retained
Appendix 3	Lessons learnt session outputs

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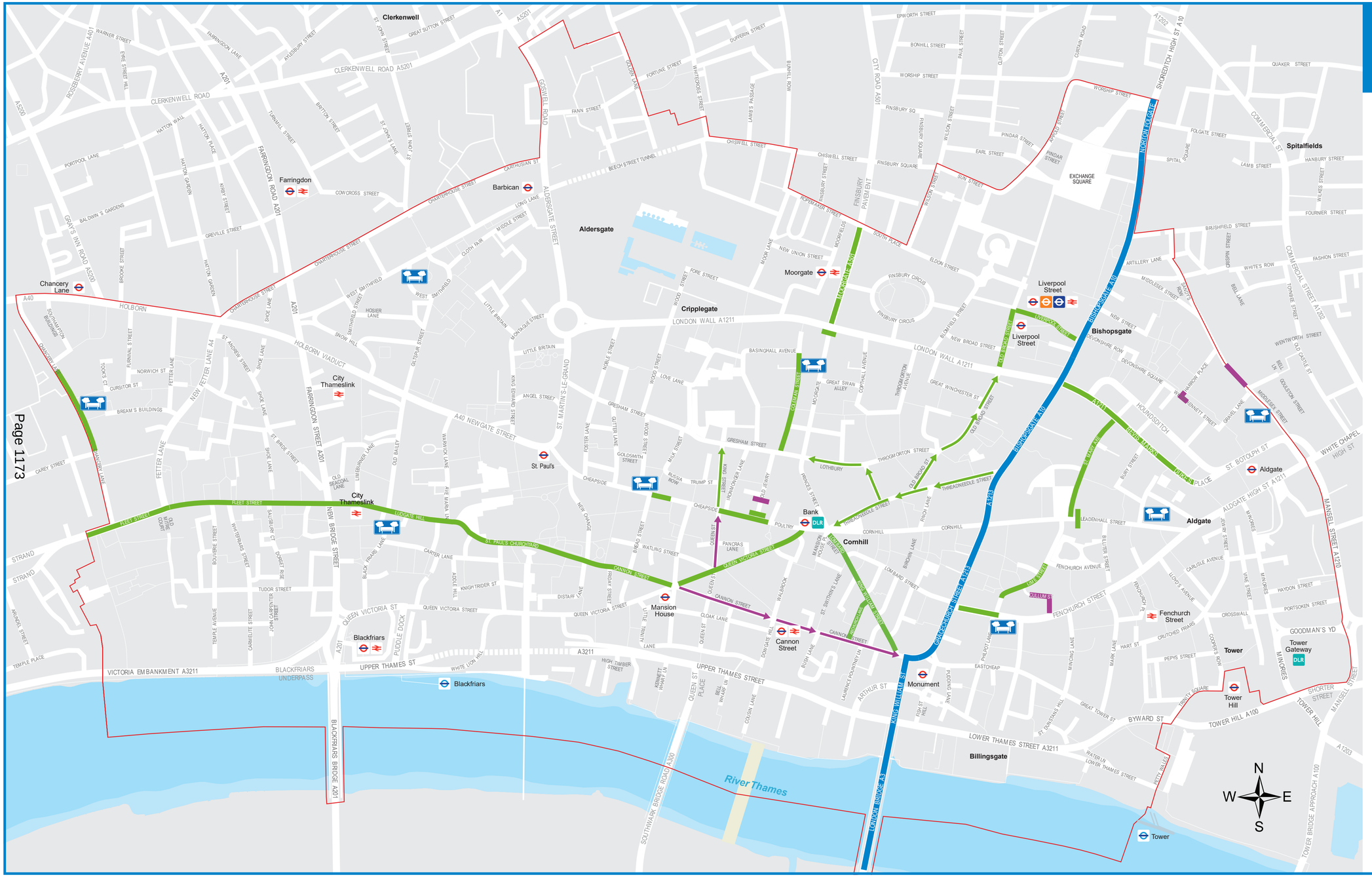
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Farringdon
Barbican
Aldersgate
Moorgate
Chancery Lane
Cripplegate
LONDON WALL A1211
Liverpool Street
Bishopsgate
Spitalfields
City Thameslink
St. Paul's
Bank
DLR
Cornhill
Aldgate
Mansion House
Cannon Street
Blackfriars
Monument
Fenchurch Street
Tower
Tower Gateway
Tower Hill
Billingsgate
River Thames
BLACKFRIARS UNDERPASS
VICTORIA EMBANKMENT A3211
UPPER THAMES STREET
LOWER THAMES STREET A3211
A40 NEWGATE STREET
HOLBORN
CLERKENWELL ROAD A5201
FARRINGDON ROAD A201
NEW BRIDGE STREET A201
FLEET STREET
LUDGATE HILL
ST. PAUL'S CHURCHYARD
CANNON STREET
QUEEN VICTORIA ST
GRACECHURCH STREET A3211
LEADENHALL STREET
FENCHURCH STREET
ALDGATE HIGH ST A1211
MANSELL STREET A1209
NORTON FOLGATE
SHOREDITCH HIGH ST A10
BISHOPSGATE A10
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- **Table 1: Temporary measures to be removed at end of social distancing requirements**

Location	Change
Queen Street	All measures removed to accommodate London Buses movement for Bank Junction
Cannon Street	All measures removed
Moorgate by London Wall	Southbound bus & cycle only restriction removed
Devonshire Square to White Kennet Street	All measures removed
Middlesex Street	Two way working removed
Cullum Street	All measures removed
Coopers Row	All measures removed

Table 2: Measured proposed to be retained : Into Existing and proposed programmes

Location	Current measures - To be reviewed before implementation of any experimental traffic order
Pedestrian Priority Programme	
Chancery Lane between Carey Street & Southampton Buildings	• Current restriction is "No motor vehicles" restriction (Monday to Friday between 7am – 7pm) except emergency services, refuse collection and local authority service vehicles. • Footway widening in places • Parking bay suspended in places • Planters and parklets
Cheapside east of Bread Street	• Point "no entry" except buses, cycles, emergency services vehicles and London Buses incident response unit. • Planters and seating adjacent to point closure
Cheapside (east of King Street) and Poultry	• "No motor vehicles restriction" (Monday to Friday between 7am – 7pm) except buses, vehicles accessing off street premises, for refuse collection, emergency services, local authority service vehicles and London Buses incident response unit.
Coleman Street and King's Arms Yard	• "No motor vehicles" restriction (Monday to Friday between 7am – 7pm) except buses, vehicles accessing off street premises, for refuse collection, emergency services and local authority service vehicles. • Parking bays suspended in locations to enable location of parklets • Pedestrian priority signage
Fleet Street, Ludgate Hill and St Paul's Church Yard are under review	• Footway widening where possible • Provision of cycle lanes • Loading bays

King William Street & Abchurch Lane (south)	• "No motor vehicles" restriction (Monday to Friday between 7am – 7pm) except buses, loading, vehicles accessing off street premises, for refuse collection, emergency services, local authority service vehicles and London Buses incident response unit. • Footway widening in locations
Lothbury, Bartholomew Lane, Threadneedle Street & Old Broad Street (south)	• One way working, contra-flow cycling • Footway widening • Loading bays
Old Broad Street	• Footway widening works retained and access/timing for servicing to be retained
Old Jewry	• Full closure (except for pedal cycles) on Old Jewry between Cheapside and Frederick's Place • Remainder of Old Jewry from Frederick's Place to Gresham Street converted to two-way
King Street	• One way working, contra-flow cycling • Footway widening • Loading bay in Gresham Street
Cycling Programme	
Dukes Place, Bevis Marks and Camomile Street	• Provision of cycle lanes in both directions
Queen Victoria Street	• Cycle lanes in both directions • Taxi rank relocated
Crossrail Moorgate Phase 2	
Moorgate (Between London Wall and Ropemaker Street)	• Cycle lane northbound • Footway widening
City Cluster Programme	
Fenchurch Street	• Small areas of footway widening
Leadenhall Street	• Point "no entry" except buses, cycles, emergency services, local authority services and London Buses incident response unit. • Planters to remain temporary
Lime Street	• Extend existing "No motor vehicles" restriction to 7am – 7pm Monday to Friday
St Mary Axe	• "No motor vehicles" restriction (Monday to Friday between 7am – 7pm) except vehicles accessing off street premises, for refuse collection, emergency services and local authority service vehicles. • Parking bays removed • Pedestrian priority signage

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Covid Transportation Measures – Lessons Learnt Session 22/02/2021

Quality:

- The end product of temporary plus materials (Wands, bolt down kerbs) and parklets looks good. Better quality than some other interventions in other locations.
- Footway widening is not effective when not raised to carriageway level. Street users are unclear about different spaces for people walking and cycling.
- Signage was and is in place messy and looks like temporary traffic management. Could have implemented more permanent looking signage earlier.

Cost

- Staff costs high for comparable projects – but this is based on percentage proportion and construction costs are significantly lower than a 'standard highways project'.
- Project scope was unknown at time of costing, and we had no experience of pricing for this type of project using temporary materials.
- Bid for external funding was made before we had determined designs. Transition into temporary plus not costed for.
- Some abortive costs incurred for streets where interventions were then removed.
- Anticipated greater take up of social distancing stickers – because of way lockdowns and restriction have occurred these haven't been taken up as expected some abortive costs incurred.
-

Programme – design, into delivery, timeframes

- Unknown programme duration at start of project – anticipated that measures might be in place until end of 2020 with the majority of people returning to the office over the summer.
- Identifying what changes to make to which streets was a successful process. Based on Transport Strategy and utilising a range of data, (pedestrian flow / footway width data, cycle volumes etc)
- The design decisions were also taken collaboratively working between teams in Highways and Transport.
- Design issues between various teams in Highways and Transport– lack of clarity around who was client and who were designers. A lot of this was due to pace of delivery. This improvee over time as moved into 'temporary plus'.
- Because of home working requirements, and lack of other detailed information, a lot of the highways design was based on OS maps which were out of date . This resulted in changes needing to be made on site.
- LL – checked on site at key locations,
- For future projects would been useful to include Construction Logistics officers to understand construction site locations, and the extent of their highway

occupation. This particularly impacted ability to deliver changes in the City Cluster

- With the teams there is a good local knowledge of the network and the impact of changes.
- Working with Transport for London on Bishopsgate and London Bridge changes was a good example of co design.
- For the Phase 3 works (Parklets and seating) the split of design responsibility between design teams made Phase 3 work more difficulty to coordinate. An overall base CAD plan would have useful
- Worked well using temporary barriers, working out issues, then transitioned into 'temp plus' once design crinkles ironed out
- Made a lot of changes from original proposals. Questions regarding value for money although this did met the flexible approach we had set out in reports.
- We did not have a process for systematically updating design drawings with changes made on site by various people. Therefore we often did not know exactly what had been deployed on site. This made it challenging in responding to correspondence on occasions.
- Timeframes for delivery – slower deployment than anticipated, temporary measures quickly out on site, temporary plus was slower than anticipated due to some material supply issues. Cycle parking design work was slower than planned (why was this?)
- Removal of cycle parking and other measures for utilities work etc working well – A process for removal and reinstatement for 3rd parties has been developed.
- For future projects of this type, with limited underlying topographical information consider agreeing key design parameters and design on site.

Governance

- Lack of governance and setting out of clear role and responsibilities did lead to some issues in design and delivery of the project. In cases there were overlaps of roles.
- The gateway reporting system isn't appropriate for a project like this which required pace and ability to be reactive. A form of delegated reporting would have been useful as committee reports were required almost monthly. A considerable amount of staff time was spent on drafting reports.
- Bronze group met weekly but should have been set up earlier in process. This group could have used more effectively, especially if delegations were made. Decision making needed to be more systematically documented.

Procurement

- Suppliers for phase 3 works – ordering process between decision to order placed took longer than anticipated (demand from other boroughs)
- Purchasing of temporary barriers was quick but in hindsight should have looked to hire of purchase such a substantial amount.

External approvals

- Existing relationships with adjacent Boroughs and Transport for London means that all external approvals were granted relatively quickly for phase 1 and 2 works.

Communication

- Single point of contact worked well for external correspondence.
- Difficult to reach all business and residents – no centralised communication database. An email bulletin was set up for all Covid related communications but this has limited takeup.
- Visitors to webpage, and consultation uptake were low in volume. The online consultation was set up for a different scenario than what eventuated i.e a more substantial return to normality in mid 2020.
- Webpage didn't give enough information to users as to what changes were made.
- We were slow to pull together a schematic map of changes. Would have been useful at start to communicate to wider range of people

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Committees: Corporate Projects Board [for information] Planning and Transportation Committee *[for decision]* Project Subs Committee *[for decision]* Corporate Asset Sub Committee [for decision] Culture, Heritage and Libraries Committee [for information]	**Dates:** 31 March 2021 13 April 2021 14 April 2021 28 April 2021 14 June 2021
Subject: Tower Bridge HV System Replacement and Increasing Resilience **Unique Project Identifier:** 11520 **CS 109/21**	**Gateway 4c** Complex **Issue Report**
Report of: City Surveyor **Report Author:** Navdeep Bhal	**For Decision**
PUBLIC	

1. Status update	**Project Description:** Refurbishment of the High Voltage (HV) and Low Voltage (LV) electrical infrastructure at Tower Bridge and increasing its power resilience (i.e. the secondary source of power in the event of a power failure). **RAG Status:** Green (Green at last report to Committee) **Risk Status:** Medium (Medium at last report to committee) **Total Estimated Cost of Project (following approval of this report):** *£6,076,293 (excl. risk)* **Total Estimated Cost of Project at Previous Gateway:** £5,687,003 (excl. risk) **Change in Total Estimated Cost of Project:** Increase of £389,290 since the last Gateway report for CRP drawdown and proposed SCADA change) **Spend and Committed to Date:** *£890,450.* **Costed Risk Provision Approved:** *£335,000* (of which £43,290 has been utilised and £291,710 remaining)

<table>
<tr><td></td><td>Funding Source: Bridge House Estates Bridges Repair Designated Fund</td></tr>
<tr><td>2. Requested decisions</td><td>Next Gateway: Gateway 5 - Authority to Start Work (Complex)
Requested Decisions:
1. That a 99-year lease of the existing Diesel Generator room is granted to UKPN for installation of their sub-station, in order to significantly reduce the risk of power failure to the bridge and to the income generating exhibition
2. The Corporate Asset Sub Committee is asked to approve the grant of a 99-year lease of the former Diesel Generator Room on St Katherines Way to UKPN delegating the agreement of final lease terms to the City Surveyor in consultation with the Comptroller & City Solicitor.
3. That a project cost increase of £346,000 is approved for a change to the project scope following an opportunity to implement a known HV control system whilst improving the network resilience and future proofing the existing bridge lift system. Please note that this additional budget will be requested as part of the Gateway 5 budget.
4. Note the revised total estimated cost of the project at £6,076,293 (excluding risk) if the change in scope is approved.
5. Note the revised total estimated cost of the project at £8,238,003 (including risk) if the change in scope is approved.
6. That option 1 is approved. Option 1 seeks approval for the partial integration of the existing bridge lifting and new HV SCADA systems and approval to grant a 99-year lease for a sub-station to UKPN.</td></tr>
<tr><td>3. Budget</td><td>The table below indicates the increase to the overall project estimated cost if the proposed change in scope is approved. It should be noted that this cost is currently indicative based on the design and will be confirmed as part of the tender for the main works contractor. This budget will not be requested until Gateway 5. The full project budget is documented in the Cost Book in Appendix 2.

<table>
<tr><th>Item</th><th>Reason</th><th>Funds/ Source of Funding</th><th>Cost (£)</th></tr>
<tr><td colspan="4">Construction Fees</td></tr>
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	<table><tr><td>Supervisory Control and Data Acquisition (SCADA) works</td><td>To provide a new HV Power intake</td><td>Bridge House Estates Bridges Repair Designated Fund</td><td>£346,000</td></tr></table> **The revised total estimated project cost (excl. risk) = £6,076,293 if proposed change of scope is approved.** This element will be included as part of the competitive tender exercise to ensure it is market tested. **Costed Risk Provision requested in this report: £0** however the remaining £291,710 costed risk provision is to be retained
4. Issue description	1. In order to significantly reduce the risk of power failure to the bridge and to the income generating exhibition, UK Power Networks (UKPN) will need to lease an area of land from the City of London and construct an HV sub-station so that they can provide the required power supply to the new North shore HV intake. Detailed lease terms are yet to be agreed however, UKPN have requested a lease term of 99 years, which this report seeks approval for. Members are asked to note that a lease renewal will likely need to be agreed with UKPN prior to the 99 years and also that as detailed lease terms are to be agreed, any additional maintenance costs affecting the City will be the subject of a future report. If required, this will be funded from the Bridge House Estate Repairs Designated Fund. 2. The report also seeks approval for delegated authority to the City Surveyor to negotiate final lease terms in consultation with the Comptroller & City Solicitors 3. It has been proposed that UKPN lease the Diesel Generator room on St Katharine's Way for this purpose. The existing generator is being removed as part of this project and being replaced by a generator plug-in point, therefore the space will be vacant. The construction of the sub-station is being funded as part of this project and is included in the overall estimated project cost. 4. During the feasibility stage of the project, a standalone Building Management System (BMS) was allowed for in the

	scope to control / monitor the new electrical equipment. However, as the project progressed it was recognised that, due to complex nature of the new electrical infrastructure being installed, a more advanced local Supervisory Control and Data Acquisition (SCADA) system would be more appropriate for controlling / monitoring the new HV equipment. 5. Working with the Tower Bridge operations team and the incumbent SCADA contractor, that installed the controls system for bridge lifting, an opportunity to improve network resilience and future proof the existing bridge lifting system was then recognised and explored. It was considered that by implementing a partial integration of the existing and new system, whereby the bridge lift operations and HV equipment share a common network but have separate programmable logic controllers (PLC), resilience would be increased whilst allowing further hardware works to the bridge lifting system to be easily implemented. The Tower Bridge operations team and the Project Board have confirmed that this is their preferred approach and have asked to include this upgrade into the current HV Electrical Upgrade project scope. This change of scope is detailed in Change Control Notice 02 (Appendix 3) and will increase the overall project cost by £346,000
5. Options	<u>Option 1:</u> Approve the 99-year lease term for the UKPN sub-station and approve the request to add the partial integration of the existing bridge lift and the new HV equipment SCADA systems to the project scope of works. This option is recommended as it importantly ensures the required power can be provided to the new North Shore HV supply and it explores an opportunity to increase the resilience of the existing bridge lifting SCADA system. <u>Option 2:</u> Reject the 99-year lease term for the UKPN sub-station and reject the request to add the partial integration of the existing bridge lift and the new HV equipment SCADA systems to the project scope of works. This option is not recommended as it would prevent the required power from being provided to the new North Shore HV supply and the opportunity to increase the resilience of the existing bridge lifting SCADA system would be lost. **Recommendation: Option 1 to importantly ensure UKPN can provide the required power to the new North shore HV supply that is to be installed. Also it will reduce the number of SCADA systems in operation on the bridge whilst increasing the resilience of the existing bridge lift SCADA system<u>.</u>**

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Appendices

Appendix 1	Project Coversheet
Appendix 2	Cost Book
Appendix 3	Change Control Notice 002
Appendix 4	Risk Register

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Project Coversheet

[1] Ownership & Status

UPI: 11520
Core Project Name: Tower Bridge HV Replacement & Increased Resilience
Programme Affiliation (if applicable): Bridge House Estate 50-Year Plan
Project Manager: Navdeep Bhal
Definition of need: Existing infrastructure is not compliant and is at high risk of failure due to age and condition. The backup power supply is also at high risk of failure due to age and condition and does not provide enough capacity for the Bridge to maintain operations as usual. This impacts on revenue, bridge operations and reduces the ability to complete bridge lifts as required under the Corporation of London (Tower Bridge) Act 1885.
Key measures of success:

1. Achieve statutory compliancy of segregation of HV and LV switchgear
2. Reduce likelihood of power failure due to age and condition of existing electrical infrastructure.
3. Increase power resilience in the event of a power outage
4. Maintain power and bridge operations during works

Expected timeframe for the project delivery:
Original Timescales:
GW 1 – 2: Oct 2015,
GW 3 – 4: Jan 2016,
GW 5: Apr 2016.
No completion date was provided in the GW1-2

Gateway 3 Timescales:
GW 1 – 2: Oct 2015,
GW 3: Sept 2019
GW 4: May 2020
GW 5: Dec 2020
Completion: Dec 2021

Gateway 4c Timescales:
GW 1 – 2: Oct 2015,
GW 3: Sept 2019
GW 4c: Nov 2020
GW 5: May 2021
Completion: Dec 2021

Current Timescales:
GW 1 – 2: Oct 2015,
GW 3: Sept 2019
GW 4c: Nov 2020
GW 5: July 2021
Completion: Feb 2022

Key Milestones:
Gateway 3 Timescales:
Surveys & Procure Consultants: Oct-Dec 2019

Develop designs: Jan - May 2020
GW4: May 2020
Utility and planning applications: May - Aug 2020
Tender contractor: Sept - Nov 2020
GW5: Dec 2020
Start on site: Jan 2021
Complete: Dec 2021

Gateway 4c Timescales:
Surveys & Procure Consultants: Jan - Jun 2020
Develop designs: Jun - Oct 2020
GW4c: Nov 2020
Utility and planning applications: Sept 2020 – Feb 2021
Tender contractor: Jan – May 2021
GW5: May 2021
Start on site: May 2021
Complete: Dec 2021

Current Timescales:
Surveys & Procure Consultants: Jan - Jun 2020
Develop designs: Jun - Oct 2020
GW4c: Nov 2020
Utility and planning applications: Sept 2020 – March 2021
Tender contractor: March – July 2021
GW5: July 2021
Start on site: July 2021
Complete: February 2022

Are we on track for completing the project against the expected timeframe for project delivery?

At GW3 there was a 41 months slippage to the original programme due to the project being put on hold after the officer responsible for the project left the department and allocation of a new internal resource. An additional 3 months of additional work to the feasibility report was needed to explore construction logistics to arrive at a more robust project programme, cost and risk assessment.

Since then the programme has slipped a further 6 weeks due to the inclusion of the partial integration of the existing and new SCADA systems into the project.

Has this project generated public or media impact and response which the City of London has needed to manage or is managing?
No public or media impact.

[2] Finance and Costed Risk

Headline Financial, Scope and Design Changes: Committees approved the decision to explore the feasibility of 5 options proposed by City of London Engineers to fulfil the requirements of this project with the appointment of a consultant team. These options were discounted as non-workable solutions so then two alternative viable proposals were

discussed. Of these two alternatives, Option B was recommended and approved by committee. Option B remains the preferred solution following further design development.

'Project Briefing' G1 report (as approved by Chief Officer in Jan 2016):

- Total Estimated Cost (excluding risk): £500,000 – £5,000,000
- Costed Risk Against the Project: none reported
- Estimated Programme Dates: (reported in initial GW1 - 2 report in Sept 2015)
    - GW 3 – 4: Jan 2016
    - Start on site: May 2016

Scope/Design Change and Impact:

'Project Proposal' G2 report (as above):

- Total Estimated Cost (excluding risk): as above
- Resources to reach next Gateway (excluding risk): £35,000
- Spend to date: none reported
- Costed Risk Against the Project: none reported
- CRP Requested: none reported
- CRP Drawn Down: none reported
- Estimated Programme Dates: as above

Scope/Design Change and Impact:

'Options Appraisal and Design' G3 report (as approved in October 2019):

- Total Estimated Cost (excluding risk): £5,800,000
- Resources to reach next Gateway (excluding risk): £303,000
- Spend to date: £26,059
- Costed Risk Against the Project: £2,600,000
- CRP Requested: £0
- CRP Drawn Down: £0
- Estimated Programme Dates:
    - GW4: May 2020
    - GW5: Dec 2020
    - Start on site: Jan 2021
    - Completion: Dec 2021

Scope/Design Change and Impact:

'Options Appraisal and Design' G3 issues report (approved by Project Subs on 21/10/20 and to be approved by Planning & Transportation on 27.10.20 and then Court of Common Council under urgency):

- Total Estimated Cost (excluding risk): £5,800,000
- Resources to reach next Gateway (excluding risk): £554,210
- Spend to date: £95,000
- Costed Risk Against the Project: £2,600,000
- CRP Requested: £0
- CRP Drawn Down: £0
- Estimated Programme Dates:
    - GW4: Nov 2020
    - GW5: May 2021
    - Start on site: May 2021*

- Completion: Dec 2021*

*Note that the duration of the design periods and construction period were unknown at previous gateway, however since involving the design team better estimates has been provided. It was recognised that design would require more time and construction less.

Scope/Design Change and Impact:

'Detailed Design' G4c (approved by committees in November 2020):

- Total Estimated Cost (excluding risk): £5,687,003
- Resources to reach next Gateway (excluding risk): £128,115
- Spend to date: £152,000
- Costed Risk Against the Project: £2,205,000
- CRP Requested: £0
- CRP Drawn Down: £0
- Estimated Programme Dates:
  - GW4: Nov 2020
  - GW5: May 2021
  - Start on site: May 2021
  - Completion: Dec 2021

Scope/Design Change and Impact:

Current G4 Issues (to be approved by committees in April 2021):

- Total Estimated Cost (excluding risk): £5,730,293
- Resources to reach next Gateway (excluding risk): £0
- Spend to date: £505,000
- Costed Risk Against the Project: £2,161,710
- CRP Requested: £0
- CRP Drawn Down: £43,290
- Estimated Programme Dates:
  - GW4: Nov 2020
  - GW5: July 2021
  - Start on site: July 2021
  - Completion: Feb 2022

Scope/Design Change and Impact:

- Partial integration of the existing bridge lifting and new HV supervisory control and data acquisition (SCADA) systems – increase of 6 weeks to the project programme for additional design work required.

'Authority to start Work' G5 report (as approved by PSC xx/yy/zz):

- Total Estimated Cost (excluding risk):
- Resources to reach next Gateway (excluding risk
- Spend to date:
- Costed Risk Against the Project:
- CRP Requested:
- CRP Drawn Down:
- Estimated Programme Dates:

Scope/Design Change and Impact:

Total anticipated on-going commitment post-delivery [£]:<Current Range>
Programme Affiliation [£]:<(If applicable) What is the estimated total programme cost including this project:>

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CITY OF LONDON CORPORATION

CITY SURVEYORS DEPARTMENT

PROPERTY PROJECTS GROUP - COST BOOK

Project No.	
Project name	
Project Type	
Period	

Financial Summary

	Element	Gateway 1 - 2 Budget
	Construction	**0**
1.1	Enabling Works	0
1.2	Main Contractor	0
1.3	Direct Package	0
1.4	UKPN Connection	0
1.5	Landscape	0
1.6	Fittings and Equipment	0
	Professional Fees	**23,060**
2.1	Architect	0
2.2	Interior Designer	0
2.3	Cost Consultant	0
2.4	Mechanical and Electrical	10,000
2.5	Structural Engineer	0
2.6	Principal Designer	6,000
2.7	Planning Consultant	0
2.8	Building Control	0
2.9	Project Management	7,060
3	Fire Risk Assessment	0
3.1	Catering Consultant	0
3.2	Acoustics Consultant	0
3.3	AV Consultant	0
3.4	Lighting Consultant	0
3.5	CDMA	0
3.6	Sustainablitty	0
3.7	CGI	0
3.8	RoL	0
3.9	Early Contractor Involvement	0
3.10	Transport Consultant	0
3.11	Communications Consultant	0
3.12	Other Consultant	0
	Consequential Fees	**0**
4.1	Construction Legal Fees	0
4.2	Consents - RoL	0
4.3	Agents	0
4.4	Marketing	0
4.5	Stamp Duty	0
4.6	Relocation	0
4.7	Planning Fees	0
4.8	FF&E (furntiure, AV, FM)	0

4.9	Utilities Companies	0
4.10	Building Control Authority	0
4.11	Surveys	0
	City of London Staff	**3,000**
5.1	IT Costs	0
5.2	DBE	0
5.3	Legal Costs	0
5.4	Other	0
5.5	Staff Costs	3,000
	SUB TOTAL	**26,060**
	Risk Register	**0**
6.1	Compliance/Regulatory (i.e Planning)	0
6.2	Financial (i.e inflation)	0
6.3	Reputation (Client Changes)	0
6.4	Contractual/Partnership (Contracts)	0
6.5	H&S/Wellbeing (i.e Design Compliance)	0
6.6	Safeguarding (i.e Site Attendance)	0
6.7	Innovation (i.e Design Development)	0
6.8	Technology (BIM/ Sustainablity)	0
6.9	Environmental (Site Constraints)	0
6.10	Physical (building Constraints)	0
6.11	Blank	0
6.12	Blank	0
6.13	Blank	0
6.14	Blank	0
7	GRAND TOTAL	26,060
	CapEx- Actuals& Committed	

CapEx-Variance	**26,060**

NOTES	
EXCLUSIONS	
Costs prepared by:	
Costs verified by:	
Date:	

72800014	
Tower Bridge HV Electrical Infrastructure Upgrade	
HV/LV	
2020 - 2021	

PM	
Site	

GATEWAY CASHFLOW

Gateway 3 Budget	Gateway 3 Issues Budget	Gateway 4c Budget	Gateway 5 Budget	Gateway 6 Budget
0	**180,000**	**0**	**4,993,000**	**0**
0	0	0	0	0
0	0	0	4,993,000	0
0	0	0	0	0
0	180,000	0	0	0
0	0	0	0	0
0	0	0	0	0
164,500	**176,095**	**108,115**	**97,084**	**32,649**
16,500	26,139	8,488	14,900	400
0	0	0	0	0
18,298	28,359	9,411	1,650	1,933
40,948	16,520	25,540	23,320	12,160
25,000	9,912	15,324	13,992	7,296
20,000	6,608	10,216	9,328	4,864
1,692	11,324	4,824	4,500	400
0	20,000	0	0	0
30,263	20,033	8,312	6,394	1,596
11,800	7,200	6,000	13,000	4,000
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	15,000	10,000	0	0
0	0	0	0	0
0	15,000	10,000	10,000	0
115,500	**60,000**	**15,000**	**0**	**0**
0	0	0	0	0
5,000	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
5,000	10,000	0	0	0
0	0	0	0	0

5,000	0	0	0	0
5,000	5,000	0	0	0
95,500	45,000	15,000	0	0
23,000	**15,000**	**5,000**	**19,000**	**3,000**
0	0	0	0	0
0	0	0	0	0
5,000	5,000	0	5,000	1,000
0	0	0	0	0
18,000	10,000	5,000	14,000	2,000
303,000	**431,095**	**128,115**	**5,109,084**	**35,649**
0	**355,000**	**335,000**	**1,870,000**	**0**
0	65,000	150,000	225,000	0
0	0	0	45,000	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	100,000	0	60,000	0
0	190,000	185,000	1,540,000	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
303,000	786,095	463,115	6,979,084	35,649

303,000	**786,095**	**463,115**	**6,979,084**	**35,649**

Total CapEX	CRP Alloc - GW2	CRP Alloc - GW3	CRP Alloc - GW4
5,173,000	**0**	**0**	**0**
0			
4,993,000			
0			
180,000			
0			
0			
644,793	**0**	**0**	**43,290**
66,427			
0			
64,151			4,500
163,048			34,560
71,524			
57,016			
22,740			
20,000			
77,888			4,230
42,000			
0			
0			
0			
0			
0			
0			
0			
0			
0			
25,000			
0			
35,000			
190,500	**0**	**0**	**0**
0			
5,000			
0			
0			
0			
0			
15,000			
0			

5,000			
10,000			
155,500			
68,000	**0**	**0**	**0**
0			
0			
16,000			
0			
52,000			
6,076,293	**0**	**0**	**43,290**
2,161,710	**0**	**0**	**43,290**
375,000			
45,000			
0			
0			
0			
0			
0			
0			
60,000			
1,725,000			
0			
0			
0			
0			
8,238,003			
8,238,003			

Change Control Notice

City of London Corporation, City of London Police

To be completed when the scope of a project / programme is going to change which will result in a change to outcomes, cost, timescales.

Title:	Tower Bridge HV Project

CCN Ref No.	2	**Date Raised**	10.03.2021
Type of Change	Project Scope	**Needed by**	TBC
Senior Responsible Officer	Ola Obadara	**Author**	Leadenhall Project Management Ltd (Steve McConaghy)

Reason for Change

Client Request	~~Contractors Request~~	~~Designer Request~~	~~PM Proposal~~
~~Other (Please Specify)~~			

Description of the proposed change

Describe what change is required.

Summary of Change

At feasibility stage, a local Supervisory Control and Data Acquisition (SCADA) system was proposed to facilitate automatic and remote control of HV and LV circuit breakers, monitor demand and automate change-overs and monitor electrical meters for consumption data and power quality analysis only (Feasibility Report 3.1). This CCN (CCN02) relates to additional construction costs associated by SCADA Option 03.

Background

Following discussions with the Tower Bridge Operations team and the incumbent SCADA contractor that installed the controls system for bridge lifting, an opportunity was identified to enhance the bridge lifting operation network resilience in line with the current electrical infrastructure proposals. There was also an opportunity to future proof the existing SCADA system for planned hardware works, as it currently contains multiple point of failures due to the age of the infrastructure.

The City of London Corporation requested that AECOM carry out a feasibility study to investigate the potential options for the SCADA upgrade as part of the electrical infrastructure project. The feasibility study TBR-ACM-XXXX-TN-EL-00-4001 identified “Option 3 - Partial Integration of SCADA Control Systems” as the preferred option. The Tower Bridge Operations team and Project Board have confirmed that SCADA Option 3 offers the best approach with increased resilience.

The information below sets out the requirement for the change control notice to deliver the additional scope and funding required.

Scope of Work

This CCN (CCN02) relates to additional construction costs associated with the supply and installation of the partly integrated SCADA system.

In summary:

Both the North and South LV switchboards will permit integrated SCADA controls and monitoring.
All SCADA interfaces will utilise the same application via the SCADA server.
SCADA redundancy will be achieved via a dual redundant server with two independent server rack cabinets containing a universal power source (UPS) and bypass switches.
Energy monitoring, trends and information will be provided by a dedicated energy monitoring software application, installed on the dedicated server.
An Ethernet network will provide connection to all devices including connections to the bridge lift programmable logic controller (PLC) system.

Additional outcome of the change

What benefit, outcome or mitigation will this change provide

This change would in affect provide a single SCADA controls system for Tower Bridge. This change will mitigate any SCADA interface risks associated with the integration of 2no SCADA systems.

What will happen if the change isn't approved

Explain the impact and outcomes if the change isn't approved

If this change is not approved, it is anticipated that the Tower Bridge operations team may not approve the installation of an independent SCADA system to facilitate automatic and remote control of HV and LV circuit breakers, monitor demand and automate change-overs and monitor electrical meters for consumption data and power quality analysis. It is also noted that the remaining SCADA system will require future update to provide a single site SCADA system and resilience.

Project/Programme Impact

Append any additional information such as breakdown of costs or revised project plans etc.

Cost / Resources	Timescales	Outcomes
Pre-Construction Programme Impact: No impact refer to CCN 01.		
Pre-Construction Cost Impact: No impact refer to CCN 01.		
Construction Programme Impact: It is understood that this CCN shall not affect the estimated construction period.		
Construction Cost Impact: It is estimated that this CCN shall increase construction costs by: **£346,000** which includes; sub-contractor OHP, Testing & Commissioning, BWIC, NPO, Combined Prelims, MC OHP, for Scada Option 3. This change will increase the overall project budget from £5,730,293 to £6,076,293 and will be funded from the Bridge House Estates Trust 50 Year Maintenance Fund for 2021 / 22.		

Project/Programme Review

Will this change impact any of the following and therefore need to be updated

Opportunity Outline	Organisational Impact Assessment	Change Impact Assessment	PID
N/A			

Risk Assessment

Type = Project, Service, Corporate, Regulatory
Likelihood = High, Medium, Low
Impact = High, Medium, Low
Mitigating Plan = Proposed options to address the risk

Description of Risk	Type	Likelihood	Impact	Mitigation Plan

Project Approval Levels

~~< £500~~	~~< £5,000~~	> £5,000

Funded By (Select as appropriate)

~~Costed Risk~~	Additional Funds - Bridge House Estates Repairs Designated Fund	~~No Financial Impact~~	~~Local Budget~~
~~Other (Please Specify)~~			

Cost Estimate

Cost Consultant (Apply +/- 10% Tolerance)		**Contractor**	
Work Cost	N/A	Construction Costs	£346,000
Fee's	N/A	Professional Fee's	N/A
Total OMIT/ADD £	N/A	Total Cost (ex VAT)	£346,000

Proposed Fee	Drawing	Design/Time
Architectural Comments: N/A - No implication on architectural design.		

Proposed Fee	Drawing	Design/Time
M&E Comments:		

Proposed Fee	Drawing	Design/Time
Project Management Comments: No additional design fees are applicable to the this CCN. Refer to CCN01 for SCADA Option 3 project team design development fees. The current SCADA design proposals align with SCADA Option 03 design proposals and quotation approved under CCN01. SCADA Construction costs associated with this CCN have been market tested and confirmed by Currie & Brown as part of the project Pre-Tender Estimate process.		

Proposed Fee	Drawing	Design/Time
Cost Consultant Comments:		

Authorisation		
Name	**Role**	**Date Approved**
NAVDEEP BHAL	Project Manager	11/03/21
OLA OBADARA	PPG Director	22/03/21
	SRO/Project Board	
Jamie Bottono	Tower Bridge Operations Manager	22/03/21

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City of London: Projects Procedure Corporate Risks Register

Project name: *Tower Bridge HV Replacement and Increasing Resillience*

Unique project identifier: *11520*

Total est cost (exc risk) *£6076293*

PM's overall risk rating	**Medium**
Avg risk pre-mitigation	**9.0**
Avg risk post-mitigation	**4.8**
Red risks (open)	**4**
Amber risks (open)	**44**
Green risks (open)	**7**

Corporate Risk Matrix score table

	Minor impact	Serious impact	Major impact	Extreme impact
Likely	4	8	16	32
Possible	3	6	12	24
Unlikely	2	4	8	16
Rare	1	2	4	8

Costed risks identified (All)	£10,625,000.00	175%	*Costed risk as % of total estimated cost of project*
Costed risk pre-mitigation (open)	£10,625,000.00	175%	*" "*
Costed risk post-mitigation (open)	£2,161,710.00	36%	*" "*
Costed Risk Provision requested	£2,161,710.00	36%	*CRP as % of total estimated cost of project*

	Number of Open Risks	Avg Score	Costed impact	Red	Amber	Green
(1) Compliance/Regulatory	11	**10.2**	£1,670,000.00	0	10	1
(2) Financial	2	**9.0**	£845,000.00	0	2	0
(3) Reputation	6	**8.3**	£170,000.00	1	4	1
(4) Contractual/Partnership	1	**4.0**	£150,000.00	0	0	1
(5) H&S/Wellbeing	2	**14.0**	£250,000.00	1	1	0
(6) Safeguarding	0	**0.0**	£0.00	0	0	0
(7) Innovation	0	**0.0**	£0.00	0	0	0
(8) Technology	0	**0.0**	£0.00	0	0	0
(9) Environmental	3	**8.0**	£700,000.00	0	3	0
(10) Physical	30	**8.7**	£5,750,000.00	2	24	4

		Extreme	Major	Serious	Minor
Issues (open)	**0**	**Open Issues**	0	0	0	0
All Issues	**0**	**All Issues**	0	0	0	0

Cost to resolve all issues (on completion)	£0.00	**Total CRP used to date**	£43,290.00

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Committee(s): Planning and Transportation	**Dated:** 13/04/2021
Subject: **Building Control Charges Report**	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1 & 2.
Does this proposal require extra revenue and/or capital spending?	**N**
If so, how much?	**N/A**
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	**N/A**
Report of: **Director of the Built Environment.**	**For Decision**
Report author: **Gordon Roy** **District Surveyor & Environmental Resilience Director.**	

Summary

The propose of this report is to advise the Committee of the findings of the Building Control's review into their fees and charges from service users during 2020.

The District Surveyor's Building Control Division increased their charges in April 2020 as agreed by this Committee, with charges being set for the service, through a "cost recovery" Charges Schemes. These charges, are known as the "City of London Building Regulations Charging Scheme No 3", for work associated with applications under the Building Regulations 2010, and the "Building Control Miscellaneous Charges No 3" for work associated with Notices under the London Building Act (Amendment) Act 1939, and the Building Act 1984. This report informs the Committee of the results of the revised charges schemes, and to recommend changes to the City of London Building Regulations Charging Scheme No 3, to change the total charge fee which is currently split into two fees known as the Plan Charge and the Inspection Charge at a 25/75 split to a 40/60 split, which is aimed at improving income and income flow, on these activities, as part of the Divisions requirements to maintain full cost recovery.

Recommendation(s)

Members are asked to:

- Approve the new "City of London Building Control Charges Scheme No 4: 2021.

Main Report

Background

1. The District Surveyors Building Control division raises income through two approved charges schemes. CIPFA guidance on the allocation and apportionment of reporting requires the division's budget to be split into three defined categories of: -

- Chargeable Building Regulations
- Non-Chargeable Building Regulations, and
- Other Building Control Activities.

The two current charges schemes are.

- The City of London Charges Scheme No 3; 2020, which applies charges for "Chargeable Building Regulation" activities, (See Appendix A and B) and
- The Miscellaneous Building Control Charges No 3:2020, (See Appendix D) which applies charges for "Other Building Control Activities".

Both of these schemes were approved by this Committee in March 2020.

2. CIPFA guidance lists a wide range of activities associated with Building Regulations which are chargeable and non-chargeable for the purposes of these schemes. Chargeable activities include checking of plan charges, site inspections, building notice charges, reversion charges and chargeable advice. Non-chargeable activities include the control of unauthorised works, general advice to the public and other departments, the first hour of any Building Regulation advice and carrying out Building Regulation functions in relation to work providing facilities for disabled people.

3. Originally Building Regulation fees, for the approval or rejection of building plans and for the inspection of building works were prescribed by central government and as a result standardised fees were applied to every local authority in England and Wales.

4. In 2010, the government introduced The Building (Local Authority Charges) Regulations 2010, being the legal framework for setting a Building Regulation charging scheme and a new scheme was implemented on the 1st October 2010, known as the City of London Charges Scheme No1, 2010. These charges were reviewed in 2018 and in 2020 and a revised Charges scheme, known as City of London Charges Scheme No 3, 2020, was approved and implemented.

5. The City of London Building Regulation Charges Scheme No3, 2020, Annex A, comprises of a range of fixed charges for small scale works with a construction cost up to £1million, and for larger projects over £1million, fees are individually assessed based on the average hourly rate of building control services. Current charges are set out in Appendix B.

6. Other Building Control activities include dealing with temporary structures applications, dealing with dangerous structures, and responding to Demolition Notices. Existing charges are set out in "Building Control Miscellaneous Charges No 3" in Appendix D.

Current Position

7. It was anticipated in 2010 that chargeable works should break even ideally over a 3-year period, however a 5-year period maybe more appropriate where unusually high deficits/surpluses have accrued. The income and expenditure derived from Building Regulation applications has been shown below in Table 1. Over the course of the period covered by Table 1 the District Surveyor has strived for efficiencies in all areas of his divisions work particularly around staffing costs.

TABLE 1
Budgetary Performance 2015-16 to 2021-22

	Chargeable			Non-Chargeable	Total (Expenditure)/ Income
	Expenditure	Income	(Deficit)/surplus		
	£'000	£'000	£'000	£'000	£'000
2021-22 (Original Budget)	(1,120)	950	(170)	(868)	(1,038) *
2020-21 (Forecast Outturn)	(1,074)	850	(224)	(882)	(1,106) *
2020-21 (Original Budget)	(1,134)	1,050	(84)	(841)	(925) *
2019-20	(1,032)	1,058	26	(821)	(795)
2018-19	(1,221)	957	(264)	(669)	(933)
2017-18	(1,204)	874	(330)	(603)	(933)
2016-17	(1,192)	1,296	104	(515)	(411)
2015-16	(1,169)	1,355	186	(514)	(328)

*** Split 56% Chargeable and 44% Non-Chargeable**

8. Unfortunately, 2020 has seen the world affected by the Covid-19 pandemic, and construction work within the City, has substantially reduced, with application numbers from March 2020 until December 2020, approximately 50% of their normal levels. This reduction in construction activity, has decreased income in both the Building Regulation fee charges and the non-Building Regulation fee charges, therefore having a negative effect on the budget performance.

9. At the end of 2020 a review into the applications received during the year and their associated fees generated was undertaken and the results are shown in Table 2. Within the calendar year, 191 applications were received, and their associated fees amounted to £810.680.

Table 2
Building Control Applications 2012-2020

Year	Number of Application	Fees Generated
2015	280	£1,210,007
2016	228	£847,099
2017	236	£778,279
2018	246	£778,279
2019	266	£1,091,256
2020	191	£810,680

10. A review was also undertaken of the applications which were completed during 2020. During this time 274 projects were completed and as all time, associated with projects is recording against the District Surveyors corporate Time master software and the CAPS Uniform software, all projects can be checked to ensure that the correct fees were being charged.

11. Each completed project was checked and cross referenced to similar projects dating back to 2015 and placed into bands that matched the Estimated Cost of Works within the fee scales. Average time taken to administer those projects within each band was then calculated using the 2020 agreed hourly rate, to establish a benchmark of appropriate cost for each band. A similar procedure was also carried out for just year 2020 to ensure that officer time on projects was equivalent to previous years. The results are shown in Table 3.

Table 3. Average time and costs per application 2015-2020

Estimated Cost of Woks	Average hrs taken 2015-2020	Average cost to service 2015-20	Average hrs taken 2020	Average cost to service 2020	Current Fit Out Fee	Current Refurb Fee
£0-£10,000	3.86 hrs	£432	4 hrs	£448	£448	£728
£10k-£20k	5.63 hrs	£631	6.33 hrs	£708	**£672**	£728
£20k-£30k	9.76 hrs	£1093	8.24 hrs	£922	**£896**	£952
£40k-£70k	9.58 hrs	£1073	10.6 hrs	£1187	£1232	£1288
£70k-£100K	11.58 hrs	£1297	10.5 hrs	£1176	£1232	£1512
£100-£150k	12.29 hrs	£1376	10.33 hrs	£1157	£1400	£1736
£150k-£200	13.47 hrs	£1509	15.23 hrs	£1705	£1624	£1960
£200k-£300k	18.27 hrs	£2046	15.6 hrs	£1749	£1848	£2408
£300k-£500k	18.9 hrs	£2116.80	13.74 hrs	£1540	£2464	£3248
£500k-£700K	25.75 hrs	£2884	20.16 hrs	£2258	£3192	£4144
£700k-£999k	19.15 hrs	£2144.80	15.64 hrs	£1751	£4032	£5376

Note: Costs calculated at £112 per hour as per the agreed hourly rate.

12. As can be seen in Table 2, there are only two fees which during 2020 did not on average provide a “cost recovery” fee, but these fees are only for the lowest possible fee within this band. Therefore, it is the proposal of the District Surveyor not to increase the fees at this time.

13. Further analysis of the applications and fees submitted were undertaken in particular to applications submitted under the LABC Partnership application scheme. Under the Partnership Scheme, applications can be submitted where:

    - The property is outside the City of London, and the District Surveyors Building Control are requested to check the plans, and the Authority where the site is located, is required to do the site inspections.
    - The property is located within the City of London, and the applicant requests an alternative Authority to check the plans and the District Surveyors Building Control are required to carry out the site inspections. Applications where a neighbouring Borough has also requested assistance with plan checking and site inspections, on a major application have been included in this type of application.

A third type of application known as a Cross Boundary application where a the property is located outside the City of London, but the applicant requests the District Surveyors to check the plans and carry out site inspections, is not included in this review, as the fees and time taken have been considered under the traditional application method.

14. Applications were reviewed back to 2012, and the total numbers of applications are shown in Table 4

Table 4. Partnership applications since 2012.

Type of Partnership Application	Number of applications	Fee Income Generated from these applications
Property outside the City of London	150	£307,266 (Plan Charge)
Property inside the City of London or working in Partnership with another Borough	48	£524,476

15. Of the applications where the District Surveyors Building Control are working with another Borough to provide a joint service two particular projects accounted for £479k. These projects were Principle Place with L.B. Hackney and South Bank Place, with L.B. Lambeth. This leaves a fee income of £52k from the remaining applications of this category, which is relatively small.

16. For the 150 Partnership applications where the District Surveyors are requested to check the plans for properties outside the City of London, only 49 of these applications can be cross checked against our costs to administer them. Of the 49 applications, it was found that the fees generated by these applications equated to £52,972, but the cost of administering them was found to be £82,617.

Table 5. Partnership applications where costs can be calculated.

Number of applications 2012-20	Total amount of fee received. (Plan check fee as 25% of total fee)	Total cost of providing the service	Potential fee if plan check fee is 40% of total fee.
49	£52,971	£82,617.33	£84,753

17. In accordance with the City of London Charges Scheme's No 1 to No 3, applicants are required to pay 25% of the total fee for checking of the plans, which is the fee requested for a Partnership application. This fee has been found to be insufficient to provide a cost recovery service and would require a fee equivalent to 40% of the total fee to make it cost neutral.

18. Therefore, it is more appropriate to amend the current The City of London Charges Scheme No 3:2020 Section 19, to require the fee split from 25/75 to 40/60. For applications submitted where the District Surveyors Building Control are providing both the plan checking and site inspection service where the applications are for work within the City, this change will result in additional monies being paid when the applications are submitted rather than when works are being undertaken, but the total fee will not be affected.

Proposals

19. It is the proposal of this report to request the Committee to agree that there should be no change to the current fee scales as shown in Appendix A

20. It is the proposal of this report to request the Committee to agree that The City of London Charges Scheme No 4:2021 be agreed with section 19 amended to request 40% of the charge to be the plan charge and 60% of the charge to be the inspection charge.

Corporate & Strategic Implications

21. There are no equal opportunity implications arising from this report save that Regulation 4 of the Building Regulations (Local Authority Charges) Regulations 2010 outlines the principles of the charging scheme in relation to building work solely required for disabled persons. No building regulation charge can be authorised in relation to providing means of access solely to an existing dwelling occupied as a permanent residence by a disabled person or for the provision of facilities and accommodation (including the provision or extension of a room in limited circumstances) designed to secure the greater health, safety, welfare or convenience of such a disabled person. Similarly, no building regulation charge can be authorised in relation to an existing building to which members of the public are admitted in similar circumstances as stated above

Legal implications

22. The Building (Local Authority Charges) Regulations 2010 impose a legal obligation on the City of London to have a Building Regulation charging scheme in place, to ensure that the overriding objective of the charges being set at a level that equates to cover the costs of providing the service, and to annually review and publish figures to ensure that this objective is been maintained. These changes will maintain this objective being obtained.

Climate implications

23. None

Security implications

24. None

Conclusion

25. The report identifies the measures being taken by the District Surveyors Building Control Division to set a revised charging scheme which accurately reflect actual time employed against individual projects.

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Appendices

- Appendix A- Current “City of London Building Regulations Charges Scheme No 3, 2020”.
- Appendix B- Current “City of London Building Regulations Charges Scheme No 3, Annex A.”
- Appendix C- Current “City of London Building Regulations Charges Scheme No 3, Annex B.”
- Appendix D- Current “Building Control Miscellaneous Charges No3:2020.
- Appendix E- Proposed “City of London Building Regulations Charges Scheme No 4, 2021”.
- Appendix F- Proposed “City of London Building Regulations Charges Scheme No 4:2021, Annex A, Charges
- Appendix G- Proposed “City of London Building Regulations Charges Scheme No 3:2021, Annex B

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Appendix A- Building Regulation Charges Scheme No 3:2020

CITY OF LONDON

*Derivation *(see footnote)*

The Building (Local Authority Charges) Regulations 2010

Regulation No

BUILDING REGULATIONS CHARGES SCHEME No. 3, 2020

1 1. This scheme may be cited as the Building Regulations Charges Scheme No. 3, 2020 of the City of London Corporation (the Charges Scheme) and shall come into force on 6th April 2020.

INTRODUCTION

2. The Charges Scheme is made under the Building (Local Authority Charges) Regulations, 2010 (the Charges Regulations). The Charges Scheme includes following paragraphs, the definitions in paragraph 5 below and the tables of charges set out in Annex A. Where clarification of the Charges Scheme is required reference should be made to the Charges Regulations. The numbers in the margin represent the relevant regulation.

3(1) 3. The City of London Corporation is authorised, subject to and in accordance with the Charges Regulations, to fix charges by means of the Charges Scheme and to recover such charges as it determines for or in connection with the performance of its functions relating to building regulations, as provided by the Charges Regulations.

4. The City of London Corporation is authorised, subject to and in accordance with the provisions of the Charges Regulations, to amend and to revoke and replace any scheme which has been made by it.

DEFINITIONS

2 5. The following definitions apply to the Charges Scheme:

"building" means any permanent or temporary building but not any other kind of structure or erection, and a reference to a building includes a reference to part of a building;
"building notice" means a notice given in accordance with regulations 12(2)(a) and 13 of the Principal Regulations;
"building work" means:

a) the erection or extension of a building;
b) the provision or extension of a controlled service or fitting in or in connection with a building;
c) the material alteration of a building, or a controlled service or fitting;
d) work required by Building Regulation 6 of the principal regulations (requirements relating to material change of use);
e) the insertion of insulating material into the cavity wall of a building;
f) work involving the underpinning of a building;
g) work required by building regulation 23 (requirements relating to thermal elements);
h) work required by building regulation 22 (requirements relating to a change of energy status);
i) work required by building regulation 28 (consequential improvements to energy performance);

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

Regulation No

"chargeable function" means a function relating to the following –

a) the passing or rejection of plans of proposed building work which has been deposited in accordance with section 16 of the Building Act 1984 (as amended) - (Plan Charge)
b) the inspection of building work for which plans have been deposited in accordance with the Principal Regulations and with section 16 of the Building Act 1984 (as amended) – Inspection Charge
c) the consideration of a building notice which has been given in accordance with the Principal Regulations – Building Notice Charge)
d) the consideration of building work reverting to the Council under the Building (Approved Inspectors etc.) Regulations 2010 (as amended) – (Reversion Charge)
e) the consideration of a regularisation application submitted under regulation 18 of the Principal Regulations – (Regularisation Charge).

"chargeable advice" is a charge made in relation to a request for building regulation advice as regards any particular case where such a charge is made in anticipation of the future exercise of their chargeable functions in relation to that case, save that no charge is made for the first hour of time spent in providing such chargeable advice.

"cost" does not include any professional fees paid to an architect, quantity surveyor or any other person;

"dwelling" includes a dwelling-house and a flat;

"estimate" in relation to the cost of carrying out building work, means an estimate, accepted by the local authority, of such reasonable amount as would be charged for the carrying out of that building work by a person in business to carry out such building work (excluding the amount of any value added tax chargeable);

"estimated cost of building work" means the estimated cost of that work which requires approval for building regulations by the City of London Corporation. If appropriate the City of London Corporation may require estimates to be aggregated or disaggregated to establish the appropriate charge;

"extension" means an extension which has no more than three storeys, each basement level (if any) counting as one storey;

"floor area" of a building or extension' is the total floor area calculated by reference to the finished internal faces of the walls enclosing the area, or, if at any point there is no enclosing wall, by reference to the outermost edge of the floor.

"the Principal Regulations" means the Building Regulations 2010 as amended from time to time;

"relevant person" means:

a) in relation to a plan charge, inspection charge, reversion charge or building notice charge, the person who carries out the building work or on whose behalf the building work is carried out;
b) in relation to a regularisation charge, the owner of the building; and
c) in relation to chargeable advice, any person requesting advice for which a charge may be made pursuant to the definition of 'chargeable advice'

"total floor area of a building" is the total of the floor area of all the storeys which comprise that building.

"total floor area of an extension" is the total of the floor areas of all the storeys in the extension.

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

Regulation No	**SUMMARY OF BUILDING REGULATIONS FUNCTIONS AND CHARGES**
5(1)	6. The City of London Corporation has determined: a) plan charges for or in connection with the passing or rejection of plans of proposed building work deposited with them in accordance with Section 16 of the Building Act 1984; b) inspection charges for or in connection with the inspection of building work for which plans have been deposited in accordance with the Principal Regulations and with Section 16 of the Building Act 1984; c) building notice charges for or in connection with the consideration of a building notice which has been given to the City of London Corporation in accordance with the Principal Regulations. The charges for the foregoing functions are as set out in the attached tables in Annex A.
5(2)	7. The City of London Corporation is also authorised within its Charges Scheme to make a charge in relation to a request for advice as regards any particular case where such a charge is made in anticipation of the future exercise of its chargeable functions in relation to that case (referred to as "chargeable advice"); save that no charge is to be made for the first hour of time spent by an officer in providing such chargeable advice.
6(3)	8. This Charges Scheme has been fixed such that its objective is to ensure that, taking one financial year with another, the income to be derived by the City of London Corporation from performing chargeable functions and providing chargeable advice (referred to as "chargeable income") as nearly as possible equates to the costs incurred by the City of London Corporation in performing chargeable functions and providing chargeable advice (referred to as "chargeable costs"). At the end of the financial year within which the City of London Corporation first made this Charges Scheme and of each subsequent financial year, the City of London Corporation will conduct a review of the level of charges set out under this Charges Scheme for the purpose of achieving the Charges Scheme's objective above.
6(2)	9. Immediately following the review of the level of charges, the City of London Corporation will prepare a "building control statement" setting out as regards the financial year to which it relates, the chargeable costs, the chargeable income and the amount of any surplus or deficit. Such "building control statement" will be approved by the City of London Corporation's Section 6 Officer and will be published not more than six months after the end of the financial year to which the statement relates.
6(4-6)	10. Each charge determined within the Charges Scheme has been related to the costs of providing building regulation services in relation to particular building work or building work of particular descriptions having regard to the objective outlined in clause 8 above. Where this Charges Scheme is first made and takes effect at any time other than the beginning of a financial

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

year, the City of London Corporation will have regard to any estimated surplus or deficit arising for that part of the financial year for which its existing scheme made under the Building (Local Authority Charges) Regulations 2010 continues to have effect.

Regulation No

11. The costs of providing City of London Corporation building regulation services in relation to chargeable functions or chargeable advice has been calculated using the hourly rate at which the time of its officers will be charged and the factors which have been taken into account in estimating the time required by its officers for performing a chargeable function or providing chargeable advice (in relation to particular building work or building work of particular descriptions).

6(7-8)

12. The hourly rate of the City of London Corporation building regulation officers is set out herewith: £112.

13. Where the City of London Corporation consider it necessary to engage and incur the costs of a consultant to provide specialist advice or services in relation to a particular aspect of building work, those costs will be included in the determination of the charges referred to in this Charges Scheme.

7(1-2)

7(4)

14. In calculating the costs and in estimating the time required by its officers for performing a chargeable function or providing chargeable advice (in relation to particular building work or building work of particular descriptions), both in relation to standard and assessed charges, the City of London Corporation has taken some or all of the following factors into account:

7(3)

a) the existing use of a building, or the proposed use of the building after completion of the building work;
b) the different kinds of building work described in regulation 3(1)(a) to (i) of the Principal Regulations. *(see definition of 'building work' in clause 5 above)*;
c) the floor area of the building or extension. *(see definitions of 'floor area of a building or extension', 'total floor area of a building' and 'total floor area of an extension' in clause 5 above)*;
d) the estimated duration of the building work and the anticipated number of inspections to be carried out.
e) the estimated cost of the building work.

7(5)

7(5)

15. In calculating the costs and in estimating the time required by its officers for performing a chargeable function or providing chargeable advice (in relation to particular building work or building work of particular descriptions), in relation to assessed charges for individual projects, the City of London Corporation will take some or all of the following additional factors into account in assessing the charges

f) the nature of the design of the building work and whether innovative or high-risk construction techniques are to be used;
g) whether the person who intends to carry out part of the building work is a person named in a self-certification scheme or list of exemptions under schedule 3 of the Principal Regulations; or is carrying out the descriptions of work where no building notice or deposit of full plans is required under schedule 4 of the Principal Regulations both as

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Regulation No	mentioned in building regulation 12(6); h) whether in respect of the building work a notification has been made that design details approved by Robust Details Limited are to be used; i) whether an application or building notice is in respect of two or more buildings or building works all of which are substantially the same as each other. j) whether an application or building notice is in respect of building work which is substantially the same as building work in respect of which plans have previously been deposited or building works inspected by the City of London Corporation. k) whether chargeable advice has been given which is likely to result in less time being taken by the City of London Corporation to perform the chargeable function; and l) whether it is necessary to engage and to incur the costs of a consultant to provide specialist advice or services in relation to a particular aspect of the building work.
	16. On receipt of an application or notice relating to particular building work or building work of particular descriptions, the City of London Corporation in determining its building regulation charges by reference to a standard charge published in the scheme (see schedule of standard charges listed in Annex A), has taken into account the factors listed in clause 14 above
	17. On receipt of a request for advice, an application or notice relating to particular building work or building work of particular descriptions, the City of London Corporation in determining its building regulation charges by reference to an individual assessment of the charge to be made (see guidance on assessed charges in Annex B), will take into account the factors listed in clauses 14 and 15 above and such individually determined charges will be confirmed in writing specifying the amount of the charge and the factors which have been taken into account.
	18. No charge will be made for the first hour of an officer's time in respect of chargeable building regulation advice given by such officer.
5(2)	19. **The sum of the plan charge and the inspection charge is equal to the building notice charge. With the exception of those circumstances detailed in paragraphs 14 and 21 below, the plan charge is 25% of the building notice charge and the inspection charge is 75% of the building notice charge**.
	20. The preceding paragraphs 6, 8, 9 and 10 are subject to paragraph 21 below.
	21. Where: a) one application or building notice is in respect of two or more buildings or building works all of which are substantially the same as each other; or b) an application or building notice is in respect of building work which is substantially the same as building work in respect of which plans have previously been approved or building works inspected by the City of London Corporation and where the City of London Corporation is satisfied that the owner of the plans who deposits them or who gives a building notice in respect of them is the same person who originally

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

deposited the plans or gave a building notice in respect of them, a reduction not exceeding 30% in the plan charge or building notice charge payable may be applied and a reduction not exceeding 30% in the inspection charge payable may also be applied, but only at the absolute discretion of the City of London Corporation.

Regulation No

22. Where the appropriate total charge is £800 or below a plan charge is payable, which incorporates that charge which would be made for an inspection of building work, although no separate inspection charge is made.

23. Standard charges set in accordance with clause 14 above are shown on Table 1 in annex A.

24. The following applications may be dealt with by individually assessed charges in accordance with clauses 14 & 15 above.
   a) Full Plans (both the passing or rejection of plans and the associated inspections) where the cost of the work exceeds £1m.
   b) Building Notice where the cost of the work exceeds £1m.
   c) All stand alone new buildings.
   d) Reversion for or in connection with the consideration of building work reverting to the control of the City of London Corporation.
   e) Regularisation submitted under regulation 18 of the Principal Regulations (unauthorised building work).

25. Where building work comprises -
   a) the installation of cavity fill insulation in accordance with Part D of Schedule 1 to the Principal Regulations where the installation is not certified to an approved standard or is not installed by an approved installer or is not part of a larger project comprising other building work; or
   b) the installation of an unvented hot water system in accordance with Part G of Schedule 1 to the Principal Regulations where the installation is not part of a larger project comprising other building work,

   the City of London Corporation has fixed its charges by reference to the estimated cost of the building work only, and no plan charge will be made in respect of such building work.

26. Where building work comprises:
   a) the installation of cavity fill insulation in accordance with Part D of Schedule 1 to the Principal Regulations where the installation is certified to an approved standard, or is installed by an approved installer or is part of a larger project comprising other building work; or

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

b) the installation of an unvented hot water system in accordance with Part G of Schedule 1 to the Principal Regulations where the installation is part of a larger project comprising other building work, no charges will be made in respect of such building work.

4(1)

27. The City of London Corporation has not fixed by means of its scheme, nor intends to recover a charge in relation to an existing dwelling which is, or is to be, occupied by a disabled person as a permanent residence; and where the whole of the building work in question is solely-

Regulation No

a) for the purpose of providing means of access for the disabled person by way of entrance or exit to or from the dwelling or any part of it, or
b) for the purpose of providing accommodation or facilities designed to secure the greater health, safety, welfare or convenience of the disabled person.

4(2)

28. The City of London Corporation has not fixed by means of its scheme, nor intends to recover a charge for the purpose of providing accommodation or facilities designed to secure the greater health, safety, welfare or convenience of a disabled person in relation to an existing dwelling, which is, or is to be, occupied by that disabled person as a permanent residence and as outlined in clause 6 (b) above, where such work consists of-

a) the adaptation or extension of existing accommodation or an existing facility or the provision of alternative accommodation or an alternative facility where the existing accommodation or facility could not be used by the disabled person or could be used by the disabled person only with assistance; or
b) the provision of extension of a room which is or will be used solely-
   (i) for the carrying out for the benefit of the disabled person of medical treatment which cannot reasonably be carried out in any other room in the dwelling, or
   (ii) for the storage of medical equipment for the use of the disabled person, or
   (iii) to provide sleeping accommodation for a carer where the disabled person requires 24-hour care.

4(3)

29. The City of London Corporation has not fixed by means of its scheme, nor intends to recover a charge in relation to an existing building to which members of the public are admitted (whether on payment or otherwise); and where the whole of the building work in question is solely-

a) for the purpose of providing means of access for disabled persons by way of entrance or exit to or from the building or any part of it; or
b) for the provision of facilities designed to secure the greater health, safety, welfare or disabled persons.

4(4)

Note: 'disabled person' means a person who is within any of the descriptions of persons to whom Section 29(1) of the National Assistance Act 1948, as extended by virtue of Section 8(2) of the Mental Health Act 1959, applied but disregarding the amendments made by paragraph 11 of Schedule 13 to the Children Act 1989.

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

PAYMENT OF CHARGES

8(1)a

30. Any plan charge shall be payable when the plans of the building work are deposited with the City of London Corporation but see also clause 40 below.

8(1)b

Regulation No

31. Any inspection charge shall be payable on demand made after the City of London Corporation carries out the first inspection in respect of which the charge is payable but see also clause 40 below.

8(1)c

32. Any building notice charge shall be payable when the building notice is given to the City of London Corporation.

8(1)d

33. Any reversion charge shall be payable for building work in relation to a building:

i) which has been substantially completed before plans are first deposited in accordance with regulation 19(2)(a)(i) of the Building (Approved Inspectors etc.) Regulations 2010 as amended; or

ii) in respect of which plans for further building work have been deposited with the City of London Corporation in accordance with regulation 19(3) of the Building (Approved Inspectors etc.) Regulations 2010 as amended,

on the first occasion on which those plans are deposited.

8(1)e

34. Any regularisation charge shall be payable at the time of the application to the City of London Corporation in accordance with regulation 18 of the Principal Regulations (unauthorised building work).

8(1)f

35. Any charge for chargeable advice shall be payable on demand after the City of London Corporation has given notice to the relevant person in writing specifying the amount to be charged and the factors which have been taken into account as listed in clauses 14 and 15 above.

8(1)g

36. Any plan charge, inspection charge, building notice charge, reversion charge, regularisation charge and charge for chargeable advice is to be payable by the relevant person *(see definition, clause 5 above).*

Regulation No 8(1)h

39. Any plan charge, inspection charge, building notice charge which is payable to the City of London Corporation shall be paid together with an amount equal to any value added tax payable in respect of that charge.

8(1)i

40. Part of any charge which is payable to the City of London Corporation, may, at its absolute discretion, be paid in instalments of such amounts payable on such dates as the City of London Corporation shall specify.

8(1)j

41. There is no entitlement to a complete refund of any regularisation charge paid, if the City of London Corporation, after incurring costs, subsequently cannot determine what work is required to comply with the relevant requirements.

8(1)h

42. Where a plan charge has been paid and not refunded, the City of London Corporation may in any case they consider reasonable, decide not to make

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

		a further plan charge in respect of plans subsequently deposited for substantially the same building work.
11(1)	43.	Where for any reason the City of London Corporation do not give notice of passing or rejection of plans within the period required by Section 16 of the Building Act 1984 (as amended), any plan charge paid will be refunded.
Regulation No		
11(2)	44.	No refund will be given by the City of London Corporation where the reason for not giving notice of passing or rejection of plans within the period required by section 16 of the Building Act, 1984 is due to the failure by the person by whom or on whose behalf the plans were deposited to supply information within a reasonable time, necessary to meet the City of London Corporation duty under that section.
11(3)	45.	Where the City of London Corporation has determined a charge in relation to a chargeable function or chargeable advice, payment of the charge has been made to the City of London Corporation and the actual amount of work required of an officer of the City of London Corporation is less than that which was originally assessed, the City of London Corporation (subject to clause 49 below) will make a refund in respect of the proportion of the charge relating to the excess payment.
11(4)	46.	Where the City of London Corporation has determined a charge in relation to a chargeable function or chargeable advice, payment of the charge has been made to the City of London Corporation and the actual amount of work required of an officer of the City of London Corporation is more than that which was originally estimated in the assessment, the City of London Corporation (subject to clause 49 below) may raise a supplementary charge in respect of any additional work carried out its officer.
11(5)	47.	In relation to the assessment of a refund or supplementary charge, the City of London Corporation may discount one hour of an officer's time from the calculation of the refund or, as the case may be, the supplementary charge.
11(6)	48.	Where in respect of plans deposited with the City of London Corporation under section 16 of the Building Act, 1984, the plan charge and inspection charge are to be aggregated for the purposes of calculating any refund or supplementary charge.
11(7)	49.	The payment of any refund or request for a supplementary charge will be accompanied by a statement setting out the reason for the assessment and the calculation of the refund or supplementary charge.
	50.	Plans which are deposited otherwise than in accordance with the requirement imposed under paragraph 24 above or an agreement under paragraph 30 above are not deposited in accordance with building regulations for the purposes of section 16 of the Act; and a building notice given otherwise than in accordance with a requirement imposed under paragraph 26 above or an agreement under paragraph 30 above is not

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

validly given for the purposes of the Principal Regulations.

51. Where an individual assessment of a plan charge or building notice charge has been made, (other than a standard charge) any individually assessed plan charge or building notice charge shall not be payable until such plan charge or building notice charge has been specified by the City of London Corporation and confirmed in writing if such confirmation is provided later than the deposit of the plan or (as the case may be) the giving of the building notice.

52. The City of London Corporation is authorised to require the supply of any information where such information is necessary to determine any building regulation charge listed in clause 9 above.

53. The City of London Corporation operates, maintains and makes available on request, to any interested party, an appropriate complaints procedure regarding its building regulations services. If a person is dissatisfied with the decision made relating to the determination of charges for building work and wishes to make a complaint, such complaint will be dealt with within the Council's agreed complaint's procedure. In the first instance, such complaints should be addressed at a local level to:

The District Surveyor & Environmental Resilience Director
Department of the Built Environment
Guildhall
London EC2P 2EJ

Telephone: 020 7332 1000
Fax: 020 7332 1968
email: district.surveyor@cityoflondon.gov.uk

11(2) 54. Where building work reverts to the control of the City of London Corporation any plans relating to that building work given to the City of London Corporation in accordance with regulation 19 of the Building (Approved Inspector etc) Regulations 2010 as amended, shall be accompanied by a current estimate in writing of the cost of that building work.

13 55. Contravention of the Building (Local Authority Charges) Regulations 2010 and or the non- payment of any charge which becomes payable are not treated as offences under Section 35 of the Building Act 1984 (penalty for contravening building regulations).

Regulation No **TRANSITIONAL PROVISIONS AND REVOCATION**

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

15(2-3)

56. The Building Regulations Charges Scheme No. 2, 2018 of the City of London Corporation made under the Building (Local Authority Charges) Regulations, 2010 will continue to apply to building work within the City of London Corporation area for which plans were first deposited or a building notice was given or a reversion charge became payable, or a regularisation certificate was made, before 6th April 2020.

INFORMATIVE

12(3)

57. Further information and advice concerning building regulation charges and the Building Regulations Charges Scheme, can be obtained from:

The District Surveyor & Environmental Resilience Director
Department of the Built Environment
Guildhall
London EC2P 2EJ

Telephone: 020 7332 1000
Fax: 020 7332 1968
email: district.surveyor@cityoflondon.gov.uk

Signed:

.....
(The officer appointed for this purpose)

Dated:

* Derivation = Building (Local Authority Charges) Regulations 2010.

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

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Appendix B - Building Regulation Charges Scheme No 3, 2020

Annex A: Charges Schedule.

Cost of Works	Charges from 6th April 2020				
	Work Categories				
£1,000's	Refurbishments & Extensions	Fit out and alterations	Material Change of Use *	Small Residential Alterations *	Other
					For works not described on the table a specific individually assessed charge will be provided.
£10	£728	£448	£1,008	£698	
£20		£672		£922	
£40	£952	£896	£1,176	£1,259	
£70	£1,288	£1,232	£1,512	£1,594	
£100	£1,512			£1,706	
£150	£1,736	£1,400	£2,128	SEE 'OTHER'	
£200	£1,960	£1624	£2,240		
£300	£2,408	£1,848	£3,248		
£400	£2,800	£2,240			
£500	£3,248	£2,464			
£600	£3,696	£2,744	£4,704		
£700	£4,144	£3,192			
£800	£4,536	£3,472			
£900	£4,928	£3,864	£6,272		
£1,000	£5,376	£4,032			
Plan & Insp charge due immediately if £800 or less (excl VAT)					
For works over £1.0 million a specific individually assessed charge will be provided					
*** If Part P electrics are not applicable or if they are dealt with under the Competent Persons Scheme - Deduct £250 per unit/flat**					

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Appendix C –

Building Regulation Charges Scheme No 3, 2020 Annex B: Factors to be taken into Account When Determining Assessed Charges.

The factors to be taken into account in determining Assessed Charges as per clauses 14 & 15 of the Building Regulations Charges Scheme No. 3, 2020 of the City of London Corporation.

1. the existing use of a building, or the proposed use of the building after completion of the building work.
2. the different kinds of building work described in regulation 3(1)(a) to (i) of the Principal Regulations. *(see definition of 'building work' in clause 5 above)*.
3. the floor area of the building or extension. *(see definitions of 'floor area of a building or extension', 'total floor area of a building' and 'total floor area of an extension' in clause 5 above)*.
4. the estimated duration of the building work and the anticipated number of inspections to be carried out.
5. the estimated cost of the building work.
6. the nature of the design of the building work and whether innovative or high-risk construction techniques are to be used; and
7. whether the person who intends to carry out part of the building work is a person named in a self-certification scheme or list of exemptions under schedule 3 of the Principal Regulations; or is carrying out the descriptions of work where no building notice or deposit of full plans is required under schedule 4 of the Principal Regulations both as mentioned in building regulation 12(6)
8. whether in respect of the building work a notification has been made that design details approved by Robust Details Limited are to be.
9. whether an application or building notice is in respect of two or more buildings or building works all of which are substantially the same as each other.
10. whether an application or building notice is in respect of building work which is substantially the same as building work in respect of which plans have previously been deposited or building works inspected by the City of London Corporation.
11. whether chargeable advice has been given which is likely to result in less time being taken by the City of London Corporation to perform the chargeable function; and
12. whether it is necessary to engage and to incur the costs of a consultant to provide specialist advice or services in relation to a particular aspect of the building work.

Type of work	Refurbishment & Extensions, Simple office alterations, Cat A to B, Material change of use, retail	Other or Notes / special factors
Duration on site		
Number of floors above ground		
Anticipated inspection time hours and notes		
Routine visits		
Piling/foundation inspections		
Below ground drainage		
Below ground structural inspections		
Superstructure		
Above ground drains – routine		
M&E routine		
Drainage testing		
Site Q/A Audit time		
Routine/Finals prior to completion		
Other special factors +/-		
De-snag visits –drainage		
De-snag visits – M&E		
De-snag visits -general		
Off site inspection		
M&E Final Commission & tests		
Review a deduction for repetition/		
Anticipated plans inspection time		
General		
As % of site time		
Structural Appraisal		
Fire engineering		
Design workshops		
	Total Hours	
Outside consultant required –	**Cost £**	

Appendix D: Building Control Miscellaneous Charges Scheme No3: 2020

Table of miscellaneous charges (from 6th April 2020)

If you would like to discuss the charges or need any help with the application or this table, please phone us on 020 7332 1000.

	Miscellaneous Building Control Charges No 3:2020 **VAT should be added at the current rate as indicated and included in your payment.**				
Work Categories (For works not described on the table a specific individually assessed charge will be provided.)					
		Current Charge	**VAT or No VAT**	**Charge from 6th April 2020**	**Proposed Change**
1.	**Demolition Notice.** **Application submitted under section 80, Building Act 1984**	**Charge £450**	**No VAT**	**Charge £450**	**Fee adequately covers the cost of administration of this application. No increase required.**
2	**Section 30** **Application submitted under Section 30, London Building Act (As Amended) 1939**	**Various Charges (See Section 30 Charges)**	**No VAT**	**As set out in the Section 30 London Building Act (As Amended) Act 1939 Charges No 3. (See Below)**	**Various increases.**
3	**Approval In Principle** **Application submitted for Technical Approval of Highway Structures.**	**£4000**	**VAT**	**As Existing**	**Fee adequately covers the cost of administration of this application. No increase required.**
4	**Marriage Act surveys**	**£500 for New registration**		**As Existing**	**Fee controlled by Community and Children's Services and no increase proposed.**
5	**Researching and Viewing Building Control Historical Records.**	**Fee based at £107 per hour to cover officer time spent researching and providing advice**	**VAT**	**Proposed new fee based at £112 per hour to cover officer time spent researching and providing advice**	**Revised fee in line with hourly rate.**
6	**Dangerous Structures**	**Charged at hourly rate**	**Varies**	**As existing**	**Fees recoverable through Section 66, London Building Act (As Amended) Act 1939**

	Section 30 London Building Act (As Amended) Act 1939 Charges No 3: 2020 **No VAT is added at the current rate in your payment.**				
Work Categories (For works not described on the table a specific individually assessed charge will be provided.)					
		Current Charge	**VAT or No VAT**	**Charge from 6th April 2020**	
1.	**Erecting a special building or structure intended to be kept permanently.**	**To be agreed based on details of structure. Please contact department for a detailed quote.**	**No VAT**	**To be agreed based on details of structure. Please contact department for a detailed quote.**	**Fee covers the cost of administration of this application. No increase required.**
2	**Erecting a Grandstand to be used for a special event. 10-250 Seats**	**£300**	**No VAT**	**Removed.**	**Removed and incorporated into fee No 3.**
3	**Erecting a Grandstand to be used for a special event up to 600 Seats**	**£500**	**No VAT**	**£560**	**Increase £60**
4	**Erecting a Grandstand to be used for a special event over 600 seats.**	**To be agreed based on details of structure. Please contact department for a detailed quote.**	**No VAT**	**As Existing**	**Fee covers the cost of administration of this application. No increase required.**
5	**Erecting a Framed tower for loudspeakers, lighting, Video screens, etc**	**£350**	**No VAT**	**£392**	**Increase £42.**
6	**Erecting a structure of a complex nature or an air inflated structure**	**To be agreed based on details of the structure. Please contact department for a detailed quote**	**No VAT**	**To be agreed based on details of the structure. Please contact department for a detailed quote**	**Fee covers the cost of administration of this application. No increase required.**
7	**Erecting a marquee for a special event.**	**Fee currently not clear as to what the charge should be but minimum £400.**	**No VAT**	**New fee for: Marquee up to 30m. sq. And Marquee over 30m.sq**	**Fee for marquee up to 30m.sq £448** **Fee for marquee over 30m.sq £672**

CITY OF LONDON

*Derivation *(see footnote)*

The Building (Local Authority Charges) Regulations 2010

Regulation No

BUILDING REGULATIONS CHARGES SCHEME No. 4, 2021

1 1. This scheme may be cited as the Building Regulations Charges Scheme No. 4, 2021 of the City of London Corporation (the Charges Scheme) and shall come into force on 3rd May 2021.

INTRODUCTION

2. The Charges Scheme is made under the Building (Local Authority Charges) Regulations, 2010 (the Charges Regulations). The Charges Scheme includes following paragraphs, the definitions in paragraph 5 below and the tables of charges set out in Annex A. Where clarification of the Charges Scheme is required reference should be made to the Charges Regulations. The numbers in the margin represent the relevant regulation.

3(1) 3. The City of London Corporation is authorised, subject to and in accordance with the Charges Regulations, to fix charges by means of the Charges Scheme and to recover such charges as it determines for or in connection with the performance of its functions relating to building regulations, as provided by the Charges Regulations.

4. The City of London Corporation is authorised, subject to and in accordance with the provisions of the Charges Regulations, to amend and to revoke and replace any scheme which has been made by it.

DEFINITIONS

2 5. The following definitions apply to the Charges Scheme:

"building" means any permanent or temporary building but not any other kind of structure or erection, and a reference to a building includes a reference to part of a building;
"building notice" means a notice given in accordance with regulations 12(2)(a) and 13 of the Principal Regulations;
"building work" means:

a) the erection or extension of a building;
b) the provision or extension of a controlled service or fitting in or in connection with a building;
c) the material alteration of a building, or a controlled service or fitting;
d) work required by Building Regulation 6 of the principal regulations (requirements relating to material change of use);
e) the insertion of insulating material into the cavity wall of a building;
f) work involving the underpinning of a building;
g) work required by building regulation 23 (requirements relating to thermal elements);
h) work required by building regulation 22 (requirements relating to a change of energy status);
i) work required by building regulation 28 (consequential improvements to energy performance);

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

Regulation No

"chargeable function" means a function relating to the following –

a) the passing or rejection of plans of proposed building work which has been deposited in accordance with section 16 of the Building Act 1984 (as amended) - (Plan Charge)
b) the inspection of building work for which plans have been deposited in accordance with the Principal Regulations and with section 16 of the Building Act 1984 (as amended) – Inspection Charge
c) the consideration of a building notice which has been given in accordance with the Principal Regulations – Building Notice Charge)
d) the consideration of building work reverting to the Council under the Building (Approved Inspectors etc.) Regulations 2010 (as amended) – (Reversion Charge)
e) the consideration of a regularisation application submitted under regulation 18 of the Principal Regulations – (Regularisation Charge).

"chargeable advice" is a charge made in relation to a request for building regulation advice as regards any particular case where such a charge is made in anticipation of the future exercise of their chargeable functions in relation to that case, save that no charge is made for the first hour of time spent in providing such chargeable advice.

"cost" does not include any professional fees paid to an architect, quantity surveyor or any other person;

"dwelling" includes a dwelling-house and a flat;

"estimate" in relation to the cost of carrying out building work, means an estimate, accepted by the local authority, of such reasonable amount as would be charged for the carrying out of that building work by a person in business to carry out such building work (excluding the amount of any value added tax chargeable);

"estimated cost of building work" means the estimated cost of that work which requires approval for building regulations by the City of London Corporation. If appropriate the City of London Corporation may require estimates to be aggregated or disaggregated to establish the appropriate charge;

"extension" means an extension which has no more than three storeys, each basement level (if any) counting as one storey;

"floor area" of a building or extension' is the total floor area calculated by reference to the finished internal faces of the walls enclosing the area, or, if at any point there is no enclosing wall, by reference to the outermost edge of the floor.

"the Principal Regulations" means the Building Regulations 2010 as amended from time to time;

"relevant person" means:

a) in relation to a plan charge, inspection charge, reversion charge or building notice charge, the person who carries out the building work or on whose behalf the building work is carried out;
b) in relation to a regularisation charge, the owner of the building; and
c) in relation to chargeable advice, any person requesting advice for which a charge may be made pursuant to the definition of 'chargeable advice'

"total floor area of a building" is the total of the floor area of all the storeys which comprise that building.

"total floor area of an extension" is the total of the floor areas of all the storeys in the extension.

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

Regulation No	**SUMMARY OF BUILDING REGULATIONS FUNCTIONS AND CHARGES**
5(1)	6. The City of London Corporation has determined: a) plan charges for or in connection with the passing or rejection of plans of proposed building work deposited with them in accordance with Section 16 of the Building Act 1984; b) inspection charges for or in connection with the inspection of building work for which plans have been deposited in accordance with the Principal Regulations and with Section 16 of the Building Act 1984; c) building notice charges for or in connection with the consideration of a building notice which has been given to the City of London Corporation in accordance with the Principal Regulations. The charges for the foregoing functions are as set out in the attached tables in Annex A.
5(2)	7. The City of London Corporation is also authorised within its Charges Scheme to make a charge in relation to a request for advice as regards any particular case where such a charge is made in anticipation of the future exercise of its chargeable functions in relation to that case (referred to as "chargeable advice"); save that no charge is to be made for the first hour of time spent by an officer in providing such chargeable advice.
6(3)	8. This Charges Scheme has been fixed such that its objective is to ensure that, taking one financial year with another, the income to be derived by the City of London Corporation from performing chargeable functions and providing chargeable advice (referred to as "chargeable income") as nearly as possible equates to the costs incurred by the City of London Corporation in performing chargeable functions and providing chargeable advice (referred to as "chargeable costs"). At the end of the financial year within which the City of London Corporation first made this Charges Scheme and of each subsequent financial year, the City of London Corporation will conduct a review of the level of charges set out under this Charges Scheme for the purpose of achieving the Charges Scheme's objective above.
6(2)	9. Immediately following the review of the level of charges, the City of London Corporation will prepare a "building control statement" setting out as regards the financial year to which it relates, the chargeable costs, the chargeable income and the amount of any surplus or deficit. Such "building control statement" will be approved by the City of London Corporation's Section 6 Officer and will be published not more than six months after the end of the financial year to which the statement relates.
6(4-6)	10. Each charge determined within the Charges Scheme has been related to the costs of providing building regulation services in relation to particular building work or building work of particular descriptions having regard to the objective outlined in clause 8 above. Where this Charges Scheme is first made and takes effect at any time other than the beginning of a financial

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

year, the City of London Corporation will have regard to any estimated surplus or deficit arising for that part of the financial year for which its existing scheme made under the Building (Local Authority Charges) Regulations 2010 continues to have effect.

Regulation No

11. The costs of providing City of London Corporation building regulation services in relation to chargeable functions or chargeable advice has been calculated using the hourly rate at which the time of its officers will be charged and the factors which have been taken into account in estimating the time required by its officers for performing a chargeable function or providing chargeable advice (in relation to particular building work or building work of particular descriptions).

6(7-8)

12. The hourly rate of the City of London Corporation building regulation officers is set out herewith: £112.

13. Where the City of London Corporation consider it necessary to engage and incur the costs of a consultant to provide specialist advice or services in relation to a particular aspect of building work, those costs will be included in the determination of the charges referred to in this Charges Scheme.

7(1-2)

7(4)

14. In calculating the costs and in estimating the time required by its officers for performing a chargeable function or providing chargeable advice (in relation to particular building work or building work of particular descriptions), both in relation to standard and assessed charges, the City of London Corporation has taken some or all of the following factors into account:

7(3)

a) the existing use of a building, or the proposed use of the building after completion of the building work;
b) the different kinds of building work described in regulation 3(1)(a) to (i) of the Principal Regulations. *(see definition of 'building work' in clause 5 above)*;
c) the floor area of the building or extension. *(see definitions of 'floor area of a building or extension', 'total floor area of a building' and 'total floor area of an extension' in clause 5 above)*;
d) the estimated duration of the building work and the anticipated number of inspections to be carried out.
e) the estimated cost of the building work.

7(5)

7(5)

15. In calculating the costs and in estimating the time required by its officers for performing a chargeable function or providing chargeable advice (in relation to particular building work or building work of particular descriptions), in relation to assessed charges for individual projects, the City of London Corporation will take some or all of the following additional factors into account in assessing the charges

f) the nature of the design of the building work and whether innovative or high-risk construction techniques are to be used;
g) whether the person who intends to carry out part of the building work is a person named in a self-certification scheme or list of exemptions under schedule 3 of the Principal Regulations; or is carrying out the descriptions of work where no building notice or deposit of full plans is required under schedule 4 of the Principal Regulations both as

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

Regulation No	mentioned in building regulation 12(6); h) whether in respect of the building work a notification has been made that design details approved by Robust Details Limited are to be used; i) whether an application or building notice is in respect of two or more buildings or building works all of which are substantially the same as each other. j) whether an application or building notice is in respect of building work which is substantially the same as building work in respect of which plans have previously been deposited or building works inspected by the City of London Corporation. k) whether chargeable advice has been given which is likely to result in less time being taken by the City of London Corporation to perform the chargeable function; and l) whether it is necessary to engage and to incur the costs of a consultant to provide specialist advice or services in relation to a particular aspect of the building work.
	16. On receipt of an application or notice relating to particular building work or building work of particular descriptions, the City of London Corporation in determining its building regulation charges by reference to a standard charge published in the scheme (see schedule of standard charges listed in Annex A), has taken into account the factors listed in clause 14 above
	17. On receipt of a request for advice, an application or notice relating to particular building work or building work of particular descriptions, the City of London Corporation in determining its building regulation charges by reference to an individual assessment of the charge to be made (see guidance on assessed charges in Annex B), will take into account the factors listed in clauses 14 and 15 above and such individually determined charges will be confirmed in writing specifying the amount of the charge and the factors which have been taken into account.
	18. No charge will be made for the first hour of an officer's time in respect of chargeable building regulation advice given by such officer.
5(2)	19. **The sum of the plan charge and the inspection charge is equal to the building notice charge. With the exception of those circumstances detailed in paragraphs 14, 21, 22 and 24 below, the plan charge is 40% of the building notice charge and the inspection charge is 60% of the building notice charge**.
	20. The preceding paragraphs 6, 8, 9 and 10 are subject to paragraph 21 below.
	21. Where: a) one application or building notice is in respect of two or more buildings or building works all of which are substantially the same as each other; or b) an application or building notice is in respect of building work which is substantially the same as building work in respect of which plans have previously been approved or building works inspected by the City of London Corporation and where the City of London Corporation is satisfied that the owner of the plans who deposits them or who gives a building notice in respect of them is the same person who originally

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

deposited the plans or gave a building notice in respect of them, a reduction not exceeding 30% in the plan charge or building notice charge payable may be applied and a reduction not exceeding 30% in the inspection charge payable may also be applied, but only at the absolute discretion of the City of London Corporation.

Regulation No

22. Where the appropriate total charge is £800 or below a plan charge is payable, which incorporates that charge which would be made for an inspection of building work, although no separate inspection charge is made.

23. Standard charges set in accordance with clause 14 above are shown on Table 1 in annex A.

24. The following applications may be dealt with by individually assessed charges in accordance with clauses 14 & 15 above.

a) Full Plans (both the passing or rejection of plans and the associated inspections) where the cost of the work exceeds £1m.
b) Building Notice where the cost of the work exceeds £1m.
c) All stand alone new buildings.
d) Reversion for or in connection with the consideration of building work reverting to the control of the City of London Corporation.
e) Regularisation submitted under regulation 18 of the Principal Regulations (unauthorised building work).

For these applications, the plan charge and the inspection charge will be advised on an individual basis.

25. Where building work comprises -

a) the installation of cavity fill insulation in accordance with Part D of Schedule 1 to the Principal Regulations where the installation is not certified to an approved standard or is not installed by an approved installer or is not part of a larger project comprising other building work; or
b) the installation of an unvented hot water system in accordance with Part G of Schedule 1 to the Principal Regulations where the installation is not part of a larger project comprising other building work,

the City of London Corporation has fixed its charges by reference to the estimated cost of the building work only, and no plan charge will be made in respect of such building work.

26. Where building work comprises:

a) the installation of cavity fill insulation in accordance with Part D of Schedule 1 to the Principal Regulations where the installation is

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

		certified to an approved standard, or is installed by an approved installer or is part of a larger project comprising other building work; or b) the installation of an unvented hot water system in accordance with Part G of Schedule 1 to the Principal Regulations where the installation is part of a larger project comprising other building work, no charges will be made in respect of such building work.
4(1)	27.	The City of London Corporation has not fixed by means of its scheme, nor intends to recover a charge in relation to an existing dwelling which is, or is to be, occupied by a disabled person as a permanent residence; and where the whole of the building work in question is solely-
Regulation No		a) for the purpose of providing means of access for the disabled person by way of entrance or exit to or from the dwelling or any part of it, or b) for the purpose of providing accommodation or facilities designed to secure the greater health, safety, welfare or convenience of the disabled person.
4(2)	28.	The City of London Corporation has not fixed by means of its scheme, nor intends to recover a charge for the purpose of providing accommodation or facilities designed to secure the greater health, safety, welfare or convenience of a disabled person in relation to an existing dwelling, which is, or is to be, occupied by that disabled person as a permanent residence and as outlined in clause 6 (b) above, where such work consists of- a) the adaptation or extension of existing accommodation or an existing facility or the provision of alternative accommodation or an alternative facility where the existing accommodation or facility could not be used by the disabled person or could be used by the disabled person only with assistance; or b) the provision of extension of a room which is or will be used solely- (i) for the carrying out for the benefit of the disabled person of medical treatment which cannot reasonably be carried out in any other room in the dwelling, or (ii) for the storage of medical equipment for the use of the disabled person, or (iii) to provide sleeping accommodation for a carer where the disabled person requires 24-hour care.
4(3)	29.	The City of London Corporation has not fixed by means of its scheme, nor intends to recover a charge in relation to an existing building to which members of the public are admitted (whether on payment or otherwise); and where the whole of the building work in question is solely- a) for the purpose of providing means of access for disabled persons by way of entrance or exit to or from the building or any part of it; or b) for the provision of facilities designed to secure the greater health, safety, welfare or disabled persons.
4(4)		*Note: 'disabled person' means a person who is within any of the descriptions of persons to whom Section 29(1) of the National Assistance*

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

Act 1948, as extended by virtue of Section 8(2) of the Mental Health Act 1959, applied but disregarding the amendments made by paragraph 11 of Schedule 13 to the Children Act 1989.

PAYMENT OF CHARGES

8(1)a	30.	Any plan charge shall be payable when the plans of the building work are deposited with the City of London Corporation but see also clause 40 below.
8(1)b Regulation No	31.	Any inspection charge shall be payable on demand made after the City of London Corporation carries out the first inspection in respect of which the charge is payable but see also clause 40 below.
8(1)c	32.	Any building notice charge shall be payable when the building notice is given to the City of London Corporation.
8(1)d	33.	Any reversion charge shall be payable for building work in relation to a building: i) which has been substantially completed before plans are first deposited in accordance with regulation 19(2)(a)(i) of the Building (Approved Inspectors etc.) Regulations 2010 as amended; or ii) in respect of which plans for further building work have been deposited with the City of London Corporation in accordance with regulation 19(3) of the Building (Approved Inspectors etc.) Regulations 2010 as amended, on the first occasion on which those plans are deposited.
8(1)e	34.	Any regularisation charge shall be payable at the time of the application to the City of London Corporation in accordance with regulation 18 of the Principal Regulations (unauthorised building work).
8(1)f	35.	Any charge for chargeable advice shall be payable on demand after the City of London Corporation has given notice to the relevant person in writing specifying the amount to be charged and the factors which have been taken into account as listed in clauses 14 and 15 above.
8(1)g	36.	Any plan charge, inspection charge, building notice charge, reversion charge, regularisation charge and charge for chargeable advice is to be payable by the relevant person *(see definition, clause 5 above).*
Regulation No 8(1)h	39.	Any plan charge, inspection charge, building notice charge which is payable to the City of London Corporation shall be paid together with an amount equal to any value added tax payable in respect of that charge.
8(1)i	40.	Part of any charge which is payable to the City of London Corporation, may, at its absolute discretion, be paid in instalments of such amounts payable on such dates as the City of London Corporation shall specify.
8(1)j	41.	There is no entitlement to a complete refund of any regularisation charge paid, if the City of London Corporation, after incurring costs, subsequently cannot determine what work is required to comply with the relevant requirements.

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

8(1)h	42.	Where a plan charge has been paid and not refunded, the City of London Corporation may in any case they consider reasonable, decide not to make a further plan charge in respect of plans subsequently deposited for substantially the same building work.
11(1)	43.	Where for any reason the City of London Corporation do not give notice of passing or rejection of plans within the period required by Section 16 of the Building Act 1984 (as amended), any plan charge paid will be refunded.
Regulation No		
11(2)	44.	No refund will be given by the City of London Corporation where the reason for not giving notice of passing or rejection of plans within the period required by section 16 of the Building Act, 1984 is due to the failure by the person by whom or on whose behalf the plans were deposited to supply information within a reasonable time, necessary to meet the City of London Corporation duty under that section.
11(3)	45.	Where the City of London Corporation has determined a charge in relation to a chargeable function or chargeable advice, payment of the charge has been made to the City of London Corporation and the actual amount of work required of an officer of the City of London Corporation is less than that which was originally assessed, the City of London Corporation (subject to clause 49 below) will make a refund in respect of the proportion of the charge relating to the excess payment.
11(4)	46.	Where the City of London Corporation has determined a charge in relation to a chargeable function or chargeable advice, payment of the charge has been made to the City of London Corporation and the actual amount of work required of an officer of the City of London Corporation is more than that which was originally estimated in the assessment, the City of London Corporation (subject to clause 49 below) may raise a supplementary charge in respect of any additional work carried out its officer.
11(5)	47.	In relation to the assessment of a refund or supplementary charge, the City of London Corporation may discount one hour of an officer's time from the calculation of the refund or, as the case may be, the supplementary charge.
11(6)	48.	Where in respect of plans deposited with the City of London Corporation under section 16 of the Building Act, 1984, the plan charge and inspection charge are to be aggregated for the purposes of calculating any refund or supplementary charge.
11(7)	49.	The payment of any refund or request for a supplementary charge will be accompanied by a statement setting out the reason for the assessment and the calculation of the refund or supplementary charge.
	50.	Plans which are deposited otherwise than in accordance with the requirement imposed under paragraph 24 above or an agreement under paragraph 30 above are not deposited in accordance with building

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

	regulations for the purposes of section 16 of the Act; and a building notice given otherwise than in accordance with a requirement imposed under paragraph 26 above or an agreement under paragraph 30 above is not validly given for the purposes of the Principal Regulations.
	51. Where an individual assessment of a plan charge or building notice charge has been made, (other than a standard charge) any individually assessed plan charge or building notice charge shall not be payable until such plan charge or building notice charge has been specified by the City of London Corporation and confirmed in writing if such confirmation is provided later than the deposit of the plan or (as the case may be) the giving of the building notice.
	52. The City of London Corporation is authorised to require the supply of any information where such information is necessary to determine any building regulation charge listed in clause 9 above.
	53. The City of London Corporation operates, maintains and makes available on request, to any interested party, an appropriate complaints procedure regarding its building regulations services. If a person is dissatisfied with the decision made relating to the determination of charges for building work and wishes to make a complaint, such complaint will be dealt with within the Council's agreed complaint's procedure. In the first instance, such complaints should be addressed at a local level to: The District Surveyor & Environmental Resilience Director Department of the Built Environment Guildhall London EC2P 2EJ Telephone: 020 7332 1000 Fax: 020 7332 1968 email: district.surveyor@cityoflondon.gov.uk
11(2)	54. Where building work reverts to the control of the City of London Corporation any plans relating to that building work given to the City of London Corporation in accordance with regulation 19 of the Building (Approved Inspector etc) Regulations 2010 as amended, shall be accompanied by a current estimate in writing of the cost of that building work.
13	55. Contravention of the Building (Local Authority Charges) Regulations 2010 and or the non- payment of any charge which becomes payable are not treated as offences under Section 35 of the Building Act 1984 (penalty for contravening building regulations).
Regulation No	**TRANSITIONAL PROVISIONS AND REVOCATION**

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

15(2-3)

56. The Building Regulations Charges Scheme No. 3. 2020 of the City of London Corporation made under the Building (Local Authority Charges) Regulations, 2010 will continue to apply to building work within the City of London Corporation area for which plans were first deposited or a building notice was given or a reversion charge became payable, or a regularisation certificate was made, before 3rd May 2021.

INFORMATIVE

12(3)

57. Further information and advice concerning building regulation charges and the Building Regulations Charges Scheme, can be obtained from:

The District Surveyor & Environmental Resilience Director
Department of the Built Environment
Guildhall
London EC2P 2EJ

Telephone: 020 7332 1000
Fax: 020 7332 1968
email: district.surveyor@cityoflondon.gov.uk

Signed:

.....
(The officer appointed for this purpose)

Dated:

* Derivation = Building (Local Authority Charges) Regulations 2010.

Note: "All Other Work" (final column) should be used for the installation of a service or fitting and for work involving the underpinning of a building.

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Appendix F - Building Regulation Charges Scheme No 4, 2021

Annex A: Charges Schedule.

Cost of Works	Charges from 3rd May 2021				
	Work Categories				
£1,000's	Refurbishments & Extensions	Fit out and alterations	Material Change of Use *	Small Residential Alterations *	Other
					For works not described on the table a specific individually assessed charge will be provided.
£10	£728	£448	£1,008	£698	
£20		£672		£922	
£40	£952	£896	£1,176	£1,259	
£70	£1,288	£1,232	£1,512	£1,594	
£100	£1,512			£1,706	
£150	£1,736	£1,400	£2,128	SEE 'OTHER'	
£200	£1,960	£1624	£2,240		
£300	£2,408	£1,848	£3,248		
£400	£2,800	£2,240			
£500	£3,248	£2,464			
£600	£3,696	£2,744	£4,704		
£700	£4,144	£3,192			
£800	£4,536	£3,472			
£900	£4,928	£3,864	£6,272		
£1,000	£5,376	£4,032			

Plan & Insp charge due immediately if £800 or less (excl VAT)

For all other applications Plan Charge is 40% of total fee, and Inspection Charge is 60% of total fee.

For works over £1.0 million a specific individually assessed charge will be provided

*** If Part P electrics are not applicable or if they are dealt with under the Competent Persons Scheme - Deduct £250 per unit/flat**

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Appendix G –

Building Regulation Charges Scheme No 4, 2021 Annex B: Factors to be taken into Account When Determining Assessed Charges.

The factors to be taken into account in determining Assessed Charges as per clauses 14 & 15 of the Building Regulations Charges Scheme No. 4, 2021 of the City of London Corporation.

1. the existing use of a building, or the proposed use of the building after completion of the building work.
2. the different kinds of building work described in regulation 3(1)(a) to (i) of the Principal Regulations. *(see definition of 'building work' in clause 5 above)*.
3. the floor area of the building or extension. *(see definitions of 'floor area of a building or extension', 'total floor area of a building' and 'total floor area of an extension' in clause 5 above)*.
4. the estimated duration of the building work and the anticipated number of inspections to be carried out.
5. the estimated cost of the building work.
6. the nature of the design of the building work and whether innovative or high-risk construction techniques are to be used; and
7. whether the person who intends to carry out part of the building work is a person named in a self-certification scheme or list of exemptions under schedule 3 of the Principal Regulations; or is carrying out the descriptions of work where no building notice or deposit of full plans is required under schedule 4 of the Principal Regulations both as mentioned in building regulation 12(6)
8. whether in respect of the building work a notification has been made that design details approved by Robust Details Limited are to be.
9. whether an application or building notice is in respect of two or more buildings or building works all of which are substantially the same as each other.
10. whether an application or building notice is in respect of building work which is substantially the same as building work in respect of which plans have previously been deposited or building works inspected by the City of London Corporation.
11. whether chargeable advice has been given which is likely to result in less time being taken by the City of London Corporation to perform the chargeable function; and
12. whether it is necessary to engage and to incur the costs of a consultant to provide specialist advice or services in relation to a particular aspect of the building work.

Type of work	Refurbishment & Extensions, Simple office alterations, Cat A to B, Material change of use, retail	Other or Notes / special factors
Duration on site		
Number of floors above ground		
Anticipated inspection time hours and notes		
Routine visits		
Piling/foundation inspections		
Below ground drainage		
Below ground structural inspections		
Superstructure		
Above ground drains – routine		
M&E routine		
Drainage testing		
Site Q/A Audit time		
Routine/Finals prior to completion		
Other special factors +/-		
De-snag visits –drainage		
De-snag visits – M&E		
De-snag visits -general		
Off site inspection		
M&E Final Commission & tests		
Review a deduction for repetition/		
Anticipated plans inspection time		
General		
As % of site time		
Structural Appraisal		
Fire engineering		
Design workshops		
	Total Hours	
Outside consultant required –	**Cost £**	

Committee(s)	Dated:
Planning and Transportation	13 April 2021
Subject: Declaration of 100 Bishopsgate city walkway (Clerk's Place and Wrestlers Court)	**Public**
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	**2, 3, 4, 12**
Does this proposal require extra revenue and/or capital spending?	**N**
If so, how much?	**£nil**
What is the source of Funding?	**n/a**
Has this Funding Source been agreed with the Chamberlain's Department?	**n/a**
Report of: Director of the Built Environment	**For Decision**
Report author: Lucy Foreman	

Summary

The new walkway at 100 Bishopsgate has now been constructed and conforms to the City Corporation's standards for new city walkways. It is now considered appropriate for the City Corporation to declare the new walkway to be a city walkway. This is therefore recommended to your Committee to resolve.

Recommendation(s)

I recommend that the Committee:-

1. By resolution declare to be a city walkway the new walkway at 100 Bishopsgate named Clerk's Place and Wrestlers Court, on a date to be determined, in the terms of the resolution set out at Appendix 1 to this report.

2. Delegate authority to the Deputy Transportation and Public Realm Director to insert an appropriate date for the declaration to come into force.

Main Report

Background

3. On 6 September 2011 your Committee resolved to grant planning permission for the erection of three buildings to comprise office (B1), retail (A1–A4), library (D1) and livery hall (sui generis) uses with associated public space and landscaping, disabled car parking, cycle parking, servicing and plant at 80–86 Bishopsgate, 88–90 Bishopsgate, 12–20 Camomile Street, 15–16 Saint Helen's Place, 33–35 Saint Mary Axe and 61 Saint Mary Axe, the site now known as 100 Bishopsgate subject to planning obligations being entered into.

4. Following the entering into of a Section 106 agreement which included a covenant prohibiting occupation of the 100 Bishopsgate buildings until an

agreement to secure a city walkway through the site had been entered into, planning permission for the development was granted on 23 November 2011 (11/00332/FULEIA), followed by a further planning permission pursuant an application under section 73 of the TCPA 1990 granted on 30 March 2012.

5. On 9 January 2018 your committee resolved to delegate authority to the Comptroller and City Solicitor to enter into a city walkway agreement with the developer of 100 Bishopsgate in accordance with the principal reservations, limitations and conditions set out in the report.

6. The walkway secured through the city walkway agreement dated 9 April 2018 was a partial replacement public right of way for the previous public rights of way through the site. The previous rights of way were Clerk's Place (which ran east to west) and Wrestlers Court (north to south); which together formed an L-shaped public footpath that allowed pedestrians to avoid the congested southern corner of Bishopsgate and Camomile Street (see the stopping up plan entitled Stopping-Up of Highways (City of London) (No.___) Order 200_ City of London Plan No. PC___ Proposed Order Plan, and numbered 213737-SUO-102 Issue F, appended to this report as Appendix 3).

Current Position

7. The permitted redevelopment has now been completed including the construction of the new walkway, providing public access from Bishopsgate to Saint Mary Axe (west to east), and from Camomile Street (north to south) to Bishopsgate and Saint Mary Axe via the west to east route (see Appendix 2).

8. The completed new walkway at 100 Bishopsgate conforms to the City Corporation's standards for new city walkways.

9. This report seeks your approval to declare the walkway as city walkway.

Proposals

10. It is therefore now considered appropriate for the City Corporation to declare the new walkway to be a city walkway.

11. Appropriate wording for a resolution to effect this declaration (Appendix 1), including a plan of the walkway to be declared (Appendix 2), is appended to this report. The resolution specifies limitations and conditions affecting the public right of way to give effect to reservations, limitations, or conditions in the city walkway agreement.

12. The plans can also be e-mailed to any Member and to any other person who wishes to receive them so that they can be viewed more conveniently using the viewing tools in Adobe Acrobat or similar document viewing software.

13. Notice of the passing of the resolution declaring the city walkway describing the extent of the city walkway must be published in one or more newspapers circulating within the city and displayed for a period of not less than 28 days in

a prominent position in the city walkway. The date for the coming into force of the declaration must not be earlier than the date of first publication of notice of the resolution.

Corporate & Strategic Implications

Strategic Implications

14. Declaring the new walkway to be a city walkway, thereby enabling the new walkway to be used as of right by the public, serves to assist in delivering the City Corporation's Corporate Plan 2018–2023. The declaration of the city walkway will help to meet the Corporate Plan aims to 'Contribute to a flourishing society' and 'Shape outstanding environments'.

Financial Implications

15. The city walkway agreement in place requires the owner of the land to undertake all maintenance, repair, drainage, cleansing and lighting of the city walkway, which will remain in the ownership of the owner in perpetuity. Therefore the costs to the City Corporation of the city walkway would be minimised and able to be contained within the Director of the Built Environment's local risk budget.

16. As above, the owner shall be responsible for the proper cleansing, maintenance, repair, drainage, cleansing and lighting of all surface and structural elements and any other structure forming part of the new city walkway to the reasonable satisfaction of the City Corporation and in accordance with a Maintenance Specification. However, should the owner default in his obligations and the City Corporation need to exercise its step-in rights to ensure adequate maintenance of the city walkway, and it was not possible in the circumstances to recover the costs of doing so from the owner, there could be additional costs for the City Corporation. This is considered to be unlikely, but if it such a situation arose the costs involved may not be able to be contained within the Department of the Built Environment's existing revenue budgets.

17. The declaration of Clerk's Place and Wrestlers Court as city walkway is anticipated to have limited financial implications on the City as the developer will meet most costs of advertisement. Under section 6A of the 1967 Act (as amended) where the Corporation receives a request to pass a resolution under section 6 (declaration of city walkway) and the Corporation complies with that request, it may make and recover from the person making the request charges in respect of the costs and expenses incurred in passing the resolution and advertising it locally. The cost of advertising in the Evening Standard will be invoiced to the developer.

Resource Implications

18. Officers have undertaken the preparation of this report and will proceed in accordance with the resolution should this committee agree the recommendations.

19. The resource implication incurred includes the officer time in preparing this report, and the time associated with advertisement and declaration.

Legal Implications

20. Wording for the resolution is included in Appendix 1 for Committee's approval. Schedule 2 sets out the limitations which affect the public right of way and of access thereon which are required to give effect to reservations, limitations or conditions contained in the city walkway agreement. The declaration of city walkway will take effect from a date to be inserted by the Deputy Transportation and Public Realm Director.

Equalities Implications

21. The width of city walkway is 3m, which is in line with our minimum recommendations for new city walkway. The new city walkway is step free and accessible for all.

22. The declaration of the city walkway complies with our Public Sector Equality Duty 2010 by creating an accessible route for all regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.

Climate Implications

23. The declaration of the city walkway serves to build climate resilience by protecting streets and public spaces, as set out in the City of London Corporation's Climate Action Strategy.

Security Implications

24. The proposed city walkway at 100 Bishopsgate benefits from natural surveillance on all sides due to the nature of the walkway dissecting the development. Therefore there are no concerns relating to crime, disorder and anti-social behaviour.

Conclusion

25. The new walkway at 100 Bishopsgate has now been constructed and conforms to the City Corporation's standards for new city walkways and the city walkway agreement. It is therefore now considered appropriate for the City Corporation to make a resolution declaring the new walkway be a city walkway.

Report author

Lucy Foreman, DBE

E: lucy.foreman@cityoflondon.gov.uk
T: 07729000133

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RESOLUTION OF THE PLANNING AND TRANSPORTATION COMMITTEE

(under powers delegated to them by the Court of Common Council on 19 July 2001)

DATED the ___ day of ___ 2021.

WHEREAS the Mayor and Commonalty and Citizens of the City of London acting by the Planning and Transportation Committee pursuant to the delegation to that Committee specified *above* (hereinafter called "the City") are authorised by section 6 of the City of London (Various Powers) Act 1967 (as amended) (hereinafter called "the Act") **BY RESOLUTION TO DECLARE** any way or place in the City of London appearing to the City:

(i) to be laid out or otherwise suitable for a city walkway within the meaning of section 5 of the Act,

(ii) to which access is available directly from a street or another city walkway, and

(iii) that is laid out or rendered suitable for a city walkway in accordance with one of the provisions specified in subsection (1) of the said section 6

TO BE A CITY WALKWAY as from such date as may be specified in such resolution

AND WHEREAS it appears to the City that:

(i) the way or place specified in Schedule 1 hereto is laid out or otherwise suitable for a city walkway within the meaning of the said section 5; and

(ii) access to such way or place is available directly from a street or another city walkway; and

(iii) the way or place is laid out or rendered suitable for a city walkway in accordance with subsection (1)(b) of the said section 6

AND WHEREAS the public right of way and of access on the way or place specified in Schedule 1 shall be subject to the limitations and conditions in Schedule 2 hereto in accordance with subsection (1A) of the said section 6 to give effect to reservations, limitations and conditions specified in an agreement for the provision of a city walkway in respect of land at 100 Bishopsgate, London EC2 dated 9 April 2018 (hereinafter called "The Agreement") entered into pursuant to subsection (1)(b) of the said section 6.

NOW THEREFORE the City in pursuance of section 6(1) of the Act by resolution **HEREBY DECLARE** the way or place described in Schedule 1 hereto on and after the ___ day of ___ 2021 to be a city walkway subject to the limitations and conditions in Schedule 2 hereto.

Dated

THE COMMON SEAL OF THE MAYOR
AND COMMONALTY AND CITIZENS
OF THE CITY OF LONDON
was hereunto affixed in the presence of:

Authorised Officer
Guildhall
LONDON
EC2P 2EJ

SCHEDULE 1

ALL THAT way or place known as Clerks Place and Wrestlers Court (hereinafter called “the New City Walkway”)

- from Bishopsgate to Camomile Street in an L shape through the 100 Bishopsgate development; and
- from Bishopsgate to Saint Mary Axe running on the south side of the 100 Bishopsgate development

as shown hatched on the city walkway declaration plan labelled

Public Walkway Site Plan, Drawing number: A-00_SK_2813 Revision 08

attached hereto.

SCHEDULE 2

1. The Owner (as defined in The Agreement) shall be entitled to temporarily close the New City Walkway insofar as is necessary for the purpose of fulfilling its obligations provided by The Agreement in respect of maintenance, repair and cleansing of the New City Walkway subject to the following:

    a. any such closure shall be for the minimum period and the minimum extent necessary;

    b. any such closure shall other than in the case of emergency, occur only during Off Peak Hours (as defined in The Agreement"); and

    c. the Owner using reasonable endeavours to ensure that an access route over the New City Walkway of a minimum width of 1.2 metres is retained at all times and where this is not possible ensuring that an access route of a minimum width of 1.2 metres is retained over the New City Walkway and/or the land immediately adjacent to the New City Walkway.

2. The Owner may temporarily suspend public rights of way and access over the New City Walkway to the extent and for the minimum period that is required in the interests of public safety where the need is first confirmed by a chief officer of the City other than in cases of imminent threat where such confirmation must be obtained within six hours of the suspension coming into force (or the suspension must cease).

3. Public rights of way and access over the New City Walkway may be suspended for such period authorised by the City pursuant to Clause 4.3.1 of The Agreement in the event of public assembly in the vicinity of the Property (as defined in The Agreement).

4. The Owner shall be entitled to use on the New City Walkway Maintenance Apparatus (as defined in The Agreement) for the purpose of the maintenance, repair and cleansing of the New City Walkway and the buildings on the land adjacent to the New City Walkway subject to the following:

    a. any such use shall be for the minimum period and the minimum extent necessary);

    b. any such use shall, other than in case of emergency, occur only during Off Peak Hours (as defined in The Agreement); and

    c. the Owner using reasonable endeavours to ensure that an access route over the New City Walkway of a minimum width of 1.2 metres is retained at all times and where this is not possible ensuring that an access route of a minimum width of 1.2 metres in retained over the New City Walkway and/or the land immediately adjacent to the New City Walkway.

5. The Owner shall be entitled to use BMUs (building maintenance units) (as defined in The Agreement) above the New City Walkway for the purpose of the maintenance, cleansing and repair of the buildings adjacent to the New City Walkway subject to the conditions specified at Schedule 2 to The Agreement and the restrictions in paragraph 4 (a) to (c) above.

6. Security bollards and manholes may be placed and left in situ on land that forms part of the New City Walkway in accordance with the Final Specification (as defined in The Agreement) and may from time to time where approved in accordance with the Agreement or otherwise approved by the City be removed and replaced as necessary.

7. Subject to the Owner seeking consent from the City by completing a Highways Indemnity Form and associated paperwork (including environmental authorisation and TM drawing) which must be completed a minimum of two weeks prior to the date of the opening of the Maintenance Hatch (as defined in The Agreement) the Owner may access and open the Maintenance Hatch.

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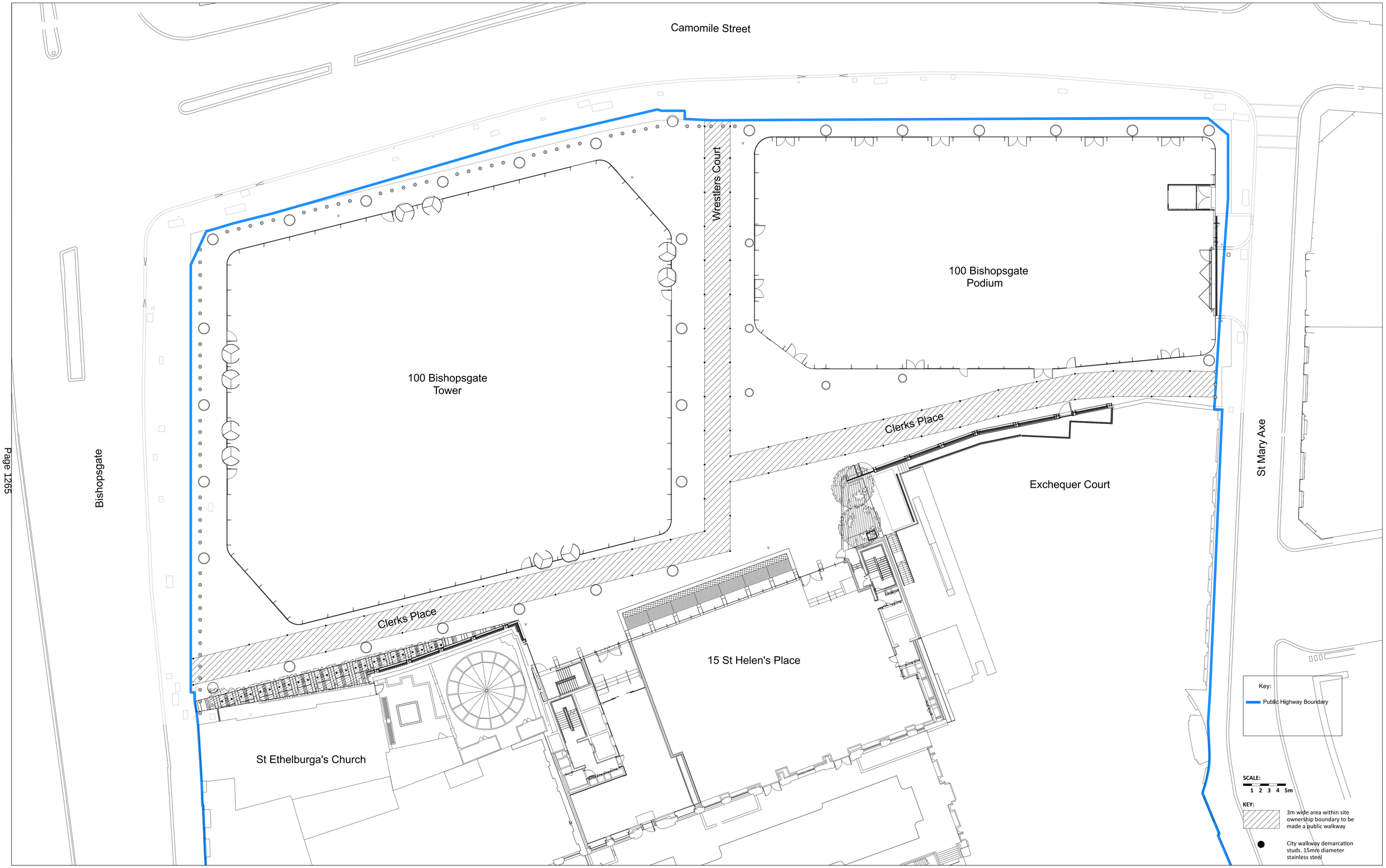

Notes

Project north

Rev	Date	Description	Ckd
00	19.01.17	First Issue	MW
01	27.06.17	Studs shown and setting out updated	MW
02	07.08.17	Levels omitted from drawing	MW
03	22.08.17	Paving & slot drains omitted from drawing	MW
04	18.09.17	Public walkway hatch updated and scale bar added	MW
05	10.11.17	Boundary lines added and access hatch location indicated	MW
06	29.11.17	Public highway boundary line omitted and services access hatch shown in blue	MW
07	22.10.20	Services hatch and perimeter studs omitted Drawing tile changed to - "Clerk's Place and Wrestlers Court City Walkway Declaration Plan" from "Public Walkway Site Plan". Lease hold boundary removed and Highways boundary added as drawing A-10900-021 -04. All Revision Bubbles removed	MW
08	23.02.21	Clerks Place and Wrestlers Court street names addded.	MW

THIS DRAWING SUPERSEDES:
PLANNING DRAWING NUMBER 426-SK-0235
AND SKETCH DRAWING A-00-SK-931

Note:
Do not scale from this drawing. Use figured dimensions only . All levels in metres. Detailed site survey to be carried out to verify positions and level relationships with site features and ordnance survey. Boundaries are indicative only and are to be verified by others. The architect must be notified of any discrepancy

Client
Brookfield

Contractor
MULTIPLEX
Built to outperform.

Allies and Morrison
Arney Fender Katsalidis
HED Hyland Edgar Driver Landscape Architects

100 Bishopsgate

Clerks Place and Wrestlers Court city walkway declaration plan

Scale
1:200 @ A1

Building
100BG+15SHP

Drawing number
A-00_SK_2813

Revision
08

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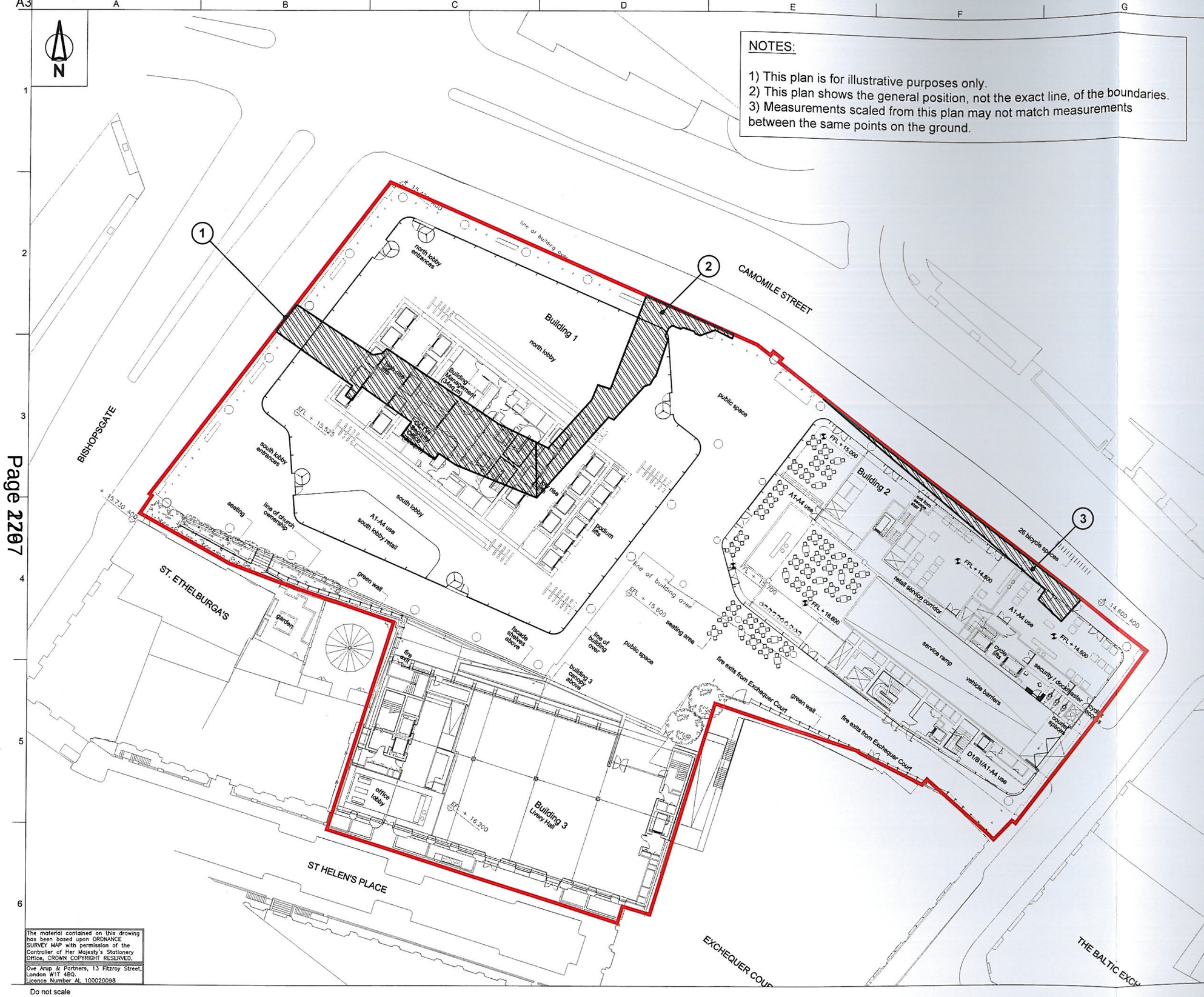
A3

NOTES:

1) This plan is for illustrative purposes only.
2) This plan shows the general position, not the exact line, of the boundaries.
3) Measurements scaled from this plan may not match measurements between the same points on the ground.



Key

- Area to be Stopped-Up
- Site Boundary

1. Clerk's Place - Area = 265m²
2. Wrestlers Court - Area = 137m²
3. South of Camomile Street - Area = 56m²

Issue	Date	By	Chkd	Appd
F	11/01/12	MW	PdeJ	PdeJ
E	12/11/10	MW	PdeJ	PdeJ
D	26/10/10	GW	PdeJ	PdeJ
C	20/10/10	GW	PdeJ	PdeJ
B	07/10/10	GW	PdeJ	PdeJ
A	05/10/10	MW	PdeJ	PdeJ
-	24/08/10	GW	PdeJ	PdeJ

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www.arup.com

Client
Brookfield Europe LP

Job Title
100 Bishopsgate

Drawing Title
Stopping-Up of Highways
(City of London) (No.__) Order 200_
City of London Plan No. PC___
Proposed Order Plan

Scale at A3 1:500

Discipline Civil - Transport

Drawing Status
DRAFT

Job No	Drawing No	Issue
213737-00	213737-SUO-102	F

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\\globallondon\AFEUobs\213000-\213737-00 100 Bishopsgate\3 4 Transportation internal project data\4 Internal Project Data\4-03 Arup Drawings\Stopping Up base plans & info\213737-SUO-102_F.dwg 12 Jan 2012 13:49:49 id: 0EAED641-5E01-46EF-A88C-BB90203FF581 manuel.williams

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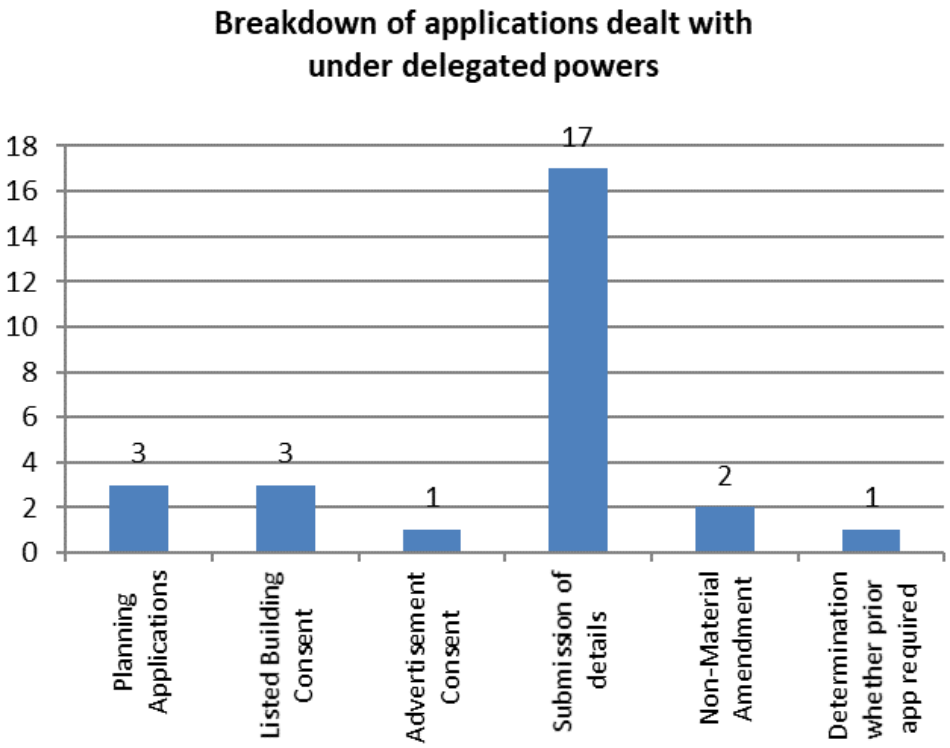
Committee(s)	**Dated:**
Planning and Transportation	13th April 2021
Subject: Delegated decisions of the Chief Planning Officer and Development Director	**Public**
Report of: Chief Planning Officer and Development Director	**For Information**

Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development and advertisement applications determined by the Chief Planning Officer and Development Director or those so authorised under their delegated powers since my report to the last meeting.

In the time since the last report to Planning & Transportation Committee Twenty Seven (27) matters have been dealt with under delegated powers. Seventeen (17) relate to conditions of previously approved schemes, Three (3) applications for Listed Building Consent, and One (1) application for Advertisement Consent, Two (2) relate to non-material amendments, and One (1) Determination whether prior app required. Three (3) Full applications.



Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk.

Details of Decisions

Registered Plan Number & Ward	Address	Proposal	Decision & Date of Decision	Applicant / Agent Name
21/00102/LBC Aldersgate	Thomas More Car Park Barbican London EC2Y 8BT	Application under Section 19 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to vary condition 4 of listed building consent 19/01046/LBC dated 28th January 2020 to allow minor alterations to approved plans to omit the external plant room and associated equipment and change the timber frame windows and doors to powder coated aluminium.	Approved 25.03.2021	City of London Corporation
20/00919/MDC Bishopsgate	222 Bishopsgate London EC2M 4QD	Submission of particulars and samples of the materials to be used on all external faces of the building, including louvered plant screen; new window and doors; details of all new windows, doors, dormers, shopfront joinery; a typical elevation and section detail of the interface between the proposed render fascia and the existing first storey brickwork for the unit on the corner of Bishopsgate and Artillery Lane pursuant to condition 8 (a), (b) and (c) of planning permission dated 7th July 2020 (20/00081/FULL).	Approved 16.03.2021	Thirdway Interiors

21/00072/MDC Bishopsgate	1 - 2 Broadgate London EC2M 2QS	Details of the schemes availability to connect to a district heating network pursuant to condition 43 of planning permission 18/01065/FULEIA dated 28/03/2019.	Approved 16.03.2021	Bluebutton Properties UK Limited
21/00166/PODC Bishopsgate	1 - 2 Broadgate London EC2M 2QS	Submission of the Local Procurement Strategy pursuant to Schedule 3 Paragraph 2.1 of the Section 106 Agreement dated 28 March 2019 (Planning Application Reference 18/01065/FULEIA).	Approved 25.03.2021	Bluebutton Properties UK Ltd
21/00134/NMA Bishopsgate	6 - 9 Eldon Street London EC2M 7LS	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission 20/00859/FULL to re-word condition 6 and the omission of conditions 5, 7, 8 and 9 attached to the original planning permission.	Approved 25.03.2021	Broadgate Eldon Properties Limited
21/00024/ADVT Broad Street	66 London Wall London EC2M 5TN	Installation and display of : one internally illuminated fascia comprising lettering measuring 0.4m high by 2.26m wide displayed at a height of 3.275m above ground floor level; an internally illuminated projecting sign measuring 0.6m high by 0.66 wide, displayed at a height of 2.87m above the ground floor level.	Approved 16.03.2021	LF2 London Limited

21/00033/LBC Broad Street	Drapers Hall Throgmorton Avenue London EC2N 2DQ	Renewal of Lighting and Ventilation Services within the Livery Hall and Redecoration of Livery Hall Interiors, including repainting and re-gilding the ceiling, upper walls and gallery/balcony. Repairs and re-polishing of existing timber panelling. Miscellaneous minor works including the removal of redundant heater and restoration of original urn lids.	Approved 25.03.2021	Drapers' Company
21/00037/LDC Broad Street	41 Lothbury London EC2R 7HF	Discharge of condition 2 (part (b) only) pursuant to listed building consent ref: 19/01365/LBC, for the submission of details of the scaffolding design including removal, storage and reinstatement of metal balustrade at third floor level for duration of works.	Approved 25.03.2021	Pembroke Lothbury Holdings Limited
20/00872/MDC Castle Baynard	6 St Andrew Street London EC4A 3AE	Submission of a Site Environmental Management Plan pursuant to conditions 2 and 3 of planning permission 20/00230/FULL dated 21.07.20.	Approved 18.03.2021	St James's Place UK PLC
21/00178/PODC Cheap	Dauntsey House 4A & 4B Frederick's Place London EC2R 8AB	Submission of the Local Procurement Strategy and the Local Training Skills & Job Brokerage Strategy pursuant to Schedule 3 Paragraph 2.1, 3.2 and 3.5 of the Section 106 Agreement dated 14 May 2020	Approved 25.03.2021	The Mercers' Company

		(Planning Application Reference 17/01057/FULMAJ).		
20/00312/MDC Coleman Street	56-60 Moorgate, 62-64 Moorgate & 41-42 London Wall London EC2	Details of a scheme which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A use pursuant to condition 15 of planning permission 19/00622/FULL dated 01.08.19.	Approved 23.03.2021	Thor Limited
20/00931/NMA Coleman Street	City Point 1 Ropemaker Street London EC2Y 9AW	Non-material amendment under Section 96A of the Town and Country Planning Act 1990 (as amended) to planning permission dated 12.12.2019 (19/00823/FULL) to allow for an amendment to the design of the west screen to the Level 6 Terrace.	Approved 25.03.2021	Wavegrang e Limited
21/00042/MDC Coleman Street	55 Moorgate London EC2R 6PA	Details of BREEAM assessment pursuant to condition 15 of planning permission ref: 18/01345/FULL (dated 26 February 2019)	Approved 16.03.2021	Trustees of Moorgate Unit Trust
20/00857/LBC Cornhill	65 Cornhill London EC3V 3NB	Alterations to ground floor including addition of feature ceiling lighting, new teller counter, bespoke storage shelving unit, alterations for minor rotation of front entrance door.	Approved 25.03.2021	Shacom Property Holdings (BVI) Limited

20/00829/MDC Cripplegate	Former Richard Cloudesley School Golden Lane Estate London EC1Y 0TZ	Submission of details of the acoustic barrier to the rooftop play area pursuant to condition 42 of planning permission 17/00770/FULL dated 19th July 2018.	Approved 16.03.2021	ISg
20/00830/MDC Cripplegate	Former Richard Cloudesley School Golden Lane Estate London EC1Y 0TZ	Submission of details of the lighting across the school site pursuant to condition 30 of planning permission 17/00770/FULL dated 19th July 2018.	Approved 23.03.2021	ISg
20/00941/PODC Cripplegate	Bernard Morgan House 43 Golden Lane London EC1Y 0RS	Submission of the Carbon Reduction Assessment of the completed development pursuant to Schedule 3 Paragraph 10 of the Section 106 Agreement dated 30 August 2017 (Planning Application Reference 16/00590/FULL).	Approved 16.03.2021	Taylor Wimpey UK Limited
21/00023/PODC Cripplegate	Bernard Morgan House 43 Golden Lane London EC1Y 0RS	Submission of the Open Space Management Strategy pursuant to Schedule 3 Paragraph 11.2.4 of the Section 106 Agreement dated 30 August 2017 (as amended by a Deed of Variation dated 16 March 2020). Planning Application Reference: 16/00590/FULL	Approved 25.03.2021	Taylor Wimpey UK Limited
20/00520/FULL Farringdon Within	3 Cloth Court London EC1A 7LS	Erection of a single storey mansard roof extension and associated works (total increase in floorspace: 21sq.m).	Approved 23.03.2021	AA Fisher Properties Ltd

20/00717/FULL Farringdon Within	Open Space Newgate Street London EC1A 7BA	Installation of sculpture for a temporary period of five years.	Approved 18.03.2021	Modus Operandi Art Consultants
20/00930/MDC Farringdon Within	6 Middle Street London EC1A 7JA	Submission of a Sustainability Plan pursuant to condition 8 of planning permission ref. 19/00623/FULL (as amended by application 19/01270/NMA).	Approved 25.03.2021	Trust For London
20/00543/FULL Lime Street	22 - 24 Bishopsgate London EC2N 4BQ	The installation of fixed structures, a temporary screen and associated lighting on the level 2 terrace.	Approved 18.03.2021	22 Bishopsgate General Partner Ltd
21/00091/MDC Lime Street	Leadenhall Court 1 Leadenhall Street London	Submission of details of an investigation to establish if the site is contaminated and a remediation scheme pursuant to parts a) and b) of condition 13 of planning permission 18/00740/FULEIA dated 28th March 2019.	Approved 23.03.2021	1 Leadenhall Limited Partnership
18/00951/PODC Tower	Emperor House 35 Vine Street London EC3N 2PX	Submission of the Public Realm Specification pursuant to Schedule 3 Paragraph 11.2 of the Section 106 Agreement dated 09 November 2017 in relation to Planning Permission 17/00239/FULMAJ (as amended by 18/00193/FULMAJ - Deed of Variation dated 26 July 2018).	Approved 25.03.2021	Urbanest UK Ltd
20/00975/MDC Tower	Emperor House 35 Vine Street London	Submission of details of the CHP Plant technical data sheet and an equipment maintenance	Approved 18.03.2021	Urbanest

	EC3N 2PX	schedule pursuant to 26 (in part) of planning permission 18/00193/FULMAJ dated 26.07.2018		
21/00049/DPAR Tower	11 - 13 Great Tower Street London EC3R 5AQ	Application under Schedule 2, Part 16, Class A of the Town and Country Planning (General Permitted Development) Order 2015 as to whether prior approval is required for the installation of a new rooftop Pig Pen design layout to support both the new and relocated antenna upon the BT exchange rooftop. Removal of 4 x antenna at 36m, to be replaced by 8 x new antenna on new supporting steelwork 4 x at 37.1m and 4 x at 36.5m. Relocation of 7 x existing antenna onto the new steelwork. Additional works include the refreshment of existing rooftop equipment cabinets and the installation of 1 x GPS Module at 27.8m off the ERS Racks on the rooftop.	Prior Approval Given 16.03.2021	Cornerstone Telecommunications Infrastructure
21/00062/MDC Tower	76 - 86 Fenchurch Street, 1 - 7 Northumberland Alley & 1 & 1A Carlisle Avenue London EC3N 2ES	Submission of a post construction BREEAM assessment pursuant to condition 23 of planning permission ref 15/00702/FULMAJ (dated 20th January 2016)	Approved 25.03.2021	Partners Group Fenchurch IC Limited (Guernsey)

Committee(s)	**Dated:**
Planning and Transportation	13th April 2021
Subject: Valid planning applications received by Department of the Built Environment	**Public**
Report of: Chief Planning Officer and Development Director	**For Information**

Summary

Pursuant to the instructions of your Committee, I attach for your information a list detailing development applications received by the Department of the Built Environment since my report to the last meeting.

Any questions of detail arising from these reports can be sent to plans@cityoflondon.gov.uk.

Details of Valid Applications

Application Number & Ward	**Address**	**Proposal**	**Date of Validation**	**Applicant / Agent name**
21/00162/FULL Bread Street	Juxon House, 100 St Paul's Churchyard, London, EC4M 8BU	External works comprising the installation of two air ventilation louvre grilles on the north elevation.	08/03/2021	Denton Associates
21/00156/FULL Castle Baynard	Condor House, 10 St Paul's Churchyard, London, EC4M 8AL,	External alterations to shopfront and change of use of part lower ground floor (Unit 3) and part ground floor (Unit 7) to Use Class E.	04/03/2021	Prime UK Condor T S.a.r.l C/o AXA Investment
21/00198/FULL Castle Baynard	81 Fleet Street, London, EC4Y 1EL	External alterations involving the removal of internal counter line partition, removal of existing signage, removal of 2no ATM's and infill opening to match existing marble/ granite.	17/03/2021	Barclays Bank PLC

21/00187/FULL Cheap	Cheapside Traffic Island, Cheapside, London, EC2V 6AA	Retention of the existing structure on the Cheapside traffic island for a further temporary period of 12 months to house a new art installation.	15/03/2021	Mr Nick Tyrer
21/00189/FULL Cordwainer	Queens House, 8 - 9 Queen Street, London, EC4N 1SP	Instillation of new ventilation grills within the north and west elevations and replacement of roof-top plant.	15/03/2021	Axiom Solutions Limited
21/00086/FULL Cornhill	Livery Hall, Merchant Taylors Hall, 30 Threadneedle Street, London, EC2R 8JB	Installation of a drainage flood relief system comprising an underground attenuation tank and pumping station connected by a new cast iron drain pipe and discharging into the existing underground drains on the site.	09/03/2021	Merchant Taylor's Company
21/00180/FULL Cornhill	2 - 3 Royal Exchange, London, EC3V 3LL	Internal works for the refurbishment of the shop unit at basement, ground, first and second floors and external works to include the restoration of glass panes to the arched window at the second floor level.	12/03/2021	Tomoka Casks
21/00124/FULL Cripplegate	16 Wallside, Barbican, London, EC2Y 8BH	Replacement of garage door. Conversion of garage for residential use. Internal demolition and replacement of internal walls. New internal doors, kitchen and bathrooms.	25/02/2021	Kouyoumjian

21/00175/FULL Farringdon Without	6 Bream's Buildings, London, EC4A 1HP	Application under Section 73 of the Town and Country Planning Act to vary condition 19 (approved plans) of planning permission 15/00971/FULL dated 10/03/2016 to enable minor material amendments to include: A rear extension in its current location to a height of 2500mm above the mansard roof; provide a roof terrace and other minor associated changes.	10/03/2021	Aviv Property Development Ltd
21/00176/FULL Tower	All Hallows By The Tower, Byward Street, London, EC3R 5BJ	The installation of one GPS unit mounted on a support pole on the south western elevation of the tower at approximately 19.0 metres above ground level, and associated development for the provision of 5G network.	10/03/2021	Net for Cornerstone and Telefonica

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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