



Planning and Transportation Committee

Date: TUESDAY, 12 DECEMBER 2023

Time: 10.30 am

Venue: LIVERY HALL - GUILDHALL

Members:

Deputy Shравan Joshi (Chairman)	Antony Manchester
Graham Packham (Deputy Chairman)	Deputy Brian Mooney
Deputy Randall Anderson	Deputy Alastair Moss
Brendan Barns	Alderswoman Jennette Newman
Ian Bishop-Laggett	Deborah Oliver
Deputy Michael Cassidy	Alderswoman Susan Pearson
Deputy Simon Duckworth	Judith Pleasance
Mary Durcan	Deputy Henry Pollard
John Edwards	Ian Seaton
Anthony David Fitzpatrick	Hugh Selka
Deputy John Fletcher	Luis Felipe Tilleria
Dawn Frampton	Shailendra Kumar Kantilal Umradia
Deputy Marianne Fredericks	William Upton KC
Jaspreet Hodgson	Vacancy*
Amy Horscroft	Vacancy**
Deputy Charles Edward Lord	Vacancy**
	Vacancy***

* to be appointed by the Court of Common Council on 7 December 2023

** to be appointed by the Court of Aldermen on 5 December 2023

*** to be appointed by the Court of Common Council on 11 January 2024

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Ian Thomas CBE
Town Clerk and Chief Executive

AGENDA

NB: Certain matters for information have been marked * and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting. These information items have been collated in a supplementary agenda pack and circulated separately.

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 on 21 November 2023.

For Decision
(Pages 5 - 20)

4. **OUTSTANDING ACTIONS***

Report of the Town Clerk.

For Information
(Pages 21 - 22)

5. **ANNUAL REVIEW OF TERMS OF REFERENCE**

Report of the Town Clerk.

For Decision
(Pages 23 - 26)

6. **CREECHURCH CONSERVATION AREA PROPOSAL**

Report of the Interim Executive Director Environment.

For Decision
(Pages 27- 250)

7. **PLANNING FOR SUSTAINABILITY SUPPLEMENTARY PLANNING DOCUMENT**

Report of the Interim Executive Director Environment.

For Decision
(Pages 251 - 354)

8. **SALISBURY SQUARE DEVELOPMENT - APPROPRIATION FOR PLANNING PURPOSES**

Report of the City Surveyor.

For Decision
(Pages 355 - 386)

9. **REVENUE AND CAPITAL BUDGETS 2024/25**

Report of The Chamberlain and the Interim Executive Director Environment.

For Decision
(Pages 387 - 400)

10. **INFORMATION REQUIREMENTS FOR THE VALIDATION OF PLANNING APPLICATIONS**

Report of the Director of Planning & Development.

For Decision
(Pages 401 - 440)

11. **PUBLIC LIFT & ESCALATOR REPORT***

Report of the City Surveyor.

For Information

12. **RISK MANAGEMENT UPDATE REPORT***

Report of the Interim Executive Director Environment.

For Information

13. **TO NOTE THE DRAFT MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE - 7 NOVEMBER 2023***

For Information

14. **TO NOTE THE MINUTES OF THE PLANNING APPLICATIONS SUB-COMMITTEE - 20 NOVEMBER 2023***

For Information

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

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

17. **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

18. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 21 November 2023.

For Decision
(Pages 441 - 442)

19. **DEBT ARREARS - ENVIRONMENT DEPARTMENT (P&T COMMITTEE) FOR THE PERIOD ENDING - 30TH SEPTEMBER 2023***

Report of the Interim Executive Director Environment.

For Information

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

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

PLANNING AND TRANSPORTATION COMMITTEE

Tuesday, 21 November 2023

Minutes of the meeting of the Planning and Transportation Committee held at the Guildhall EC2 at 10.30 am

Present

Members:

Deputy Shравan Joshi (Chairman)	Deputy Natasha Maria Cabrera Lloyd-Owen
Graham Packham (Deputy Chairman)	Antony Manchester
Deputy Randall Anderson	Deputy Brian Mooney
Brendan Barns	Deputy Alastair Moss
Ian Bishop-Laggett	Alderwoman Jennette Newman
Mary Durcan	Deborah Oliver
John Edwards	Alderwoman Susan Pearson
Anthony David Fitzpatrick	Deputy Henry Pollard
Deputy John Fletcher	Ian Seaton
Deputy Marianne Fredericks	Hugh Selka
Jaspreet Hodgson	Luis Felipe Tilleria
Deputy Charles Edward Lord	William Upton KC

Officers:

Zoe Lewis	- Town Clerk's Department
Fleur Francis	- Comptroller and City Solicitor's Department
Simon Bradbury	- Environment Department
Gillian Howard	- Environment Department
Ian Hughes	- Environment Department
Rob McNicol	- Environment Department
Gwyn Richards	- Environment Department
Bob Roberts	- Environment Department
Samantha Tharme	- Environment Department
David Horkan	- Environment Department
Peter Wilson	- Environment Department

1. APOLOGIES

Apologies for absence were received from Deputy Michael Cassidy, Dawn Frampton and Shailendra Umrada.

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

There were no declarations.

3. **MINUTES**

RESOLVED – That the public minutes of the previous meeting held on 3 October 2023, be approved as an accurate record.

4. **OUTSTANDING ACTIONS***

An Officer informed the Committee that Officers were meeting a potential external trainer to provide heritage training for Members. It was anticipated this training would be arranged in Quarter 1 or 2024. The Officer stated that a Members' training session on archaeology was being arranged and in addition Members had been invited to see archaeology that had recently been found. There would also be a training session arranged on fire safety and the new building regulations.

In response to a Member's question about whether Historic England guidance would be part of the heritage training, the Officer stated that this would be integrated into the training.

5. **CITY PLAN 2040**

The Chairman informed Members that this item had been withdrawn from the agenda. He informed Members that the Levelling Up and Regeneration Act had gained Royal Assent at the end of October 2023 and following this there were indications that an update to the National Planning Policy Framework was due to be published imminently by the Government, including changes that would affect the plan-making process. For this reason, it has been decided to withdraw this item and return it to Committee as soon as possible once there was further clarity on the national policy changes that were due to come forward. The Chairman advised that it was likely to be considered by the Committee in mid-late January 2023.

6. **BANK JUNCTION IMPROVEMENTS (ALL CHANGE AT BANK): TRAFFIC MIX AND TIMING REVIEW UPDATE**

The Committee considered a report of the Interim Executive Director, Environment updating Members on the All Change at Bank project.

An Officer stated that the report was a summary of the work undertaken since July 2023 following the Court of Common Council approval to pause further work on the traffic modelling exercise at Bank Junction and to instead focus on identifying and evidencing the need for change and how this could be best addressed. Further work had been undertaken to understand the potential latent demand regarding taxis. The Court of Common Council had also requested that a progress report be submitted to its December 2023 meeting.

The Officer stated that the report contained the information that had been collected and analysed to date. The work undertaken to date on taxi volumes showed that there had been a significant reduction in the volume of taxis near Bank and across the City when comparing figures from 2017 and 2022. This was not dissimilar to the figures in parts of Westminster or in terms of volumes of taxis entering the congestion charge area in the same timeframes.

Members were informed that there had been a continued trend of a reduction in the total number of licensed taxi drivers and vehicle volumes for many years. However, this data was likely to help to support the way forward for establishing an agreed approach to the latent demand issues for the traffic modelling requirements with TfL.

The Officer stated, that it was recognised that there had been some dissatisfaction in the proposed timeframes of the possible implementation of any findings from this review, and Officers considered that there was an opportunity to accelerate this by three to four months and outlined this option to Members. The Officer advised that the other options were to continue with the methodology as agreed in July 2023 by the Court of Common Council, or to stop the review.

The Officer informed Members that a further report would be presented to Members of the Planning and Transportation Committee by May 2024 with the final findings of the data collection, the traffic modelling and the updated equalities analysis included. It would recommend the next steps to either close the review or to proceed in terms of progressing changes to the traffic orders at Bank Junction.

Deputy Thompson addressed the Committee. He spoke in favour of Option B, the option recommended by Officers. He stated however that he would prefer for the City to take back control from TfL and implement a trial lifting of restriction on licensed hackney carriages across Bank Junction and Bishopsgate but have been advised this would be difficult and so he proposed that the City's relationship with TfL be reset. He raised concerns that TfL had closed two lines on the day of the Lord Mayor's Show with no consultation with the City. He also raised concerns on the restrictions by TfL on London Bridge which meant high volumes of traffic were driving across the iconic Tower Bridge, which was not designed for this. He stated that this caused congestion and wear and tear on the bridge and expense on the City Bridge Foundation. Deputy Thompson stated that short trips across the City could be long and expensive and as a result, many black taxis avoided the City.

He further stated that it could be very difficult to hail a cab on the street especially at night whilst they remained readily available in the West End. He stated that there being fewer cabs post COVID was as a result of the restrictions that were being imposed, as shown by taxi app data and discussions with black taxi drivers.

Deputy Thompson stated that in the trial of 2017, Members were given assurances the restrictions could be varied easily if access for black taxis was an issue but this was not the case and was the reason a motion was put to the Court of Common Council in April 2022. He stated that this issue was a problem for businesses in his ward and raised concern that although there was the possibility of an easing of restrictions, this would not be until 2025. Deputy Thompson outlined a number of cases where the shortage of taxis was providing significant issues and stated that he considered that the restrictions were discriminatory against the elderly and those with mobility issues and were

causing significant issues for individuals and businesses. He stated that numerous black taxi drivers backed up these experiences. He also stated that restrictions should be lifted for women's safety, for a safe and vibrant nighttime economy, to encourage businesses to locate and remain in the City, to encourage taxi drivers to the City, for economic growth, for vibrant hospitality and to support Destination City, businesses and the City's 10 million annual visitors.

Deputy Thompson raised concerns about there being difficulties during the Lord Mayor's Show as a result of the changes to Bank Junction.

He also stated that black taxis were the safest vehicles on the City's roads and were part of the public transport system so should be permitted where buses were. He asked Members to support Option B in the Officer report.

The Chairman asked for Members' questions to Officers.

A number of Members raised concerns about businesses suffering due to a lack of taxis, issues where staff were required to work early mornings or night shifts, where people had to travel to business meetings and where people did not have the time to use other methods of transport. It was also stated that many foreign investors coming into the city would expect to use taxis and visitors would not have Apps for booking other taxis and could experience difficulties in hailing a black cab. A Member stated that as part of Destination City, it was important to encourage people, visitors, families, workers, everyone into the city.

The Chairman asked Officers about the most efficient method to have a decision made by the Court of Common Council and was informed that Option B, as outlined in the report was the most efficient, robust method to ease restrictions if that was the decision of Members. A Member asked whether, if option B was chosen, Officers could discuss with TfL and others with an interest to find a solution that would enable taxi capacity at Bank Junction to be increased sooner than summer 2025. An Officer stated that as any party could take out a judicial review, a negotiated settlement with TfL would not stop the possibility or likelihood of a challenge.

The Chairman asked Officers to explain what would happen if Members decided to stop further work and put in an experimental traffic order. An Officer stated there was a clear legislative process to be followed. Modelling and data were required and without these there could be legal challenge. TfL was the Strategic Transport Authority and had the right of oversight over the way in which some streets were managed.

Members commented on the Bank Junction Taxi Availability and Analysis Report which seemed to suggest that availability was a Londonwide problem and was not unique to the city, with the comparatives between Westminster and the City showing the problem did not seem to be worse in the city. A Member asked for clarification on whether opening Bank Junction would resolve the problem as this did not seem to be supported by the evidence in the

report. An Officer stated that some comparisons had been made with Oxford Street and Regent Street by working with Westminster, the data in the appendix was an interim report and further information would be provided in due course. The Officer stated that the high-level data suggested taxi availability was an issue across central London and that the numbers of licenced drivers and licenced vehicles had been decreasing over a long period of time.

Members discussed Bank Junction currently being open to taxis after 7pm and measures that could help increase numbers of taxis at nighttime including more taxi ranks and charging points. An Officer referred to paragraph 29 and 30 of the Officer report and stated that Cheapside had been opened up to taxis, there was a marshalling scheme at Liverpool Street and a taxi rank put in outside the Ned. He stated that although taxi availability was a pan-London phenomenon, City focused improvements were being implemented. A Member asked if work was being undertaken to see why more taxis were not in the City in the evening as Bank Junction was open to them at this time. An Officer stated that the current data collection was high-level and aggregated. When individual sites were considered, it would be possible to see where there were differences in taxi availability across the day and the quantity of vehicles in the City in the evening period. It was anticipated that this would inform the position as to whether or not reopening Bank Junction to taxis during the day, would result in more taxi drivers there in the day who therefore might then be there in the evening too. A Member suggested an education piece could be undertaken as some drivers seemed unaware they could drive through the junction at other times and this could increase the number of taxis in the City in the evening. Another Member asked that modelling be undertaken with sufficient granularity e.g. three hour by three hour availability.

Members discussed the accessibility benefits of taxi use by those with mobility challenges. A Member commented that not permitting taxis through Bank Junction was discriminatory to those who were unable to use other methods. He added that with more people working longer, the number of people with mobility challenges would increase. Some Members commented that whilst mobility issues should be taken into account there could be other ways to address this, than by allowing taxis through Bank Junction. Members were informed that the equalities analysis would be presented to Members by May 2024 and would be a more detailed analysis than the previous one. The new equalities analysis would better substantiate the balance between taxis through Bank Junction providing a benefit for some people with protected characteristics and the likelihood that it would also disbenefit other people with protected characteristics who walked, cycled, used buses etc. Data would include Oyster card data from TfL buses to provide more information on the demographic of people and volumes of people using services at and near the junction and on those routes e.g. by using data from Young Persons Oyster Cards, Disabled Persons Oyster Cards and Freedom Cards, etc. to work out the volumes of people that were using those services.

A Member raised concern about the costs of the work. The Officer stated that a request was made through the Resource Allocation Sub-Committee for funding from the On-Street Parking Reserve to supplement the existing budget for Bank

Junction and funding was granted. Therefore there was funding to complete this work unless Option C, as outlined in the report, was chosen in which case that funding would be released.

In response to points made about accidents at the junction and whether or not these would increase if taxis were allowed through the junction, the Officer stated that the reason for changing the junction was the accidents that were happening. He informed Members that once the data collection was finished and all the information had been collated it needed to be balanced against the risk to the people driving, cycling and walking through the junction. These points would be put to Members when they were asked to decide on whether to change the traffic orders.

Members discussed the Lord Mayor's Show and the pinch points which had been an issue for some large vehicles when turning. An Officer informed Members that Officers had worked closely with the Pageant Master's team when designing the junction and had watched the show before the junction was designed to see how it moved through the junction. The Officer stated that there were very large military vehicles taking part in the show this year and they took part on an infrequent but rotating basis. The size of these military vehicles sat outside the modelling CAD design process because normal highways were not designed to take that scale of military vehicle. Officers would ensure that the margin for error would be broadened and that a couple of additional pieces of infrastructure would be removed for future shows. The pinch points that would be addressed as part of the usual debrief process and this would feed into the planning of the next show. A Member commented on how good Bank Junction looked for the Lord Mayor's Show and credited the hard work that Officers had put in with the Conway contractors to get the area cleared and ready for the show.

A Member raised concern about socio-economic inequality with taxis not being the most accessible method of transport for the majority of people. She stated that data on the public sector equality duty should be presented to Members and stated that she would welcome the City of London access group being consulted around this. An Officer stated that more detail would be provided on the equalities impact assessment and socio-economic inequality would be included.

A Member suggested that more consultation should be undertaken with businesses in and around Bank Junction and there should be robust engagement with TfL. An Officer stated that engagement from businesses would be welcomed the engagement, however, there had been a reluctance by businesses and commercial organisations to come forward with their views. The Officer also stated that robust engagement had taken place, and would continue to take place, with TfL.

A Member commented that the City of London was well served by a number of tube stations, mainline stations and bus routes. She stated that TfL had been updating stations with lifts, escalators and new entrances at Bank itself and the City was being more accessible. In response by a comment from Deputy

Thompson that TfL had closed two lines on the day of the Lord Mayor's Show without consultation, the Member stated that she had been advised by TfL that this was unavoidable as the works were critical. She stated the importance of looking at the impact on the bus journeys in the modelling because these were affordable and accessible and many people used them to travel in and out of the City in the very early morning and at night. She stated that consultation should be fair and suggested that modelling should also include what would happen if traffic was taken out of Bank junction at weekends. An Officer stated that the more modelling and testing that took place, the longer time it would take and advised that Officers would be reluctant to do this unless instructed to do so by the Committee.

In response to the Chairman's suggestion that reduced journey times would reduce emissions and could be an argument to put to TfL alongside the accessibility work, an Officer stated that improving air quality and emissions at Bank Junction was part of the original ambition for the scheme. There was a balance between the organisation's different broader strategic objectives e.g. accessibility, transport strategy, climate action, Destination City, and they did not always perfectly align. Therefore all the information would be brought together for Members to make a considered decision.

Having fully debated the application, the Chairman asked Members to vote on Recommendation B (the Officer's recommended Option).

Votes were cast as follows: IN FAVOUR – 22 Votes
OPPOSED – 1 Vote
There was 1 abstention.

The recommended Option B was therefore carried.

RESOLVED – That Members of the Committee

1. Note the contents of the report.
2. Endorse Option B: To immediately restart the modelling of the traffic impacts, running this work in parallel with the data collection and analysis. (Recommended)
3. Agree on the basis of recommendation 2 that this report is referred to the Court of Common Council for consideration.

7. FLEET STREET AREA HEALTHY STREETS PLAN

The Committee considered a report of the Interim Executive Director, Environment concerning the Fleet Street Area Healthy Streets Plan (HSP) which would provide a framework for improvements to streets and public realm in the area.

RESOLVED - That the Fleet Street Area Healthy Streets Plan be approved.

8. VISION ZERO PLAN 2023-2028

An Officer introduced the report and stated that the Vision Zero plan set out the ambition to reduce road danger on the City's streets and reduce the number of fatal and serious injuries to zero in the longer term. Members were informed

that the plan had been considered by the Streets and Walkway's Sub-Committee and the Police Authority Board. There had also been a briefing of Planning and Transportation Committee Members and Police Authority Board Members. The Officer stated that the plan had been amended following Member feedback. He informed Members that the document was now more succinct and focused on the areas where the most difference could be made. In addition, the engineering and infrastructure improvement elements had been moved to the front of the document and there was a new section on delivering the plan which set out timescales and funding sources. The Officer stated that the funding for the plan was now in closer alignment than it was previously, in terms of the City of London Police funding envelope, and there was not an expectation of additional unfunded commitments from the City of London Police. The Officer stated that there was a broad range of ambitious proposals to help achieve the interim targets, reducing fatal and serious injuries in the City.

The Officer stated that aside from existing TfL Local Implementation Plan funding, the delivery of the plan depended on the success of future capital funding bids. He assured Members that the approach to these forthcoming bids would be considered, would be spread across the period of the plan and would fully comply with all existing governance and decision-making procedures.

In response to a Member's question, the Officer confirmed that there had been a reduction in terms of the numbers of fatal and serious injuries during the pandemic, mainly due to lower numbers of people in the City. Through the delivery of the schemes and initiatives, steps had been taken to try and ensure that as additional numbers of people returned to the City, there was not a concurrent increase in the numbers of those fatally or seriously injured. Unfortunately, in 2022, the figures for the City, and across London, showed an increase in the number of people killed and seriously injured. This showed the need for a more ambitious plan, as outlined in the Officer report.

A Member asked if work was being done with the Safer City Partnership regarding unsafe cycling and taking enforcement action or educating cyclists. The Officer stated that the plan set out the different types of conflict that existed between different street users in the city e.g. the conflict between people walking and cycling. There were a number of commitments included within the plan which built upon existing work principally undertaken by colleagues in the City of London Police in terms of ensuring that dangerous cycling was tackled in an appropriate way. It was also central to the design of new infrastructure improvements to ensure it was addressed and discouraged as much as possible. The plan set out initiatives across the themes of streets, people's behaviours, and the vehicles themselves.

An Officer stated that the police were currently running a successful operation, Operation Lewis, with a cycling team dealing with cycling issues. There had been a high level of engagement with cyclists and pedestrians. There had also been a number of stop and search outcomes from it, warning notices and fixed penalty notices issued, and the outcomes were reported through the Safer City Partnership to the Police Authority Board.

A Member stated that 50% of accidents were caused by inattention and this needed to be addressed through behavioural change. He asked how it was proposed to do this. The Officer stated that it was difficult to change behaviour and while themes of activity within safe behaviours would be considered, it was important to take a holistic approach to understand how behaviours could be influenced in other ways too e.g. through the design of the street environment.

A Member commented that pedestrians distracted on mobile phones was an issue and was not referred to specifically in the plan. An Officer stated that the plan stated there was a need to understand more about the system and more about conflicts that occurred. The plan recognised there was more to do in terms of understanding and building on knowledge and research in this area. There was a commitment to looking at this in more detail. Findings of research would then lead into the potential for more intervention in future.

In response to a Member's concern about dockless cycles being abandoned rather than left in bays, an Officer stated that a Member briefing had been held with one of the operators and a report to the next Streets and Walkways Sub-Committee had been requested on short, medium and long-term proposals to demonstrate the actions being taken. A Member briefing would also be held with another operator had also been arranged.

A Member commented that the police cycle team had recently been increased in size. She stated that many Members had been out with the police either observing or collecting data and that the police were working to tackle cycling issues. She raised concern that it was more difficult to tackle the issue of inattentive pedestrians. A Member stated that cyclists and motorists should be made aware that the City was predominantly a pedestrian-friendly environment and they should be looking out for pedestrians.

In response to a Member's question, the Officer stated that the quality of data was imperative for the development and delivery of the plan. There had been improvements in the data received and there were actions in the plan to continue to improve the insight and understanding from the data. In addition, the allocation and prioritisation of funding in relation to the plan was associated with the priorities seen in the data.

A Member asked if measures could be taken to discourage vehicles from entering the space at junctions intended only for cyclists, and if increasing the offer around cycling proficiency courses was part of the plan. The Officer stated the importance of maintaining cycle safety through protected and safe space for them, including advanced stop lines and advanced stop boxes and this was referred to in the plan. The Officer also stated that cycle training had been delivered for a number of years and would continue to be funded through the Transport for London Local Implementation Plan. The Officer referred to the work being done by City of London Police colleagues, including through Operation Lewis, for example, where officers were riding bicycles and having a visible presence, and also the good work of the roads policing unit which would

continue to enforce and discourage encroachment into advanced stop lines by motorists.

A Member stated that it would be difficult to change the behaviours of pedestrians and there had to be a focus on improving safety at junctions and crossings. She stated that the report mentioned that the majority of accidents took place at T-junctions and crossings and at nighttime. She commented that speeds tended to be higher than they were during the day. She raised concern about the clusters of collisions shown in the report and asked if having all the traffic lights at a junction turning red at the same time so pedestrians could cross would reduce pedestrian confusion and the risk of collisions. She asked if more raised ramps and better lighting at T-junctions could also help. The Officer stated that there was a list of the 10 priority junction locations, to be a priority for the period of the plan with the process of junction prioritisation undertaken on an annual basis to ensure that any emerging issues and new hotspots were acted upon. The Officer stated that Officers worked closely with Transport for London as the strategic highway authority, responsible for traffic signals, including the extent to which there might be more appropriate ways and more understandable ways for people walking to cross junctions. He stated that Officers would continue to work with colleagues at TfL to ensure that they continued to evolve and harness new technologies regarding signalling.

RESOLVED – That the Vision Zero Plan 2023 – 2028 be approved.

9. PUBLIC LIFT AND ESCALATOR REPORT*

The Committee received a report of the City Surveyor on the availability and performance of publicly accessible lifts and escalators monitored and maintained by City Surveyors, in the reporting period 19 September 2023 to 3 November 2023.

A Member asked Officers to confirm whether the Millenium inclinor would be in place and ready when the building was opened in spring 2024. An Officer clarified that the lift was outside the envelope of the building and was not within the building. The Officer stated that work was taking place with the City Bridge Foundation, and in particular the Millenium Commission. Officers were working to facilitate the opening when the building was opened in spring 2024. The Officer also clarified that a service agreement was in place with the developer for the ongoing service and maintenance of the lift under the Section 106 agreement.

RESOLVED – To note the report.

10. TO NOTE THE MINUTES OF THE PLANNING APPLICATIONS SUB-COMMITTEE - 21 JULY 2023*

The Committee received the public minutes of the meeting held on 21 July 2023.

RECEIVED.

11. TO NOTE THE DRAFT MINUTES OF THE LOCAL PLANS SUB-COMMITTEE - 18 OCTOBER 2023*

The Committee received the draft public minutes of the meeting held on 18 October 2023.

RECEIVED.

12. TO NOTE THE MINUTES OF THE STREETS AND WALKWAYS SUB-COMMITTEE - 26 SEPTEMBER 2023*

The Committee received the draft public minutes of the meeting held on 26 September 2023.

RECEIVED.

13. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

Lighting SPD and Voluntary Charter

A Member asked about the withdrawal of funding for the promoting of the Lighting SPD and Voluntary charter. The Chairman stated that the promotion of the Lighting SPD and Voluntary Charter was outside the remit of just Planning and Transportation. He stated that there was a desire to have a publicity campaign to promote that amongst existing buildings, encouraging them to turn their lights off. Whilst it was considered that the Corporation should lead the way and sign up, to achieve this, there was a requirement to understand the capital cost of doing so. This was currently being undertaken. It was considered that it would be premature to launch a marketing campaign until the Corporation was in a position to sign up. The Chairman stated that funding or the marketing campaign was not currently on the agenda, this was on the basis that the costs were better understood and that the Corporation wanted to promote the SPD and Voluntary Character. The Chairman stated that many organisations would be undertaking similar work to understand the capital cost of them signing up to the charter. He informed Members that understanding the cost was a responsible approach to fulfilling the policy.

In response to questions from Members on steps that could be taken to help residents who were keen to promote the Lighting SPD and Voluntary Charter to businesses, and if more could be done to help them, Officers stated that discussions had taken place with the City Property Association (CPA) and Business Improvement Districts could encourage their Members to switch their lights off. An Officer stated the work was currently light touch as it was resource intensive. The Officer also stated that discussions had taken place with residents who were keen to promote the charter and speak to businesses and they had been given background information. The Officer stated that in terms of the resources to further publicise the charter, this was dependent on additional funding which currently was not in place. The Officer also stated that any major schemes being granted planning permission, either by the Planning & Transportation Committee, or by delegated authority, now contained a lighting condition.

A Member suggested that there were environmental benefits which could be promoted to encourage organisations to sign up to the Voluntary Charter. Officers stated that they could speak to colleagues about the information that could be shared.

Roof Terraces

A Member asked if a list of open roof terraces could be circulated to Members of the Committee and sent to the Destination City team so that it could be included on the website. She also suggested that a leaflet containing the details of roof terraces plus QR codes so people could book. An Officer confirmed that a list could be circulated of all the consented, built and roof terraces in the pipeline as well as opening hours. He stated that Officers were working with the Destination City team on how to publicise these roof terraces.

At this point, the Chairman sought approval from the Committee to continue the meeting beyond two hours from the appointed time for the start of the meeting, in accordance with Standing Order 40, and this was agreed.

The City Plan

A Member asked whether the tracked changes version of the plan in the Officer report had the approval of the Local Plans Sub-Committee and could be used by Members as a working draft. The Officer stated that the Sub-Committee had effectively approved the plan to be submitted to the Planning and Transportation Committee and it could be shared on that basis.

The Member also asked about the timetable. The Officer stated that the decision to withdraw the item from the agenda, would result in an expected delay of about two months. He stated that there was a need to continue rapid progress with the City Plan and it was hoped that some of the delay could be made up later in the overall timescale for the project. It was expected that the submission of the plan might be delayed by a month in the summer, but that would be within a reasonable timeframe and long in advance of the June 2025 deadline for submissions of local plans under the current planning system. Officers would consider whether or not the local development scheme needed to be updated as part of this work. The Officer added that if there was a need to deviate from this plan a report would be submitted to the Committee.

A Member raised concern about the late withdrawal of the item from the agenda and stated that members of the public might have been in attendance for this item and would not have been aware it would be withdrawn. She stated she had many points she wanted to raise on the Local Plan. The Member also suggested that the City Plan should be considered at a meeting where that was the only item on the agenda. She asked if it was expected that the document would be substantially changed and asked for Members to be provided with the background material that informed the plan.

The Chairman stated that Officers were open to receiving comments and suggestions on the City Plan and these could be sent to Officers. An Officer stated that following the Levelling Up and Regeneration Bill becoming an Act at

the end of October 2023, imminent changes and updates to the National Planning Policy Framework were expected and therefore the item had been withdrawn from the agenda. He informed Members that the City Plan had to be in accordance with national policy. Officers would ensure the Committee had full background material in advance of the Committee consideration of the City Plan and would send documents to Members once they were published. Members were informed that a substantial major rewrite of this City Plan was not envisaged and the plan had been informed by extensive engagement, through the Local Plans Sub-Committee.

A Member asked that the City Plan be considered at a meeting where it was the only agenda item. She asked that the background information be publicly available in a library section on the websites with the plan so anyone reviewing the plan could see the data. She also asked for a message to be put on the website explaining the delay, outlining the new timetable, and how the background information could be accessed. An Officer stated that the website would be updated following the meeting and information would be as easily accessible as possible. The Chairman confirmed that a special meeting would be arranged to consider the City Plan as a single item.

14. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

Custom House

The Chairman commented on the transformation of Sugar Quay which was now a well-used public space. He compared this to Custom House, narrow pathway along the north bank which was difficult to access and often flooded. He asked for the Committee's view to write to the current owners to ask them to remove their railings as the security reasons for having them no longer existed as the building was empty. If the railings were removed it would open up the quay side and allow the public safe access to walk on the north bank. A Member commented that planks on the Broadwalk needed to be repaired. She also stated that there were a number of lights that did not work by Blackwater Passage and asked Officers to address this. Another Member commented that the letter should be clear that this did not affect any planning decision. Members supported a letter being written to the owners of Custom House.

Resolution from Port Health and Environmental Services Committee

The Chairman stated that the Committee had received a resolution from the Port Health and Environmental Services Committee. The wording was as follows:

The Port Health & Environmental Service Committee request the Planning Committee seek, wherever possible, the provision, as part of major new developments, of public and accessible toilets. Officers should also investigate the possibility of ensuring that major hospitality and retail developments have a requirement to provide publicly accessible toilet facilities as part of their planning obligations.

An Officer stated that the City Plan 2040 would recognise the need for new development to play a part in providing public toilet provision in the City particularly to help realise Destination City ambitions. The Officer stated that

Policy HL 7 of the plan would require public toilets in major retail, leisure and transport developments, particularly near visitor attractions, open spaces and existing major transport interchanges. The policy required them to be available 24 hours a day and it also sought the incorporation of further additional public toilets in proposed developments. The Officer stated that the policy as it was currently drafted had been amended to specifically state that this could be in hotel and office schemes and in locations likely to see significant footfall and visitors. A Member who was the Chairman of the Port Health and Environmental Services Committee stated that this was encouraging.

A Member asked whether it would be possible to include publicly accessible toilet provision as part of the negotiations with the applicant of the development granted planning permission at the Planning Sub-Committee meeting on 20 November 2023 as this site was close to a station and other facilities. Officers stated they would discuss this with the applicant.

A Member requested that the City Plan policy be amended to require visible signage indicating the presence of a publicly accessible toilet. In response to a question about the threshold size for a major scheme, an Officer stated that a major scheme was generally over 1000 square metres of floor space, although there were other categories. He stated that there were policies in the adopted local plan and work was taking place to improve and refine this. A Member commented that regardless of the size of a development, applicants should be encouraged to make toilets accessible to the public.

15. EXCLUSION OF THE PUBLIC

RESOLVED – 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.

Item Nos

16

Paragraph No(s)

3

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

There was one non-public question.

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

There were no additional urgent items of business for consideration in the non-public session.

The meeting closed at 12.45 pm

Chairman

Contact Officer: Zoe Lewis
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PLANNING AND TRANSPORTATION COMMITTEE – OUTSTANDING ACTIONS

Item	Date	Action/ Responsible Officer	Progress Update and Date to be progressed/completed
1	17 Nov 2020, 15 Dec 2020, 5 Jan 2021, 26 Jan 2021, 16 Feb 2021, 24 Feb 2021, 9 March 2021, 30 March 2021, 22 April 2021, 12 May 2021, 8 June 2021, 29 June 2021, 20 July 2021, 7 Sept 2021, 21 Sept 2021, 26 Oct 2021, 16 Nov 2021, 14 Dec 2021, 11 Jan 2022, 1 Feb 2022, 22 Feb 2022, 26 April 2022, 17 May 2022, 7 June 2022, 1 July 2022, 19 July 2022, 20 Sept 2022, 11 Oct 2022, 1 Nov 2022, 10 Jan 2023, 7 March 2023, 11 May 2023, 18 July 2023, 3 October 2023, 21 November 2023, 12 December 2023	<p style="text-align: center;"><u>Member Training</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director / Director of the Built Environment</p> <p>A Member questioned whether there would be further training provided on Daylight/Sunlight and other relevant planning matters going forward. She stated that she was aware that other local authorities offered more extensive training and induction for Planning Committee members and also requested that those sitting on the Planning Committee signed dispensations stating that they had received adequate training.</p> <p>The Chair asked that the relevant Chief Officers consider how best to take this forward. He also highlighted that the request from the Town Clerk to all Ward Deputies seeking their nominations on to Ward Committees states that Members of the Planning & Transportation Committee are expected to undertake regular training.</p>	<p>UPDATE: (12 December 2023): New Committee Members are provided with training on key aspects. A programme of wider Member training is being implemented in 2023. The first of the recordings (regarding Material Planning Considerations) were sent to members with a Q&A on this topic prior to the 11 May 2023 Planning and Transportation Committee meeting. The next member training material on fire safety is in the process of being organised. Heritage training is being arranged for Quarter 1 2024.</p>

2.	<p>11 Jan 2022 1 Feb 2022 22 Feb 2022 26 April 2022 17 May 2022 7 June 2022 1 July 2022 19 July 2022 20 Sept 2022 11 Oct 2022 1 Nov 2022 10 Jan 2023 7 March 2023 11 May 2023 18 July 2023 3 October 2023 21 November 2023 12 December 2023</p>	<p style="text-align: center;"><u>Sustainability SPD</u></p> <p style="text-align: center;">Chief Planning Officer and Development Director</p> <p>A Member questioned whether the production of a Sustainability SPD could feature on the list of outstanding actions.</p> <p>The Chief Planning Officer and Development Director stated that he would be liaising with his sustainability officers to provide a more targeted timeline around the production of the Sustainability SPD and agreed to include this information in the list of outstanding actions.</p>	<p>UPDATE (12 December 2023):</p> <p>The Sustainability SPD is being developed and will be considered by the Committee on 12 December 2023, before public consultation.</p>
	<p>18 July 2023 3 October 2023 21 November 2023</p>	<p style="text-align: center;"><u>Whole Life-Cycle Carbon Emission Data Monitoring In Major Planning Applications</u></p> <p style="text-align: center;">Planning and Development Director</p> <p>A Member asked if consideration was being given to the scope for schemes the City had permitted and whether this could feature on the list of outstanding actions.</p>	<p>UPDATE (21 November 2023):</p> <p>Data relating to operational carbon intensity, embodied carbon intensity and whole life-cycle carbon emissions from major applications approved in 2021 and 2022 have been published on the CAS dashboard.</p>

Agenda Item 5

Committee(s): Planning and Transportation Committee	Dated: 12/12/2023
Subject: Annual Review of Terms of Reference	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	3, 8, 10
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	
Report of: The Town Clerk	
Report author: Zoe Lewis, Governance and Member Services Manager	For Decision

Summary

The Annual Review of the Committee's Terms of Reference enables any proposed changes to be considered in time for the annual reappointment of Committees by the April Court of Common Council. The current Terms of Reference for the Planning and Transportation Committee are therefore attached at Appendix 1.

Recommendations:

That the terms of reference of the Committee (**set out at Appendix 1**) be approved, subject to any comments, for submission to the Court in April 2024.

PLANNING AND TRANSPORTATION COMMITTEE TERMS OF REFERENCE

Constitution

A Ward Committee consisting of:

- four Aldermen nominated by the Court of Aldermen.
- up to 31 Commoners representing each Ward (two representatives for the Wards with six or more Members regardless of whether the Ward has sides) or Side of Ward.

Quorum

The quorum consists of any nine Members.

Terms of Reference

To be responsible for:-

- (a) All functions of the City as local planning authority [relating to town and country planning and development control] pursuant to the Town and Country Planning Act 1990, the Planning (Listed Building and Conservation Areas) Act 1990 and Compulsory Purchases Act 2004, the Planning Act 2008 and all secondary legislation pursuant to the same and all enabling legislation (including legislation amending or replacing the same).
- (b) Making recommendations to Common Council relating to the acquisition, appropriation and disposal of land held for planning purposes and to exercise all other functions of the local planning authority relating to land held for planning (or highways) purposes, and making determinations as to whether land held for planning or highways purposes is no longer required for those purposes, other than in respect of powers expressly delegated to another committee.
- (c) All functions of the Common Council as local highway, traffic, walkway and parking authority (other than in respect of powers expressly delegated to another committee) and the improvement of other open land under S.4 of the City of London (Various Powers) Act 1952.
- (d) All functions under part II of the City of London (Various Powers) Act 1967 including declaration, alteration and discontinuance of City Walkway (other than in respect of the promotion of works to the Barbican Podium, which shall not include any declaration, alteration or discontinuance of City Walkway [“City Walkway regulatory functions”] in connection with such works, all City Walkway regulatory functions to remain the responsibility of Planning and Transportation Committee).

- (e) All functions relating to the construction, maintenance and repair of sewers in the City, including public sewers (on behalf of Thames Water under an agency arrangement).
- (f) All functions of Common Council as Lead Local Flood Authority in relation to the Flood and Water Management Act 2010.
- (g) All functions relating to the Stopping Up of highway (including as local planning authority and highway authority).
- (h) All functions relating to street naming and numbering under the London Building Acts (Amendment) Act 1939.
- (j) All functions relating to building control under the Building Act 1984, Building Regulations 2000-10 and London Building Acts 1930-82.
- (k) All functions and powers of the City Corporation of providing assistance to the Building Safety Regulator under Section 13 of the Building Safety Act 2022, where the Building Safety Regulator is acting as the Building Control Authority under section 91ZA and 91ZB of the Building Act 1984.
- (k) The setting of building control charges under the Building (Local Authority Charges) Regulations 2010.
- (l) Updating and approving the Planning Protocol.
- (m) Response to and resolution of dangerous structures under the London Building Acts (Amendment) Act 1939.
- (n) All functions relating to the City of London Corporation's commemorative blue plaques.
- (o) All functions relating to the Local Land Charges Act 1975.
- (p) The appointment of the Chief Planning Officer & Development Director.
- (q) The appointment of the Director of Environment (in consultation with the Port Health and Environmental Services Committee).
- (r) The appointment of such Sub-Committees as is considered necessary for the better performance of its duties including a Planning Applications Sub-Committee, Streets & Walkways Sub-Committee and a Local Plans Sub-Committee.

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Agenda Item 6

Committee(s): Planning & Transportation Committee – for decision	Dated: 12th December 2023
Subject: Creechurch Conservation Area Proposal	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	2, 4, 7, 10, 11, 12
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: Bob Roberts	For Decision
Report author: Tom Nancollas, Environment	

Summary

As Local Planning Authority, the City Corporation has a statutory duty to consider, from time to time, the potential for new conservation areas. within the City’s boundary. Following authorisation by this Committee, between September and November 2023 a public consultation was held on a proposal for a potential new conservation area in the Creechurch locality, near Aldgate.

976 responses were received in total, a welcome and unprecedented level of engagement in a City conservation area proposal. The analysis and conclusions of this are contained within Appendix 2, while the redacted responses are compiled in Appendix 5.

Following this, it is proposed that one conservation area be designated, covering the area identified on the map in Appendix 1 and assessed in more detail in Appendix 3. The City Corporation have completed an equalities screening which is attached to this report as Appendix 4.

Recommendation(s)

Members are asked to:

- Consider the results of the public consultation, analysis and conclusions;
- Resolve to designate the area identified on the map in Appendix 1 as the Creechurch Conservation Area

Main Report

Background

1. The proposed area, located within the wards of Aldgate and Portsoken, is richly historic, comprising a critical mass of characterful, late Victorian/Edwardian

warehouses built on the site and echoing the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, and including three outstanding places of worship: Bevis Marks Synagogue, St Katherine Cree Church and St Botolph Aldgate Church (all listed Grade I).

2. In July 2023, a request to publicly consult on proposals for a conservation area in this locality was reported to Planning and Transportation Committee. Underpinning this was an assessment which identified that the area has a core group of buildings and spaces of sufficient special architectural and historic interest to warrant conservation area designation. Committee authorised a public consultation on this core group, hereafter referred to as 'Option 1', alongside two other options proposed by Members: 'Option 2', which included 31 Bury Street (which had not been included in Option 1), and 'Option 3': the separate proposal for a conservation area tabled by representatives of Bevis Marks Synagogue.
3. As a Local Planning Authority, the City Corporation has a statutory duty under s69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to consider which parts of their area are areas of special architectural or historic the character of which it is desirable to preserve or enhance, and to designate those areas as conservation areas.
4. S69(2) of the Act states that: 'it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this Section and to determine whether any parts or further parts of their area shall be designated as conservation areas; and if they so determine, they shall designate those parts accordingly'.
5. It is the duty of the City Corporation, as Local Planning Authority, from time to time to formulate and publish proposals for the preservation and enhancement of conservation areas. In the exercise of planning functions with respect to any buildings or other land in a conservation area, the City Corporation is required to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. Relevant policy, to be taken into account when determining planning applications affecting the historic environment, is contained within the City's Local Plan 2015 (in particular in section 3.12), emerging City Plan 2040 (in particular in section 6.4), the London Plan 2021 (chapter 7) and the National Planning Policy Framework (NPPF) (chapter 16).
6. Paragraph 191 of the NPPF states that "When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest."
7. Historic England Advice Note 1 (Second Edition) Conservation Area Appraisal, Designation and Management provides information on conservation area appraisal, designation and management.

8. The designation of a conservation area brings certain demolition of unlisted buildings and structures (known as 'relevant demolition') within the area under the control of the local planning authority, in the absence of planning permission for redevelopment. Conservation area designation is unlikely to give rise to unduly onerous requirements for property owners to obtain planning permission. There are some minor permitted development rights which do not apply in conservation areas but (other than in respect of demolition) these are not significant. For example, it would not change permitted development rights in relation to changing windows. The Mayor of London's powers are unchanged whether the development is within or outside a conservation area. The character and appearance of the conservation area is a significant material consideration in the consideration of planning applications in that area. Some further controls would be exercised over the control of advertisements and there would be greater control over works to trees.
9. It is worth noting that even where a site does not fall within a conservation area, but neighbours or is adjacent to it, the local planning authority are still required to consider whether the redevelopment of that site would cause harm to a designated heritage asset. Paragraph 199 of the NPPF provides 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 200 of the NPPF goes on to provide 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.
10. There are currently 27 conservation areas in the City, with the most recently designated being the Barbican and Golden Lane Conservation Area in October 2018. The City has previously carried out reviews of conservation areas and their boundaries on a comprehensive basis, with the last such review carried out in 2007, to ensure that conservation area boundaries continue to be clear, precise and meaningful. It is anticipated that the next be undertaken following the adoption of the City Plan 2040.

Public Consultation – responses

11. Officers had originally hoped to run an eight-week consultation period, however, the start of the consultation period was delayed slightly to allow Officers to prepare the consultation material and respond to some questions raised by interested parties about the proposed consultation.
12. The consultation period ran from 21 September and 6 November, as set out in the consultation pages and documents and on the City's webpage.
13. Note that Officers were working to a timetable to allow the final report to be brought back to this Committee on 12 December.

14. The length of the consultation is considered to have been appropriate and fair in the circumstances and was made clear in the consultation documents.
15. Between 21 September and 6 November, a public consultation of over six weeks was carried out. Three public drop-in sessions were held when officers were available to answer questions:
 - Artizan Street Library (20th October) – 5 people attended;
 - Holland House (26th October) - 5 people attended; and
 - Bevis Marks Synagogue (30th October) - 8 people attended
16. A bespoke website hosted by Commonplace was created for the consultation, as well as a webpage in the City of London website, including information about the consultation and a link to Commonplace.
17. Hard copies of the consultation material were placed at: Artizan Street Library; Shoe Lane Library; Barbican Library; and the Planning Information Desk (Guildhall).
18. Notification emails were sent to 2,703 existing subscribers in the Commonplace database that have opted to be notified of new Commonplace engagements in the Creechurch Area. Notification emails were also sent to 495 recipients who are listed on the City's Local Plan Database,
19. The public consultation was advertised in the press including City Resident, and in September's Members' Briefing (which is a public document). In addition, 12 site notices were placed in and around the proposed conservation area.
20. 976 responses were received including from statutory bodies, residents, building occupiers in the area, individuals and local bodies. The main comments and responses to the issues raised are summarised in Appendix 2. Notably, 84.5% of the responses supported Option 3, the proposals tabled by representatives of the Bevis Marks Synagogue. The consultation responses contained a wealth of useful and relevant information which has fed into the current proposal.
21. Historic England, the government's heritage advisor, supported the proposals and recommended Option 2 extended to include two sites – One Creechurch Place and Cunard House – which would better recognise and reflect the unique Jewish history of the area, and also allow for a more coherent boundary. They recommended considering the inclusion of the buildings on Bevis Marks/Duke's Place and the production of a Management Plan to manage change if the conservation area were to be designated.
22. The consultation drew great interest from the heritage sector. Several of the statutory amenity societies provided lengthy responses: the Society for the Protection of Ancient Buildings, the Georgian Group, the Victorian Society and the Twentieth Century Society. SAVE Britain's Heritage provided a detailed response. All these respondents suggested variously extended versions of Option 3 to encompass additional buildings to the south, east or west.

23. Representatives of the Synagogue submitted several, comprehensive responses supporting Option 3; these included valuable new historical information relating to the special historic interest of the area identified in the revised Conservation Area proposal at Appendix 3. Additionally, the vast majority of the consultation responses supported Option 3 with many references to the importance of the existing Synagogue, former synagogues and their sites and the Jewish heritage of the area. Representatives of the two churches in the area supported this option.
24. Representations were received from commercial occupiers in the area, including from representatives of sites at 31 Bury Street, Cunard House, 10-16 Bevis Marks and 33 Creechurch Lane. These generally favoured Option 1, which excluded their sites from the proposed conservation area, and questioned the justification for a larger conservation area.
25. The City of London Conservation Area Advisory Committee supported the designation of Option 3, which they considered would include buildings of interest and would offer better protection to the buildings which form the core of the area in light of the provisions of the NPPF; and that this option would show and enhance the City's respect for diversity.
26. Full details of the public consultation, analysis and conclusions is included as Appendix 2 to this report. Redacted, printed copies of the responses are available in the Members' Reading Room.

Proposals

27. It is the statutory duty of the City Corporation to consider whether it should designate conservation areas which are defined as 'areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance'.
28. Following the public consultation and taking into account the breadth and depth of new information and various alternative boundary proposals, it is now proposed that a single conservation area be designated. The proposed boundary would align with Option 3, that originally tabled by the representatives of the Synagogue.
29. Officers consider that this would (i) encompass the area which justifies status as a conservation area because of its special architectural or historic interest, and in particular, the Jewish and other heritage in this part of the City, (ii) best respond to and take into account the findings of the consultation and (iii), as a result, optimally capture the special architectural and historic interest inherent in the Creechurch locality. Officers are of the view that omission of the sites referred to in paragraph [21] above would result in a conservation area which did not encompass the extent of the area of special architectural or historic interest. Option 3 allows for a more coherent boundary.
30. A map of the proposed area and the designated heritage assets is included in Appendix 1.

31. It is the view of officers that the area identified is of sufficient architectural or historic interest to be considered to be special. That special interest is experienced through both character and appearance, in particular the strong and visible associations with the Roman and medieval City wall, Holy Trinity Priory and the rich Jewish history of the area exemplified by Bevis Marks Synagogue, the characterful group of historic warehouses that illustrate the area's later development, and the rich sense of diverse historic uses, and in particular faiths, exemplified by the historic places of worship, and that it is desirable for that character or appearance to be preserved or enhanced. Designation could ensure that special attention will be paid to the desirability of preserving or enhancing the character or appearance of the whole area identified in Appendix 1, when exercising planning functions in relation to buildings and land within that area.
32. Notice of designation, with particulars of its effect, must be published in the London Gazette and at least one newspaper circulating in the local planning authority's area. Notice of designation must be given to the Secretary of State and Historic England and the designation of the area must be registered as a local land charge.
33. Following the decision of this committee to designate, the proposal would be taken to Court of Common Council for final approval in Spring 2024, in line with past procedure.
34. Following designation, a Conservation Area Appraisal and Management Strategy would be prepared. It is currently anticipated that this would take place over Spring 2024, with a public consultation on the draft in late Spring/early Summer 2024.

Corporate & Strategic Implications

35. The City Plan 2040 is undergoing review. This decision is separate from the City Plan process.

Financial implications

36. None

Staff resource implications

37. Staff time to support the designation of the conservation area and production of the follow-up Appraisal and Management Strategy will be met through the ongoing work of the Planning & Development Division

Legal implications

38. The legal framework and the implications of designating a conservation area are set out in the body of the report.

Equalities implications

39. Section 149 of the Equality Act 2010 requires that the City Corporation, as a public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 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.
40. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.
41. A proposed range of draft boundaries were consulted on. The City Corporation have completed an equalities screening which is attached to this report as Appendix 5. The equalities screening was carried out on the recommended option (option 3) which is the most extensive proposed conservation area, and is the area proposed by representatives of Bevis Marks Synagogue. The equalities screening concluded that the option recommended would have positive impacts on the persons who share the protected characteristics of marriage and civil partnership, religion or belief, and race. There were no negative impacts identified for persons who share any other relevant protected characteristics.
42. Counsel acting on behalf of Bevis Marks Synagogue and the Spanish and Portuguese Synagogue has provided a letter as part of the consultation responses which provides that the proposals would *'particularly and disproportionately affect the Jewish community of Great Britain which worships at the Synagogue and for whom the Synagogue and surrounding Jewish sites hold incalculable religious and historic value'*. The letter expresses that *'the wider the conservation area the greater the level of protection to the Jewish sites, particularly Bevis Marks Synagogue and its wider setting and that option 3 would have the most positive impact on the Jewish community and its relations with other groups'*. The view is expressed that the alternative options offer far less protection to the Jewish sites and that exclusion of the sites of the former Creechurch Lane and Great Synagogues and the potential development site of 31 Bury Street would negatively impact the Jewish community. The full response which sets out why the wider boundary is considered to have the most positive impact, is included in Appendix 5. These views are supported by other consultation responses.
43. Should members wish to approve a narrower boundary this remains an option open to members if it is properly reasoned by reference to the statutory test and taking account of Historic England guidance, however members should take into account (have due regard to the fact) that whilst a smaller area with a narrower boundary would still have positive impacts on those sharing relevant protected characteristics compared to the current situation, the full equality benefits that would come through protecting the wider area would not be achieved.

Risk implications

44. None

Climate implications

45. The previous report to committee proposed the production of a Sustainability Appraisal in the event of a recommendation to designate a conservation area. Having further examined the relevant legislation and regulations, officers are of the view that this is not required for the purposes of conservation area designation, which is not considered to have direct implications for sustainability and climate change.

Security implications

46. None

Conclusion

47. Following the assessment of the area and consultation responses, it is recommended that your Committee resolves that the revised Conservation Area proposed in Appendix 3 be designated as a new conservation area called 'Creechurch Conservation Area'.

48. The proposed boundary is identified on the map in Appendix 1.

Appendices

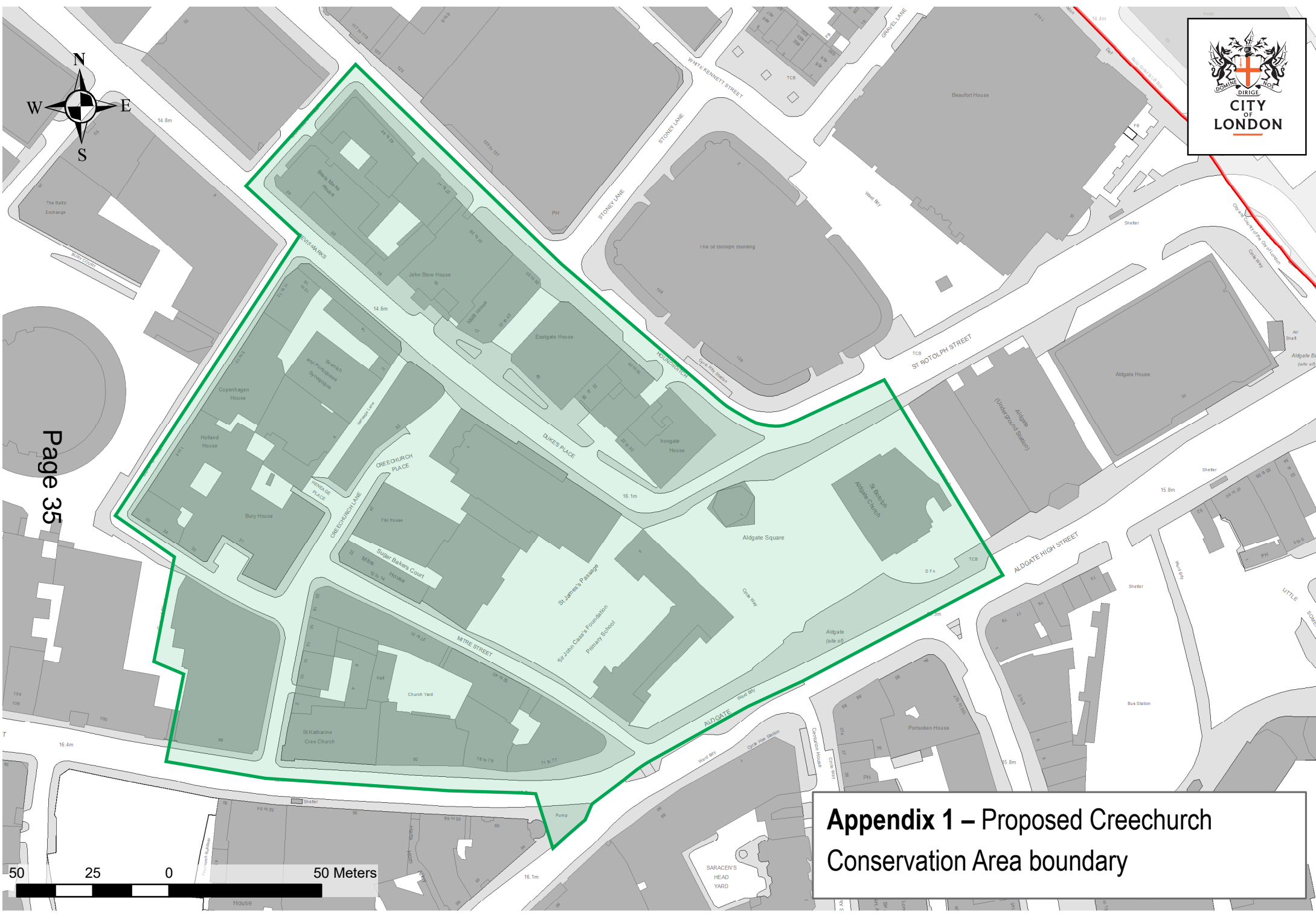
- Appendix 1 – Creechurch Conservation Area – Proposed Boundary Map
- Appendix 2 – Consultation Statement
- Appendix 3 – Creechurch Conservation Area proposal
- Appendix 4 – EIA Screening
- Appendix 5 – Consultation Responses (redacted)

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Appendix 1 – Proposed Creechurch Conservation Area boundary

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Appendix 2 – Consultation Statement

1. Summary

- 1.1. The Development Division of the City of London conducted a public consultation on a potential new conservation area, known as Creechurch Conservation Area. The aim of the consultation was to gather the views of the public and relevant stakeholders on the proposed conservation area and its potential boundary. This report encapsulates the analysis of the responses, recommendations and information gathered during the consultation process.
- 1.2. In total 976 completed responses were received, 943 responses through Commonplace, 30 via email and three completed hard copies in the last drop-in session.
- 1.3. The majority of respondents were from individuals / members of the public while 17 respondents were stakeholders, including an MP, businesses, heritage groups and organisations.
- 1.4. Overall, there was welcome, unprecedented levels of engagement for a City conservation area proposal and there was an overwhelming support for the designation of the Creechurch area as a conservation area. We have received invaluable contributions throughout the consultation process which are discussed and analysed below. Details of the consultation responses are discussed below, while all the redacted responses are compiled in Appendix 4.
- 1.5. The contents of this analysis report have been collated and organised to provide a comprehensive overview of the consultation's outcomes and insights. This report includes information about the extent and reach of the consultation. The main aim of the findings and recommendations presented herein is to inform next steps and decisions in relation to the proposed conservation area and definition of its boundary.

2. Background and Methodology

2.1. The consultation period lasted for just over six weeks from Thursday 21st September 2023 until 6th November 2023.

2.2. Notification emails were sent to 2,703 existing subscribers in the Commonplace database that have opted to be notified of new Commonplace engagements around the Creechurch area. Notification emails were also sent to 495 recipients who are listed on the City's Local Plan Database, which included the following:

- City residents who are listed on our database and resident associations/groups
- Historic England
- Greater London Authority/Mayor of London
- SAVE
- The Georgian Group
- Victorian Society
- Twentieth Century Society
- Bevis Marks Synagogue Heritage Foundation
- London Business Forum
- The Portal Trust
- Bevis Marks Synagogue
- St Botolph's Church without Aldgate
- The Guild Church of St Katharine Cree
- London Boroughs, including City of Westminster, London Borough of Camden, London Borough of Hackney, London Borough of Islington, and others
- Barbican & Golden Lane Neighbourhood Forum

2.3. The aim of the consultation was to allow stakeholders, businesses, organisations and the public to share their opinions on whether the Creechurch area should be designated as a conservation area and to identify their preferred boundary. The consultation presented three options for the conservation area boundary with a fourth option to allow respondents to suggest an alternative.

2.4. A bespoke website hosted by Commonplace was created for the consultation, as well as a webpage in the City of London website, including information about the consultation and a link to Commonplace.

2.5. Hard copies of the consultation material were placed at:

- Artizan Street Library
- Shoe Lane Library
- Barbican Library
- Planning Information Desk (Guildhall)

2.6. The public consultation was advertised in the press including September's Members' Briefing (which is a public document) and City Resident.

2.7. 12 site notices were placed in and around the proposed conservation area.

2.8. Three drop-in sessions were held at:

- Artizan Street Library 20th October – 5 people attended;
- Holland House 26th October - 5 people attended;
- Bevis Marks Synagogue 30th October - 8 people attended.

2.9. Three options were presented for consultation, with an additional fourth option giving consultees the opportunity to suggest an alternative boundary.

Option 1 - An initial assessment for the wider area prepared by the City of London Corporation. The assessment undertaken by CoL Officers was provided via a link here.

Option 2 - Following presentation of Option 1 to the Planning and Transportation Committee meeting, this option was suggested by Members as an alternative. Option 2 includes the same area as Option 1 with the addition of the building at 31 Bury Street.

Option 3 - This option was tabled by representatives of Bevis Marks Synagogue. It includes the same area as Option 2 with the addition of the buildings to the north of Bevis Marks/Duke's Place, 1 Creechurch Lane and Cunard House at 88 Leadenhall Street. An assessment was commissioned by the Bevis Marks Synagogue to accompany this option, prepared by Alec Forshaw and Esther Robinson Wild was provided via a link here.

Option 4 – This option allowed for an alternative boundary to be suggested.

2.10. The consultation posed eight questions:

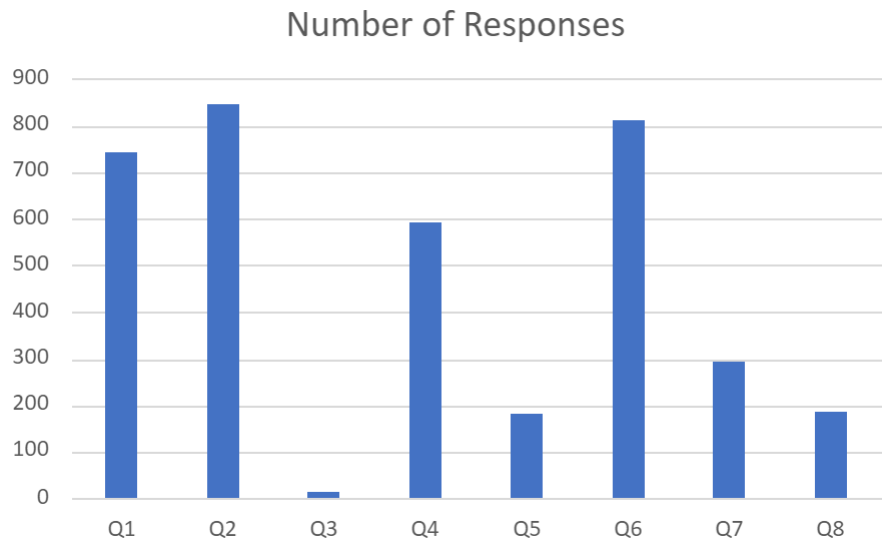
1. Do you agree that the Creechurch area should be designated as a conservation area?
 2. Which is your preferred option? (Option 1, Option 2, Option 3, Option 4 – Alternative Boundary)
 3. If you choose Option 4, please describe your preferred boundary.
 4. Why do you think your selected area is of special architectural or historic interest?
 5. Please share any additional general information and facts about the area to support your choice.
 6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? An Explanation of the Equality Act - Section 149 was included as an external link.
 7. Please explain your answer to Question 6.
 8. Is there anything that could be done to mitigate any impacts identified?
- 2.11. The Commonplace page included a Map with some identified buildings and places of interest. The map was interactive and respondents could add new places of interest and/or information and comments on existing points. The consultees could answer any of the following questions:
- What contribution do you think this place makes to the area?
 - What is the place, building, street or green space that you have marked on the map?
 - Do you think this should be included in the proposed conservation area?
 - Please provide information about the place you identified and its relationship to the proposed conservation area.
- 2.12. There were 41 comments in relation to the map, these are included and discussed in the section below.

Reporting Methodology

- 2.13. A total of 976 completed responses were received, 943 responses through Commonplace, 30 via email and three completed hard copies in the last drop-in session.
- 2.14. The main themes and issues raised are discussed in this report, alongside an Officer's response. Due to the large amount of the responses, not all of the responses are included in this report. The consultation responses can be viewed on the Commonplace website [here](#). The responses received via email are reproduced in full in Appendix 5. Personal information has been redacted and not shared or published in the report.
- 2.15. The consultation engagement has been undertaken in line with the City's adopted Statement of Community Involvement, details of which can be found here: [Statement of Community Engagement](#) .

3. Summary and analysis of responses

3.1. Questions 1, 2, 4, and 6 received the highest number of responses (Fig. 1). The majority of the respondents shared their preferences on boundary options and their views on potential impacts on individuals with protected characteristics. While many respondents expressed opinions on Question 6, few elaborated or suggested mitigation, as per Questions 7 and 8. Additionally, most respondents provided input on designating the Creechurch area as a conservation area. The limited responses for Question 3 indicate the count of consultees choosing Option 4 – Alternative Boundary."



Q1: Do you agree that the Creechurch area should be designated as a conservation area?

Q2: Which is your preferred option?

Q3: If you choose Option 4, please describe your preferred boundary.

Q4: Why do you think your selected area is of special architectural or historic interest?

Q5: Please share any additional information and facts about the area to support your choice.

Q6: Do you have any views on potential impact of the proposals on people with protected characteristics?

Q7: Please explain your answer to Question 6.

Q8: Is there anything that could be done to mitigate any impacts identified?

Figure 1: Responses per question

3.2. Of the respondents, approximately, more than 70% identified their relationship to the area. Approximately 40% of the respondents identified themselves as visitors, approximately 13% as workers and approximately 10% as residents, as can be seen in **Figure 2** below.

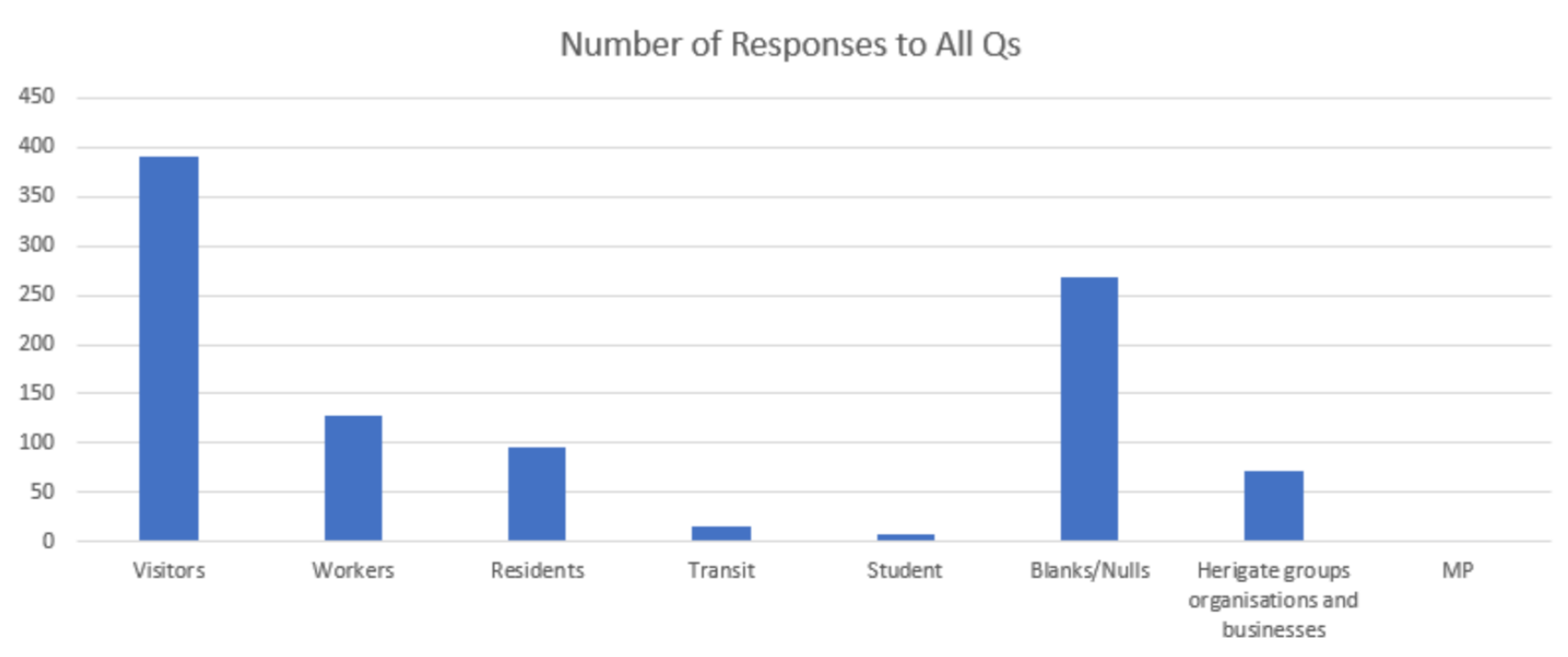


Figure 2: Relationship of respondents to the proposed conservation area (Null means that the respondent chose to enter no information to the respective question)

3.3. Below are analysed the responses to each survey question (as presented in paragraph 2.10).

Q1: 'Do you agree that the Creechurch Area should be designated as a Conservation Area?'

3.4. Figure 3 below shows the responses to whether the consultees agreed that the Creechurch Area should be designated as a conservation area. The majority of the respondents (73%) agreed with the proposed designation while a small percentage (1.9%) did not agree with the designation of the area.

Q1. Do you agree that the Creechurch Area should be designated as a conservation area?

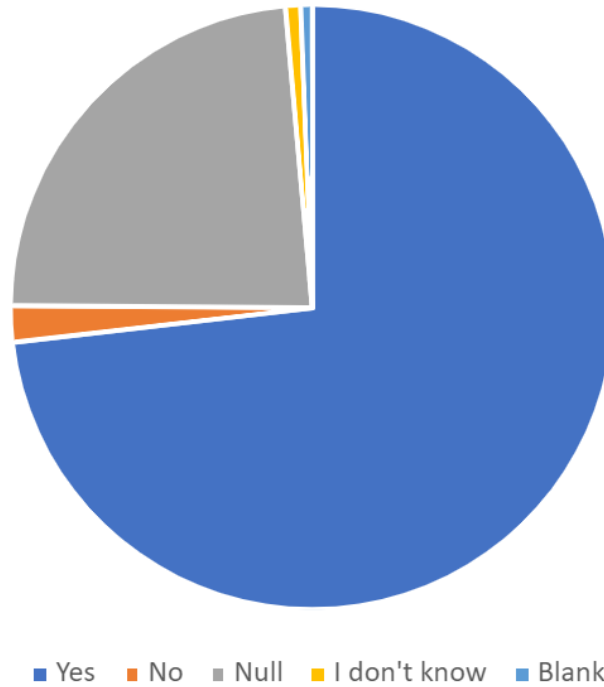


Figure 3: Answers to Question 1

Q2: 'Which is your preferred option?'

3.5. The options included the following:

- Option 1 - An initial assessment for the wider area has been prepared by the City of London Corporation.

- Option 2 - Following presentation of the potential conservation area to the Planning and Transportation Committee meeting, this option was suggested by a Committee member. Option 2 includes the same area as Option 1 with the addition of the building at 31 Bury Street.
- Option 3 – The option tabled by Bevis Marks Synagogue. It includes the same area as Option 2 with the addition of the buildings to the north of Bevis Marks/Duke’s Place, 1 Creechurch Lane and Cunard House at 88 Leadenhall Street.
- Option 4 – This option allowed for an alternative boundary to be suggested.

3.6. The overwhelming majority of the consultees (approximately 84.5%) who engaged with the survey and answered Question 2, chose Option 3.

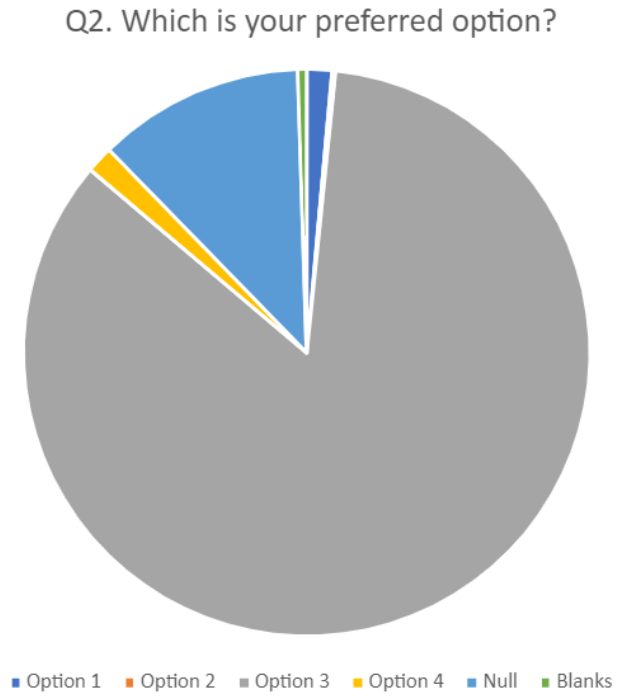


Figure 4: Answers to Question 2

Q3: 'If you chose Option 4, please describe your preferred boundary'.

3.7. Of the consultees who selected Option 4 and responded to Question 3, the responses provided by stakeholders, groups and organisations provided via email, these are analysed in detail below. In terms of the rest of the answers to Option 4 (approximately 2.6%) the main themes of the responses are summarised below:

- Extensions of the proposed option 3 to include areas to the west, east and south, including the Gherkin and associated plaza; Aldgate Tube Station; alternative boundary as proposed by SAVE; and the adjoining frontages on the south side of Leadenhall Street and east side of Aldgate High Street.

Officer's response: Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the south and east.

- Six of the responses to this question, expressed their disagreement with designating a conservation area.

Officer's response: Please see section 3.3 of the revised Conservation Area proposal on the eligibility for conservation area status.

Q4: 'Why do you think that your selected area is of special architectural or historic interest?'

3.8. The word cloud below shows the key themes that emerged in answers to this question, with the size of the word reflecting the frequency of use.



Figure 5: Wordcloud indicating frequency of key words within the responses

3.9. While the wordcloud above gives an indication of why respondents have selected their preferred option, a more in depth look into the responses identified the following main themes.

- Option 1 or No conservation area

3.10. Respondents who answered negatively to Question 1 ('no conservation area') or chose Options 1 or 4 also responded to Question 4, offering justifications for their choices. Their reasoning revolves around the protection that existing listed buildings also benefit from questioning the necessity of designating the area as a conservation area or advocating for the smallest possible designated area. Examples of such answers are reproduced below:

"I do not think this. Because the historically important buildings within the Creechurch area are already listed, it is unnecessary to provide further protections to such an area as a whole. (Nonetheless, I have selected Option 1 in question 2, as this option would minimise the architectural restrictions imposed by a conservation area.)" – Option 1

"There should be no conservation area. This is an aggressive attempt by NIMBYs and people against any change to block development under bad-faith arguments about preservation by creating additional pinch points during the development application process." – Option 4

"The area in question already has numerous listed buildings, such as Holland House, the Bevis Marks Synagogue, the Church of St Katherine Cree and Sir John Cass School, amongst others. There is no need for additional conservation area designation given extant listed status." – Option 4

- Option 3

3.11. A very high number of the responses to this question were in support of Option 3. These included, as a whole or in parts, the following themes:

- Surprising the area is not a Conservation Area already;
- unusually rich heritage;
- Conservation Area protects the settings and context of important buildings;
- not all buildings included in Conservation Areas have to be of specific heritage interest themselves;
- Option 3 boundary is not arbitrary;
- 31 Bury Street is a highly contentious site;
- The argument that the existing building at 31 Bury Street is not worthy of inclusion is fallacious.

3.12. An example of the most frequently recurring response, either wholly or in part, is provided below.

"1. This area very much deserves to be designated a Conservation Area. It is surprising it has not been designated as a Conservation Area before now."

2. *The heritage of the area is unusually rich, both in terms of Jewish history (Bevis Marks; the site of the first synagogue of the resettlement; and the site of the Great Synagogue) and Christian history (the Guild Church of St Katharine Cree and the church of St Botolph Without Aldgate). It is a great thing for inclusivity and community coherence that here both traditions can be celebrated and protected together.*

3. *Protecting individual buildings can be achieved by Listing. The point of a Conservation Area is that it protects the settings and context of important buildings, and has an intangible as well as a tangible dimension. It is important that this Conservation Area is drawn widely enough to properly embrace the settings of all the Jewish and Christian sites (as well as the very important site of the Roman city wall).*

4. *It is very clear from official guidance that buildings included in Conservation Areas don't have to be of specific heritage interest themselves. Indeed, they don't even need to make a positive contribution. They should be included if doing so makes for a more relevant and coherent Conservation Area. All the buildings shown in Option 3 should be included for these reasons.*

5. *The Option 3 boundary is not arbitrary. It was drawn up by two experienced heritage experts commissioned by the Synagogue.*

6. *31 Bury Street is a highly contentious site. If redeveloped with a tower, as the owners would like, it would cause irreparable damage to the Synagogue. The City rightly rejected a proposed tower only a couple of years ago, but it appears the owners are going to try again. This makes it particularly important for the site to be included in the Conservation Area so that the heritage considerations can be given full weight if and when further planning applications are submitted.*

7. *The argument that the existing building at 31 Bury Street is not worthy of inclusion is fallacious. It is an unremarkable piece of 1990s architecture that is respectful of its setting and makes at least a neutral contribution to the heritage value of the area. It must be included to ensure the Conservation Area has coherence, quite apart from the fact that its unsympathetic redevelopment has the potential to cause great harm. – this response has come up more than once, quite a few times.”*

- Buildings associated with Jewish Heritage

- 3.13. Another common theme in the responses to Question 4, from the respondents choosing Option 3, discussed the inclusion of buildings associated with Jewish heritage into the conservation area. An example is included below:

“My selected area, Option 3, includes sites of great historic interest to the Jewish community; it includes the sites of the Great Synagogue (Duke’s Place Ashkenazi Synagogue which was built in 1690 and destroyed by German bombing in 1941. It also includes the site of the Creechurch Lane Synagogue (Synagogue of the Resettlement 1657-1701. These sites are of important historic significance and are testament to the lasting connection of the Jewish community with the area, which has endured over the centuries right up until today.”

Officer's response: The responses to Question 4 have been carefully considered and have informed the proposed boundary of the conservation area. The Creechurch Conservation Area Proposal (Appendix 3) provides more information on how the proposed boundary has changed to align with Option 3.

Q5: 'Would you like to share any additional general information and facts about the area?'

3.14. The image below shows key words that were used the most when answering Question 5 (with size indicating the frequency of use).

- 3.15. The wordcloud above gives an indication of additional information that was shared by respondents. From the most frequently used words, it is concluded that the Bevis Marks Synagogue was one of the most common themes, with respondents sharing their views on the history and importance of the existing and previous Synagogue buildings in the area. Some examples of the additional information that was shared as a response to Question 5 have been included below.

"I researched the area when briefly working for the CoL on Aldgate Square and learnt about the area's rich textile/merchants history - one of the first places to sell secondhand clothing (off Bevis Marks) - and one of the first dept stores - Gardiners (Aldgate High St). Some of the churches had herb gardens, held plays and facilitated small businesses. Would need to dig out my notes!"

"It is vital that commercial pressures do not undermine the historical character of the City which is one of its biggest differentiators. We must keep the city unique, and not let it become a dreary, uniform over-developed financial hub as we see all over the world."

"Imposing a conservation area here will limit the architectural progress of the Square Mile, and indeed of London as a whole. The existing protections for the area's historical buildings are quite sufficient."

"The only amendment we would suggest to Option 3 is the inclusion of the Aldgate Pump. Whilst not in its original location due previous planning decisions, it is of historic significance as a distance marker from points east to the Tower Division and major supplier of water to the area."

"The first two options exclude the area around Bevis Marks Synagogue, the oldest Synagogue in the United Kingdom, and the oldest in Europe to have been in continuous use, along with parts of the former priory site, significantly impacting on the cohesion of the proposed Conservation Area and the protections that it seeks to bring to what makes our area so special."

"The site of the Old Tea Warehouse pub, used to house a salvage warehouse. Goods such as cargos or from warehouses perhaps partially damaged by fires or floods etc , and on which an insurance payment had been made were often salvaged and sold to the public from this warehouse. They were usually in excellent condition , as only a small part of the insured goods would have suffered damage. Many bargains were to be found."

"Option 3 seems the most balanced- taking into account many cultures, stories and histories in the one area- the priory and Cree church, St Botolph-without-Aldgate (an notable waypoint historically, I believe, for people entering the city), the square by the school, a portion of the old London wall, and also the Jewish heritage."

Officer's response: Helpful information shared has been noted and used to inform the Creechurch Conservation Area Proposal (Appendix 3) and the proposed boundary. Please refer to Appendix 3 and the Committee report for more information.

Q6: 'Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?'

Q7: 'Please explain your answer in relation to the question above'

3.16. Figure 7 below shows the responses to Question 6. Approximately 29.6% of the respondents answered "no" to whether they have any views on the potential impact of the proposals on people with protected characteristics with a similar percentage 27.8% who answered "yes".

3.17. Approximately 30% of the people engaged in this consultation provided a response to Question 7, explaining their answer to Question 6 above. Examples of the responses are included below:

- *"Good impacts: Greater knowledge of community histories will help inclusion"*
- *"Bevis Marks is a jewish place of worship. Development blocking daylight to the synagogue affects the protected characteristics of both religion and race. To not allow Option 3 could contravene ss 149(1)(c) and (3)."*
- *"That part of London has a many layered history with many communities moving through it, from British people to Huguenots, Jews, Bengalis , Eastern Europeans and others. It is a small remnant of a poorer part of London which nevertheless represents the opportunities that London offers for upward social mobility and diversity."*

Officer's response: An Equality Impact Screening Report has been undertaken, which concluded that the proposal to adopt Option 3 could have positive impacts for groups that share a protected characteristic, and would not have negative impacts. The Screening Report, which can be found in Appendix 5, concluded that a full Equality Impact Assessment is not considered necessary.

Q6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

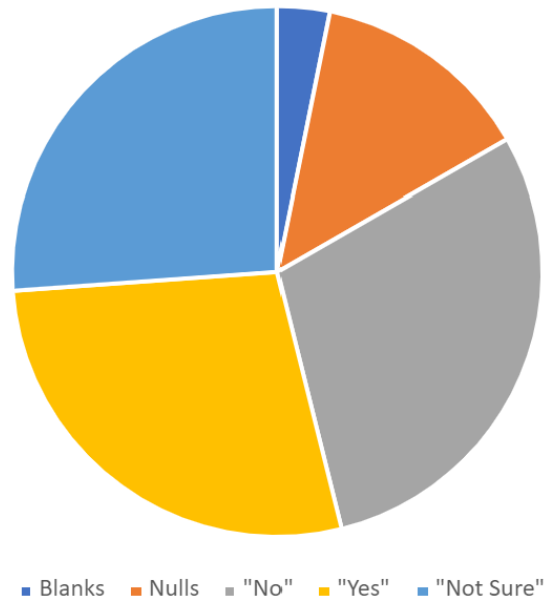


Figure 7: Responses to Question 6

Q8: 'Is there anything that could be done to mitigate any impacts identified?'

3.18. Approximately 19% of the respondents answered this question, with some example responses included below:

- "What are the impacts, there is no information about them here. Is there an EqIA, or is one required?"
- "If it is declared a Conservation area, I consider the impact to be positive."

- *“To ensure that the right to worship unmembered within the confines of Bevis Marks Synagogue is protected. This can be achieved by respecting a reasonable boundary and not reducing further it's already limited light.”*

Officer's response: An Equality Impact Screening Report has been undertaken, which concluded that the proposal to adopt Option 3 could have positive impacts for groups that share a protected characteristic, and would not have negative impacts. The Screening Report, which can be found in Appendix 4, concluded that a full Equality Impact Assessment is not considered necessary.

4. Summary and analysis of email and paper responses, including from individual stakeholders, businesses, heritage groups and organisations

4.1. Responses from stakeholders, businesses, heritage groups and organisations received via email, are included below, alongside an Officer’s response. Some of these responses followed and expanded on the questions posed in the Commonplace survey, while others provided a more bespoke response. Reproduced

Respondent	Option	Response/themes	CoL response
Bahagia Investments Ltd (Cunard House)	1	<ul style="list-style-type: none"> - Does not consider that Option 3 can be justified based on ‘legitimate conservation requirements’ - Intangible factors should not be a basis for including buildings in a CA (para 2.18) - CAs should be designated as buffers for listed buildings (2.18), nor to prevent redevelopment - No evidence to suggest that Cunard House makes a positive contribution to the area as set out in the appraisal for option 3 - Blue plaques alone not sufficient to justify inclusion - Inclusion of Cunard House within the CA boundary would be inappropriate 	<p>Intangible Factors/Blue Plaques – legislation requires the City (from time to time) to determine which parts of their area are ‘areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance’ (s69(1) 1990 Act). It is considered that the sites of the lost Synagogues are of special historic interest which it is desirable to preserve or enhance, and that their inclusion is not incompatible with the legislation.</p> <p>Positive/Negative Contributor The NPPF recognises that, in practice, conservation areas may contain a small proportion of buildings which are not positive contributors or of special interest. At para 207 states that ‘not all elements of a Conservation Area... will necessarily contribute to its significance’. It is considered that legislation and policy aims to avoid the inappropriate designation of whole areas as conservation areas (at NPPF para 191), rather than warranting the exclusion of individual sites within an area that has been identified as eligible for this status.</p>
Bevis Investment Holdings	-	<ul style="list-style-type: none"> - Existing building not considered to be of high architectural quality - Would make a neutral contribution to the CA 	Agreed and this will be included in the SPD.

(10-16 Bevis Marks)		<ul style="list-style-type: none"> - Please say this in the forthcoming SPD 	
Merchant Land (33 Creechurch)	1	<ul style="list-style-type: none"> - The extent of the Conservation Area should not be drawn on the basis of one stakeholder's assessment of the area (Option 3), which will inevitably bring a bias to the process. - Option 3 is not in line with policy and guidance in respect of designation criteria. The inclusion of buildings lacking special architectural or historic interest within the proposed boundary has not been justified - Decision makers should give limited weight to the submission for option 3 	<p>Bias/Extent of the Conservation Area The initial assessment interrogated the Synagogue's proposal and identified the core of special architectural and historic interest. The proposed boundary has been formed following commentary from many stakeholders received during the consultation. That it now aligns with the boundary proposed in Option 3 is a reflection of the wealth of new information and detail arising from the consultation.</p> <p>See Positive/Negative Contributor above</p>
Welput (31 Bury Street)	1	<ul style="list-style-type: none"> - Intangible factors like archaeology or associations should not be a basis for including buildings in a CA (2.9) - CAs should not be designated as buffers for listed buildings, nor to prevent redevelopment (2.10) - The juxtaposition between the finer grain historic buildings and modern tall buildings is an underlying characteristic of the Creechurch locality and should be recognised as part of its special interest (4.7) - Amendments to map required to reflect legal ownership - 31 Bury Street is not of sufficient merit to justify inclusion in a CA 	<p>See Intangible Factors above</p> <p>Redevelopment Buffer Legislation and policy is clear that conservation areas are 'areas of special architectural and historic interest, the character of which it is desirable to preserve or enhance'. Therefore, legislation explicitly contemplates states that part of the function of this designation is to facilitate preservation or enhancement to the character or appearance of an area. This may include preventing certain kinds of inappropriate redevelopment that would affect the special interest identified. Conservation areas should be designated on the basis of the statutory criteria, and not by the desire to protect a particular building, or to resist particular development, or to create a buffer.</p> <p>Juxtaposition of scale This has been noted in the revised proposal (para 4.2.vi)</p> <p>Amendments to the map</p>

		<ul style="list-style-type: none"> - Options 2 or 3 would be inconsistent with legislation and are not justifiable 	<p>Not required as Option 3 is proposed for designation.</p> <p>See Positive/Negative Contributor</p>
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Respondent	Option	Response/themes	CoL Response
Rabbi Morris (Bevis Marks)	3	<ul style="list-style-type: none"> - Exclusion of 31 Bury Street is deeply inappropriate and profoundly offensive - 31 is clearly part of the setting of the Synagogue and Holland House and should therefore be included - Cunard House is the site of the 'Synagogue of the Resettlement' and should be included without question - 1 Creechurch Place, site of the 'Great Synagogue', has immense historic significance and should not be excluded - Only by including all three sites will the cohesion of the entire area be maintained; each reflects a different stage in the Jewish community's acceptance into Britain - Bevis Marks/Duke's Place – the peripheral location and proximity to the wall was important in the siting of the Resettlement and therefore these buildings should be included to reflect this history - Exclusion of 31 Bury Street or the aforementioned synagogue sites would be at odds with the CoL's legal responsibility to promote cohesion and protect the rights of a minority community - Option 3 would enable the area to become a cultural destination 	<p>The response contains helpful information and is noted. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised.</p>

St Botolph Aldgate (Laura Jorgenson)	3	<ul style="list-style-type: none"> - The present vibrant Jewish community and its history is respected best by Option 3 - Historical associations of sites is just as important as the buildings upon them - As exclusion brings no benefit, the excluded buildings [i.e. the areas excluded by Option 1 from Option 3] should be included on the basis that their sites are important in defining the historic importance of the area - Cunard House should be included for its associations with the first Synagogue and for its sympathetic architectural treatment. 	<p>The response contains helpful information and is noted. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised.</p>
Sephardi Trust	3	<p>Cover Letter</p> <ul style="list-style-type: none"> - No justification for options 1 & 2 - Exclusion of 31 Bury Street is ‘frankly nonsensical’, it is physically joined to Holland house and makes a marginally positive or at worst neutral contribution to the character of the area - 31 is a highly controversial site for a proposed tower, if excluded the Corporation’s judgement would be questioned <p>Detailed response (Forshaw)</p> <ul style="list-style-type: none"> - Important for boundary to be drawn to secure the objective of conserving and enhancing the character and appearance of the area - Commonplace for buildings of neutral or negative value to be included - Options 1 & 2 would be too small to effectively preserve and enhance the 	<p>The response contains a wealth of very useful information and is noted. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised. Additionally, the Historical Information section in particular has been fed into the revised conservation area proposal.</p> <p>Protected Characteristics Please see the Equality Impact Screening Report at Appendix 4.</p>

		<p>outstanding architectural and historical character</p> <ul style="list-style-type: none"> - Emphasize great historical importance of the area and its pivotal role in the Readmission - The fact that the First Synagogue and Great Synagogue, Holy Trinity Priory and London Wall have disappeared does not reduce the archaeological and historic importance of their sites - - Strong objection to omission in option 1 of Bury House - Bury House should be included in the proposed CA for architectural and setting reasons - Cunard House should be included for architectural and historic-associative reasons (first synagogue plaque) - Bevis Marks/Duke's Place/Houndsditch are important in protecting the setting of the Synagogue and St Botolph's church - It is logical to include the whole of Creechurch Lane - The Roman wall runs beneath much of this block; Hebrew name for Bevis Marks is 'Gate of Heaven', a likely reference to the Wall - 1 Creechurch Place is the site of the Great Synagogue and should be included, even though the building would be a negative contributor - Welcome the general comments in section 2.3 <p>Historical Information</p>	
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		<ul style="list-style-type: none"> - <p>Protected Characteristics</p> <ul style="list-style-type: none"> - Option 3 would have the most positive impact on the Jewish community - Exclusion of Cunard House, 1 Creechurch Place and 31 Bury Street would lead to equalities impacts on a protected group - establishing the right boundary in equalities and planning terms for a conservation area represents a critical opportunity for the City to discharge its legal obligation under s.149(1)(a) and (c) and foster good relations between the Jewish community and other groups. 	
Faith Letter	3	<ul style="list-style-type: none"> - Options 1 & 2 exclude the area around the Synagogue, significantly impact on the cohesion of the proposed CA - Option 3 would acknowledge the Jewish history of the area and include 31 Bury Street (implication to prevent the tower proposal from coming forward) - 	The response contains helpful information and is noted. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised.
Nickie Aiken MP	3	<ul style="list-style-type: none"> - Fully supportive of Option 3 - Do not consider Option 1 to be appropriate at all 	The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised.

Respondent	Option	Response/themes	CoL response
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Historic England	4 (abridged version of 3)	<ul style="list-style-type: none"> - Recommends an enhanced version of option 2, incorporating 31 Bury Street, Cunard House and One Creechurch Place - Also recommend inclusion of the SE section of Bevis Marks/Duke's Place/Houndsditch - Recommend production of a full CA appraisal and management plan 	<p>The response contains helpful information and is noted. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised.</p> <p>Management Plan A full Appraisal and Management Plan will be drafted and consulted on in late Spring/Summer 2024.</p>
SPAB	SAVE proposal below	<ul style="list-style-type: none"> - Excluding 31 Bury Street, Cunard House, 1 Creechurch Place and the buildings at Bevis Marks/Duke's Place would perpetuate development threats to the Synagogue and Katherine Cree - Area <u>as a whole</u> must meet relevant CA tests, rather than every individual building being of interest 	<p>The response contains helpful information and is noted. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised.</p>
Georgian Group	4 (buildings to E and S)	<ul style="list-style-type: none"> - Development threat warrants a CA - Information on significance of Synagogue and St Botolph - Option 3 proposed with additions 	<p>The response contains helpful information and is noted. Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the south and east.</p>
Sharman Kadish	As above	<ul style="list-style-type: none"> - Supports Georgian Group option 	<p>The response contains helpful information and is noted. Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the south and east.</p>
Victorian Society	SAVE proposal	<ul style="list-style-type: none"> - Strongly supports SAVE option including buildings to the south and east - 	<p>The response contains helpful information and is noted. Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the south and east.</p>
Twentieth Century Society	4 (buildings to W, S & E)	<ul style="list-style-type: none"> - Recommends extending Option 3 to include the Gherkin - Recommends Extending Option 3 to include the group of buildings on the south side of 	<p>The response contains helpful information and is noted. Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the south, west and east.</p>

		Aldgate High Street between Jewry Street and Aldgate bus station	
SAVE Britain's Heritage	4 ('3+' incorporating extensions)	<ul style="list-style-type: none"> - Recommends an enhanced version of option 3 extended eastwards and southwards - Boundaries should be along the centreline of roads and not through party walls - 31 Bury Street should be included to preserve the setting of the Synagogue - Recommend the adoption of a Management Plan 	The response contains helpful information and is noted. Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the south and east. The proposed boundary now runs along the centreline of roads and not through party walls.
London and Middlesex Archaeology Society	3	<ul style="list-style-type: none"> - The only way to provide full protection to this important area of the City is the establishment of a CA as outlined in option 3 	The response contains helpful information and is noted. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised.
City of London Archaeological Trust	3	<ul style="list-style-type: none"> - Recommend consulting the scholarly work on Holy Trinity Priory and including more information on the elements of medieval fabric preserved in 71 Leadenhall Street 	The response contains helpful information which will be fed into the draft Appraisal. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised.
City of London Conservation Area Advisory Committee	3	<ul style="list-style-type: none"> - It contains a number of listed buildings, including three places of worship of the greatest importance and high quality commercial and public buildings of the late 19th and early 20th centuries. The area has a rich history set out in the assessment and benefits from open spaces, including the recently created Aldgate Square. - We believe that the more extensive area proposed in Option 3 includes some buildings of interest and will offer better protection to the buildings which form the core of the area in the light of the advice in the National 	The response contains helpful information and is noted. The proposed boundary aligns with that proposed by the respondent and it is considered that this addresses the points raised. A Conservation Area Appraisal and Management Strategy will be prepared in due course.

		<p>Planning Policy Framework about the setting of historic assets.</p> <ul style="list-style-type: none"> - We believe that the proposal will show and enhance the City's respect for diversity, albeit in some cases (eg. the former Sir John Cass school) with appropriate explanation. - <i>Is there anything that could be done to mitigate any impacts identified?</i> A well-prepared Conservation Character Study and Management Strategy. 	
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Respondent	Option Supported	Response/themes and CoL response
Resident	Option 4	<ul style="list-style-type: none"> - Recommends inclusion of Aldgate underground station – <u>CoL Response: please see Appendix 3, 3.5</u> - Recommends that it would seem appropriate to let the response to public consultation to determine inclusion or otherwise of 31 Bury Street <u>CoL Response: please see Appendix 3, 3.4</u> - Suggests that <i>“the exclusion of Bevis Marks/Duke’s Place (north side) should be from Goring Street to St Botolph’s Street and not Aldgate, unless you mean Aldgate Square. As the block between Goring Street and Camomile Street/Houndsditch isn’t included, this “exclusion” is irrelevant anyway.”</i> <u>CoL Response: please see Appendix 3, 3.4</u> - Recommends inclusion of One Creechurch Place, as his block is so positioned that any significant change to it will seriously impact on the CA <u>CoL Response: please see Appendix 3, 3.4</u> - Notes that Cunard House, 88 Leadenhall Street, is said to have retained much of the Art Deco styling of the actual Cunard House and although outside of a natural boundary, it appears to be no higher than many buildings within the CA <u>CoL Response: please see Appendix 3, 3.4</u> - Suggests that the southern boundary of the conservation area should be as Aldgate High Street/Leadenhall Street and its eastern as St Mary Axe. This would enable the inclusion of 30 St Mary Axe as well as the Grade I listed St Andrew’s Undershaft and the Grade II listed 38 St Mary Axe

		<p><u>CoL Response: please see Appendix 3, 3.5</u></p> <ul style="list-style-type: none"> - Comments on approach to the Barbican and Golden Lane Conservation Areas in 2017 <p><u>CoL Response: Comments are noted.</u></p> <ul style="list-style-type: none"> - Note there is reference to buildings being of “special architectural or historic significance” but this is the test for listing, not for inclusion in a conservation area. Please explain the use of these words <p><u>CoL Response: please see Appendix 3, 1.</u></p>
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Paper Responses (x3)		
Respondent	Option	
Synagogue event	3	‘for non-listed buildings that should be preserved for the general ‘Ambiance’ of the area’
Ditto	3	‘Because of the central position of Bevis Marks Synagogue, opened 1701, which is a listed building.’
Ditto	3	‘A natural addition to the City’s Conservation Areas. It has been surprising that St Katherine Cree and St Botolph Aldgate have not been so recognised before now. It helps knit together the place names and neighbourhood identity.’ ‘The area linkages in place names - Heneage- bubble up in Whitechapel - Henegae, Finch, Osborn, Chicksands and Old Montagre Street. The Osborn family estate intrerests in King Charles Nursery Gardens for 12 generations (Chicksands Bedfordshire). Conservation Area support documentation could pick up on place name and ownership of estates. Pick up on popular culture - Oranges and lemons xxx forgotten, " Bells of St. Katherine", "Old Father BaldPate" (Aldgate). Jewish community needs well covered. Anything from literature, George Eliot, Daniel Deronda.’
CoL Response		These responses contains helpful information and are noted. The proposed boundary aligns with that proposed by the respondents and it is considered that this addresses the points raised.

Map Comments

4.2. There were 41 comments in relation to the Interactive Map that was included in the Commonplace website. The map was included as an opportunity for consultees to share their views on specific buildings and places in the area. The comments can be seen in full [here](#). In summary, the following places were identified:

- The majority (80%) of the comments identified Bevis Marks Synagogue as a place which makes a very positive contribution to the area and answered yes in the question where this place should be included in the proposed conservation area. Officer's response: The information provided is noted. The building is included within the proposed conservation area.
- A single comment on the map, identified the buildings at 85 Aldgate High Street and 88 Aldgate High Street as buildings that make a very positive contribution to the conservation area and should be included in the proposed conservation area. Officer's response: Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the east.
- A single comment identified the building at 65-68 Leadenhall Street as a buildings that make a very positive contribution to the conservation area and should be included in the proposed conservation area. Officer's response: Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the south.
- A single comment identified the Hallmark Building at 52-56 Leadenhall Street as a building that makes a very positive contribution to the area and should be included in the proposed conservation area. Officer's response: Please see section 3.5 of the revised Conservation Area proposal on the proposed additions of other buildings to the south.
- A single comment identified 31 Bury Street as a building that makes a very positive contribution to the area and should be included in the conservation area. Officer's response: Please see section 3.4 of the revised Conservation Area proposal, the building is included in the proposed conservation area.
- A single comment identified St Katharine Cree as a building that makes a very positive contribution to the area and should be included in the proposed conservation area. Officer's response: The information provided is noted. The building is included within the proposed conservation area.
- A single comments identified One Creechurch Place as a building that makes a very negative contribution to the area. The comment includes information about the history of the site being "*the historic location of the Great Synagogue, otherwise known as Duke's Place Synagogue. It existed on this spot for nearly three centuries from when it was founded in 1690, until it was destroyed in the Blitz in 1941*". The full comment can be on the Commonplace website. Officer's response: The information provided is noted. Please see section 3.4 of the revised Conservation Area proposal, the building is included in the proposed conservation area.

Places of interest identified by CoL Officers in the Commonplace map:

1. Bevis Marks Synagogue – Grade I listed Synagogue, dating from 1701
2. St Katharine Cree - Grade I listed church of 1631 (the tower has been dated to c.1504)
3. St Botolph Without Aldgate – Grade I listed church (present church building dating from 1744)
4. Nos. 2-16 Creechurch Lane - Grade II listed tea warehouse building of 1887
5. Cree House, nos. 18-20 Creechurch Lane - warehouse building of 1892
6. Creechurch House, nos. 22 and 24 Creechurch Lane - pair of four storeyed tea warehouses of 1895

7. Sugar Bakers' Court – historic alley, first laid out c. 1586 by William Kerwin
8. Aldgate Square – square formally opened in 2018
9. No. 33 Creechurch Lane - modern office building
10. No. 31 Bury Street – modern office building
11. Mitre Square - the site of the former cloister of Holy Trinity Priory
12. Heneage Lane – historic alley paved with Yorkstone flags and incorporating traditional iron lamp standards
13. Nos. 12-14 Mitre Street - former tea warehouse of 1895
14. Nos. 27-31 Mitre Street – the building incorporates three different frontages of former warehouses dating from 1891 and 1888
15. St Katharine Cree churchyard – former churchyard associated with St Katherine Cree
16. Aldgate School – Grade II* listed school dating from 1908
17. Nos. 33-34 Bury Street - early 20th-century office building
18. Holland House, 1-4 Bury Street – Grade II* listed building of distinctive detailing and materials, built in 1916
19. Nos. 5-10 Bury Street (Copenhagen House) – modern office building with pink granite façade
20. Rabbi's House (no. 2 Heneage Lane) – Rabbi's House dating from the 19th century (between 1875 and 1916)
21. The Vestry (no. 4 Heneage Lane) - Vestry dating from the late 19th century
22. Aldgate Pump - Grade II listed pump at the junction of Leadenhall Street and Fenchurch Street

5. Conclusion

- 5.1. There has been an overwhelming and unprecedented response and active engagement to this public consultation. Useful information has been shared that have informed our assessment and the proposed conservation area boundary.
- 5.2. 976 responses have been received, 943 through Commonplace, 30 via email and three completed hard copies. The majority of the respondents were individuals.
- 5.3. Approximately 73% of the respondents stated that they agree the Creechurch Area should be designated as a conservation area and 84.5% chose Option 3 as their preferred option.
- 5.4. An equality impact screening report has been undertaken, which concluded that the proposal to adopt option 3 could have positive impacts for groups that share a protected characteristic, and would not have negative impacts, and therefore that a full Equality Impact Assessment is not considered necessary.
- 5.5. Overall, there has been an overwhelming support for the designation of the Creechurch area as a conservation area and for Option 3 as the preferred boundary.
- 5.6. These responses have informed the proposed assessment and conservation area boundary. In particular, the detailed information on the history and significance of the area's Jewish connections, and the sites of the former synagogues, have led to a reappraisal of their inclusion within the proposed boundary. Similarly, the influence of the Roman and medieval City wall on the area's development has led to further consideration of the inclusion of the buildings on Bevis Marks/Houndsditch. And, as a result of the responses received, particularly in respect of more nuanced consideration of the legislative and policy context, further consideration was given to the desirability of a coherent boundary for the proposed conservation area. Please see the revised Conservation Area Proposal at Appendix 3 for a revised assessment of these sites and the proposed Conservation Area as a whole.
- 5.7. Option 3 is now proposed with the addition of the Aldgate Pump to the south.

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Creechurch Conservation Area Proposal

December 2023



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1. Introduction

1.1. Background

As part of work towards the City Plan 2040, the Planning & Development Division has, since Spring 2022, been undertaking an extensive and systematic characterisation and heritage significance exercise. This is a robust assessment of the character and heritage significance of the City at both a macro strategic and local level, examining everything from the City's role and character in pan-London strategic views to granular assessments of the character and appearance and heritage significance of different Character Areas in the City. This will form part of the evidence base underpinning the City Plan 2040. The potential for a new conservation area in the Creechurch locality was identified as part of this work.

In Spring 2023, the City received a proposal for a new conservation area in the same Creechurch locality from representatives of Bevis Marks Synagogue. In view of both factors, it was decided to formally assess the potential of the locality for conservation area designation alongside, but separate from, the City Plan 2040 process. This assessment identified a core group of buildings and spaces of special architectural and historic interest in the locality, which was reported to Planning and Transportation Committee on 18 July 2023 with a request to hold a public consultation. After discussion, Members authorised a public consultation on three options for the proposed conservation area boundary:

Option 1 – aforementioned core group of special architectural and historic interest

Option 2 – a version of Option 1 with the inclusion of the site at 31 Bury Street

Option 3 – the proposed conservation area tabled by representatives of Bevis Marks Synagogue

The results of the public consultation are set out in the Consultation Statement at Appendix 2. It brought to light a considerable amount of useful information pertaining to the Jewish history of the area and the significance of the former Synagogue sites at Cunard House and One Creechurch Place, and provided elaboration and nuance on the statutory and policy framework for considering the designation of a conservation area and the inclusion or exclusion of various parts.

This has led to a revised conservation area proposal, detailed below, with a boundary modelled on that originally proposed by the Synagogue. It is considered that this revised proposal would achieve the following:

- (i) A 'core' of special architectural and historic interest
- (ii) Fuller recognition of the Jewish history of the locality
- (iii) A coherent and logical boundary which appropriately reflects the extent of the special architectural and historic interest of the Creechurch locality

1.2. Legislative & Policy context

Planning (Listed Buildings and Conservation Areas) Act 1990

S69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 obliges local authorities to determine which parts of their areas are of special architectural or historic interest and to designate them as conservation areas. S69(2) of the Act states that: 'it shall be the duty of a local planning authority from time to time to review the past exercise of functions under this Section and to determine whether any parts or further parts of their area shall be designated as conservation areas; and if they so determine, they shall designate those parts accordingly'.

Once designated, local authorities are further obliged (s71) to formulate and publish proposals for their preservation and enhancement, to present such proposals for consideration at a public meeting in the area and to have regard to any views expressed at the meeting concerning such proposals.

It is the general duty of all Local Planning Authorities in the exercise of planning functions, with respect to any buildings or other land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas (s72). Relevant policy is contained within the City's Local Plan 2015, emerging City Plan, London Plan and the National Planning Policy Framework (NPPF).

The designation of a conservation area brings certain demolition within the area under the control of the Local Planning Authority, in the absence of planning permission for redevelopment. Conservation Area designation is unlikely to unduly onerous requirements for property owners to obtain planning permission. There are some minor permitted development rights which do not apply in conservation areas but (other than in respect of demolition) these are not significant. For example, it would not change permitted development rights in relation to changing windows. The character and appearance of the conservation area is a significant material consideration in any proposals for alteration or redevelopment of sites within the area. It would require that considerable importance and weight be attributed to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework and the Planning Practice Guidance

Paragraph 190 of the NPPF mentions that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, taking into account the desirability of sustaining and enhancing the significance of heritage assets.

Paragraph 191 states that “when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.”

Once a proposed area is designated, paragraphs 206 and 207 are of relevance. Paragraph 206 states that Local Planning Authorities should look for opportunities for new development within conservation areas and within their setting, to enhance or better reveal their significance. Paragraph 207 states that not all elements of a conservation area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the conservation area should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole.

As set out in the Planning Practice Guidance (PPG), a local planning authority needs to ensure that the area has sufficient special interest to justify its designation as a conservation area (para 024). Upon designation, a conservation area appraisal can be used to help Local Planning Authorities develop a management plan and plan-making bodies to develop appropriate policies for local and neighbourhood plans. A good appraisal will consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection. (paragraph 025)

According to paragraph 55 of the PPG, generally the requirement for planning permission for works to unlisted buildings in a conservation area is the same as it is for any building outside a conservation area, although some permitted development rights are more restricted in conservation areas. In addition, planning permission is required for the demolition of certain unlisted buildings in conservation areas (known as ‘relevant demolition’).

2. The Creechurch Area

2.1. Location

Creechurch is located to the east of the City and comprises (approximately) the area bound by Bevis Marks to the north, Creechurch Lane/Bury Street to the west, Leadenhall Street to the south, and Aldgate to the east. It is located in part in the City Cluster tall buildings area. It is notable, like the Leadenhall Market and St Helen's Conservation Areas, for being in amidst the high-rise modernity of the Cluster and there is a strong defining juxtaposition between the areas historic buildings and the tall modern buildings.

2.2. Historical development

Early History

Roman occupation of the locality is not well understood, but the City wall and Aldgate were constructed by the 3rd century AD. Aldgate, one of the seven City of London's historic gates, and the easternmost gateway through the London Wall leading to Whitechapel and the City of London, stood at the corner of the modern Duke's Place, on the east side of the city, with a busy thoroughfare passing through it.

During the later Roman and Saxon period, the focus of settlement lay to the west of the City and the Strand, with the Creechurch locality being only sporadically occupied.

One of the first Augustinian monastic houses in England, Holy Trinity Priory was founded just inside the City wall near Aldgate in either 1107 or 1108 AD by Queen Matilda, wife of Henry I. From the outset, the Priory seems to have been especially high-status and popular with the elite. Royal patronage led to the construction of a splendid complex. Amidst the mainly timber and brick buildings on surrounding streets, Holy Trinity Priory would have been a distinctive, enriched grouping of stone buildings, with much fine glazing and ornamentation. A medieval pointed stone archway, which was probably part of the southern wall of the chancel of Holy Trinity Priory Church, survives and is embedded in the party wall between nos. 39 and 40, and nos. 72 and 73 Leadenhall Street. The surviving archway is Grade II listed.

Within the precinct of Holy Trinity Priory stood the original building of St Katharine Cree Church which originated as a Priory chapel and later became a parish church.

Immediately west of the Priory complex was another medieval religious establishment, the Abbot of Bury St Edmund's Inn, the boundaries of which now correspond to Bury Street, Bevis Marks and Heneage Lane. An eclectic mix of historic and modern contextual buildings survive here.

Early Modern – C16 and C17

These two centuries brought considerable upheavals to the locality, disrupting the settled medieval character established over four hundred years.

By the early 16th century, and as can be seen on the map of Holy Trinity Priory c.1520 (Historic Towns Atlas), the Priory had expanded and developed and at its peak occupied the Creechurch locality the land now bounded by Bevis Marks, Leadenhall Street, Bury Street and Aldgate.

During the English Reformation, Holy Trinity Priory was the first monastic house to be dissolved by Henry VIII, in 1532, three years before the general Dissolution. It marked one of the first occasions that a religious complex had been repurposed for the secular world. The buildings and land associated with it were given or sold to prominent courtiers and City merchants over the next thirty years.

These include Thomas Audley, who as Speaker and then as Lord Chancellor was a key figure in the break with Rome. After his death in 1544, the Priory site then became the property of the Duke of Norfolk, another leading courtier, with further adaptation of the Priory buildings into a mansion; Duke's Place is so named for this. The western section of the Priory was given to Sir Thomas Heneage, with today's Heneage Lane marking the separation of the two halves.

Following its subsequent sale to the City Corporation in 1592, the Priory site broke up into smaller and smaller plots, having a profound impact on the character of the area. The Priory buildings and old Tudor mansions fragmenting into smaller houses and industrial premises. No trace of them remains above ground today (but for the vestige of arch preserved in Nos. 71-77), but the layout of the complex is preserved in the street pattern: Mitre Square corresponds to the Priory cloister; Mitre Street, the nave of the Priory church. A Priory chapel became the church of St Katherine Cree, rebuilt in its present form in 1631.

The locality mostly escaped destruction in the Great Fire. The 1676 Ogilby and Morgan map demonstrates the extent of post-medieval change, with the layouts of the Priory and Inn having been largely subsumed by a street pattern that begins to resemble the present, with most of the main streets having been formed: Leadenhall Street, "Beavis Markes", Berry Street and Bevis Lane. St Botolph's is shown on the same location with its churchyard clearly defined, as well as St Katherine Cree and its associated churchyard.

In the early C17 the Jewish community began to return to Britain; semi-formally during the Commonwealth, during which time a house on Creechurch Lane was converted into a Synagogue for semi-public worship. The site of the first resettlement synagogue is marked by a plaque on the Cunard Building which reads -"Spanish & Portuguese Jews' Congregation - The site of first Synagogue after the resettlement 1657 - 1701."

In 1688, many Sephardi (originating from the Iberian Peninsula) Jews from Holland settled in the area growing the community. Consequently, the Sephardi congregation

needed a larger space for worship. In response, the Bevis Marks Synagogue was constructed between 1699 and 1701 to the designs of Joseph Avis, a master builder and Quaker who had previously worked with Christopher Wren. It is the oldest synagogue in the country and the only synagogue in Europe that has held regular services continuously for over 300 years. It represents tangible evidence for the historic and on-going relationship that the Jewish community has had with this part of the City.

By the end of the C17 the Ashkenazi (originating from northern and eastern Europe) Jewish community had grown to such an extent that they moved to a new building, The Great Synagogue situated on what is now Duke's Place. The congregation continued to grow in the 18th century and in 1722 and then between 1788 and 1790, larger replacement synagogues were built on the site. The third and final synagogue of 1788-90 was destroyed by German bombs in 1941.

Georgian and Victorian

Growth of the City in the C18 saw the eventual breach of the Roman and medieval City wall; in places the wall and gates were demolished entirely, removing the visual and physical distinction between the ancient sites within the walls and the more recent, fashionable suburbs located without.

The church of St Botolph Without Aldgate was originally attached to the Priory of the Holy Trinity. It was rebuilt just before the Dissolution, but subsequently declared unsafe and demolished in 1739, replaced by the present building.

The GOAD map of 1887 provides a snapshot of the uses in the area, which at this time were mixed, with warehouses jostling for space amongst offices, schools, churches, synagogues, public houses and many more. The map also shows the intricacy and survival of the street pattern which, despite some site amalgamations, remained ancient and medieval in character.

Later phases of the area's development saw the construction of warehouse buildings in the late C19 and C20. Handling commodities such as tea and fruit, these buildings remain and form the heart of the locality's character.

The earliest appearance of the name Mitre Square, which occupies the site of the cloister of Holy Trinity Priory, seems to be in 1830. By 1888, Mitre Square was predominantly lined with four large warehouses, a yard, a commercial building and a few old houses. Mitre Square has undergone total rebuilding since 1888, with the majority of the demolition taking place as late as 1979/80.

Modern – C20 and C21

By the early C20 Creechurch Lane had assumed its present form, and Holland House had been constructed on the east side of Bury Street, introducing a strikingly distinctive faience-led, vertical form of architectural expression to the locality. Otherwise, the area remained markedly traditional in character, with most of the building plot sizes small and recognisably medieval. Of particular note were the tiny plots between Heneage Lane and Creechurch Lane.

The locality escaped significant destruction in the Blitz; only suffering bomb damage towards its easternmost part. The Great Synagogue on Duke's Place was destroyed, together with buildings south of the School, which plots were subsequently swept away in a road widening scheme, giving the School its present, open setting to the south.

Despite avoiding the bombs, the locality could not avoid the trend towards road-widening and site amalgamation that saw the coarsening of the fine grain that had prevailed hitherto. In the 1970s, International House was constructed on a series of amalgamated sites that included the former site of the Great Synagogue; it established an unfortunately large, blocky sense of scale that is perpetuated in its successor, One Creechurch Place. In the same decade, Bevis Marks was widened, resulting in the clearance of small plots either side and the construction of buildings which frame the Synagogue today, including No. 33 Creechurch Lane and Nos. 10-16 Bevis Marks; Copenhagen House on the west side of the Synagogue was built in this decade, too. All these buildings saw the clearance and amalgamation of small, ancient plots, as did the redevelopment in the 1980s of the sites around St Katherine Cree churchyard.

The IRA bombings in 1992 and 1993 transformed the streetscape to the west of the locality along St Mary Axe, destroying the Baltic Exchange and resulting in the very different townscape character of 30 St Mary Axe and its plaza framing the locality to the west. Contrastingly, to the east, Aldgate Square was laid out upon the former Aldgate Gyratory in the early decades of the C21, redressing some of the wrongs wrought by earlier traffic schemes and resulting in a more verdant, open, tranquil and sympathetic setting to the least of the locality.

2.3. General Character and Uses

The Creechurch area is characterised by the fine group of late C19 warehouses at its heart (Creechurch Lane/Mitre Street), which have since been converted to other uses, typically residential/office in the upper floors with the lower floors given over to active uses including pubs and restaurants. The size of these units are typically small and combine to form a sense of granular, traditional character at the heart of the locality. Residential properties are mainly concentrated to the southern part of Creechurch Lane (including nos. 10 to 20), north of St Katharine Cree, and on Mitre Street (including nos. 27 to 31).

These uses are diversified by the presence of the Aldgate School, with its fine Edwardian building forming a commanding presence to the east of the locality and generating patterns of activity (i.e. processions of schoolchildren; their whoops and cries) that are distinctly different to the office uses surrounding and help to reinforce the sense of Creechurch as somewhat separate from the commercial core of the Cluster, transitioning into the East End.

This sense of escape/retreat is further enhanced by the three places of worship in the area, which give the locality a sense of ancient roots and, in the form of Bevis Marks Synagogue, the presence of a particularly rare place of worship. Amidst all this variety and interest, such office uses as exist in the locality are generally understated and located in the more neutral, modern buildings as part of a historic street pattern.

Finally, the locality is rich in open spaces: Mitre Square, Aldgate Square, the churchyards of St Botolph Aldgate and St Katherine Cree, the courtyard of the Synagogue and the playgrounds of the school (though these last two are not publicly accessible). With their planting, historic monuments and street furniture, trees and general sense of respite from the highly urban mood of the Cluster, these spaces offer crucial respite and further bolster the interest and amenity of the locality.

3. The Assessment

3.1. Methodology

The assessment included below has been undertaken to inform the designation process. In assessing the area, the relevant advice note prepared by Historic England, “Conservation Area Appraisal, Designation and Management Historic England Advice Note 1 (Second Ed, 2019)”, was used as guidance.

This Advice Note provides best practice advice on identifying potential conservation areas, assessment of such areas and content of conservation area appraisals, designation and management of proposals in conservation areas.

The Advice Note does not set out an overly prescriptive framework for identifying and designating conservation areas, instead being more advisory in nature. At para 11 it suggests three basic questions to test the eligibility of a place for conservation area designation, which have been addressed in section 3.3, below.

At para 72, the Advice Note gives examples of the circumstances where special character could exist and therefore justify designation as a conservation area, but does not require adherence to, some different traits of special architectural and historic interest which have led to designation. They are reproduced below and renumbered for cross-referencing:

- I. areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations;
- II. those linked to a particular individual, industry, custom or pastime with a particular local interest;
- III. where an earlier, historically significant, layout is visible in the modern street pattern;
- IV. where a particular style of architecture or traditional building materials predominate; and
- V. areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest.

Although not a requirement for justifying designation, the Creechurch locality possesses several of these characteristics, which have been identified at section 4.2 below.

A convenient starting point for the assessment was provided by the boundary as proposed by the Synagogue’s representatives (Appendix 3). The area assessed is that bounded by Bevis Marks/Duke’s Place to the north, Bury Street/Cunard Place to the west, Leadenhall Street/Aldgate High Street to the south and Aldgate to the east.

The assessment below covers each of these streets and buildings and takes the form of street-by-street commentary. Where areas, including spaces, individual buildings, structures and/or streets are not considered to meet the criteria for inclusion in a conservation area, this is explicitly indicated. As per Historic England's Advice Note, boundaries have been defined by physical features where possible.

3.2. Assessment

Creechurch Lane

Creechurch Lane is, with Mitre Street, at the heart of the Creechurch locality. The southernmost part, just off Leadenhall Street formed part of 'Burys Street', the ancient west boundary of Holy Priory; somewhat confusingly, the present-day Bury Street was formed on land to the west of the former Abbot of St Edmundsbury's Inn that neighboured the Priory complex to the west. By 1746 only a small spur was named Creechurch Lane, the remainder of it being called King Street which led to the surviving vestige of the Priory's Broad Court; by 1916 this whole arrangement had been renamed and rationalised into the street's present-day appearance.

The street takes most of its character from the group of late C19 warehouses that survive on the eastern side of the street (**Figure 1**), which are of consistent scale, and adjoin the important church of St Katherine Cree. The difference in brick colour and ornate details of the warehouse buildings adds interest to the continuous building facades. The character of this area is also defined by the narrow street and pavement widths and continuous building line. The slightly curved alignment of the street creates interest in views north and south. Surrounding modern development is evident in the street, with some tall buildings being visible above the historic roofline of the warehouses, including One Creechurch Place.

At the corner of Leadenhall Street and Creechurch Lane is the Guild Church of St Katharine Cree (**Figure 2**), a Grade I listed church of 1631 (the tower has been dated to c.1504). This church predates the Great Fire and the building is a rare example of the early use of classical architectural motifs (internally) alongside the then more traditional perpendicular gothic (externally). The church was consecrated by Archbishop Laud, an influential clergyman under King Charles I. It occupies the site of a parish church established by 1414 within the Priory boundary. It is of outstanding architectural, historic and archaeological significance, and is one of the 'anchor' heritage assets in the locality. It has a strong relationship with those historic buildings enclosing it and can be seen against the dramatic backdrop of the Cluster from most places.



Figure 1: Historic Warehouses, Creechurch Lane

The neighbouring group of warehouses includes Nos. 2-16 Creechurch Lane, a grade II listed tea warehouse building of 1887. The building is five storeys high, of brick, iron and stone and gives a typical flavour of the locality. It incorporates many surviving warehouse features such as external cranes and loading bays which contribute to its special historic and architectural interest and also its townscape value. The complex forms a group with the warehouse buildings immediately to the east and on Mitre Street.

Cree House (Nos. 18-20, unlisted), to the north, is an imposing warehouse building that occupies a prominent corner block with Mitre Street. It dates from 1892, by M. E. Collins, for Phillips & Co fruiterers. It is of five storeys with an additional attic storey with richly carved terracotta panels and keystones illustrating fruits and the other commodities originally stored within.



Figure 2: St Katharine Cree

Further north, Fibi House, at Nos. 22 and 24, a pair of four storeyed tea warehouses of 1895, yellow brick dressed with red, above stone-faced ground floors. The building forms the easternmost end of the warehouse group and shares with the others simple brick and terracotta detailing. The building was converted to offices in the mid-20th century but retains a convincing warehouse exterior.

The little Sugar Bakers' Court, just south of Fibi House, was first laid out c. 1586 by William Kerwin. This is another typical City alley of historic character and appearance. The glazed white brick of the warehouse elevations facing into the court bring some reflective light into the alley. The modern development at One Creechurch Place (outside of the proposed conservation area) now forms a rather abruptly modern and characterless terminus to the eastern end of the alley.

On the western side of Creechurch Lane is No. 33, a modern office building of 5 main storeys. Consent was granted for the building on 27 June 1978 and construction began shortly after. The building, originally known as Arthur Castle House, is clad in a purplish marble with vertically rising brown tinted square windows

and infill panels. Although the building is not of any special architectural or historic interest, the footprint of the building reflects the historic street pattern and its height, mass and scale are sympathetic to its context.

Mitre Street

Turning east from Creechurch Lane is Mitre Street. It runs along and perpetuates the alignment of the nave and chancel of the former Priory church and, with Mitre Square, the cloister: two key and fundamental features of the Holy Trinity complex. The western part of the street is lined with additional warehouse buildings, which were formed in the early C19, cutting through courts and yards of the Priory. When visible, tall buildings to the east, including views of 30 St Mary Axe from Mitre Street provide a dynamic backdrop to the historic warehouse buildings (**Figure 3**). Further east, the character is more modern, with the exception of the southern elevation of the Sir John Cass School. Mitre Square contributes to a sense of openness at the eastern part of the street.

Nos. 12-14 Mitre House is a former tea warehouse of 1895 by Weightman and Bullen. The building is of five storeys and relates well to Fibi House across Sugar Baker's Court and has a well-modelled brick elevation to Mitre Street that forms a convincing group with the other 19th century brick frontages. The ground floor incorporates a shopfront punctuated with columns with Classical detailing.

Nos. 27-31 incorporate three different frontages of former warehouses dating from 1891 and 1888. Five storeys high, they are attractively varied in materials, design and detailing and enrich the group of warehouse buildings to the north and east. The northernmost frontage incorporates references to the Priory site in the form of carved mitres.

Mitre Square is the site of the former cloister of Holy Trinity Priory and, in its loosely square form, reflects the preceding claustral shape. It was recently relandscaped in connection with One Creechurch Place. Although the modern landscape treatment has no particular aesthetic pretensions, the layout of the space that marks the historic cloister is of historic interest, and the planting and stone materiality creates a tranquil oasis. To the north and east it is framed by One Creechurch Place, which presents modern elevations which detract from its sense of place: a deficiency redressed to the south by the warm red brick and lively architectural detailing of the School, and the brick wall and traditional iron railings (and extensive greenery) delineating the playgrounds and the south side of St James's Passage, communicating with Duke's Place.



Figure 3: Historic Warehouses on Mitre Street, with 30 St Mary Axe in the background

Nos. 32-40 is a modern stone-faced building of sympathetic scale and modelling, relating well in these traits to the unlisted warehouses adjacent. It constructed in 1991 to designs by Ley, Colbeck and Partners, and incorporates the passageway from Mitre Street into St Katherine Cree churchyard. An open space within the Priory complex, it became a churchyard associated with St Katherine Cree in the medieval period. It ceased to be a churchyard in the 1870s and was converted into a public garden, last relandscaped in the 1960s. The space forms a loose polygon enclosed by the rear of buildings on Leadenhall and Mitre Streets, with a church hall facing to the west. These elevations are of brick or stone and provide an appropriately traditional setting. Unusually, the church is separated from the churchyard. Around the perimeter is York stone paving enclosing a gravelled central area containing chest and table tombs, planting, benches and trees. Just to the east of the entrance is a carved stone gateway, originally placed at the south-east angle of the yard, dated 1631 that now encloses a fountain. Surrounded by buildings, there is a special sense of enclosure, history and verdancy in this space.

Aldgate

To the west of Leadenhall Street, north of Aldgate is the Grade II* listed Aldgate School (**Figure 5**). The school dates from 1908 and was formerly located in the churchyard of St Botolph Aldgate and on Jewry Street. It now stands within the site of the former Priory complex on the site of the Priory garden; a sense of openness is retained in the playgrounds, formed on the sites of buildings demolished in the 20th century. In the neo-Wren style, constructed of red brick and Portland stone with a green slate roof. Due to its size arrangement, the building is prominent within the locality and is the focus of a number of views from surrounding streets. The main elevation incorporates a central cupola facing east onto the new pedestrian Aldgate Square while secondary frontages facing onto Aldgate High Street and Mitre Street. Its materiality, scale and detailing reflect the warehouse group at the north end of Mitre Street.



Figure 4: St Botolph-Without-Aldgate

East of the school extends Aldgate Square, one of the largest open spaces within the City. The Square was formally opened in 2018 and includes a central lawn area flanked by raised planters which provide informal seating, tree planting on the southern boundary; and a water feature. The cafe on the square, Portsoken Pavilion (named after Portsoken ward), was designed by Make.



Figure 5: Aldgate School

The square sits between the Aldgate School (formerly Sir John Cass School) and the church of St Botolph-Without-Aldgate (Grade I, Figure 4) and its churchyard. The present church building dates from 1744, after the collapse of an early C16 church built by the Priory (itself a rebuilding of an early medieval predecessor). Designed by George Dance the Elder, the present building is of yellow and red brick with partly painted stone dressings, of similar, simple classical architecture as the Synagogue, but of greater ornament, sporting pediments, quoins and Venetian and Gibbsean windows. The church tower and spire rise prominently from the body into open clear sky, and have a landmark quality (indeed, the church is noted as one with a Skyline Presence in the Protected Views SPD). The railings and gates (also Grade I), the yard and associated planting and trees make a positive contribution to the townscape. Further interest is added through the presence of historic street furniture outside the church: the Police Call Box (c.1935, grade II listed) and the Metropolitan Drinking Fountain, c.1906.

The whole ensemble of School, Square and Church form a striking and sympathetic townscape group of great character and interest, showing how new public realm can

beautifully stitch together existing heritage assets, bestowing a unique sense of place on the site of the Aldgate and the easternmost edge of the Creechurch locality.

Bury Street

Bury Street forms the westernmost edge of the locality, an obvious division between the more historic, granular scale to the east and the much larger and more modern scale of the City Cluster around. It branches west from Creechurch Lane and inks round to run north to join Bevis Marks; it delineates the boundaries of the Abbot of St Edmundsbury's Inn (hence 'Bury').

Assessed here are the buildings on the north side of the section branching from Creechurch Lane and those lining the east side opposite Gherkin Plaza. No. 31 Bury Street forms the corner building with Creechurch Lane. It was a 1960s extension to Holland House (see below) which extinguished the historic James' Court immediately to the west and the southernmost section of Heneage Lane, which originally ran all the way from Bevis Marks to Bury Street. The building is not considered to possess inherent interest, but is important in framing Heneage Lane.

Nos. 33-34, on the southeast corner of Bury Street, is a four-storey building with a basement and attic storeys built for Messrs Burge, grain dealers in 1912. It is a characterful survival of a small-scale early 20th-century office building, once a common type in the City. It has good quality carved stone detailing and makes an effective contrast with the adjacent Holland House (the original form of which it stymied, and subsequently influenced, because Messrs Burge refused to sell up to that building's developers).

The most prominent building on the street is the grade II* listed Holland House (Nos. 1-4 Bury Street, **Figure 6**), built to designs by H.P. Berlage for a Mueller, a Dutch shipping company. Completed, unusually, in 1916 (enabled by Dutch neutrality in WW1), the building consists of six storeys with additional set back roof storeys. Its Expressionist style, distinctive detailing and materials, making it a striking landmark and singular in its use of grey-green faience materials. It has a very high quality of detailing and execution and is one of the architecturally standout buildings in the locality. It wraps around Renown House onto the southern part of Bury Street, continuing the same style and architecture, with a strong and imposing carved corner feature in polished black marble, with stylised prow of ship.



Figure 6: Holland House, Bury Street

To the south, Nos. 5-10 (Copenhagen House) is an office building, constructed in 1977 by Hildebrandt & Glicker. The building has an imposing presence within the street, due to its width but also its robustness and pink granite façade. The building has an affinity with the offices of similar date on Leadenhall Street and Mitre Street and is cut from similar cloth to No. 33 Creechurch Lane. Like those, the scale, modelling and layout of this building are in sympathy with its more historic neighbours in the locality.

Terminating the east side of Bury Street to the north, Nos. 11-12 Bury Street is the earliest building in this street block after the Synagogue: an early C19 house, of five storeys with a modern two-storey mansard roof extension. The façade to Bury Street is of stock brickwork with stucco dressings; the ground floor has been altered considerably to incorporate a large glazed entrance; to the rear it presents a plainer, beautifully patinated brickwork elevation to the Synagogue courtyard. The building is a rare survivor of its kind in the locality and adds variety and interest to the townscape.

Bevis Marks/Duke's Place

Bevis Marks is a busy, heavily-trafficked street. Assessed here are the buildings running southeast from Goring Street to Aldgate Square: a mixed architectural group, of no prevailing architectural or scalar character. Such character as exists is defined mainly by a mix of tall contemporary buildings and C20 buildings of more modest scale. They sit just outside and in some cases partly straddle the position of

the Roman and medieval City wall; a scheduled section of the wall runs between 17 Bevis Marks and Irongate House.

The north side of Bevis Marks comprises buildings of variable periods, quality, style, and materials. No. 24 is a façade retention scheme by Ivan Starkin which incorporates a simple but characterful 1920s stone frontage with corner turret; the remainder is modern and of no significant architectural or historic interest. At the time of writing, a consent for a tall building on the site is being implemented; when completed, it would reinforce one of the key characteristics of the proposed conservation area: the contrast in scale and height between historic and modern buildings.

Nos. 19-22 are a lower, undistinguished modern range. No. 18 (John Stow House) is a modern building of different scale again, set back further from the street than its neighbours; No. 17 possesses a degree of individual interest as a 1935 warehouse by Lewis Solomon, with Art-Deco stylings and visually prominent bands of alternating Portland stone and metal spandrels. No. 40 Duke's Place, opposite, is of a similar aesthetic but differing scale and block plan. Nos. 32-38 Duke's Place, by Seifert, breaks the building line again and is a generic office block of its kind. Duke's Place terminates with a curio: Irongate House (1973-8 by Fitzroy Robinson), seven storeys of strongly modelled elevations clad in stonework fragments of a meteorite that struck South Africa, of geological and some architectural individual interest.

On the south side of the street, Nos. 10-16 Bevis Marks, Biiba House, is a 1970s building of dark orange brick, four storeys high with a set-back fifth floor. The building deals with its tricky narrow site (created by 1970s road widening) by introducing a colonnade at ground floor level. It incorporates late 19th century pediment and gated archway associated with Bevis Marks Synagogue (located to the south), of historic and architectural interest. The building is an important frontispiece building to the Synagogue and its courtyard, and is of sympathetic scale, form and materiality.

Located off Bevis Marks, reached through the gated archway in Nos. 10-16, is Bevis Marks Synagogue (1701 by Joseph Avis, **Figure 7**) set within its discreet courtyard. Glimpsed tantalisingly through the elegant ironwork gates of this portal, the Synagogue is an undemonstrative brick building, rectangular in plan, with simple elevations of red brick and modest Portland stone dressings with classical stylings. Above these, a slate roof is set behind a plain parapet above cornice level. The courtyard is surrounded by buildings of various dates but mostly consistent scale and, Valiant House excepted, framing the Synagogue with brickwork elevations with regular window openings. There is an intimate sense of enclosure, seclusion and quietness upon entering the courtyard that contrasts strongly with the bustle of the main street, despite the presence of tall buildings in the Cluster beyond these self-contained immediate boundaries. The Synagogue has strong functional, aesthetic and historic relationships with the adjacent Rabbi's House (2 Heneage Lane) and the Vestry (4 Heneage Lane).



Figure 7: Bevis Marks Synagogue, western elevation

As the oldest Synagogue in the UK, the building is of outstanding architectural and historic interest. It was the first purpose-built Synagogue in the City of London following the Readmission of the Jewish community in the C17. It is the oldest Synagogue in Britain still in use for continuous worship; a line of continuity unbroken since it was constructed. As such, it has profound and multifarious associations with generations of Jewish people for whom it figured enormously, particularly in the heady years following its opening. The rich and intricate manner of worship within

the Synagogue is partly shared with other Jewish communities and partly unique to Bevis Marks.

The building's discreet, off-street location in an enclosed, private courtyard may or may not have stemmed from a law forbidding the Jewish community from building on a high street, but it symbolises the long and complex history of the Jewish community in the City (and Britain), from formal expulsion in 1290 by Edward I to semi-formal readmittance during the Commonwealth and subsequent resettlement. This is a long and profound intense narrative, at once apparent in the relationship between the Synagogue, its courtyard, and the main street. Of outstanding architectural and historic significance, the Synagogue is one of the 'anchor' heritage assets in the locality.

After Heneage Lane and the north-east elevation of No. 33 Creechurch Lane (see below and above), the remainder of the south side of Bevis Marks, running into Duke's Place, is occupied by the modern development at One Creechurch Place. This is a large office building of black metal cladding and glazed panels with an amorphous and uninviting ground floor presence. It has a negative relationship with the Creechurch locality, relating poorly to the surviving historic street pattern and historic buildings surrounding. It establishes hard visual and physical barriers between them, save for a link between Creechurch Place and Mitre Square that reorientates a historic route.

However, as denoted by a plaque, the building stands on the site of the Great Synagogue, built in 1690 and destroyed in the Blitz in 1941. It was 'the origin-synagogue of the now-dominant Ashkenazi Jewish community, the seat of the Chief Rabbi, and the foundation place of the United Synagogue and the London Beth Din (Jewish Court) were also part of the Great Synagogue complex. Both Sir David Salomons and Lionel de Rothschild were members of this synagogue, key protagonists in the campaign for Jewish emancipation¹.

The site of One Creechurch Place is therefore of very high importance in the history of the Jewish community both in the Creechurch locality and on a national level. Although the existing building would not contribute positively to the character and appearance of the conservation area (and NPPF para 207 allows for this eventuality), it is considered that the very high significance of this site's history and historic relationships with Bevis Marks and the Creechurch Lane Synagogue warrant its inclusion within the conservation area boundary as one of three key sites which underpin the locality's significant Jewish history which has contributed to the character and appearance it is considered desirable to preserve or enhance. .

¹ Green, A. Consultation Response, para 12

Heneage Lane

The eastern elevation of the Synagogue faces into Heneage Lane (**Figure 7**), a narrow thoroughfare paved with Yorkstone flags and incorporating traditional iron lamp standards. This is quintessential City alley, defined by a strong sense of enclosure, due to its narrow width and the scale of the buildings on both sides of the lane. The historic character and feel of the lane are further reinforced with the presence of the historic lampposts that make a very positive contribution to the area. The prevailing scale, seclusion and subservience it offers to the Synagogue's east front is an important element of the historic area around the Synagogue.

Just north of the Synagogue building and attached to it is the Rabbi's House, No.2 Heneage Lane, dating from the 19th century (between 1875 and 1916). The part of the building facing onto Heneage Lane is of red brick with red Mansfield stone dressings with Tudor detailing and a plainer stock brick elevation to the Synagogue courtyard. Although of different style to the Synagogue, the patina, texture, colour tones and modesty of the Rabbi's House makes it a sympathetic neighbour.



Figure 8: Heneage Lane

To the south of the Synagogue is the Vestry and Valiant House (no. 4 Heneage Lane). The Vestry dates from the late 19th century and though incorporated into the wider Valiant House development, it continues to serve as a vestry and is visually distinct from its more modern adjunct. The three-storey elevation to Heneage Lane is of high-quality rubbed and carved red brick, and incorporates beautiful brickwork detailing to the window surrounds and cills at first floor level, which feature fine carved rosettes. The third floor is plainly rendered and the fourth mansard floor is recessed from view. The elevation is of a highly sympathetic scale approximate to that of the Synagogue and its materiality and architectural detailing complement that of the Synagogue and the Rabbi's House, with which it forms an integral group.

The main elevations of the adjoining Valiant House (1978-81 by Peter Black and Partners) incorporate glazed bands and dark brown cladding. Rising to seven

storeys, extends above the Synagogue complex with a largely black flank wall of grey cladding rising above them, in views from Heeneage Lane. Its architectural treatment, forms, materials and detailing depart from the modest brickwork elevations of the other buildings facing the Synagogue from within the courtyard or along Heeneage Lane, within the proposed conservation area.

The western part of Heeneage Lane is defined by the 1970s office block at no. 33 Creechurch Lane. As described in more detail above, this building is of no inherent interest, but is of a sympathetic scale, materiality and character, importantly preserving the historic street pattern and secluded, quiet lane character.

Leadenhall Street

Leadenhall Street is one of the City's principal and most well-known streets and has undergone a radical transformation in character in recent years, with many of the tall buildings of the City Cluster having a street presence here. The section here assessed is the north side running east from Cunard Place to the junction with Aldgate. The size of the road, the presence of sizeable and tall buildings and the increased vehicle and pedestrian traffic create a more bustling character and feel that contrasts with the more secluded, granular and historic character of the Creechurch locality.

Cunard House is a modern building (completed c.2000) of no inherent special architectural or historic interest, although of broadly sympathetic scale and materiality to the other buildings in the locality. It notably mediates between the grander scale of Leadenhall Street and the smaller-scale, more granular character of the Creechurch locality. Importantly, the building is on the site (denoted with a City of London Plaque) of the Creechurch Lane Synagogue, the first established in Britain after the expulsion of the Jews by Edward I in 1290. The building was originally a merchant's house, converted into a Synagogue in 1657. It became a spectacle and was visited by non-Jews, including Samuel Pepys. Worshippers at this Synagogue went on to found the purpose-built Synagogues at Bevis Marks and the Great Synagogue.

The site of Cunard House is therefore of very high importance in the history of the Jewish community both in the Creechurch locality and on a national level. It is considered that the very high significance of this site's history and historic relationships with Bevis Marks and the Great Synagogue warrant its inclusion within the conservation area boundary as one of three key sites which underpin the locality's significant Jewish history which has contributed to the character and appearance it is considered desirable to preserve or enhance. .

After the important elevation of St Katherine Cree (see above) are a pair of modern buildings which help to define the street block around the churchyard, and which are of broadly sympathetic scale, materials and detailing: No. 80 Leadenhall Street by Hamilton Associates (1990) and No. 78-79, by Ley, Colbeck & Partners (1991). Though modern, these buildings form quieter, more neutral components of the Creechurch locality, and maintain the building line and scale of the street block.



Figure 9: No. 80 Leadenhall Street

The corner plot of Leadenhall Street and Mitre Street, Nos. 71-77, is a prominent corner site and one of the key gateways into the locality from the east. The existing building dates to 1986-7 by Gollins Melvin Ward, of five storeys with two additional floors set-back. The building maintains the scale and building line of the street block, with the curved SE corner of the building forming a point of architectural interest; through windows here can be seen a section (grade II listed) of the Holy Trinity Priory comprising a tall late C14 Gothic window arch relocated here from another site.

Of historic, architectural and townscape interest is also the grade II listed pump at the junction of Leadenhall Street and Fenchurch Street. A 'well' is mentioned here in the C13. The present tapering stone pier with vermiculated blocks looks mid-C18 but with a Victorian pedimented top and brass dog's head spout. Although now surrounded by modern office blocks, the Pump is reminiscent of the earlier history of the area; it is a de-facto memorial to the Aldgate Pump epidemic and signifies the start of the East End, as well as a point from which distances were measured into the counties of Essex and Middlesex.

3.3. Eligibility for Conservation Area Status

Historic England Advice Note 1 proposes, at para 11 (p.5), three questions to define eligibility for conservation area status:

- a) Does the area have sufficient architectural or historic interest for the area to be considered 'special';
- b) Whether this is experienced through its character and appearance;
- c) Whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help solve.

As reported to Planning and Transportation Committee in July 2023, the Creechurch locality has been assessed and found to possess a 'core' of special architectural and historic interest which makes it eligible for conservation area status.

In respect of (a) and (b), the Creechurch locality is found to be richly historic, with a multi-layered sense of place stemming from the ancient delineation of the Roman and medieval City wall and Aldgate and the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, both of which have perceptibly influenced the modern street plan. Although upstanding remains of these structures are not now visible in the townscape (with the exception of the Grade II listed archway to the rear of nos. 39 and 40 Mitre Street), the archaeological potential, placenames, forms and spaces (e.g. Aldgate, Mitre Street and Square, Creechurch Place, St Katherine Cree churchyard) they bequeathed convey a strong sense of special historic interest. Of additional and considerable note are the sites of the First and Great Synagogue which, alongside Bevis Marks, testify to the extraordinary significance of the locality's historical associations with the Jewish community.

Above ground, there is significant architectural interest in the streets and buildings subsequently developed from the early modern period onwards: the two City churches and Bevis Marks Synagogue offer outstanding examples of their types; Holland House strikes a pleasingly eclectic note; the Creechurch/Mitre Street warehouses are a rare and fine group of their kind. The locality is found to possess a varied, characterful and interesting group of historic buildings studded with highly significant historic places of worship and interspersed with more neutral modern buildings that help to create a consistent sense of townscape and distinctive sense of place.

A conservation area is proposed with a simple, coherent boundaries drawn around the streets and buildings described above. In respect of question (c), it is considered highly desirable to preserve the architectural charisma and sense of history prevailing in the Creechurch locality, particularly that of the Jewish community; and that conservation area designation would be an appropriate management tool to achieve this overall aim, and for preserving and enhancing the appearance particularly of the unlisted group of late C19 warehouse buildings at the heart of the locality, but also of the cohesiveness of the area's character and appearance as a whole.

3.4. Sites included following Public Consultation

The Public Consultation held on the initial conservation area proposal drew strong support for the inclusion of additional sites within the proposed boundary.

As set out in the assessment above, it is considered an appropriate to include the sites of Cunard House and One Creechurch Place for their very high significance as the sites of the First and Great Synagogues.

Furthermore, it is considered appropriate to include the buildings along Bevis Marks and Duke's Place to the north, both on the basis of individual instances of architectural interest as set out above, but also to reflect the presence of the Roman and medieval City wall which so instrumental in shaping the locality.

The site of 31 Bury Street is now proposed for inclusion for several reasons: to reflect the fact that it is instrumental in defining the end of Heneage Lane, is physically attached to the grade II* listed Holland House, and to shape a more coherent boundary at this point in the conservation area.

As set out above, the buildings on the aforementioned sites, with a few exceptions, have not been identified as possessing inherent architectural or historic interest, and in a few cases detract from the character and appearance of the area.

It is not considered that the inclusion of these sites would be contrary to national legislation and policy, the spirit of which aims to avoid the inappropriate designation of whole *areas* as conservation areas, rather than warranting the exclusion of individual sites within an area that has been identified as eligible for this status. Indeed, para 207 of the NPPF specifically states that 'not all elements of a Conservation Area... will necessarily contribute to its significance'.

Accordingly, it is considered the inclusions of the above sites would result in a more coherent conservation area that would better capture the very highly significant history of the Jewish presence in and the influence of the Roman and medieval City wall on the Creechurch locality.

3.5. Buildings assessed but not included

Some respondents to the Public Consultation further advocated for the inclusion of the following buildings in the proposed conservation area boundary.

Sites bounded by Jewry Street, India Street, Minories, Aldgate Bus Station and Aldgate High Street (south side); No. 9 Aldgate High Street and Aldgate Underground Station

These buildings are individually unlisted, date from various periods and are of differing architectural styles. They amount to a fragmentary survival of historic

townscape to the south and east of the Creechurch locality and not particularly representative of its character and appearance; extending the conservation area to include them would risk diluting this. Furthermore, they do not cohere with the elements of special architectural and historic interest identified at section 4.2, below.

Accordingly, these buildings are not proposed for inclusion in the proposed boundary.

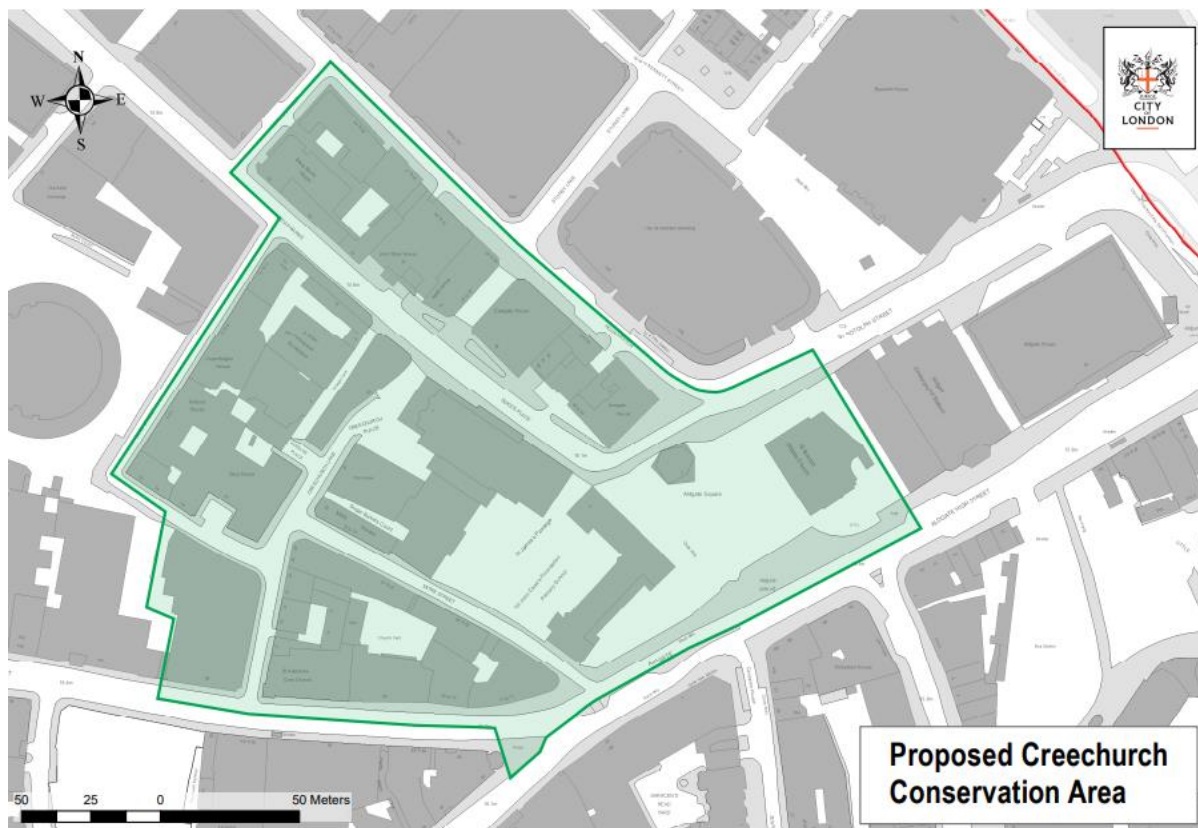
No. 30 St Mary Axe ('the Gherkin')

This well-known tall building and its plaza was proposed by a few respondents for inclusion. Whilst the innate design quality of the building is widely accepted, it is not considered to share any affinities with the elements of special interest identified at section 4.2 (and in respect of point (vi)) would very much be considered a backdrop building to the conservation area). Including it would involve extending the conservation area westwards and would risk diluting the character and appearance of the Creechurch locality identified above.

Accordingly, this building and its plaza are not proposed for inclusion within the proposed boundary.

4. Proposed Creechurch Conservation Area

4.1. Proposed boundary



4.2. Overarching summary of special interest

- (i) Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern [HE bullet III]
- (ii) A characterful group of late C19/early C20 warehouses on Creechurch Lane/Mitre Street that are fine examples of their kind and survivors of a type now rare in the City [HE bullets I, IV]
- (iii) Three places of worship of (in a City context) unusually diverse origins and of outstanding architectural and historic interest: Bevis Marks Synagogue (first purpose-built since resettlement and now oldest in UK), St Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church) [HE bullet I]
- (iv) A proliferation of historic open spaces of diverse scales, functionality and appearance [HE bullet V]

- (v) Strong and continuing associations with the Jewish community following resettlement in the C17, exemplified by the presence of Bevis Marks and the sites of the First and Great Synagogues [HE bullet II]
- (vi) A place of contrasting architectural scales, juxtaposed dramatically with the backdrop of tall buildings in the City Cluster.

4.3. Architectural/artistic interest

The oldest building in the proposed conservation area is St Katherine Cree (tower of c.1504, church of 1636), an architecturally unusual City church in that it comprises a very early and idiosyncratic marriage of perpendicular Gothic externally and classicism internally; the earlier, diminutive, ragstone-walled tower speaks powerfully of the building's humble status as a parish church and, before that, a small Priory chapel.

Bevis Marks Synagogue (1701) is an excellent example of a simple, non-Anglican, C17 place of worship. The simplicity of its exteriors belies a fascinating complexity of influences. The Queen Anne stylings reflect both the simple vernacular of nonconformist chapels (Joseph Avis was a Quaker) and also the simpler elevations of some of the contemporaneous City churches; architecturally, therefore, it sits somewhere between the churches of the state religion and the buildings of the nonconformist faiths. This reflects the moment of its construction, at the turn of the C17/C18, when the rebuilding campaign of the City churches was well under way and the City was teeming with skilled carpenters and masons, many with links to Wren and his office. Though simple, the elevations are executed to a very high standard of quality, again reflecting the proliferation of expertise with brick and woodwork at this time.

Some forty years later, the church of St Botolph Aldgate was rebuilt by George Dance the Elder in an amplified version of the simple Classicism employed at the Synagogue. It is a robust composition employing all the usual stylistic devices of the day and has a fine, landmark quality. Collectively, the three places of worship in the proposed conservation area are fascinating illustrations in the shifting tastes as to the suitable architectural clothing of a place of worship. The surviving house at Bury Street (1811) illustrates, albeit later, the way this style was employed on secular buildings of the period.

The group of C19 warehouses are a fine illustration of the kind of small-scale, robust, free-classical mercantile architecture once widespread in the City; they display assured handling of scale and proportion and judicious use of simple classical devices such as rustication, keystones and columns; Cree House, a focal point of the group, goes further with striking terracotta banding and fine carved brickwork and cast terracotta incorporating fruit motifs. The group are executed to a high level of skill. Also, of the C19 are the Vestry and Rabbi's House flanking the Synagogue, modest but well-crafted and executed examples of their kind.

The Aldgate School is another prominent presence within the proposed conservation area. Of a fine, Edwardian neo-Wren style – such that its main east front has the air of a miniature Hampton Court – it is a judiciously designed and proportioned and superbly executed building, of characterful Portland stone and warm red brick, rubbed for details such as keystones and pilasters. It incorporates much characterful ornament such as the little statues of children on the east front and is attractively patinated.

The standout building of the C20 in the proposed conservation area is Holland House. For a sense of its architectural impact, it is best viewed with its neighbour, Renown House. Designed by H.P. Berlage, the building exhibits a tensely vertical main elevation to Bury Street (a response to the original narrowness and exclusively oblique views of that street), with an asymmetrical entrance and simple, vaguely Art Deco detailing; it broke all the architectural rules the City tended to favour at that time, a flavour of which is given by the staid Classicism of Renown House.

Later C20 buildings tend to be of lesser inherent interest, but there is an important consistency in the way they conform to the scale and building lines of the street blocks to which they belong and employ sympathetic materials and simple details. The exception to this would be Irongate House which, with its meteorite cladding, introduces a unique note of materiality to the conservation area. Otherwise, these buildings act as neutral punctuation marks within the proposed conservation area, allowing the historic buildings and spaces to shine.

4.4. Historic interest

There is evident, superlative historic interest in the locality's connection with the Roman and medieval City wall (substantive parts of which and the Aldgate survive below ground as Scheduled Ancient Monuments) and Holy Trinity Priory, one of the foremost monastic foundations of the medieval City, of such importance that medieval English royalty were buried here; it was the earliest to be dissolved in England and therefore of particular interest in this respect; parts of it were sold off to significant courtiers including the Duke of Norfolk.

Of the individual buildings, St Katherine Cree (the oldest surviving above ground) is a nationally-rare type: an early C17 church built during the schisms of Charles I's reign, when few new churches were built; it was consecrated by Archbishop Laud, the controversial Carolean churchman. The church itself stands within the Priory precincts and originated (not this building, but its predecessor) as a Priory chapel.

Bevis Marks Synagogue lends the locality profound associations with the Sephardi Jewish community, who settled here following resettlement in the C17 and have maintained an unbroken presence ever since; the area also has, through the lost presence of the Great Synagogue on Duke's Place, historic associations with the Ashkenazi Jewish community.

The group of C19 warehouses at the heart of the proposed conservation area are a fascinating illustration of how a once-prestigious monastic complex evolved through a period of dissolution and subsequent aristocratic occupation/landlordism to arrive at relatively humble mercantile uses; they illustrate the shifting fortunes of a more peripheral area of the City tucked within the wall and gates, away from the centre, and a once-widespread mercantile warehousing function of the City which is now far less visible.

Through Holland House, the locality has associations with H.P. Berlage, an influential C20 Dutch architect, and the Dutch shipping company Mueller. Other individual associations of note include, but are not limited to, Geoffrey Chaucer (who lived in the Aldgate), the Duke of Norfolk, Archbishop Laud, Samuel Pepys (who visited the preceding Synagogue on Creechurch Lane) and George Dance the Elder.

4.5. Archaeological interest

There is considerable archaeological potential to uncover more of the precincts and remains of Holy Trinity Priory and the Abbot of St Edmundsbury's Inn, as well as burials in the former churchyards. Many of the individual buildings, particularly the tower of St Katherine Cree and the Synagogue, hold evidential value as to construction methods and design practices of their eras.



TEST OF RELEVANCE: EQUALITY ANALYSIS (EA)

The screening process of using the Test of Relevance template aims to assist in determining whether a full Equality Analysis (EA) is required. The EA template and guidance plus information on the Equality Act and the Public Sector Equality Duty (PSED) can be found on City of London Intranet at: [Equality and Inclusion](#)

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Introduction

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have statutory 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not.

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation

It is also Corporation policy to give voluntary (non-statutory) 'due regard' to the impact upon Social Mobility

What is due regard?

- Statutorily, it involves considering the aims of the duty in a way that is proportionate to the issue at hand.
- Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision.
- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Even in cases where it is considered that there are no implications of proposed policy and decision making on the PSED it is good practice to record the reasons why and to include these in reports to committees where decisions are being taken.

It is also good practice to consider the duty in relation to current policies, services and procedures, even if there is no plan to change them.

The Corporation has also adopted a voluntary (non-statutory) due regard of the impact upon social mobility issues. This should be considered generally and, more specifically, against the aims/objectives in the Social Mobility Strategy, 2018-28.

How to demonstrate compliance

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker.
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient Information** - The decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty
- **No delegation** - public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is continuing applying when a policy is developed and decided upon, but also when it is implemented and reviewed.

However, there is no requirement to:

- Produce equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make services homogeneous or to try to remove or ignore differences between people.

The key points about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications
- Keep adequate records of the full decision making process

Test of Relevance screening

The Test of relevance screening is a short exercise that involves looking at the overall proposal and deciding if it is relevant to the PSED.

Note: If the proposal is of a significant nature and it is apparent from the outset that a full equality analysis will be required, then it is not necessary to complete the Test of Relevance screening template and the full equality analysis must be completed.

The questions in the Test of Relevance Screening Template to help decide if the proposal is equality relevant and whether a detailed equality analysis is required. The key question is whether the proposal is likely to be relevant to any of the protected characteristics.

Quite often, the answer may not be so obvious, and service-user or provider information will need to be considered to make a preliminary judgment. For example, in considering licensing arrangements, the location of the premises in question and the demographics of the area could affect whether section 149 considerations come into play.

There is no one size fits all approach, but the screening process is designed to help fully consider the circumstances.

What to do

In general, the following questions all feed into whether an equality analysis is required:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities?

At this initial screening stage, the point is to try to assess obvious negative or positive impact.

If a negative/adverse impact has been identified (actual or potential) during completion of the screening tool, a full equality analysis must be undertaken.

If no negative / adverse impacts arising from the proposal it is not necessary to undertake a full equality analysis.

On completion of the Test of Relevance screening, officers should:

- Ensure they have fully completed, and the Director has signed off the Test of Relevance Screening Template.
- Store the screening template safely so that it can be retrieved if for example, Members request to see it, or there is a freedom of information request or there is a legal challenge.
- If the outcome of the Test of Relevance Screening identifies no or minimal impact refer to it in the Implications section of the report and include references to it in the Background Papers when reporting to the Committee or other decision-making process.

1. Proposal / Project Title: Creechurch Conservation Area Consultation

2. Brief summary (include main aims, proposed outcomes, recommendations / decisions sought):

As Local Planning Authority, the City Corporation has a statutory duty to consider the potential for new conservation areas (CA's) within the City's boundary. Whilst undertaking an intensive characterisation and heritage significance assessment of the Square Mile to inform the emerging City Plan 2040, and in response to key stakeholders during the consultation on the draft City Plan, a potential new conservation area has been identified in the Creechurch locality, near Aldgate. The area has been assessed in line with national and local planning policy and Historic England's guidance on such matters. A proposed range of draft conservation area boundaries and supporting conservation area proposals have been consulted on.

Consultation on the proposed new CA, to be known as Creechurch Conservation Area, was carried out between 21st September and 6th November 2023, with a wide range of people and organisations consulted. The proposals would establish planning controls which would protect three Grade I listed places of worship: Bevis Marks Synagogue, St Katherine Cree and St Botolph Aldgate churches and the Grade II listed Aldgate School dating from 1908.

The Bevis Marks Synagogue is the oldest synagogue in the country and home to the unique and rich religious traditions of the Sephardic Jewish community in Britain. It is of outstanding architectural, artistic, communal, historic and archaeological significance. The Synagogue has a small courtyard which is used for communal gatherings and wedding celebrations.

The Guild Church of St Katharine Cree is an Anglican Church in Leadenhall Street, opened in 1629, which has historically focussed on providing for workers, as it does not have its own parish. A church has stood on this site since 1280. The church is available for weddings, funerals and use of the church hall and courtyard for community use. St Botolph Aldgate is located on Aldgate with a history of helping the poor in the East End. The church was built in 1744, with mention of a church on this site going back to 1115. The church is available for weddings, christenings, funerals, as well as community activities in the outdoor space.

The Consultation exercise included three options for the coverage of the proposed conservation area. This equalities screening is being carried out on the proposed conservation area boundary that Planning and Transportation Committee are being asked to consider designating. This proposed boundary aligns with Option 3 presented for and strongly supported by the public consultation.

3. Considering the equality aims (eliminate unlawful discrimination; advance equality of opportunity; foster good relations), indicate for each protected group whether there may be a positive impact, negative (adverse) impact or no impact arising from the proposal:

Protected Characteristic (Equality Group)	Positive Impact	Negative Impact	No Impact	Briefly explain your answer. Consider evidence, data and any consultation.
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed CA will not have a specific impact on people of different groups.
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed CA will not have a specific impact on people with disabilities.
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed CA will not have a specific impact on people experiencing gender assignment.
Marriage and Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The designation of a Creechurch conservation area would assist in the preservation and enhancement of the area because of its special architectural and historic interest. This could have a positive impact on people who are involved in marriage proceedings at Bevis Marks Synagogue, St Katherine Cree and St Botolph Aldgate churches, as these religious buildings and the areas around them are used and as spaces for celebrating marriage.
Pregnancy and Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed CA will not have a specific impact on people who are pregnant or have recently given birth.
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The designation of a Creechurch conservation area would assist in the preservation and enhancement of the area because of its special architectural and historic interest. This could have a positive impact on people who belong to the Jewish race using the Synagogue for worship and religious use.
Religion or Belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The designation of a Creechurch conservation area would assist in the preservation and enhancement of the area because of its special architectural and historic interest, including Bevis Marks Synagogue, St Katherine Cree and St Botolph 's Aldgate churches. This could have a positive impact on people of the Jewish faith using the Synagogue for worship and religious use, and the Synagogue's courtyard for communal purposes, and on people of the Christian faith using the two churches for worship and religious purposes.</p> <p>The designation of a Creechurch conservation area would assist in the preservation and enhancement of the area, including sites of importance for Jewish and Christian history. This could have a positive impact for people of Jewish and Christian religions.</p>
Sex (i.e. gender)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed CA will not have a specific impact on specific sex/genders.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed CA options will not have a particular impact on gay, lesbian and bisexual people.

4. Are there any potential social mobility or wider issues? Yes No Briefly explain your answer: The proposed CA is not considered to have any impact on social mobility or wider issues.

5. There are no negative / adverse impact(s) Please briefly explain and provide evidence to support this decision:
The nine categories of protected characteristics were assessed, and the proposed CA has been assessed as having no negative impact on any of the characteristics. The implementation of the CA could have a positive impact on people who share the protected characteristic of marriage and civil partnership, and people who share the protected characteristic of religion, and of race. The remaining categories were assessed as having no impact as a result of the proposed CA.

6. Are there positive impacts of the proposal on any equality groups or Social Mobility? Please briefly explain how these are in line with the equality aims or social mobility strategy:
The nine categories of protected characteristics were assessed. The proposed CA has been assessed as having a positive impact on the categories of Marriage/Civil Partnership, Religion /Belief and Race.

7. As a result of this screening, is a full EA necessary? Yes No Briefly explain your answer:
Please check appropriate box A full EA screening is not considered to be necessary as none of the categories of the nine protected characteristics have been assessed as having a negative or adverse impact resulting from the implementation of the proposed Creechurch Conservation Area.

8. Name of Lead Officer: Lisa Russell Job title: Planning Officer Date of completion: 30/11/2023

Name: Rob McNicol Date: 30/11/2023

Appendix 4

This Appendix includes the consultation responses (redacted) received via email and as hard copied. The consultation responses received via Commonplace can be viewed here:

<https://creechurchconservationarea.commonplace.is/en-GB/contributions/proposal/surveyquestions>

TJH/EO/DP6571

06 November 2023

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Dear Sir / Madam,

CREECHURCH CONSERVATION AREA – REPRESENTATIONS ON BEHALF OF BEVIS INVESTMENT HOLDINGS LTD

Context

On behalf of our client, Bevis Investment Holdings Ltd, we are pleased to submit representations in respect of the Creechurch Conservation Area Consultation. Bevis Investment Holdings Ltd has an ownership interest in 10-16 Bevis Marks, an existing five storey office building located between Heneage Lane to the east and Bury Street to the west ('the Building'). The Building is located just inside the northern boundary of the proposed Creechurch conservation area.

The existing offices within the Building have been vacant for over 18 months. Bevis Investment Holdings Ltd have subsequently recently been engaged in pre-application discussions with the City of London and other local stakeholders regarding proposals to repurpose the building to create serviced apartments across the upper floors with active and multifunctional uses located at ground floor level. The proposals also include replacement of the existing plant level with a new level containing serviced apartments, as well as a number of enhancements to the existing facades, including a reinstatement of the original entrance to the Bevis Marks Synagogue which is located through an existing passageway to the south of the Building.

Proposed Creechurch Conservation Area

Within the Creechurch Conservation Area Proposal Document (July 2023), the Building is identified as *"...an important frontispiece building to the Synagogue and its courtyard, and is of sympathetic scale, form and materiality"*.



Bevis Investment Holdings Ltd recognise that due to the Building's location in proximity to the Bevis Marks Synagogue that it has a relationship with the Grade I listed Synagogue. However the existing Building is not considered to be of high architectural quality, and currently has a tired and worn appearance, both on its main elevation fronting Bevis Marks and its rear elevation facing the Synagogue and its associated courtyard. At best, the Building could only be described as making a neutral contribution to the proposed Conservation Area once it comes into place.

On this basis, it is requested that specific reference is made within the Character Summary and Management Strategy document once adopted that the Building only makes a neutral contribution to the character and appearance of the area. The proposals that are currently being developed will improve the overall architectural quality of the Building, delivering an overall improvement to the quality of the townscape and its appearance within the Conservation Area, as well as the setting of the Bevis Marks Synagogue.

We look forward to receiving acknowledgement of these representations. Should you require any further information please contact Tim Holtham or Esme O'Meara of this office.

Yours faithfully

DP9 Ltd

DP9 Ltd.

The Proposed Designation of the Creechurch Conservation Area Consultation Representations on Behalf of Bahagia Investments Limited

3rd November 2023

1.0 Introduction

1.1 These Representations are prepared by The Townscape Consultancy Ltd. on behalf of Bahagia Investments Limited, the freehold owners of Cunard House, 88 Leadenhall Street. These Representations have been made in response to the consultation on the proposed designation of the Creechurch Conservation Area. The Local Planning Authority (LPA) in this case is the City of London Corporation (hereby referred to as 'CoLC'). CoLC is currently consulting on boundary options for the Creechurch Conservation Area; Options 1, 2 and 3 or potentially Option 4, being a further boundary that consultees may propose. While Options 1 and 2 would exclude it, Cunard House would be included within the proposed boundary of Option 3. Below we provide our answers to the questions set out by the CoLC as part of the consultation process.

Answers to the consultation

1) *Do you agree that the Creechurch area should be designated as a conservation area?*

- Yes

2) *Which is your preferred option? If you don't like any of them you can offer an Option 4.*

- Option 1

3) *If you choose Option 4, please describe your preferred boundary.*

- N/A

4) *Why do you think your selected area is of special architectural or historic interest?*

- See Section 3

5) *Please share any additional general information and facts about the area to support your choice.*

- This note sets out further information.

6) Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Explanation of the Equality Act - Section 149 \(external link\)](#)

- It is expected that people with protected characteristics that live, work, and/or worship in the area should not be affected differently than other people by the boundary selected for the conservation area. When individual development proposals come forward within or nearby the future conservation area, the CoLC will consider its duty under the Equality Act 2010

7) Please explain your answer to Question 6.

- See answer to Question 6.

8) Is there anything that could be done to mitigate any impacts identified?

- N/A

1.2 In principle, we are supportive of the overarching objectives of CoLC to formally designate a new conservation area in the Creechurch locality, based on the findings of the Creechurch Conservation Area Proposal prepared by CoLC in July 2023 in respect of Option 1, which provides an overarching summary of the area's special interest:

(i) Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern;

(ii) A characterful group of late C19/early C20 warehouses on Creechurch Lane/Mitre Street that are fine examples of their kind and survivors of a type now rare in the City;

(iii) Three places of worship of (in a City context) unusually diverse origins and of outstanding architectural and historic interest: Bevis Marks Synagogue (first purpose-built since resettlement and now oldest in UK), St Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church);

(iv) A proliferation of historic open spaces of diverse scales, functionality and appearance; and

(v) Strong and continuing associations with the Jewish community following resettlement in the C17.

1.3 For the purposes of these Representations we have not sought to provide commentary on the relative merit of the individual buildings proposed to be covered by the conservation area designation, except for the existing building at 88 Leadenhall Street (Cunard House) which falls within the ownership of Bahagia Investments Ltd. Cunard House has been identified as a positive contributor in the alternative



report supporting Option 3, produced by consultants on behalf of the Bevis Mark Synagogue, as opposed to the report produced by the CoLC's officers.

- 1.4 We have carefully considered the potential boundary options presented as part of the consultation. Our conclusion is firmly in line with the proposal prepared by the CoLC, supporting Option 1. The methodology and assessment conducted by CoLC officers aligns with due process and the conclusion is robust. The purpose of any thorough consultation is of course to consider all views to ensure that the best end result is obtained, but in this scenario we do not consider that Option 3 can be justified based on legitimate conservation requirements. Further detail is included within these Representations to explain our rationale behind this position.

2.0 Legislation, policy, and guidance on conservation areas

The LPA's statutory duty in respect of conservation area designation

- 2.1 As defined in Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the '1990 Act'), a conservation area is an area which has been designated by an LPA because of its '*special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.*'
- 2.2 In discharging its powers under Section 69 of the 1990 Act, the LPA is bound to exercise its discretion reasonably, and to have due regard to the legislation, relevant policy, and guidance.
- 2.3 The quality and interest of the whole area should be the primary consideration in identifying conservation areas. The object, therefore, should not be to protect individual buildings or spaces which are not of demonstrable interest, nor if they do not contribute to the particular character of the conservation area.

National policy and guidance on conservation areas

- 2.4 The National Planning Policy Framework (2023) sets out at paragraph 191 that:

When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest (our emphasis).

- 2.5 The policy is supported by the National Planning Policy Guidance ('PPG'). The PPG includes a section on the 'Historic Environment' which was last updated in July 2019.

- 2.6 At paragraph 024, the PPG states that:

Local planning authorities need to ensure that the area has sufficient special architectural or historic interest to justify its designation as a conservation area. Undertaking a conservation area appraisal may help a local planning authority to make this judgment.

Supplementary guidance prepared by Historic England

- 2.7 Historic England provides supplementary guidance on the purpose and methods of designating and assessing historic areas in its Advice Note on *Understanding Place: Historic Area Assessments* (April 2017). The guidance note sets out how Historic Area Assessments (HAAs) should be undertaken to



understand and explain the heritage interest of an area. The note sets out that methods of HAA closely align with methods of Conservation Area Appraisal.

- 2.8 Under the 'Key Issues' to be considered the guidance states that *'appropriate boundaries'* should be established to keep Historic Area Assessments *'focused and manageable'* and that the relevance of such boundaries should be examined critically.
- 2.9 Historic England has prepared separate guidance in relation to conservation areas in *Advice Note 1: Conservation Area Designation, Appraisal and Management* (2nd Edition, February 2019).
- 2.10 At paragraph 11 the Advice Note sets out that the purpose of appraising an area for designation is to consider:

a) whether there is sufficient architectural or historic interest for the area to be considered 'special'?;

b) whether this is experienced through its character or appearance?; and

c) whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve.

Suitability for Designation

- 2.11 At paragraph 72, Advice Note 1 provides examples of the different types of special architectural and historic interest which could justify conservation area designation, including:

- *areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations;*
- *those linked to a particular individual, industry, custom or pastime with a particular local interest;*
- *where an earlier, historically significant, layout is visible in the modern street pattern;*
- *where a particular style of architecture or traditional building materials predominate; and*
- *areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest.*

Assessment of Special Interest

- 2.12 At paragraph 34 the guidance in Advice Note 1 sets out a number of key elements that may assist in defining the special interest of an area, including *'the still-visible effects/impact of the area's historic development on its plan form, townscape, character and architectural style and social/ historic associations and the importance of that history'*.
- 2.13 The guidance goes on to state at paragraph 43 that conservation area appraisals *'should focus on setting out what makes the area special and the impact of its history on its current character and appearance.'*

Positive contributors to conservation areas

- 2.14 There is a presumption against demolition of buildings identified as 'making a positive contribution' to the Conservation Area. Positive contributors are referred to at page 20 of Historic England's Advice Note 1, which states:

[...] Whilst designated status (ie nationally listed) or previous identification as non-designated heritage assets (such as through local listing) will provide an indication of buildings that are recognised as contributing to the area's architectural and possibly historic interest, it will be important also to identify those unlisted buildings that make an important contribution to the character of the conservation area.

- 2.15 The guidance goes onto suggest a number of questions to assess the value of an unlisted building to the importance (significance) of a conservation area.

Summary of policy and guidance on conservation areas

- 2.16 The purpose of designating or extending conservation areas is to preserve or enhance areas of *'special architectural or historic interest'*. Therefore, the designation or extension of a conservation area which is motivated principally by a desire to protect specific buildings would not ordinarily meet the statutory test.
- 2.17 The guidance in the NPPF and PPG emphasises the importance of ensuring that an area justifies its status as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. This is supported in the guidance produced by Historic England, in particular within Advice Note 1.
- 2.18 We consider therefore that there must be some physical evidence, experienced visually and experientially through the character and appearance of the area's buildings and spaces, to give rise to an area's special architectural or historic interest. It follows that the historic interest of a specific site or group of buildings is not sufficient if they do not contribute to the character and appearance of an

area which is worth preserving and enhancing. Conservation areas therefore should not be designated with the purpose of creating a buffer for listed buildings (which already have statutory protection through the consideration of their setting and its contribution to heritage significance), nor to prevent redevelopment of buildings, as this runs contrary to legislation, policy, and guidance.



3.0 Summary and significance of the Draft Creechurch Conservation Area

- 3.1 We have reviewed the Creechurch Conservation Area Proposal prepared by CoLC in July 2023, and the Proposed Bevis Marks/Creechurch Conservation Area document prepared by consultants for the Bevis Marks Synagogue (May 2022). The CoLC's Creechurch Conservation Area Proposal notes at 'Section 3.3 – Eligibility for Conservation Area Status' that:

'[...] the Creechurch locality is found to be richly historic, with a multi-layered sense of place stemming from the ancient delineation of the Roman and medieval City wall and Aldgate and the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, both of which have perceptibly influenced the modern street plan. Although upstanding remains of these structures are not now visible in the townscape (with the exception of the Grade II listed archway to the rear of nos. 39 and 40 Mitre Street), the archaeological potential, placenames, forms and spaces (e.g. Aldgate, Mitre Street and Square, Creechurch Place, St Katherine Cree churchyard) they bequeathed convey a strong sense of special historic interest.

Above ground, there is significant architectural interest in the streets and buildings subsequently developed from the early modern period onwards: the two City churches and Bevis Marks Synagogue offer outstanding examples of their types; Holland House strikes a pleasingly eclectic note; the Creechurch/Mitre Street warehouses are a rare and fine group of their kind. The locality is found to possess a varied, characterful and interesting group of historic buildings studded with highly significant historic places of worship and interspersed with more neutral modern buildings that help to create a consistent sense of townscape and distinctive sense of place.'

- 3.2 We consider that the significance of the listed buildings, individually and as a group, is considerable and along with the 19th century warehouse buildings and the historic remains of the Holy Trinity Priory at 77 Leadenhall Street, they should form the core of the new Creechurch Conservation Area. As such we agree that the area has sufficient architectural or historic interest to be considered 'special' and thus would warrant designation as a conservation area.

4.0 Proposed boundaries for consultation

- 4.1 In this section we set out our review of the proposed boundary options for the Creechurch Conservation Area in line with Historic England’s guidance and the statutory requirement at section 69 of the 1990 Act.
- 4.2 CoLC is currently consulting on boundary options for the Creechurch Conservation Area. The boundary options are as follows:
- Option 1: CoLC’s officers’ preferred option, based on expert evidence and subject to an appraisal, dated July 2023;
 - Option 2: Alternative option by CoLC proposed as a result of members’ input into the suggested conservation area consultation. The proposed boundaries are the same as Option 1, with the addition of 31 Bury Street;
 - Option 3: Alternative option proposed by Bevis Marks Synagogue. This option includes the same area as Option 2 with the addition of the buildings to the north of Bevis Marks/Duke’s Place, 1 Creechurch Lane, and Cunard House at 88 Leadenhall Street; and
 - Option 4: Any further alternative boundary as may be proposed by consultees.
- 4.3 For the purposes of these Representations, we have not sought to provide separate commentary on the relative merit of proposed boundary Options 1 and 2 as neither option proposes to include Cunard House within the boundary. We have provided separate commentary on the extended boundary proposed by the Bevis Marks Synagogue in Option 3.

Commentary on Options 1 and 2

- 4.4 Option 1 comprises CoLC’s preferred option and is accompanied by the CoLC’s Creechurch Conservation Area Proposal of July 2023. There are a number of listed buildings that are proposed to fall within the boundary, including;
- The Bevis Marks Synagogue (Grade I);
 - The Church of St Botolph (Grade I) and associated iron gateway to the church yard (Grade II);
 - The Church of St Katherine Cree (Grade I) and associated gateway in church yard (Grade II);
 - Holland House (Grade II*);
 - Sir John Cass School (Grade II*);
 - Archway between numbers 39 and 40 Mitre Street and at rear of numbers 72 and 73 Leadenhall Street (Grade II); and
 - 2-6 Creechurch Lane (Grade II).

- 4.5 The suggested boundary excludes a number of streets and individual buildings that are considered to depart from the qualities of the conservation area, including:
- Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate;
 - Bury House, 31 Bury Street;
 - One Creechurch Place, 26 Creechurch Lane and 1 Mitre Square; and
 - Cunard House, 88 Leadenhall Street.
- 4.6 Option 2 presents the same boundary as Option 1, with the inclusion of the building at 31 Bury Street.
- 4.7 With regards to Cunard House, the Creechurch Conservation Area Proposal appraisal accompanying Option 1 notes at section 3.2 (p. 25) that the building *'[...] is a modern building (completed c.2000) of no inherent architectural or historic interest, although one of its predecessors on the site was the first Synagogue, converted from a house, following the resettlement. Although of broadly sympathetic scale and materiality to the other buildings in the locality, it is notably higher and relates more in orientation and 'feel' to bigger buildings along Leadenhall Street than the smaller-scale, more granular character of the Creechurch locality. As such it is not considered to meet the criteria for inclusion in a conservation area.'*
- 4.8 We agree with CoLC's assessment that there are no evident reasons for the inclusion of Cunard House within the conservation area boundary, as it does not meet the criteria for inclusion and would run contrary to paragraph 191 of the NPPF (2023), with CoLC failing in its duty to *'[...] ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'*

Commentary on Option 3

- 4.9 Option 3 is the boundary option proposed by Bevis Marks Synagogue. This option includes the same area as Option 2, with the addition of the buildings to the north of Bevis Marks/Duke's Place, 1 Creechurch Lane, and Cunard House at 88 Leadenhall Street.
- 4.10 We note that the alternative appraisal prepared on behalf of the Bevis Marks Synagogue identifies the existing building at Cunard House as a positive contributor. The appraisal refers to Cunard House as:

[...] six storeys, limestone facing, with recessed 7th floor, 1999 by Fitzroy Robinson, sub-classical style, with inverse curved corner with Creechurch Lane, referencing the magnificent 1930s Art Deco building by Mewes & Davis which previously stood on the site. It incorporates details from the previous building including nautically inspired metalwork to the ground floor and plaque from the old building on the curved corner to Creechurch Lane. The scale reduces to the north to reflect the listed tea warehouse opposite. The north-east corner with Bury Street incorporates a historic City

Corporation plaque marking the Site of the First Synagogue 1657 – 1701. Overall, Cunard House makes a positive contribution to the area.

- 4.11 We note that the description of the height of the building is inaccurate, as it is an equivalent of nine storeys in total of which the level 8 is slightly recessed and level 9 is further recessed and contains plant. Also, the building does not reduce in scale to the north but maintains the same height throughout.
- 4.12 The Historic England document, *Historic England Advice Note 1 (Second Edition) - Conservation Area Appraisal, Designation, and Management* (2019) suggests a number of questions to assess the value of an unlisted building to the significance of a conservation area in Table 1. Each question is addressed in turn below.
- 1) Is it the work of a particular architect or designer of regional or local note?
 - The building was designed by Fitzroy Robinson & Partners. The practice is known to have designed several commercial buildings and public buildings in central London, including Sampson House, 102 Petty France 1976-9, the Sedgwick Centre (now the White Chapel Building) 1986-8, and Brown Shipley, Moorgate, 1973-5 (Grade II). It is considered that the practice was, to a limited degree, of some local note, however the building at Cunard House is a later example of their work and is not considered of the same architectural design quality as their best work.
 - 2) Does it have landmark quality?
 - No – the building replaces a previous large scale commercial building on the site which occupies a corner plot at Leadenhall Street and Creechurch Lane. Historic mapping suggests that historically the site was occupied by buildings of a much finer grain and thus its larger plot form does not exhibit landmark qualities.
 - 3) Does it reflect a substantial number of other elements in the conservation area in age, style, materials, form or other characteristics?
 - No – the existing building on site is not a historic building that would inform the character and appearance of the proposed conservation area, which is primarily made up of 19th century warehouses, early 20th century commercial buildings, and notable religious buildings. It is a typical commercial office building of the 1990s.
 - 4) Does it relate to adjacent designated heritage assets in age, materials or in any other historically significant way?
 - No – the building shares no functional relationship with the previous Art-Deco building on the site and does not relate to the adjacent designated heritage assets which are of a finer grain and lower scale.

- 5) Does it contribute positively to the setting of adjacent designated heritage assets?
- No – the building does not relate in scale nor share a relationship with the surrounding listed buildings, such as the Grade I listed Church of St Katherine Cree and the Grade II listed 2-16 Creechurch Lane immediately opposite.
- 6) Does it contribute to the quality of recognisable spaces including exteriors or open spaces within a complex of public buildings?
- No – it forms an unremarkable built edge at the corner of the historic routes of Leadenhall Street and Creechurch Lane.
- 7) Is it associated with a designed landscape, e.g. a significant wall, terracing or a garden building?
- No – it is not associated with a designed landscape.
- 8) Does it individually, or as part of a group, illustrate the development of the settlement in which it stands?
- No – the building does not mark any particular architectural period of interest in the wider historic development of the City of London.
- 9) Does it have significant historic associations with features such as the historic road layout, burgage plots, a town park, or a landscape feature?
- No – the existing building at 88 Leadenhall Street was built on a medieval plot layout that historically comprised finer grain buildings. Its architecture does not relate to the historic street pattern.
- 10) Does it have historic associations with local people or past events?
- No – the building replaces an earlier Art-Deco building but this in itself does not derive it any significance. It is a typical office building of the 1990s.
- 11) Does it reflect the traditional functional character or former uses in the area?
- No – it is a typical late 20th century commercial building in the City of London and is of no particular interest.
- 12) Does its use contribute to the character or appearance of the area?
- No – the building does not make any particular contribution to the character and appearance of the area, although its office use is consistent with the wider City of London.

- 4.13 Overall, we consider that there is no evidence to suggest that Cunard House ‘*makes a positive contribution to the area*’ as set out within the alternative appraisal prepared on behalf of the Bevis Marks Synagogue, and in any event its inclusion within the conservation area boundary would be inappropriate as it does not meet the statutory test. The building comprises an unremarkable late 20th century commercial office building. The existing building reflects the materiality of the neighbouring buildings yet it is of a considerably larger scale which contrasts to that of the historic buildings along Creechurch Lane, including the Grade I listed Church of St Katherine Cree, immediately opposite. Although the building partially reflects the architectural character and detailing of the previous 1930s building on the site, this is on its southern façade fronting Leadenhall Street, away from the rest of the proposed conservation area, and it does not relate in age and scale to the buildings proposed to fall within the conservation area boundary.
- 4.14 The appraisal prepared on behalf of the Bevis Marks Synagogue refers to the historic City Corporation plaque marking the Site of the First Synagogue 1657 – 1701, which is affixed to the north-eastern corner of Cunard House. We contend that the presence of a commemorative plaque affixed to a relatively modern building would not be sufficient to demonstrate the level of special interest required to warrant the building’s inclusion within a conservation area designation, nor its identification as a positive contributor to a conservation area. If this was the case, then the building at One Creechurch Place, which also incorporates a historic City Corporation plaque marking the site of the Great Synagogue on Duke’s Place, would also need to be identified as a positive contributor in the accompanying appraisal. Instead, the alternative appraisal identifies One Creechurch Place as having a negative impact on the area.
- 4.15 The Proposed Bevis Marks/Creechurch Conservation Area document, prepared on behalf of the Bevis Marks Synagogue, states at paragraph 1.02 that:
- [...] Despite the proximity to the cluster of tall buildings in the eastern part of the City, the area under consideration has a remarkably consistent and harmonious low-rise scale of buildings with similar parapet heights which results in a consistent and uniform townscape fronting the narrow streets.’*
- 4.16 We contend that the above is factually inaccurate, as the larger conservation area boundary proposed by the Bevis Marks Synagogue includes a number of existing and consented taller modern developments including Cunard House and even taller buildings like One Creechurch Place and the consented 24 Bevis Marks. So, if Option 3 was selected, tall buildings would form a defining characteristic of the conservation area’s character and appearance.
- 4.17 As a whole, it is considered that the inclusion of Cunard House within the conservation area boundary would be inappropriate considering the statutory criteria for conservation area designation. Its

inclusion appears to contradict the apparent low-rise scale of the Creechurch area referred to in the appraisal document.

- 4.18 It follows therefore that the Option 3 boundary is not in line with established designation criteria and proposes to include existing and consented built forms that would not contribute in a meaningful way to an appreciation and understanding of the proposed conservation area's special interest. The logic for including larger scale, or architecturally undistinguished buildings within the proposed boundary has not been explained within the accompanying appraisal document.

5.0 Conclusions

- 5.1 This report has been prepared on behalf of Bahagia Investments Ltd. in response to the consultation on the proposed designation of the Creechurch Conservation Area by the City of London.
- 5.2 Overall, we are supportive in principle of the proposed designation of the Creechurch Conservation Area in recognition of its special interest as identified in the assessment conducted by the CoLC's officers, and summarised at section 4.2 of the appraisal document (and referenced above at paragraph 1.2).
- 5.3 We reiterate that the proposed designation of any conservation area must be assessed against the statutory criteria. The quality and interest of the area as a whole, as opposed to individual buildings, should be the primary consideration in identifying conservation areas. The objective, therefore, should not be to protect individual buildings or spaces which are not of demonstrable interest, in line with Historic England's guidance (2019). On this basis, it is clear that Cunard House would not meet the criteria for inclusion within the Creechurch Conservation Area boundary.
- 5.4 We submit that the proposed boundary Option 3 put forward as an alternative by the Bevis Marks Synagogue would be inconsistent with the purpose of the legislation and would not substantiate a claim for '*special architectural or historic interest*' as required for designation under s69 of the 1990 Act. In addition, the identification of Cunard House as a positive contributor in the accompanying appraisal is unsubstantiated.
- 5.5 We consider that the inclusion of Cunard House simply to create a buffer for other buildings is not a valid argument for inclusion within the proposed Creechurch Conservation Area as it does not inform the character and appearance of the conservation area and cannot be justified based on legitimate conservation requirements. Further, we consider that its inclusion within the conservation area boundary could devalue the concept of conservation through the designation of an area that lacks special interest, as per paragraph 191 of the NPPF (2023).



Email: PlanningPolicyConsultations@cityoflondon.gov.uk

2 November 2023

Dear planning team,

RE: Creechurch Conservation Area

Thank you for consulting the Twentieth Century Society on the proposed new Creechurch Conservation Area in the City of London. The Society welcomes this proposed new designation and writes in support of Option 3 but encourages the City of London to extend these proposed boundaries slightly to include other nearby buildings of note. As the amenity society that specialises in sites built post-1914, our response here focuses on the 20th- and early 21st-century architecture in the area.

Of the three options presented, the Society's preference is for the third option which would include the following 20th-century sites

- Creechurch House, No.17 Bevis Marks, built in 1935 by Lewis Solomon
- No.31 Bury Street, built in 1967 by Gotch & Parters, which extends from the Grade II* Holland House of 1916 by Berlage and Van de Velde (which is also included in Option 2)
- Irongate House, No.30 Duke's Place, built in 1978 by Fitzroy Robinson
- Greenly House, No.40 Duke's Place, built in 1950 by Levin Solomon, son & Joseph
- Nos.40-41 Houndsditch, 1920s
- Nos.76 Leadenhall Street (1987 by Gollins Melvin Ward), No.78 Leadenhall Street (1991 by Ley, Colbeck & Partners) and No.80 Leadenhall Street (1990 by Hamilton Associates) (all of which are included in all three options)
- Cunard House, No.88 Leadenhall Street, built in 1999 by Fitzroy Robinson and incorporating elements of the former Mewes & Davis Art Deco building. Cunard House and Irongate House are very good examples of the late 20th-century architecture of Fitzroy Robinson who had an important role in shaping the architecture of the post-war City. Writing in *Building Design* in 1991, Kenneth Powell declared that "No firm has set its stamp so firmly on the City of London since 1960 than 'Fitzroys'" (p.18). Powell described the practice's work as embracing "stylistic pluralism" and "diversity", while being "streetwise" and contributing positively to the urban scene. These buildings showcase these characteristics.

The Twentieth Century Society is a company limited by guarantee, registered in England no 05330664

Registered office: 70 Cowcross Street, London EC1M 6EJ
Registered Charity no 1110244
Tel. 020 7250 3857

These are a very good collection of inter- and post-war buildings which relate well to one another and create an interesting and varied streetscape.

The Society recommends the slight extension of Option 3's boundaries to the north- and south-east to include

- Aldgate Station which has a very fine 1925-6 elevation to its C19th trainshed, designed by Charles Walter Clark. Its white faience façade is very similar to Clark's other stations at Farringdon, Paddington and Willesden Green which are Grade II listed. Remarkably, Aldgate is not statutory listed but is clearly of architectural and historic interest as well as townscape value and would benefit from conservation area protection. Drawing the conservation area around Aldgate Station would help to provide a clear boundary in this north-east corner.
- Portsoken House (84-85 Aldgate High Street and 155-57 Minories) which was built in 1927-8 by George Val Myer, the architect of the BBC's Grade II* Broadcasting House (1932) on Portland Place. It was built back from the street to allow the road to be widened at this point which was a notorious traffic bottleneck. It is a landmark building at a prominent location where Minories meets Aldgate High Street, and its curved elevation responds to its corner plot. Portsoken House was reportedly the tallest office in the City of London when completed in the 1920s and it is stone-faced and richly ornamented.
- No.1 Minories, a 5-storey interwar Neo-Georgian building of red brick with stone dressings. It faces Portsoken House and mirrors its curved elevation. Together, the two buildings provide a gateway to the Minories from Aldgate High Street. No.1 is well-detailed, with decorative window surrounds and mouldings.
- The Grade II listed 19th-century 31 Jewry Street ('Sir John Cass College') and its interwar extension by Vener Rees. This Grade II listed building would nicely book-end the conservation area here.

The extension of the boundary here has also been requested by SAVE Britain's Heritage in their report published on 1 November 2023. These are high-quality buildings which have clear townscape value.

We also call for its extension to the north west to include 30 St Mary Axe ('the Gherkin') and its public plaza. Built in 2001-4 for Swiss Re by the renowned architectural practice of Foster and Partners, the iconic 41-storey 'Gherkin' is a technically- and environmentally-ambitious building which was extensively and highly reviewed upon its completion and was the worthy recipient of the prestigious Stirling Prize in 2004. It replaced the Baltic Exchange, which was damaged beyond repair by the IRA bomb in 1992 and its replacement with the new development was somewhat controversial at the time, but the Gherkin itself as a new work of architecture was well received and it has become one of London's best-known landmarks and a much-admired building on its skyline. It is known and admired not only in a national context but also internationally. The history of the Gherkin's construction and reception is well chronicled by Kenneth Powell in *30 St Mary Axe: A Tower For London* (2006). 30 St Mary Axe makes an important contribution to the City of London's

townscape and there are good, clear views of the skyscraper from within the proposed Creechurch Conservation Area, for instance looking north-west up Mitre Street. 30 St Mary Axe is a strong contender for future listing but in the meantime the City should identify and protect its heritage significance through its inclusion within the proposed Creechurch Conservation Area.

I attach with our letter a map of our proposed boundaries for the new Creechurch Conservation Area.

The Society's proposed extension has been supported by Kenneth Powell, a leading architectural historian and critic. Powell has written much about the late 20th- and early 20th-century built landscape of the City and is an expert on Norman Foster and author of *30 St Mary Axe: A Tower For London* (2006). Powell writes

"I write with reference to the current consultation regarding the proposed designation of a Creechurch Conservation Area. I strongly endorse the City's move to give added protection to this historic quarter. The C20 Society has asked me to support its recommendation that Option 3, as detailed in the consultation, be adopted. I am entirely supportive of this recommendation. The boundaries of the area proposed by Option 3 embrace a number of significant C20th buildings.

The Society has further recommended that the proposed conservation area be slightly extended to include 30 St Mary Axe, known as "the Gherkin". This building, designed by Foster + Partners, formed the subject of my 2006 book, *30 St Mary Axe: A Tower for London*.

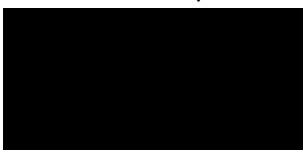
30 St Mary Axe has been internationally acclaimed as a major work by this renowned practice. Environmentally progressive, it is a popular London landmark – indeed, it is one of very few tall office buildings of recent date in London that must in due course be considered for statutory listing.

30 St Mary Axe should certainly, for the interim, be included in the proposed conservation area. Consideration should be given to protecting its setting, in particular the clear views of the building that currently exist. It is a major element in the modern heritage of London.

Kenneth Powell" (1/11/2023).

We hope that these comments are of use to you. Please do not hesitate to get in touch if you have any questions.

Yours sincerely



The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ –



www.c20society.org.uk

Coco Whittaker

Senior Caseworker
The Twentieth Century Society
70 Cowcross Street

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

The Twentieth Century Society, 70 Cowcross Street, London EC1M 6EJ – [REDACTED]

[REDACTED]
www.c20society.org.uk



Koukouthaki, Katerina

From: Rabbi Shalom Morris [REDACTED] >
Sent: 06 November 2023 16:44
To: McNicol, Rob; Nancollas, Tom; Koukouthaki, Katerina
Subject: Re: Conservation Area Consultation Response
Attachments: Faith_Letter.jpeg

THIS IS AN EXTERNAL EMAIL

Hi,

I'm separately submitting this letter which supports Option 3. It was circulated by the area's three faith leaders, including me. I hope it reflects the extent to which the local faith community shares the same view, which should be particularly significant in light of the fact that the proposed CA is meant to preserve the history of faith in the area.

Thank you for taking this into consideration.

Best,

Rabbi Morris

From: Rabbi Shalom Morris
Sent: Monday, November 6, 2023 4:33 PM
To: McNicol, Rob [REDACTED]; Nancollas, Tom [REDACTED];
Koukouthaki, Katerina [REDACTED] >
Subject: Conservation Area Consultation Response

Dear Rob, Tom and Kat,

Please find attached my personal submission. The 'Synagogue' has submitted separately. I hope you've found this to be an enriching and enlightening process, and that you will reach a recommendation that the synagogue, and 95% of respondents, support. I think you all realize that this is an opportunity to create something significant and lasting for future generations, and to support community cohesion, which is hugely important during trying times.

I look forward to hopefully taking it forward together with you. Thank you for the open-minded consultation.

Best,

Rabbi Morris

Dear friend,

October 2023

CREECHURCH CONSERVATION AREA CONSULTATION

The City of London is currently consulting on a Conservation Area:
(<https://creechurchconservationarea.commonplace.is/en-GB/proposals/surveyquestions/step1>)
that acknowledges the importance of the area around Creechurch Lane in terms of its history and its architecture. This plan will help to protect what makes this area so special.



At the heart of the area is the site of Aldgate Priory (Creechurch), which until the 16th century was one of the largest complexes of buildings in the medieval City of London.

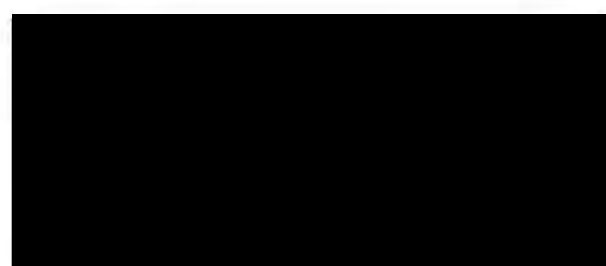
There are three alternative options for the Conservation Area. All three acknowledge that the significance of the area is wider than just the site of the former priory. Each also includes areas such as Aldgate Square and St Botolph's Church, as these are linked historically to the priory and also are important to the understanding and the context of the area.

The first two options however exclude the area around Bevis Marks Synagogue, the oldest Synagogue in the United Kingdom, and the oldest in Europe to have been in continuous use, along with parts of the former priory site, significantly impacting on the cohesion of the proposed Conservation Area and the protections that it seeks to bring to what makes the character of our area so special as a community

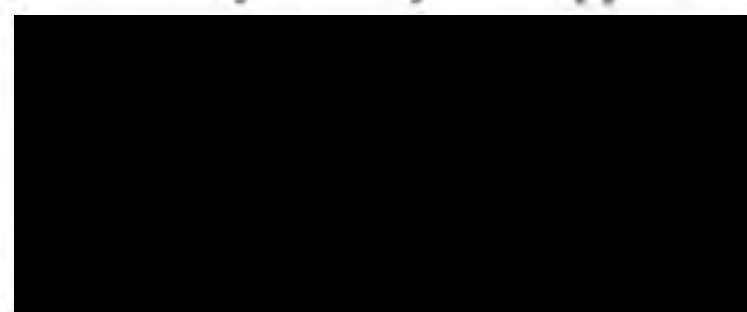
Within the proposed area there are three Grade I listed Places of Worship and together we wish to recommend to you that **Option 3** is the option that makes most sense in protecting the heritage and respecting the history and context of the area. This option would protect the whole of the site of the priory, the Synagogue, as well as slightly extending the area to acknowledge its context in relation to the adjacent old London Wall.

This option acknowledges the Jewish history of the area by including the historic sites of the Great Synagogue and the Creechurch Synagogue. The importance of these sites is already established by heritage plaques. Additionally, this option includes No 31 Bury Street where there is an application to build a 43-storey tower which would negatively impact on the proposed area and particularly would significantly overshadow the Bevis Marks synagogue, irreparably damaging its setting and affecting the light within the building.

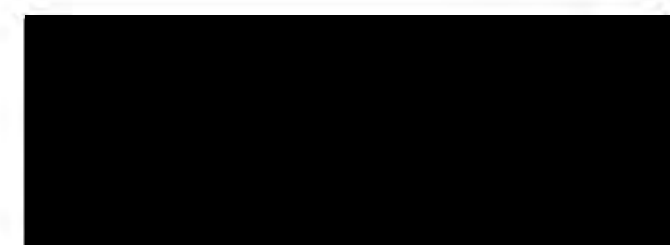
We fully support the creation of this Conservation Area but believe that it is best served by **Option 3** and not by excluding particular buildings and areas in order to limit its scope. We are asking for your support in protecting our local area by commenting on the consultation and making a choice to protect what makes our local area so special as a place where we live, work, and worship. We thank you for your support.



Josh Harris
Priest-in-Charge,
The Guild Church of St Katharine Cree



Shalom Morris
Rabbi,
Bevis Marks Synagogue



Laura Jorgensen
Rector,
St Botolph without Aldgate



RE: Creechurch Conservation Area Consultation

Dear Planning Team,

Thank you for consulting the Georgian Group on the designation of a new conservation area within the City of London. Our statutory remit relates to applications concerning elements of alteration or demolition to listed buildings dating between 1700-1840. **The Georgian Group's charitable objectives are as follows:**

'to save from destruction or disfigurement Georgian buildings, whether individually or as part of a group, monuments, parks and gardens of architectural and historic interest and, where necessary, encourage their appropriate repair or restoration and the protection and improvement of their setting'.

'to stimulate public knowledge and appreciation of Georgian architecture and town planning; of Georgian taste as displayed in the applied arts design and craftsmanship, and its influence on later periods'.

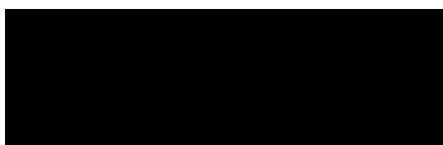
The Group has reviewed the options proposed by your local authority and forward the following comments and recommendations.

Development Threat

The Group objected to two applications within the setting of Bevis Marks Synagogue in 2021, these were for a tower rising to just under 198 metres located at 31 Bury House and a tower rising to just over 93 metres situated at 33 Creechurch Lane. Both these applications, if permitted, would have caused significant harm to the setting and significance of Bevis Marks Synagogue and the Group were vocal in highlighting this threat to the City of London. Whilst the two applications were refused by your local authority, the threat to the synagogue from surrounding development still exists and measures need to be implemented to safeguard the significance of the grade I listed Bevis Marks, the oldest surviving synagogue in England.

Paragraph 10 of the *Conservation Area Appraisal, Designation and Management Second Edition, Historic England Advice Note 1* **states that 'conservation area** designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest'.

The Group therefore welcomes the initial steps in designating a conservation area including Bevis Marks Synagogue and acknowledging the rich history of this part of the City of London.



Registered Charity No. 209934

Patron HRH The Prince of Wales
Vice-Patron The Rt Rev. and Rt Hon. Lord Chartres GCVO
President The Duchess of Argyll
Chairman Paul Zisman
Director David Adshead

Significance of Surrounding Area

The Bevis Marks and Creechurch area possesses considerable archaeological, **architectural, artistic, and historic interest and is worthy of designation. The Group's** statutory remit relates to listed buildings dating between 1700-1840 and for this reason only those buildings and their setting dating to this period will be alluded to within this letter. The Group defers to the expertise of other societies on buildings within their periods.

Bevis Marks Synagogue

Bevis Marks is the oldest surviving synagogue in England and is statutorily listed at grade I. It is a rare survival of an extremely well-preserved synagogue which has remained in continual use since its completion in 1701. Externally, the design of the building has drawn comparisons with the city churches of Christopher Wren and the early nonconformist meeting houses – most evidently with their large, arch headed windows. The interior of Bevis Marks bears a strong resemblance to the building of its mother congregation, the Portuguese great synagogue of Amsterdam designed by Elias Bouwman. Historic fabric linking these important synagogues is present in **Bevis Marks, in the form of the great central chandelier which sits over the reader's** platform and four lamp stands that stand before the Torah shrine.

Whilst the architectural interest of Bevis Marks is exceptional, the contribution the building and its associations make to the historic interest of the surrounding area is of the utmost importance. Bevis Marks is the only survivor of three Jewish places of worship in the vicinity. The first synagogue after the resettlement was situated where the existing Cunard House sits and is commemorated with a historic City **Corporation Plaque. Duke's Place was the location of the now demolished Great** Synagogue which was constructed to serve the growing congregation in the area but destroyed by bombing in 1941. Bevis Marks is therefore the last tangible link to the historic Jewish association in this area of London.

The setting of the synagogue not only greatly contributes to the significance of the **building as an architectural composition but also to the synagogue's religious** workings and function. The provision of light into a synagogue is fundamental to the practices of **Judaism and would have been an influential factor in Joseph Avis's** designs. Bevis Marks admits natural light through the large windows on the first floor, providing a suitable environment for the reading and reciting of prayers. This is particularly necessary on the eastern wall of the synagogue where the Ehal is located, which, in the case of Bevis Marks, is made up of three ark cupboards divided by pilasters of the Corinthian order. Setting is influenced by environmental factors, as set out within **Historic England's guidance document GPA3 *The Setting of Heritage Assets***. Reducing the amount of light into the synagogue would harm its setting and therefore significance.

Wrapped around the synagogue is an enclosed space which performs a vital liturgical function in the celebrations of festivals and holy days. This space is seen as an extension of the synagogue and is therefore due equal protection. Threats to this functioning space have been posed in recent years and consent has been rightly refused. Now is the time to provide further protection to ensure the courtyard is allowed to continue to perform its integral function.

Whilst development threats to the south of Bevis Mark's Synagogue have highlighted the impact on the setting and significance of the building, development to the north would have a similar impact. The attached boundary to this letter includes those

buildings facing Houndsditch and Bevis Marks which are consistent in their scale and massing. This scale respects and preserves the setting of the synagogue whilst contributing to the surrounding character and appearance of the Creechurch area. Their inclusion is therefore recommended for the benefit of the wider conservation area.

St Botolph without Aldgate

St Botolph's church is located on the site of an earlier building thought to date to the 16th century but with earlier origins. The current building was designed by George Dance the elder and built between 1741-44. Dance was at this time the Clerk of Works for the City of London, a role he held from 1735 until 1765, and during this time was responsible for the Mansion House at Bank. Dance has a great association with the surrounding area, with his son George Dance Jnr taking up the role of Clerk of Works for the City of London in 1767. St Botolph's church possesses exceptional architectural and historic interest.

Externally, the church is laid in Flemish bond with mixed yellow and red brick and stone dressings. Venetian windows are present to the north, east and west elevations along with Gibbsian surrounds and pedimented doorways forming an impressive classical composition. The church is aligned N-S meaning that the tower, which rises from a pediment topping the body of the church, forms a pleasing view from the south and longer views down the Minories. The tower and spire hold prominence in its surroundings giving it a landmark quality.

The classical composition of the tower and northern elevation is appreciated from the Minories, with the buildings on the western and eastern side framing the church when approaching from the south. Their inclusion within the proposed conservation area is encouraged for the benefit of the surrounding character and appearance and **setting of St Botolph's Church.**

The setting of the St Botolph's greatly contributes to the significance of the church and the prominence the spire has on the surrounding built environment is a key element. The hotel development to the east of the church allows for the spire to appear against a clear skyline when moving along Leadenhall Street onto Aldgate High Street. Whilst development to the rear, notably Irongate House and those buildings between Houndsditch and **Bevis Mark's leading to Duke's Place**, contribute **to the setting of St Botolph's** due to their relatively low-rise design. The consistent roofline and scale along the eastern and western sides of the Minories draws the eye **towards the northern elevation of St Botolph's and the spire creates a pleasing** townscape element. The erection of One Creechurch Place has harmed the setting of **St Botolph's church when viewed across Aldgate Square** from the east, creating the potential for enhancement with future development.

Historic Interest of the Area

The Bevis Marks and Creechurch area has exceptional historic interest relating to the presence of Bevis Marks and those sites where former synagogues were located. The area has important and visible associations with the Jewish community and their resettlement within the City of London during the 17th century. This is a contributing factor to the importance of the proposed conservation area. The presence of Bevis Marks along with the two plaques commemorating the former synagogues within the area represent a unique connection between the area and the Jewish community and for wider Anglo-Jewry relations.

Alongside Bevis Marks Synagogue, two religious buildings in St Botolph's without Aldgate and St Katherine's Cree creates a distinct character of important religious institutions.

Legislation

Section 69(1) of the Planning (Listed Building and Conservation Areas) Act 1990 sets out the requirement for local authorities to determine areas which it is desirable to preserve and enhance, and designate them as conservation areas. Section 69(2) sets out the requirement for local authorities to review their past activities in this area, including existing conservation areas, and to add more conservation areas.

Recommendation

The Georgian Group supports the designation of the Creechurch and Bevis Marks Conservation Area, however certain additions should be made to fully reflect the special interest present.

To protect the setting and significance of those buildings falling within the Group's remit, we support option 3 with additional buildings to the east and south. The extent of this new boundary is shown in the map attached to this letter. There is a clear special interest within the area of Bevis Marks and Creechurch and for this to be fully recognised we recommend the City of London adhere to Option 3 with those additions to the east and south.

Options 1 and 2 put forward do not address the imposing threats of development in the vicinity and the need to expand on this is integral to character and appearance of the proposed designation. Omitting 31 Bury Street and One Creechurch Place would leave two plots of land located within the middle of the proposed conservation area open to development. If development was permitted on these two plots it would put into question the special interest of the conservation area, as well as causing serious harm to the significance of Bevis Marks synagogue.

Including those buildings to east and south of option 3 would ensure the landmark **quality of St Botolph's church is preserved. The church and its spire are prominent in** views down the Minories and from across Aldgate High Street. Extending the conservation area boundary to protect this would enhance the special interest associated with the designation. Whilst including those buildings facing Houndsditch is integral to preserving the setting of the Bevis Marks Synagogue courtyard.

Not all buildings within a conservation area will contribute to its importance and their inclusion should be seen as an opportunity to manage change and create the opportunity to address past harmful development, as set out within the Historic England guidance on conservation areas.

Designation reflecting the boundary put forward within this letter would help solve the potential threat on assets of the highest importance. Expanding the conservation area to the north to include those building on Houndsditch would preserve the setting of Bevis Marks synagogue, whilst expansion to the south and east would **preserve the landmark quality of St Botolph's church.**

Yours Sincerely,

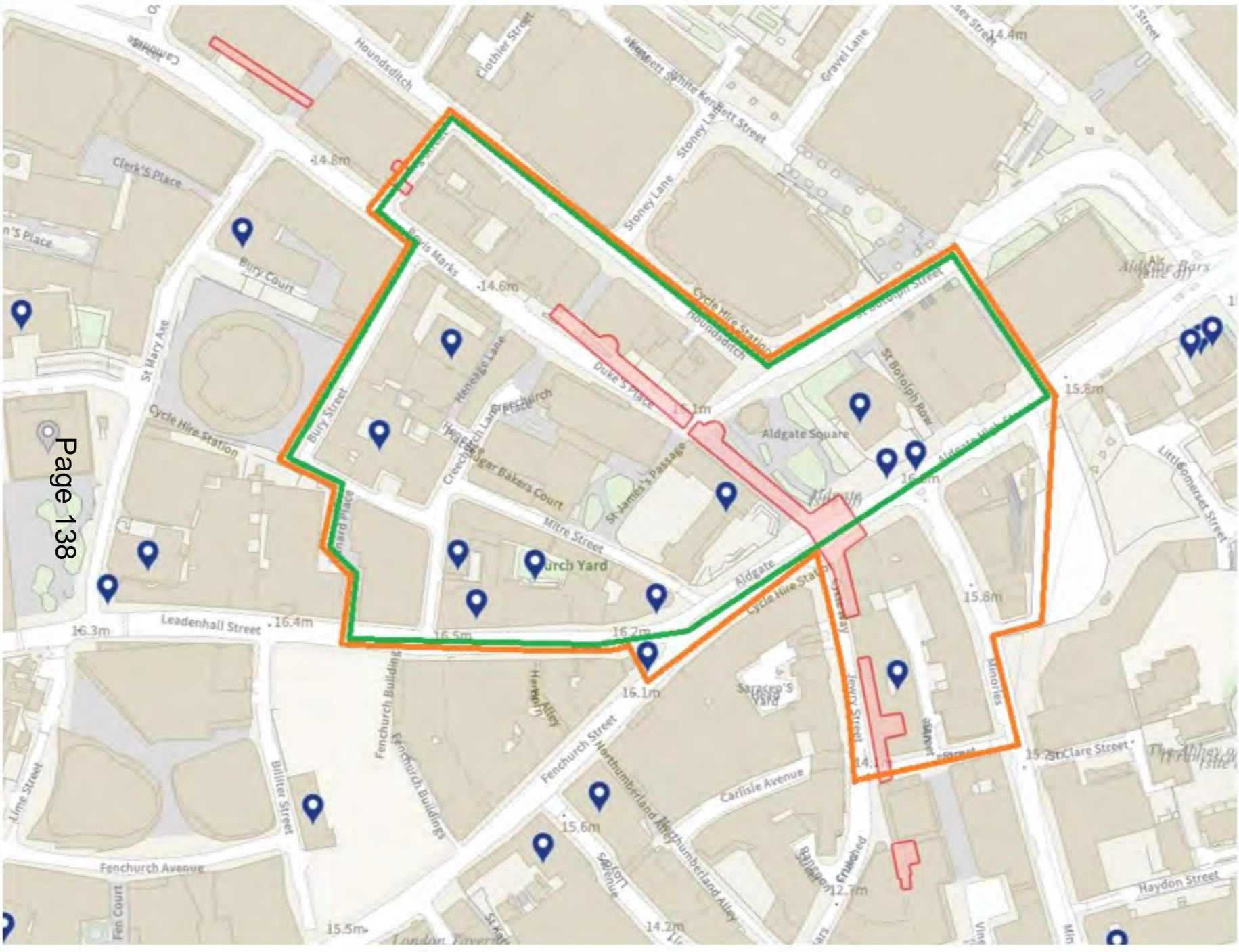
Edward Waller (Conservation Adviser for London and the Southeast)

Map showing the boundaries of Option 3 (as per consultation) and Option 3 Plus as proposed by SAVE Britain's Heritage (Map Base: Historic England)

Option 3 Boundary

Option 3 Plus Boundary

-  **Listed building**
-  **Remains of London's Roman Wall - Scheduled Ancient Monument**





Historic England

By email:

PlanningPolicyConsultations@cityoflondon.gov.uk

Our ref: PL00794106

Historic Environment Team
Department of the Built Environment
City of London
PO Box 270
London
EC2P 2EJ

Date: 6/11/2023

Dear Historic Environment Team

Re: Public Consultation on the proposed Creechurch Conservation Area designation

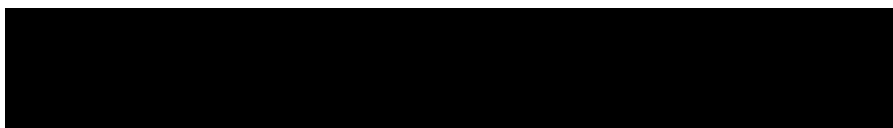
Thank you for consulting Historic England on the City of London's proposal to designate the Creechurch Conservation Area.

We have reviewed the consultation documents in light of the *National Planning Policy Framework* (NPPF, 2023) which requires, as one of its core objectives, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Historic England updated its conservation area guidance in 2019, which you may find useful: *Conservation Area Appraisal, Designation and Management Historic England Advice Note 1* (Second Edition) dated 8th February 2019 <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

Historic England Advice

The City of London's area proposal documentation, dated 23 July 2023, clearly demonstrates that the area displays considerable architectural and historic interest consistent with the requirement for local planning authorities to designate areas which it is desirable to preserve and enhance (Section 69(1)) of the Planning (listed buildings and conservation areas) Act 1990. We would therefore support the designation of a conservation area in this case, although we recommend that you give further consideration to its extent.





The area encompasses the former monastic precinct of Holy Trinity Priory, a number of exceptional religious buildings and spaces, and many fine commercial buildings, including the grade II* listed Holland House and richly embellished warehouses. The religious history of the area is reflected in the three exceptional grade I listed buildings: Bevis Marks Synagogue; the church of St Botolph-Without-Aldgate; and the church of St Katherine Cree. As identified in the proposal document, the archaeological potential, place names, forms and spaces with its hidden courtyards and churchyards all help to underpin the area's strong sense of history.

The consultation sets out three potential conservation area boundary options. Two options are proposed by the City of London, with Option 1 (the City's preferred option), tightly drawn to exclude 31 Bury Street. Option 2 includes 31 Bury Street and creates a more legible boundary along Bury Street. A third proposal, prepared for Bevis Marks Synagogue by Alec Forshaw and Esther Robinson Wild, sets out a case for a wider designated area. This third option provides additional analysis of architectural character and scale and further recommendations to inform the subsequent appraisal and management guidelines.

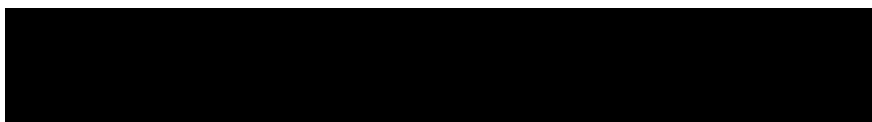
Having reviewed the proposals, Historic England recommends an enhanced version of Option 2, incorporating 31 Bury Street, Cunard House and One Creechurch Place; we think this would be the most compelling conservation area boundary (see attached map).

To the south of Bury Street, we consider there is clear merit in the inclusion of Cunard House. The site of the first Synagogue, built in 1657 (commemorated by a plaque), Cunard House also responds positively to No 80 Leadenhall Street, and the church of St Katherine Cree. The current Cunard House is of some architectural merit and to the rear provides an appropriate sense of enclosure to Creechurch Lane and Bury Street, where it responds well to the scale of the street.

31 Bury Street was built as an extension to the grade II* listed Holland House in 1967. In our view this building should be included within the conservation area. To explain that recommendation we refer to the following advice in paragraph 58 of Historic England's Advice Note No. 1:

Setting and views - 58. Heritage assets can gain significance from their relationship with their setting whilst views from within or outside an area form an important way in which its significance is experienced and appreciated. This part of the appraisal should identify how the landscape or townscape that the area is located within contributes to its special interest, perhaps by providing approaches along historic routes or visual connections between different areas that illustrate an important historic relationship.

31 Bury Street is sympathetic to the general scale of historic development in views along Bury Street and Creechurch Lane. It occupies an integral and significant part of the townscape within the proposed conservation area at the junction of Creechurch Lane and Bury Street and to omit this site would create an inconsistent boundary cutting into the historic street pattern. It is therefore logical that building is included within the conservation area and that in the event of





redevelopment, any replacement is subject to appropriate requirements to ensure it contributes positively to the character and appearance of the area.

We would also recommend the inclusion of the South eastern section of Bevis Marks/Dukes Place/Houndsditch from (and including) No 17 Bevis Marks to Irongate House. The City Wall is a key influence on the street pattern and survives below ground and in basements; although it is well protected as a scheduled monument, it is also a key influence on the historic street pattern as reflected above ground. No 17 Bevis Marks and No 40 Greenly House are imposing handsome classically inspired commercial buildings which form the northern extension to Creechurch Lane and contribute positively to the area. No 17 Bevis Marks is by Lewis Solomon, a prominent Jewish architect with associations to Aldgate and Whitechapel. Irongate House (1978) is somewhat of an architectural anomaly constructed from exceptionally rare granite. It occupies the prominent southern corner of Dukes Place and is well proportioned.

We note that other heritage bodies have suggested wider boundaries, all of which include the buildings we are suggesting are incorporated. We consider that our recommended boundary is the minimum area that would capture what is special about the local character of this area, and would allow for its effective management. However, we suggest that you also give careful consideration to other potential additions.

It must be noted that not all buildings will make a positive contribution to the character and appearance of a conservation area and that all the presented options include buildings which are architecturally neutral. In many instances these help to define and reinforce the form and scale of the historic townscape through appropriate parapet heights, by reinforcing the historic street pattern and sense of enclosure. The exception to this, and excluded from the City's boundary proposals, is One Creechurch Place, completed in 2016. The scale and appearance of this development is wholly alien to the character of the area. However, its prominent location within the street pattern, as defined by Duke's Place and the historic city wall boundary and its overbearing impact on the proposed conservation area are such that we consider it should be included within the boundary but clearly identified as detracting from the historic and architectural character and appearance of the area. This would facilitate consideration of how such impacts can be mitigated and how opportunities for future enhancement should be managed.

We note that both City options include the grade II listed Aldgate pump, which is excluded from Option 3. We agree that this important historic feature, which is both artistically pleasing and reflects the wider social history of the area, should be included.

Conservation Area Appraisal and Management Plan

The proposed conservation area is subject to extensive development pressure and as such its preservation and enhancement will depend upon a robust approach to the wider management of the area. In the event of designation, we would support the Option 3 proposal report which



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

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



calls for any subsequent appraisal and management plan to set out robust guidance on how development within the area and its setting should respond in order to preserve or enhance its character and appearance. The appraisal and management plan should seek to identify key views and landmarks from both within, and outside of, the designated area and identify sensitivities and opportunities for enhancement. This management plan should complement and reinforce policy protection for individually designated heritage assets within the area and their settings.

Guidance should also identify opportunities for new development to enhance the area through reinstating the appearance of finer grain development and by seeking opportunities to reconnect historic street patterns. Attention should also be given to ensuring that new development incorporates more active frontages where appropriate.

Conclusion

Subject to the above recommendations, Historic England welcomes the proposal to designate the conservation area and considers this will make a valuable contribution to the future management of this important historic quarter of the City.

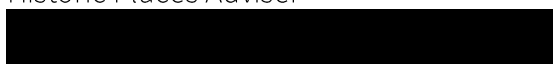
In the event of designation, we would expect the City to produce a full conservation area appraisal and management plan which addresses the key issues of development pressure, and the impact development within the conservation area and its setting can have on its special character. Given the pressure for change and the sensitivity of the area we would greatly value the opportunity to work with the City and key stakeholders to develop a robust management plan for the area in order to preserve and enhance its character and appearance.

I hope you find the above observations helpful. If you wish to discuss any of the above issues, please do contact me.

It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment.

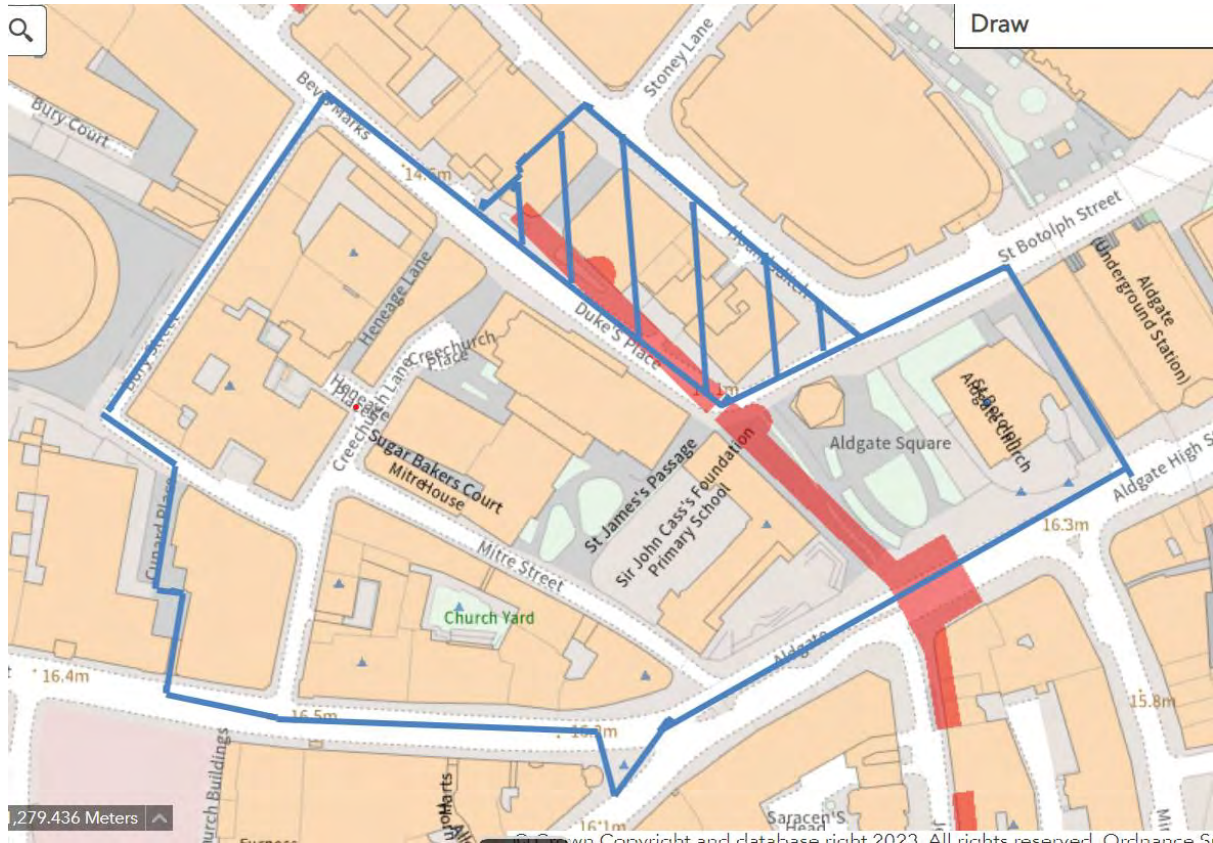
Yours sincerely

Richard Parish
Historic Places Adviser



Appendix One

Creechurch Conservation Area Boundary Proposal: Historic England proposed boundary showing appropriate minimum extent and recommended Houndsditch extension to include Creechurch Lane (north) and scheduled ancient monument.



Koukouthaki, Katerina

From: Jeremy Randall [REDACTED]
Sent: 06 November 2023 09:25
To: McNicol, Rob; Koukouthaki, Katerina; Nancollas, Tom
Subject: Creechurch Conservation Area Consultation.

THIS IS AN EXTERNAL EMAIL

Dear Rob, Kat, Tom,

We write on behalf of our client, Merchant Land, and submit representations to the consultation on the proposed designation of the Creechurch Conservation Area.

Merchant Land own the building at 33 Creechurch Lane, which is in the centre of the proposed Conservation Area.

Katherine McCullough of Merchant Land addressed Members of the Planning and Transportation Committee in July 2023 and indicated Merchant Land's in principle support for the establishment of the new Creechurch Conservation Area. In particular, Merchant Land highlighted that such a heritage designation would *inter alia* provide an "an excellent opportunity to provide well considered guidance for decision makers, officers, land-owners and local stakeholders".

Merchant Land remain supportive of the principle of the creation of the Creechurch Conservation Area as set out in the Creechurch Conservation Area Appraisal prepared by City of London in July 2023 in respect of Option 1. This option has been prepared by expert officers and the evidence prepared as part of an Appraisal as required by national Guidance.

It is considered that the assessment conducted by City officers aligns with the legislation, relevant policy, and guidance required in respect of the preparation of Conservation Area designations, and Merchant Land agree that the area of the proposed Conservation Area set out in Option 1 is broadly of sufficient architectural and historic interest to be designated a Conservation Area. This is not the case for Option 3.

Merchant Land have reviewed the proposed options for the proposed Conservation Area and the accompanying material prepared by the City Corporation and the Bevis Mark Synagogue.

Merchant Land consider strongly that the extent of the Conservation Area should not be drawn on the basis of one stakeholder's assessment of the area (Option 3), which will inevitably bring a bias to the process. Guidance is clear that a Conservation Area designation should not be to protect buildings which are not of special architectural or historic interest, or areas that lack special interest (NPPF, 2023, para 191).

Merchant Land are of the view that Option 1, which has been prepared by City Officers with the appropriate expertise in this heritage field, should form the basis of the Conservation Area. It is right that the impartiality of the City's assessment should be given more weight by the decision makers in concluding on the appropriate extent. In particular, we note in the Synagogue's assessment of the proposed extended Conservation Area, that they make unsupported assessments about "appropriate height" and identifying buildings as "positive contributors" in order to unjustifiably widen the extent of the proposed Conservation Area. This assessment is at odds with the City's assessment and as a result, having regard to the NPPF and Conservation Area designation guidance, adopting this approach would devalue the Conservation Area by including areas that lack special architectural or historic interest.

It is considered that Option 3 is not in line with policy and guidance in respect of designation criteria. The inclusion of buildings lacking special architectural or historic interest within the proposed boundary has not been justified within the Synagogue's appraisal. Accordingly, it is considered that the decision makers should give limited weight to the submission with regards to Option three and base the implementation of the new Conservation Area on the

impartial assessment prepared by the City officers who we are confident have given careful consideration to heritage issues at hand and the strongly held views of key stakeholders including those of the Synagogue.

Our specific responses to the consultation questions are as follows:

1. *Do you agree that the Creechurch area should be designated as a conservation area?*
 - Yes
2. *Which is your preferred option? If you don't like any of them you can offer an Option 4.*
 - Option 1
3. *If you choose Option 4, please describe your preferred boundary.*
 - N/A
4. *Why do you think your selected area is of special architectural or historic interest?*
 - As set out above
5. *Please share any additional general information and facts about the area to support your choice.*
 - As set out above

We would be happy to elaborate on these representations if helpful. Please can you confirm safe receipt of these representations.

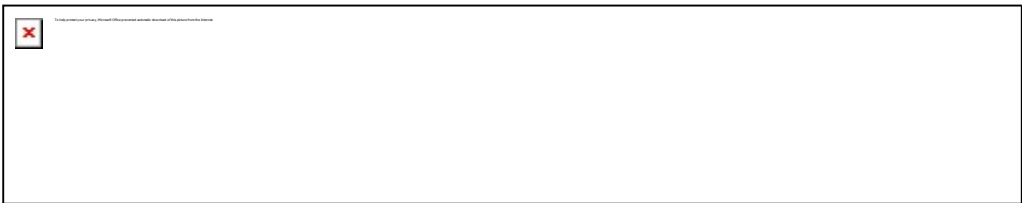
Kind regards,

Jeremy

Jeremy Randall
Partner



Gerald Eve LLP
Bow Bells House, 1 Bread Street
London, EC4M 9BE
www.geraldeve.com



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6 November 2023

Dear City of London Planning Department,

I'm writing to express my personal views on the proposed Creechurch Conservation Area. I write this as the rabbi of Bevis Marks Synagogue, a PhD student in Jewish history at King's College London, and as a resident in the proposed area with a deep understanding of its streets and character.

I've used these past weeks to reflect on the different proposed boundary options. Without question only Option 3 reflects the history and needs of Bevis Marks Synagogue, the British Jewish community, and the cohesion of the area more broadly.

What follows is a consideration of three different components of Option 3. They reflect three different issues that set Option 3 apart from Options 1 and 2, and that warrant its full adoption.

1. 31 Bury St - The exclusion of this site in Option 1 is deeply inappropriate and profoundly offensive.
 - A. It is clear that a tall building on this site would harm the synagogue. This has already been demonstrated in numerous studies (light, setting, etc) and confirmed in a prior planning decision. This should be reason enough to include in the CA, if it is indeed going to conserve the area at all.
 - B. 31 Bury has direct views down Heneage Lane over the all-important eastern windows of Bevis Marks Synagogue making it clearly part of the setting of the synagogue. Any change to the current building would result in immediate impact on the synagogue, and as such it cannot be considered a different area.
 - C. It sits next to Grade 2* Holland House, so it is clearly part of its setting.
 - D. It shares a party wall with Holland House, so it is clearly part of the same 'area' and cannot reasonably be excised from it.
 - E. It was built as an extension of Holland House, so is clearly both a part of its setting and shares the same area.
 - F. The exclusion of this site would essentially create the feeling on the ground of two different areas, that around the synagogue and the area of the churches. Any inappropriate redevelopment would essentially divide between the two pockets, removing any sense of cohesion between the two that is currently maintained by the similarity in massing of the current site with the area of the synagogue and the churches.

2. Creechurch Lane - This is the name given to the Conservation Area, and yet, numerous buildings along it have been excluded in Options 1 and 2.
 - A. The exclusion of so many buildings will lead to redevelopment which could eradicate the cohesion currently maintained along this area due to the similarity in massing of nearly every buildings along it.
 - B. Cunard House is the historic site of the 'Synagogue of the Resettlement' the place where Jews first met for worship upon being readmitted to England in 1656, following their expulsion in 1290. It is difficult to overstate its historic importance, and for that reason it is marked with a historic plaque. Without question it should be included in the Conservation Area.

- C. 1 Creechurch Place is the historic site of the 'Great Synagogue', the spiritual home of Ashkenazi Jewry from 1690-1941, when it was destroyed in the Blitz. It too is marked with a historic plaque, reflecting its immense historic significance, and it should therefore not be excluded.
 - D. Together with Bevis Marks Synagogue, these three synagogues reflect the Historic Jewish District of London which was centred along Creechurch Lane and the surrounding area. Only by including all of these sites will the cohesion of the entire area be maintained and allow for the preservation of this hugely important historic Jewish area and its story.
 - E. Finally, each of the synagogue sites reflect a different stage in the Jewish community's acceptance into Britain as understood by historians. Creechurch Lane Synagogue was a 'house' synagogue, Bevis Marks Synagogue was a 'private' synagogue kept within a courtyard, while Dukes Place Synagogue was a 'public' synagogue built along a public thoroughfare. Together, they reflect an important evolution in British religious tolerance and Jewish comfort in England. Excluding any of these sites would diminish the ability to understand this history, an exceptionally important story that should be preserved and celebrated in Britain today.
3. Bevis Marks/Dukes Place - The buildings along this street run along the route of the London Wall, with its archeology extant below ground.
- A. Their inclusion allow for a natural and fitting edge to the Conservation Area, as the Jewish community's location was not randomly located, but specifically situated at the periphery of the City. This reflected the degree to which the community was permitted to settle in the City, but still kept at its edge. The inclusion of these buildings will help future generations to 'read' this history through thoughtful future redevelopment.
 - B. The Hebrew name of Bevis Marks Synagogue is 'Gate of Heaven' (taken from the Biblical dream of Jacob's Ladder). This name was likely selected to reflect the synagogue's proximity to London Wall and the nearby gates at Aldgate, Bishopsgate, etc. The community imagined that while those locations were gates into the city, the synagogue was the gate to heaven. By including the route of the wall within the the Conservation Area, this important association and self-understanding can be recalled and highlighted.
 - C. The proximity to London Wall to both the medieval Priory Holy Trinity and the inn of Bury St Edmonds Abbey (where the synagogue is now located), is also necessary for understanding their histories at the City's edge and their role with travellers, such as with St Botolph's Church Without Aldgate.
 - D. The sites along this route if not appropriately redeveloped would negatively impact Bevis Marks Synagogue if built to a height that blocks out the morning light, which is already diminished by previous unsympathetic development. The opportunity to protect the synagogue from this further harm should be embraced by the inclusion of this street in the Conservation Area.

You can see more about these three issues in the following videos that I've made both previously and more recently in response to the consultation:



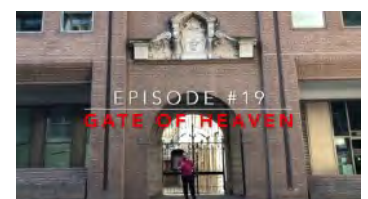
Creechurch Lane



31 Bury St



London's Historic Jewish District



London Wall

It think it goes without saying that the exclusion of 31 Bury St, or the sites of synagogues already recognised for their historic importance with memorial plaques, would stand at odds with the legal responsibility to promote community cohesion and to protect the rights of a minority community. It is simply indefensible to exclude 31 Bury St knowing that a tall building on its site would harm a synagogue. Indeed, inclusion of these sites is an opportunity to fulfil the objective of this law and for the City to demonstrate leadership and cultural understanding and sensitivity. Not doing so, would send an entirely different message to the Jewish community and wider society, and mark a dangerous precedent of not adhering to such a deeply important law in multicultural Britain.

Finally, I would add that I think this is an opportunity for the City to capitalise on future opportunities that only boundary Option 3 would afford. The creation of this Conservation Area would allow the area around Creechurch Lane to truly become a cultural destination, much as is the case in historic Jewish areas in places like Venice and other European cities. It would demonstrate the City's appreciation for its Jewish history and current-day Jewish community, and encourage this history to be further highlighted in new redevelopment and cultural offerings.

I see the adoption of Option 3 as a turning point in community relations, and ultimately as a win-win for both the Jewish community and the City of London. Let's not squander this moment, or usher in another round of planning battles that would surely ensue by adopting another option.

Thank you for the consideration.

Best,

Rabbi Shalom Morris



**PROPOSED
CREECHURCH
CONSERVATION
AREA**

1st November 2023

INTRODUCTION

SAVE Britain's Heritage is delighted that the City Corporation has elected to consider designating a new Conservation Area in the Creechurch, Bevis Marks and Aldgate area. This is a deeply historic area of London whose significance is under-recognised in terms of heritage designation.

In responding to the current consultation SAVE has assessed the site and buildings by way of site visits – including the public exhibition on Friday 20th October – as well as consideration of the two reports accompanying Options 2 and 3, reference to architectural reviews including Niklaus Pevsner's Buildings of England and consultation with experts on this historic area of London.

Following careful assessment, we fully endorse Option 3 as proposed by Alec Forshaw and Esther Robinson Wild plus several key additions which are shown on the attached Option 3 Plus map and detailed in the supporting text below. For clarity, we have titled our proposed boundary area Option 3 Plus to reflect the alignment with the current Option 3 but including the expanded areas. For comparison, both boundaries are shown in the map on the following page.

The following assessment focuses on the extensions we have deemed to be appropriate, coherent and justified additions to the proposed Conservation Area. We defer to other statutory heritage bodies on particular buildings, features and / or additions which fall within the period of their expertise.

OVERALL SPECIAL ARCHITECTURAL AND HISTORIC INTEREST

Historic England's *Conservation Area Appraisal, Designation and Management Second Edition, Advice Note 1* states that: "conservation area designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest".

The Advice Note goes on at para 11 to set out three questions for use when defining eligibility for conservation area status:

- a. Does the area have sufficient architectural or historic interest for the area to be considered 'special';
- b. Whether this is experienced through its character and appearance;
- c. Whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help solve.

We consider the proposed Creechurch Conservation Area satisfies all these criteria, being both of exceptional architectural, historic and evidential significance, all of which are readily evident in the experience and character of being in the area. There are issues of neglect in places and well documented ongoing development change. Designation would provide a positive policy toolkit for addressing these issues and managing them in the future. In this sense, SAVE considers the area to be an anomaly, being of exceptional historic significance but thus far unrecognised or protected in planning terms.

Despite its near total inclusion within the City's designated Eastern Cluster boundary area for tall buildings¹ (see map excerpt on page 5), the Creechurch locality remains fundamentally low scale. It exhibits a collection of exceptionally important historic, architectural and cultural landmarks studded amongst a range of unlisted buildings which contribute positively to historic sense of place. Three of these landmarks are listed at grade I, including the internationally significant Bevis Marks Synagogue, a survivor of the highest historic and cultural order. These buildings are carefully and convincingly assessed in both the City's draft Conservation Area Proposal text accompanying Option 2, and the report accompanying

¹ Defined by the City as buildings over 75m Above Ordnance Datum (AOD)
Page | 2

Option 3. We do not propose to repeat this material here but add our strong support to the justification and content of Option 3 of the consultation.

The area also contains a rich collection of non-designated heritage assets, many of which follow the City's medieval street pattern. All currently benefit from no planning protection or heritage recognition despite forming a rich ensemble of buildings reflecting multiple historic periods, architectural styles and cultural uses in the area for over 1000 years. Beyond historic and architectural interest, the area is also of extraordinary evidential and archaeological interest, from the surviving elements of the Roman wall (now a scheduled ancient monument) and the grade II listed remains of Holy Trinity Priory houses in nos 39-40 Mitre Street, to the Bevis Marks Synagogue and the deep social and cultural association this building has with the Sephardic Jewish community in this part of London, a link which has remained unbroken since the late 18th century.



Bevis Marks Synagogue sits within an enclosed courtyard but was designed with windows to all elevations to maximise light into the historic interior. Further protection of its setting would be a major benefit of Conservation Area designation (Credit: SAVE Britain's Heritage)

The area's unusually low-scale character reaches its climax at Aldgate Square, an attractive open space which creates exhilarating and increasingly rare short and long distance views through the conservation area. Many are framed and complimented by the long arterial streets which punctuate the proposed Conservation Area and which create coherent borders in terms of scale. These include Houndsditch to the north, and Leadenhall Street and Aldgate to the south, but also the historic thoroughfares of Jewry and Minories, whose width and length promote the enjoyment of historic views of the areas listed landmarks.



Above: Aldgate Square forms a focal point for the conservation area which creates a visual and practical connection with the historic buildings on both sides of Aldgate High Street (Credit: SAVE Britain's Heritage)

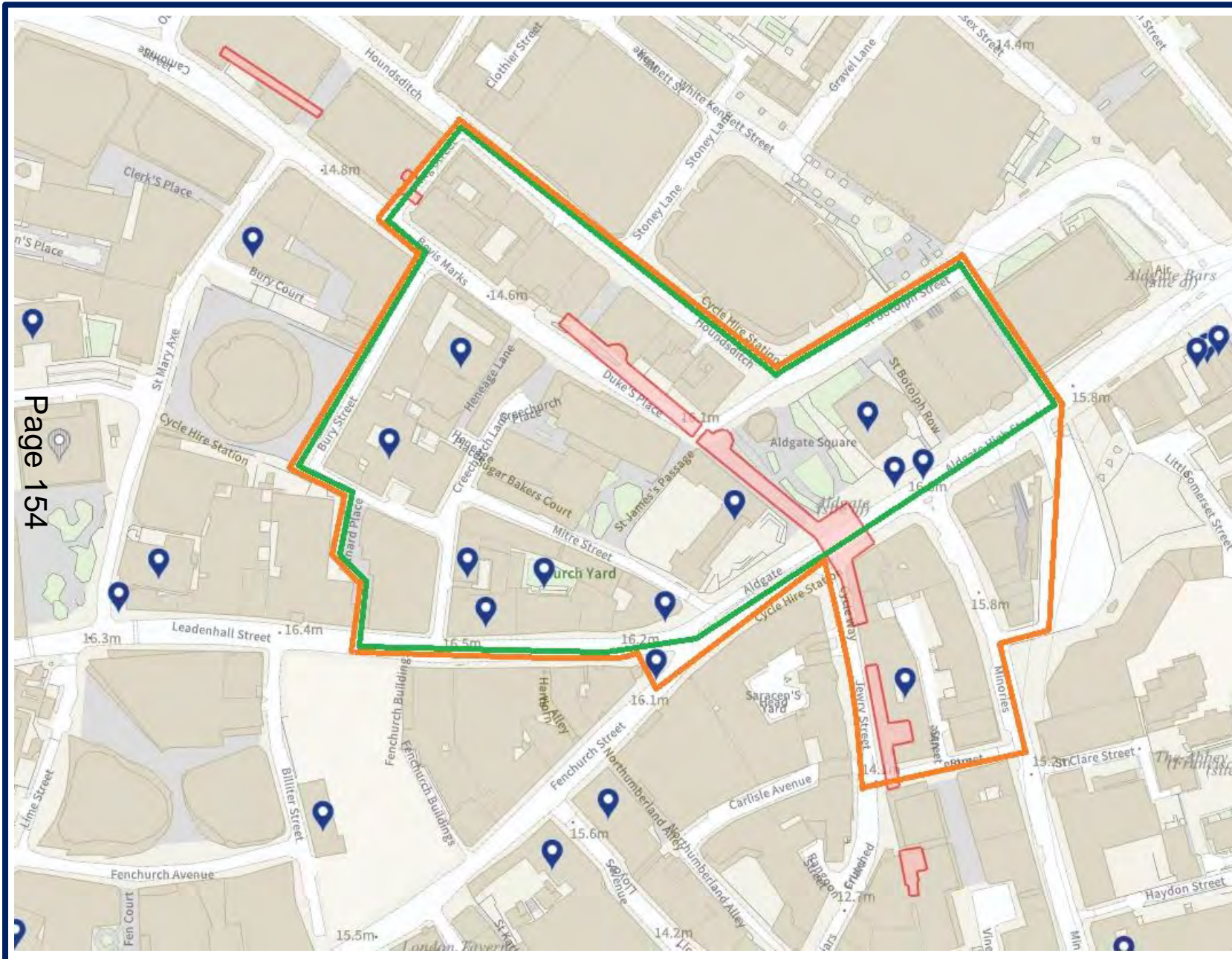


Left: Portsoken Pavilion by Make Architects was completed in 2018 to mark the new public space in Aldgate. Built from glass, wood and steel the building is a sculptural monocoque and a positive addition to the character of the area and a good example of the kind of sympathetic new development a conservation area would promote more of (Credit: Courtesy of Make Architects)

PROPOSED BOUNDARIES

In line with Historic England's Advice Note guidance, the boundaries proposed by SAVE are an extended version of those proposed in Option 3 of the consultation. To facilitate clear policy enforcement, all boundaries run down the centreline of roads, with the exception of the passageway through Cunard House from Bury Street through to Leadenhall Street. We consider running conservation area boundaries along party walls of existing buildings, as is proposed in the City's Option 1 boundary map at 31 Bury Street, raises immediate issues over fabric and setting impacts of possible development and how these would be treated. This is particularly the case with Option 1, where the boundary proposed would skirt along the party wall of the grade II* listed Holland House.



OPTION 3 & PROPOSED OPTION 3 PLUS BOUNDARIES MAP



Map showing the boundaries of Option 3 (as per consultation) and Option 3 Plus as proposed by SAVE Britain's Heritage (Map Base: Historic England)

Option 3 Boundary

Option 3 Plus Boundary

-  **Listed building**
-  **Remains of London's Roman Wall - Scheduled Ancient Monument**

MANAGING DEVELOPMENT PRESSURE POSITIVELY

The Bevis Marks Synagogue is one of the most important historic synagogues in the world, and of international significance. The sensitivity of its setting was a key reason for the refusal of recent plans to erect a 47 storey tower in place of the building at 31 Bury Street and a 27 storey immediately adjacent on Heneage Lane. On this basis, we consider the inclusion of 31 Bury Street, as presented in Options 2, 3 and now our proposed Option 3 Plus, to be both logical and justified. If the Synagogue is to be a fundamental feature of the proposed conservation area's special interest, including its immediate setting is both logical and necessary if the integrity of its grade I listing and the conservation area is to be enforceable. The omission of 33 Bury Street and the emerging plans for a 42 storey tower on the site risks undermining this.

Protection of the synagogue and its setting would therefore be a primary function of any conservation area designation. The inclusion of the procession of 20th century office buildings to the north of Duke's Place would act as a positive barrier to insensitive development already encroaching on the area, including extent permissions along Houndsditch.

We also view conservation area designation as a positive tool for promoting sympathetic new development which would enhance the character of the area. Extending the conservation area boundary to include the buildings and streets proposed under SAVE's Option 3 Plus would encourage this approach to development, allowing the historic environment to be celebrated whilst adapting to changing needs and uses.



Map from The City Plan (2014) showing the currently adopted Eastern Cluster Area for tall buildings, which covers a substantial portion of the proposed Creechurch Conservation Area. Designation would complement existing planning guidance by providing specific guidance on the character and location of new development within the historic Creechurch and Aldgate locality (Credit: Page 70 of City Plan)



View up Mitre Street towards 31 Bury Street and the Gherkin behind. 31 Bury Street appears well scaled in this context, with contrasting façade materials and detailing creating a sense of variety at the termination of the street, further enhancing the setting of the listed warehouses either side (Credit: SAVE Britain's Heritage)

CURRENT UNDER-DESIGNATION

The coherent and low scale character of the area as a whole, including the extensions proposed, is as remarkable as the survival of so many landmark buildings and streets which reflect the development of many of the City's earliest communities and cultural activities. Yet this part of The City, approaching the eastern boundary with Tower Hamlets has been long under-recognised in planning and heritage terms.

Paragraph 75 of Historic England's Advice Note on designation highlights "the need to consider whether the setting is itself sufficiently protected by national policy or the policies in the Local Plan." Bar one, none of the buildings proposed in SAVE's extended boundary area currently benefit from no protection, despite forming a critical part of the setting of listed landmarks within, and views into, from and across the conservation area. Including them in the proposed conservation area is therefore a key opportunity to address this issue. Including these extensions in the conservation area would also afford these positive buildings protection against demolition under permitted development rights.

PROPOSED EXTENTIONS – OPTION 3 PLUS

The extensions proposed in SAVE's proposed Option 3 Plus Conservation Area Boundary draw on the same criteria for which the current options have been proposed for designation. The extensions proposed here include a range of designated and undesignated historic buildings to the South Eastern corner of the proposed conservation area which share important characteristics, scale and significance with the existing boundary area. We consider their inclusion would be complimentary and coherent in the overall recognition of this area as a conservation area of national importance. The additions are as follows:

EXTENSION 1: ALDGATE UNDERGROUND STATION



Left: The 1926 frontage to the unlisted Aldgate Underground Station | Right: Blue Boar Alley looking north, which would form the eastern boundary of the expanded Conservation Area proposed by SAVE and others (Option 3 Plus) (Credit: SAVE Britain's Heritage)

Significance

Aldgate Underground Station is an unusual survivor and an important historic landmark deserving of inclusion in the conservation area. The frontage building is by Charles Walter Clark built in 1925-26 and exhibits the classic white faience style which is familiar from other Metropolitan Line stations at Paddington, Willesden Green and Farringdon, which are all Grade II listed. Farringdon also shares a similar combination of Victorian Train shed and 1926 frontage. Aldgate's great iron trainshed behind the frontage was built by the Metropolitan Railway in 1876 as its new terminus stations and was retained when the frontage building was rebuilt in the 1920s.

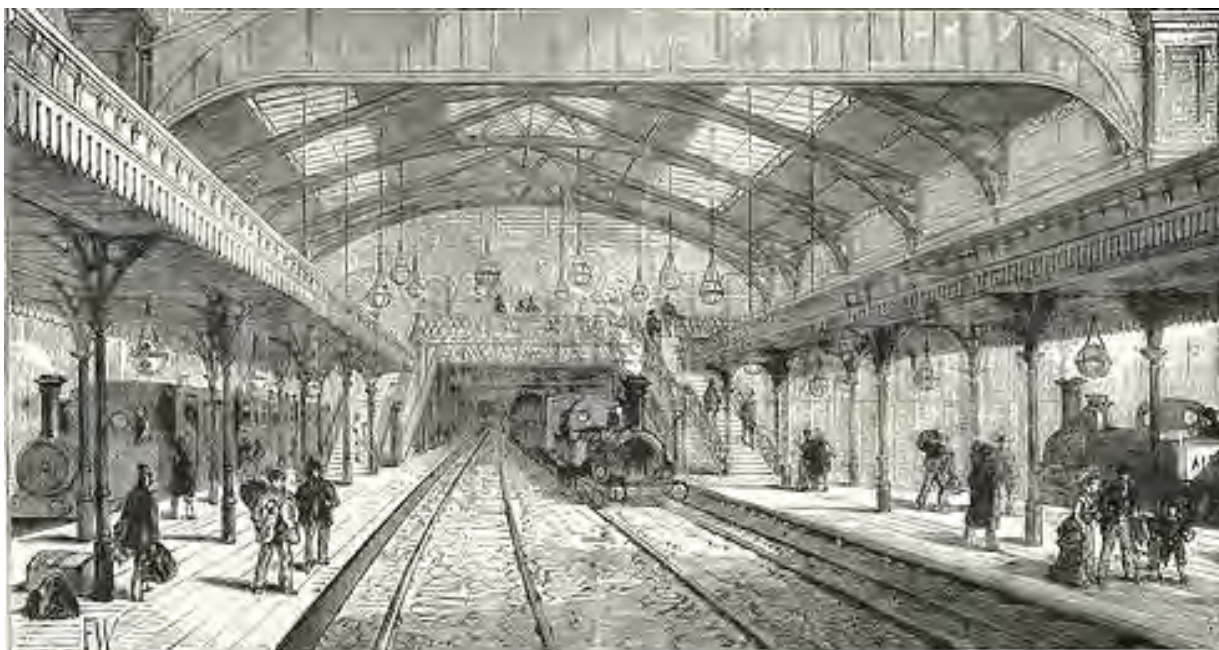
The trainshed and station below retain many features of the original design, including the unusual turquoise and maroon tiling patterns at street level, with decorative ironwork platform canopies, stock brick retaining walls and cast-iron columns supporting these structures from below, with attractive symmetrical staircases connecting street level to platforms.



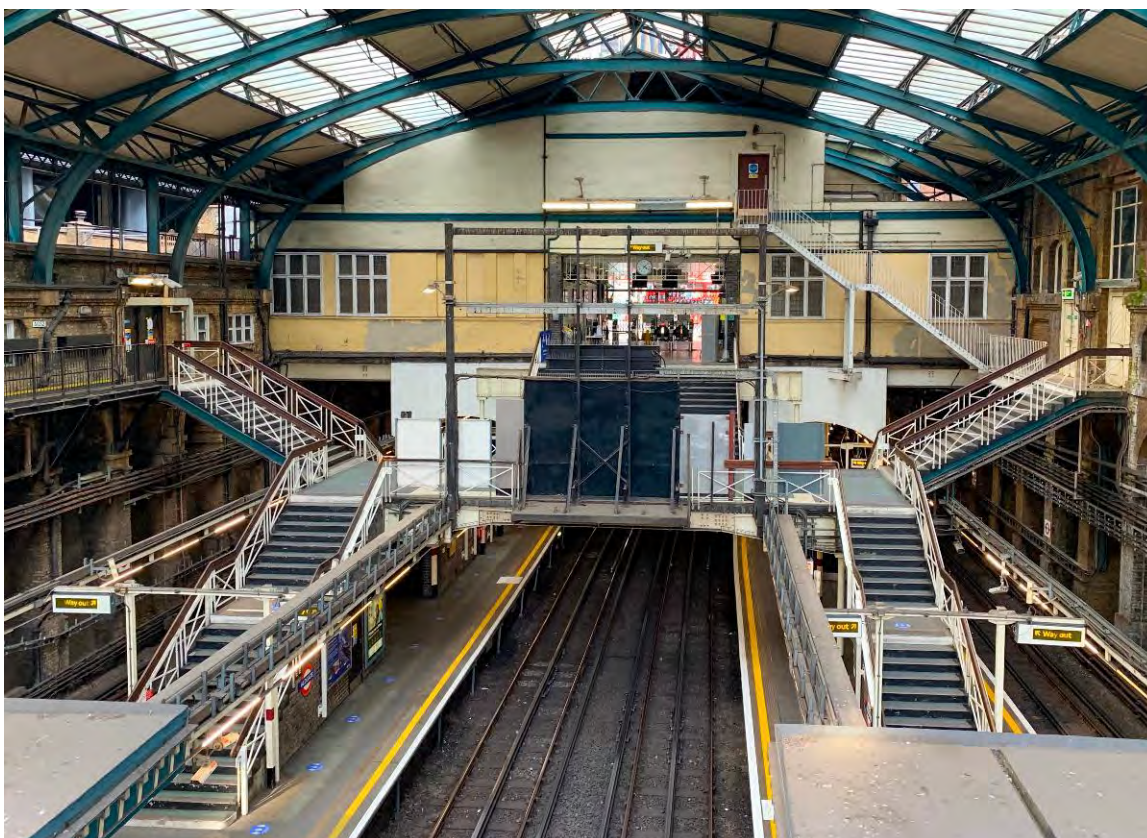
View looking north within the Victorian trainshed of Aldgate Underground Station, completed in 1876, with the cast iron span roof over the four platforms below (Credit: SAVE Britain's Heritage)

Justification for inclusion

The survival of the 1876 trainshed extant today is remarkable, and despite its low scale at street level, is of clear landmark quality when viewed from all directions along Aldgate High Street. Its inclusion would also create a strong and legible bookend to the conservation area on the north side of Aldgate High Street. Despite its clear historic significance and townscape contribution, the station has no form of heritage protection. Extending the boundary eastwards to include the station would provide this, with the boundary terminating along Blue Boar Alley allowing for a clear and coherent boundary which would also relate well to the other extensions proposed below.



Etching of Aldgate Underground Station trainshed at platform level in the 1890s, with the island platform canopies on either side – the cast iron columns and spandrels are largely still extant (Credit: Wikipedia)



Views looking south within Aldgate Station towards the ticket hall and entrance, with the decorative symmetrical staircases either side (Credit: Wikipedia)

EXTENSION 2: AREA BOUNDED BY ALDGATE HIGH STREET, MINORIES, INDIA STREET, AND EASTERN SIDE OF JEWRY



The Victorian terrace along the south side of Aldgate High Street (73-78) with Minories to the right side (Credit: SAVE Britain's Heritage)

73-78 ALDGATE HIGH STREET, 1 MINORIES, 2-5 MINORIES AND 6-12 MINORIES

Significance

The buildings which characterise the southern side of Aldgate High Street form and the north eastern side of Minories are interesting and increasingly rare Victorian survivals. **73-78 Aldgate High Street** is a terrace of six mid Victorian properties is a very fine composition, and a rare survival in this part of the City's eastern fringe both in terms of collective survival as a single historic urban block and its low-scale. All these buildings are of four storeys and exhibit a rich and diverse mix of ashlar and brick facades. **Nos 73-75 Aldgate High Street** form an elegant tripartite classical features frontage, including fluted and rusticated pilasters, a dentil cornice and central triangular pediment. The windows on the upper two storeys display attractive lugged architraves.



The attractive frontage of Nos 73-75 Aldgate High Street (Credit: SAVE Britain's Heritage)

Spanning just three bays, **No.76 Aldgate High Street** is the narrowest on the terrace but is distinct for its original arched sash windows set in a pale yellow stock brick façade decorated with stone dressings and a decorative painted guilloche inset below the pediment. **Nos 77 and 78 Aldgate High Street** are of an earlier Italianate style, of paler brick and decorative fenestration. Architraves at 1st floor level are characterised by decorative consoles and cornices. **No. 78 Aldgate High Street** is the former Rose & Crown public house (archive photograph below).

No.1 Minories is a handsome curved Neo-Georgian five storey edifice of red brick with stone dressings and classical elements such as the corner window pediment, multi-pane sash windows, deep dentiled cornice at 2nd floor level and segmental pediments to the attic dormers. This building and Portsoken House opposite create a generous splayed corner at the junction of Minories and Aldgate High Street which only add to the landmark nature of views to and from the grade I listed church of St Botolph without Aldgate.

The collective presence and survival of these buildings on the areas medieval street pattern focuses and frames the view north up Minories towards the church tower of St Botolph without Aldgate. Sheet 121 of Goad's Insurance Maps Vol III (copied below with buildings circled in green) shows that 76-78 Aldgate High Street, 1 Minories and 6-12 Minories were all extant by 1887, with their historic footprint backing on to the underground railway cutting behind still clearly visible.



Sheet 121 of God's Insurance Plan Vol III, showing the area immediately south of Aldgate High Street in 1877. Green boundary shows the buildings which are still extant today (Credit: London Picture Archive)



The view looking north up Minories, framed by Portsoken House on the left and 1 and 2-5 Minories on the right-hand side (Credit: SAVE Britain's Heritage)



Left: Historic photograph of 76 and 78 Aldgate High Street which once house the former Rose & Crown Public House | Right: 1 Minories which spans the wide corner with Aldgate High Street (Credit: SAVE Britain's Heritage)

2-5 Minories fills a gap site on the eastern flank of the street, with the current building noted in Pevsner as being the work of 'Keith Dalton & Associates, 1986-88, with rounded verticals and green cladding'. We defer to The Twentieth Century Society on the more detailed architectural merits and contribution of this building to the area.



Justification for inclusion

These buildings currently benefit from no heritage protection and are showing clear signs of neglect and / or vacancy on many of the upper floors. The variety of architectural language within the terrace and its intact survival (bar 2-5 Minories) is of both architectural and historic significance, and together they would contribute strongly to the special interest of a proposed conservation area. In turn designation would provide the tools to address this neglect and bring these historic buildings back into full and vibrant use.

They also share a clear relationship with the generally low scale of the proposed conservation area, and help frame important views of landmarks identified as key features of the conservation area. We therefore consider their inclusion to be fully justified. The pressure of largescale development on Aldgate High Street could negatively impact these buildings unless they are afforded some degree of protection. The approved scheme at 60 Aldgate High Street is a case in point. Conservation area designation would provide guidance on how to manage development like and help shape it more sympathetically earlier in the planning process.

Existing



Existing and Proposed views showing the view-to-be looking east with the currently undesignated Underground Station to the left and the unlisted Victorian terrace of 73-78 Aldgate High Street to the right (Credit: Planning Documents)

Proposed



The new Aldgate Square has strengthened the physical and historic connection between the historic buildings and streets to the north and the south of Aldgate and Aldgate High Street. Extending the conservation area boundary in line with Option 3 Plus is therefore justified in terms of the shared character and historic development of these two sides of Aldgate. Designation would formalise this connection in the planning process for future development, facilitating greater positive change within the wider area, including along Jewry Street and Minories, where the current historic buildings benefit from no policy recognition or protection in heritage terms.

87-89 ALDGATE HIGH STREET & PORTSOKEN HOUSE



The curved Italianate frontage of 87-89 Aldgate High Street (Credit: SAVE Britain's Heritage)

The handsome stucco edifice of **87-89 Aldgate High Street** echoes the scale and decorative design of the corresponding building at **No.1 Minories**. Described in Pevsner as being still '*undilutedly Italianate*' in style, the building is thought to be the work of D.A. Cobbett, and dates from 1860. The building comprises a generous central curved corner frontage, flanked by two symmetrical wings, all three characterised with stone coining, decorative architraves and a centrally placed venetian window on each elevation. The roofline is marked by pedimented dormers on all, set back against the single storey mansard roof.



The curved range of Portsoken House as seen from the north side of Aldgate High Street (Credit: SAVE Britain's Heritage)

Portsoken House forms the western corner of Minories and Aldgate High Street and is a building of high architectural significance and landmark quality. Portsoken House was completed in 1927-28 to designs by the renowned architect George Val Myer who also designed the grade II* listed BBC Broadcasting House on Portland Place (1932), and the landmark Alford House on Park Lane in Mayfair (1930-32). When Portsoken House was completed it was reputed to be the tallest office building in the City of London. This tall stone faced building is characterised by rich classical detailing and strong horizontal bands of windows which add to the street presence and the building which is currently used for offices.

Nos. 6-12 Minories comprises a row of 4 unlisted Victorian commercial buildings built in 1891-93. Pevsner notes the unusually ornate detailing, including corbelled out 2nd floor balconies, denoting their historic use facing onto the street. Busts of lions and floral consoles are particular features of architectural note. Historic maps indicate the buildings were used to house manufacturing businesses in latter 19th and early 20th centuries', perhaps explaining their decorative public facades.

These buildings look to be in average to poor condition, with clear signs of neglect on the upper storeys. They nonetheless make a clear and positive contribution to the street scene and we consider them to be coherent additions to the conservation area, relating in both period, use and style to the surviving Victorian terrace moving south from Aldgate High Street.



The four adjoining Victorian buildings at Nos. 6-12 Minories are attractive contributors to the architectural character of the area, but remain unlisted (Credit: SAVE Britain's Heritage)

ALDGATE & JEWRY STREET

Aldgate Pump is a grade II listed Victorian water pump which stands at the junction where Aldgate meets Fenchurch Street and Leadenhall Street.

A well has been noted on this spot since the 13th century, with the current structure consisting of a tapering stone pier with brass dog's head spout and triangular pediment. The current pump is thought to be 18th century in origin and has come to be seen as the symbolic threshold of the East End of London. The pump is no longer in use for drawing water but is the only surviving historic fragment at this important visual junction of the conservation area which has otherwise undergone extensive rebuilding during the 20th century.

Right: The Aldgate Pump in 1847, with its original stone basin and ornate wrought iron lantern, both of which were removed in the early 20th century (Credit: Wikipedia Commons)

Below: Modern day view looking eastwards from the Aldgate Pump into the proposed Creechchurch Conservation Area and fellow listed landmarks including St Botolph without Aldgate (Credit: SAVE Britain's Heritage)



The Three Tuns Public House, 36 Jewry street

Evidence of a public houses on this site dates back to 1747, with the present building erected in 1939 by the Charringtons Brewery. Fragments of the old Roman London Wall runs through the pub cellar and have been preserved behind a large Perspex panel. The pub forms a positive feature along the curving Jewry Street, its slightly lower scale creating a pleasant contrast between the two unlisted buildings either side.



The Three Tuns Public House, 36 Jewry street in 1941 and in 2023 (Credit: SAVE Britain's Heritage)

The Portal Trust & David Game College, 31 Jewry Street (formerly the Sir John Cass Institute)

This impressive row of interconnected buildings forms the eastern side of Jewry Street and comprises one grade II listed building built in 1898-1901 by A.W. Cooksey (who also designed the later Aldgate School of 1908 on Dukes Place which is at the heart of this proposed new conservation area) with its unlisted extension built in 1954 and designed by Verner Rees (1886-1966), who also designed Westmoreland County Hall in Kendal of 1939, Swansea University Library of 1937, the London School of Hygiene & Tropical Medicine in Bloomsbury of 1929.

The grade II listed portion of the building shares an important link to the existing area proposed for the conservation area being by the same architect as the Sir John Cass School (now Aldgate School). This building was however the first of the two to be established in this area under bequests made by Sir John Cass. Receiving a detailed entry in Pevsner, the building today remains a major landmark on Jewry Street and together with the adjoining buildings moving north towards Aldgate, forms a clear link with the school and by virtue the proposed conservation area boundary in all options under consideration.

A further connection with the conservation area as proposed is the preservation of further fragments of Roman Wall with the basements of the college.



View looking north up Jewry Street and long decorative frontage of the former Sir John Cass Institute (Credit: SAVE Britain's Heritage)



The northerly extension added to the Sir John Cass Institute in 1954 is an attractive landmark designed by Verner Rees (Credit: SAVE Britain's Heritage)

CONCLUSIONS

1. SAVE wishes to reiterate its support for Option 3 (as currently proposed for consultation) as the starting point for any proposed Creechurch Conservation Area, but with the extensions outlined above (Option 3 Plus) for inclusion in the final conservation area boundary put to Members of the Planning Committee.
2. Designation of the extensions proposed in Option 3 Plus would help guide coherent and sympathetic development in the wider area as a whole, with the ancient thoroughfare of Aldgate and Aldgate High Street – together with Aldgate Square – at the heart of the new conservation area.
3. This area of the City clearly possesses a high and varied degree of historic, architectural and evidential significance, which together generate a place of special interest deserving of recognition and protection. On this basis, we consider our proposed Option 3 Plus to fully meet the criteria set down for conservation area designation in The Planning (Listed Buildings and Conservation Areas) Act 1990.
4. We consider the extensions proposed by SAVE others to be fully justified in terms of the criteria set out in Historic England guidance for conservation area designation and the duties the City of London Corporation is beholden to under Section 69 of the Planning Act 1990.
5. These include clear and positive historical connections, architectural coherence and key shared characteristics including a consistent low-scale townscape and the interspersal of landmark civic buildings amongst unlisted but largely contemporaneous non-designated heritage assets which currently benefit from no statutory protection.
6. Conservation area boundaries should provide certainty. The boundaries proposed in our extended Option 3 Plus are logical and enforceable by design, demarking the conservation area clearly from its setting.
7. Should the City proceed to designate a new Creechurch Conservation Area, we also consider it essential that a Management Plan be created to accompany the Conservation Area Appraisal. In an area of high development pressure, clear guidance on the nature, scale and placement of new development will be key to the effective protection and enhancement of the conservation area as a planning consideration.
8. Further detail on the kinds of management policies which such a Management Plan might contain are set out in paragraph 9.03 of the Option 3 report prepared by Alec Forshaw and Esther Robinson Wild.

Ben Dewfield-Oakley

Conservation Officer, SAVE Britain's Heritage

24th October 2023

SAVE
BRITAIN'S HERITAGE

Front cover image: Aerial birds eye view from above Aldgate School looking over St Botolph without Aldgate church & the buildings along Aldgate High Street with Aldgate Square in the centre foreground (Credit: © Justin Kase Zninez)

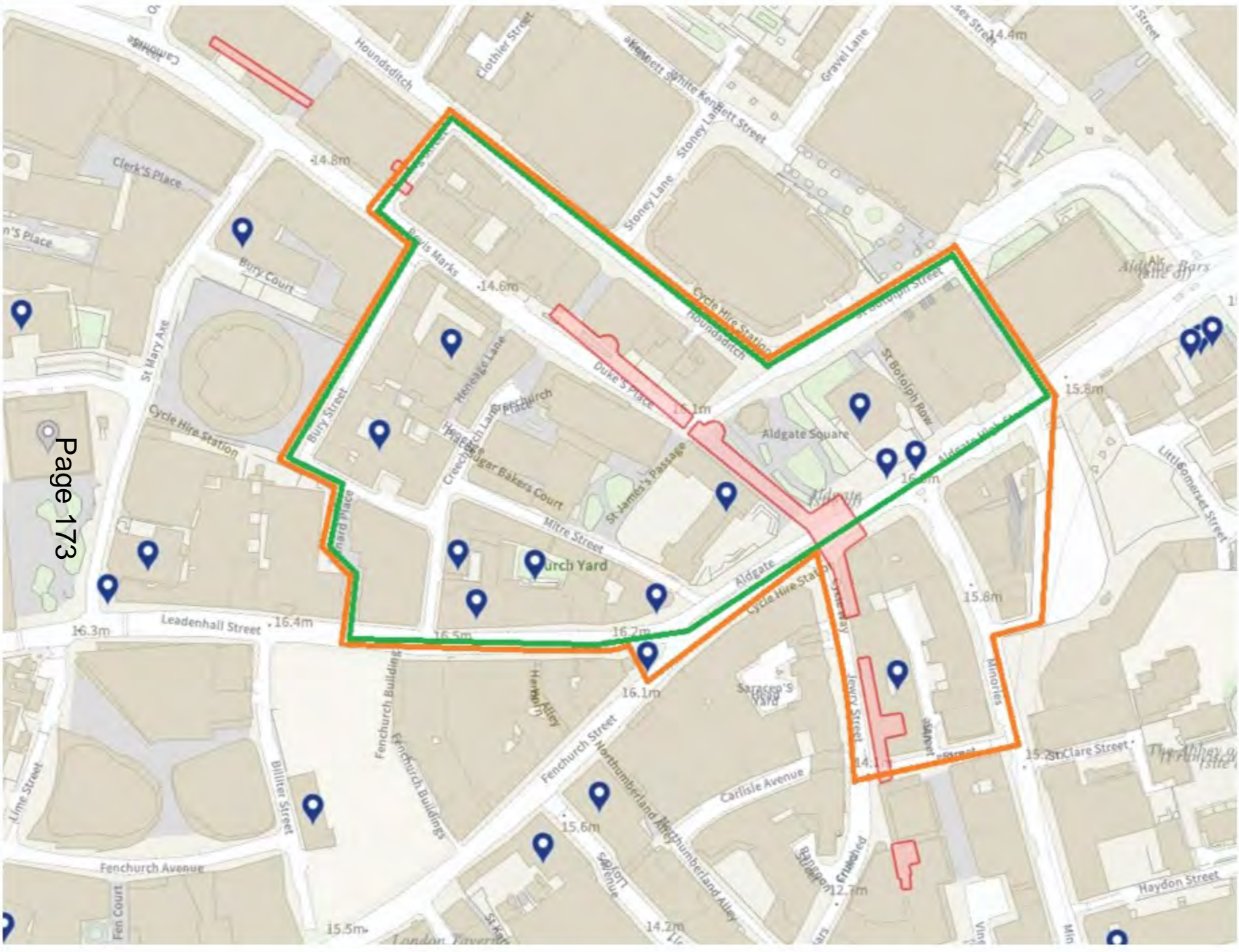
All images © SAVE Britain's Heritage unless otherwise stated

Map showing the boundaries of Option 3 (as per consultation) and Option 3 Plus as proposed by SAVE Britain's Heritage (Map Base: Historic England)

Option 3 Boundary

Option 3 Plus Boundary

-  **Listed building**
-  **Remains of London's Roman Wall - Scheduled Ancient Monument**



Koukouthaki, Katerina

From: McNicol, Rob
Sent: 07 November 2023 09:35
To: Nancollas, Tom; Koukouthaki, Katerina
Subject: FW: Consultation Response to Proposed Creechurch Conservation Area
Attachments: Cover Letter_Consultation Response_S&P Sephardi Community.pdf; Detailed_Consultation Response_S&P Sephardi Community.pdf; Historical Considerations_Consultation Response (A Green)_S&P Sephardi Community.pdf; Protected Characteristics_Consultation Response (S Sackman)_S&P Sephardi Community.pdf



Rob McNicol | Assistant Director (planning policy and strategy)
Environment Department | City of London | Guildhall | London EC2V 7HH
[REDACTED]
[REDACTED] | www.cityoflondon.gov.uk

From: Tilla Crowne [REDACTED]
Sent: Monday, November 6, 2023 3:37 PM
To: McNicol, Rob [REDACTED]
Cc: Rabbi Shalom Morris [REDACTED]
Subject: Consultation Response to Proposed Creechurch Conservation Area

THIS IS AN EXTERNAL EMAIL

Dear Rob,

Please find attached our formal consultation response.

It includes

1. Cover Letter
2. Detailed Analysis
3. Historical Considerations
4. Protected Characteristics

Thank you for giving it your full consideration.

Best regards,

Tilla Crowne, Trustee, S&P Sephardi Community

TC



[Kal Nidre 5784 Appeal](#)

[We are grateful for your generosity which enables us to unite, succeed and prosper as a Kahal Please \[click here to donate\]\(#\).](#)

Thank you for your generous support.

Tilla Crowne
Trustee



a:



Registered Charity no. 212517

Dear Rob,

I am writing with our formal response to your consultation about the proposed Creechurch Conservation Area.

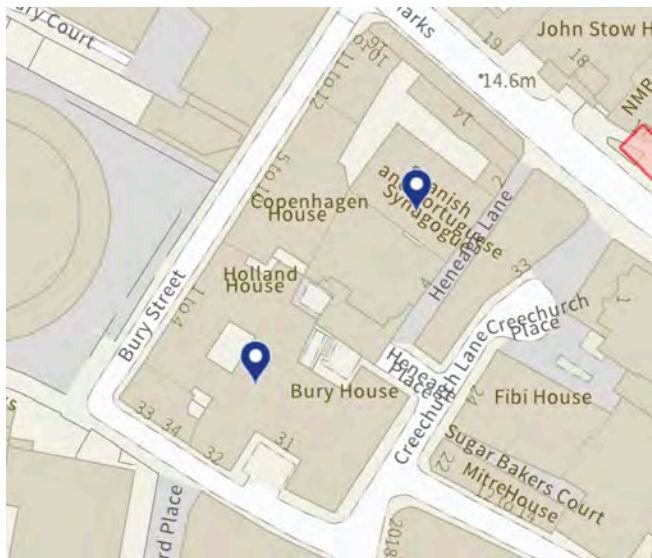
As you know, we are very supportive of the proposal in principle, and grateful to you and your colleagues for having put so much time and effort into getting things this far.

As you also know, we made a submission several months ago which proposed a boundary which you now refer to as Option 3. That submission was the product of detailed and scholarly work by two eminent experts, Alec Forshaw and Esther Robinson Wild.

We have thought hard about your Options 1 and 2, and we can see no justification for them. Both fail to embrace the coherent heritage of the Creechurch/Aldgate area, which has a very strong faith dimension - both Jewish and Christian. Furthermore - and this is I think a factor that has not so far been taken into account - they fail to reflect the fact that, in addition to Bevis Marks Synagogue, the immediate area contains the sites of two other very important synagogues (both of which are remembered through blue plaques). The juxtaposition of these three very important Jewish heritage sites is well illustrated here:



The exclusion of the site of 31 Bury Street from Option 1 is frankly nonsensical, and can only be motivated by considerations that have nothing to do with heritage and good planning. That site is occupied by a building which was purpose-designed as a complementary extension to the Grade 2* Listed Holland House, and which is not separately distinguished from Holland House on the Historic England Listing map:



It makes a marginally positive or at worst neutral contribution to the character of the area.

We are all only too well aware that this is a highly controversial site upon which the owners would like to build a tower that would cause enormous damage to Bevis Marks Synagogue and the area generally. If this site is excluded from the final Conservation Area boundary, the Corporation stands to be severely criticised for allowing its planning judgement to be over-ridden by improper considerations.

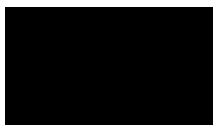
We now attach three further papers. One by Alec Forshaw, which responds in technical terms to the consultation; another by Abigail Green, which explains the history of the Great Synagogue and the Crechurch Lane Synagogue, hitherto seemingly not taken into account; the last is from Sarah Sackman, and is a response to the consultation's questions 6/7 about protected characteristics. I am sure you will want to read them all carefully and take full account of their contents.

I am conscious there has been considerable public interest in the consultation, and that almost all respondents favour Option 3 (or in some cases an enlarged Option 3).

Whether you assess the consultation on the weight of public opinion or the weight of planning evidence, the outcome should be the same: there is everything to be said for Option 3 (with or without extension).

I look forward to seeing your Committee report shortly.

Best wishes,



Tilla Crowne, Trustee, S&P Sephardi Community

PROPOSED CREECHURCH CONSERVATION AREA

RESPONSE TO CITY OF LONDON PUBLIC CONSULTATION FROM BEVIS MARKS SYNAGOGUE - Alec Forshaw

INTRODUCTION AND SUMMARY

1. The London Sephardi Trust (the Trust) and the Spanish and Portuguese Sephardi Community (the Community) are the joint custodians of the Bevis Marks Synagogue. As a very long-established institution, in continuous occupation of its existing premises for over 300 years, the Trust and Community are grateful for the opportunity to contribute towards the future planning and well-being of this part of the City of London.
2. The following comments present their views on the various options that have been put forward for consultation concerning the potential designation of a new Conservation Area in the Creechurch/Bevis Marks area, and sincerely hope that these will be very carefully considered.
3. The proposal that a new Conservation Area be designated with the aim of conserving and enhancing the architectural and historic character and appearance of this part of the City of London is strongly welcomed in principle.
4. Nevertheless, it is essential that the boundaries of the new Conservation Area are drawn in a way that secures this objective. Regardless of the requirement to consider the setting of conservation areas and the heritage assets within them, the inclusion or exclusion of particular buildings or street blocks is extremely important and will have major implications for what is covered by conservation area policies and what is not. It is also particularly important that the historic significance of the area is carefully considered, not only the architectural merits of the existing buildings.

5. It is commonplace for buildings of neutral or negative value to be included within conservation areas. This is explicitly recognised in Paragraph 207 of the National Planning Policy Framework (NPPF) which states that “Not all elements of a Conservation Area or World Heritage Site will contribute to its significance.” Government advice under *Do Local Authorities Need to Review Conservation Areas?* is also clear: “A Conservation Area Appraisal can be used to help local planning authorities develop appropriate policies for local and neighbourhood plans. A good appraisal will consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection”. It is entirely normal that a conservation area can contain negative features.

6. Paragraph 75 of Historic England’s Advice Note 1 (Second Edition) *Conservation Area Designation, Appraisal and Management* considers the issue of conservation area boundaries. It states that: “Before finalising the boundary it is worth considering whether the immediate setting also requires the additional controls afforded by designation, or whether the setting itself is sufficiently protected by national policies or policies in the Local Plan”. Paragraph 91 specifically deals with gap sites or negative contributors within a conservation area, and how detailed proposals for improvement can be made, again recognising that negative or neutral are to be expected in almost any conservation area.

7. Of the three options for the boundaries of a new Creechurch Conservation Area the Trust and Community are very strongly in favour of Option Three. It is considered that the boundaries proposed in Options One and Two are too small to effectively preserve and enhance the outstanding architectural and historical character and appearance of this part of the City of London.

LONDON'S HISTORIC JEWISH DISTRICT

8. The Trust and Community particularly wish to emphasise the very great historical importance of the area in terms of its pivotal role in the story of the Readmission of Jews to England from 1657, which is set out in detail in the Option Three proposal report. The area covered by Option Three includes three sites of great significance in London's Historic Jewish District. These comprise the site of the First Synagogue (1657 – 1701), the site of the Great Synagogue (1690 – 1941) and the Bevis Marks Synagogue, built in 1701. Combined with the underlying remains of the medieval Holy Trinity Priory and the two thriving Christian faith communities at St Katharine Cree and St Botolph Aldgate the historic and present-day spiritual presence in the area is of very high heritage significance.

9. It must be stressed that Annex 2 of NPPF states that the significance of a heritage asset (such as a designated conservation area) may comprise archaeological, architectural, artistic or historic interest. The fact that the First Synagogue and Great Synagogue, or indeed the Holy Trinity Priory and London Wall, have disappeared does not reduce the archaeological and historic importance of their sites.

NO.31 BURY STREET

10. The Trust and Community have a particularly strong objection to the omission in Option One of Bury House, No.31 Bury Street. The Trust and Community devoted a huge amount of time and resources to resisting proposals made in the planning application ref. 20/00848/FULEIA for a very tall building on this site. This application was refused by Planning Committee, against the advice of the planning officers. The Trust and Community are extremely concerned that the exclusion of No.31 Bury Street in Option One from a new Conservation Area is because City planning officers are already engaged in pre-application discussions with the owner/developer and their consultants for a revised redevelopment scheme. While this might be slightly reduced in height, it is likely nevertheless be potentially highly contentious, and raise the same issues

as were considered previously, including a catastrophic loss of daylight to the Synagogue.

11. The Trust and Community are strongly of the opinion that No.31 Bury Street fully justifies inclusion within a new Conservation Area. This is not only because of the proximity of the site to the Bevis Marks Synagogue, and the potential impact of any redevelopment of the site, but also because of the merits of the existing building at No.31 Bury Street.

12. During the consideration of the planning application for the demolition and replacement of the existing No.31 Bury Street virtually no attention was given to the merits of the existing building. Because it was not within a conservation area and had no designated heritage status, demolition was deemed completely uncontroversial. Everything centred around its replacement and the scale and impact of the proposed very tall tower.

13. It is considered that Bury House, No.31 Bury Street does possess merit in its own right. It was constructed in 1967 as an extension to the offices of Holland House which it immediately adjoins. Holland House, listed Grade II*, is a building of very high heritage significance, built in 1916 to the designs of the extrovert Dutch architect Hendrik Petrus Berlage. When Berlage fell out with his client, the wealthy Kröller-Müller shipping firm, the interior decoration of Holland House was completed by Henri van de Velde, his only work in the UK. Van de Velde was a pioneer of Art Nouveau, Modernism and first director of the Bauhaus, and the interiors of Holland House have no contemporary parallel in England.

14. The *Buildings of England: London 1: The City of London* by Simon Bradley and Nikolaus Pevsner describes No 31 Bury Street as an ‘undistinguished extension: Portland stone uprights carry on Berlage’s’. The architect was Gotch and Partners, a large commercial firm based in Pall Mall with branch offices in Glasgow, Brighton and Cardiff. Within the City of London they also designed No.5 Cheapside in 1971, the free-standing octagonal seven-storey structure near St Paul’s precinct which has recently been retrofitted.

15. While Pevsner's description may be modest and restrained, the Trust and Community disagree with the officer assessment in the Option One report that the architecture of No.31 is 'insipid and bland', or 'cannot lay claim to have any architectural or historic interest'. The verticality of the stone columns and the carefully modelled scale of five storeys plus two set-back floors admirably respect the massing of Holland House and are strongly positive elements. The set-back building line of No.31 on Bury Street provides an important well-proportioned forecourt for the eastern entrance of Holland House and an appropriate setting for the remarkable 'ship's prow' sculpture on the street corner.

16. No.31 Bury Street is clearly part of the historic development of the Holland House site. It is worth noting that the Historic England listing description of Holland House (Nos 1-4 and No.32 Bury Street) specifies "rear of premises rebuilt to greater height". This likely refers to the 1967 extension. The map accompanying the list entry also shows no property boundary between Nos. 31 and 32 Bury Street. There is no doubt that No.31 Bury is integral to the development of Holland House and its present-day setting.

- 17.No.31 Bury Street is also an integral part of a complete street block, all of which is included in Option One except for No.31. Its omission makes no sense. It should also be noted that service access to it from Heneage Lane passes over land that is owned by the Synagogue.

- 18.As well as directly abutting Holland House, No.31 Bury Street is surrounded by buildings of appropriate character and scale that are, or should be, included within the Conservation Area. These include the warehouses on Creechurch Lane and Mitre Street, and the northern elevations of Cunard House.

19. It should also be noted that Bury House is occupied and seemingly in good condition, with no indication that it is either obsolete or incapable of continued use.

20. The eastern elevation of No.31 Bury Street is an important component of the view down Mitre Street (illustrated in Figure 3 on Page 16 of the Option One report).

CUNARD HOUSE

21. On the south side of Bury Street, the Trust and Community consider that Cunard House should be included in the Conservation Area. Its east and north-facing brick elevations fronting Creechurch Lane and Bury Street are sensitively scaled and detailed to respect and reflect the warehouses on the east side of Creechurch Lane and Holland House on the north side of Bury Street. Its elevation to Leadenhall Street is grander and stone clad, but stylistically reflects the fine 1930s Art Deco Cunard Building which previous stood on the site, both in terms of design and materials, reusing some of the motifs and decorations from the previous building. It also carefully retains Cunard Passage which would form a logical boundary for a new Conservation Area. Cunard House is an important component in the setting of St Katharine Cree Church, but also for the Bevis Marks Synagogue.
22. Even more importantly Cunard House occupies the site of the first synagogue built after the Readmission of Jews to England in 1657, commemorated by a plaque on the corner of Creechurch Lane and Bury Street. The site of the Creechurch Lane Synagogue is of very high historic significance, and an important component in telling the story of London's historic Jewish District.
23. It is noted that both Options One and Two propose the inclusion within a new Conservation Area of the historic pump sited on the pavement at the acute junction of Leadenhall Street and Fenchurch Street. This structure is statutorily listed and under the ownership and control of the City Corporation and contributes to the local historic and architectural townscape. The Trust and Community would support its inclusion also within Option Three.

DUKES PLACE AND HOUNDSDITCH

24. The Trust and Community also consider that the collection of buildings on the north side of Bevis Marks, and south side of Houndsditch, between Goring Street and Aldgate Square, are important in terms of protecting the setting of the Synagogue and St Botolph's church. While there is a mixture of architectural designs and styles, all from the 20th century, there is a consistency of scale and grain of comparatively small plot sizes which continue that south of Bevis Marks and contribute a positively to the character and appearance of the area. Some of the buildings have particular merit, notably No.30 Duke's Place (Irongate House), No.40 Duke's Place (Greenly House) No.17 Bevis Marks (Creechurch House), No.24 Bevis Marks on the corner with Goring Street, and Nos 40-41 Houndsditch. Creechurch Lane runs north of Bevis Marks to join Houndsditch, flanked by the good elevations of No.17 Bevis Marks and No.40 Duke's Place. It is logical to include the whole of Creechurch Lane within the new Conservation Area.
25. Furthermore, the course and likely fabric of the Roman Wall runs beneath much of this block, reflected in it being a Scheduled Ancient Monument. This part of the area is of very high historic significance. The Hebrew name for the Bevis Marks Synagogue means 'Gate of Heaven'. This is quite probably a reference to its historic location just inside the City walls and close to the ancient gateway of Aldgate.
26. The Trust and Community consider that the existing scale and grain of the street block bordered by Houndsditch, Duke's Place, Bevis Marks and Goring Street must be conserved, including opportunities for enhancement, in order to protect the setting and context of the Synagogue and St Botolph's Church.

ONE CREECHURCH PLACE

27. It is agreed by all that One Creechurch Place has a very negative architectural and townscape impact on the area. The circumstances of its

comparatively recent approval and development, regardless of what was there before, are disappointing. It is omitted from Options One and Two. However, the site of One Creechurch Place is also important in the story of Anglo-Jewish heritage, as it was the site of the Great Synagogue in Duke's Place which stood from 1690 until its destruction in 1941. A plaque on Duke's Place records this. Option Three rightly includes One Creechurch Place because of its historic importance and its contribution to the London Historic Jewish District. Rather than having a 'hole' within the designated area, it can be made clear within the Conservation Area designation and the subsequent Policy Guidelines for preservation and enhancement that the existing building is a negative feature, alongside identifying opportunities for improvement. Given the pace of change within the City, with buildings only 25-30 years old being replaced, there may be future scope for considerable improvement in the context of appropriate policies for preserving and enhancing the character and appearance of the Conservation Area.

CONCLUSION

28. On a positive note, the Trust and Community very much welcome the general comments in Section 2.3 of the officers' report. This recognises that the three long-established places of worship and faith communities, the school, the residential uses, the pubs and restaurants and the communal open spaces give the area a very different character compared with the concentrated office uses of the nearby commercial cluster. The Trust and Community believe that a new Option Three Conservation Area will help not only to protect this existing character but could serve to promote further mixed uses within the area, including more residential occupation, educational uses and promoting more visitors and leisure activities. The inclusion of the larger area proposed in Option Three will increase the scope for the diversification of uses within the area. There is an opportunity here to nurture and enhance a strong and vibrant local community which will make this a distinct and flourishing quarter within the City of London. The Trust and Community urge the City Corporation to adopt Option Three.

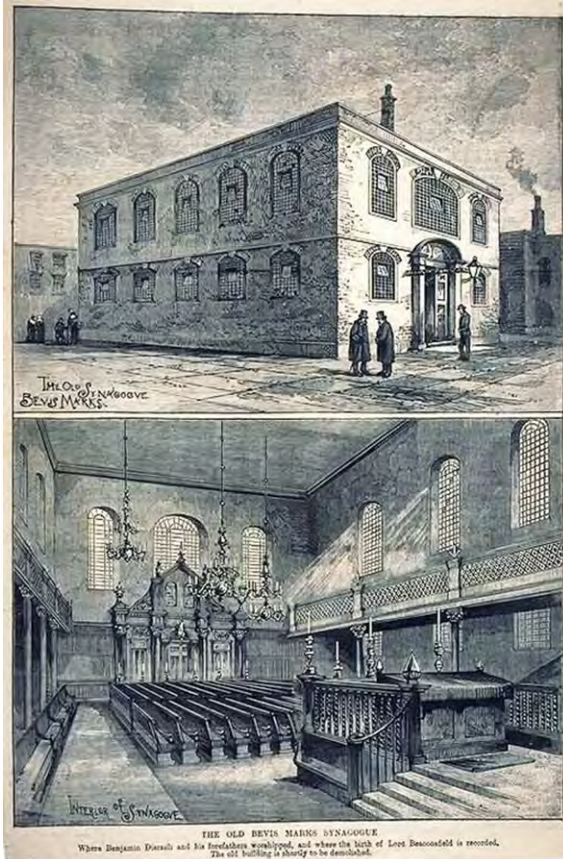
OCTOBER 2023



PROPOSED CREECHURCH CONSERVATION AREA

1. I am Professor of Modern European History at the University of Oxford, with a particular interest in British Jewish history and heritage, and extensive experience working with national and international heritage organisations like Historic England, the National Trust, and the European Association for the Preservation and Promotion of Jewish Culture and Heritage. It is in this capacity that I have been asked to produce a report on the Jewish history and heritage of the proposed Creechurch Conservation Area.
2. Jews, and particularly Sephardi Jews, played a critical part in the history of the City of London and in London's role as a global financial and commercial centre at the heart of the British Empire for 300 years. This history is barely understood nowadays, and occupies no place in public memory or the British national narrative which overwhelmingly associates British Jews with the mass-immigration of eastern European Jews and the influx of refugees from Nazi Germany during the 1930s. It is a lost part of our national narrative, one that this initiative promises to help us preserve –perhaps even recover.
3. Beyond Bevis Marks, there is at present little trace of the historic Jewish presence in the City of London. Jewish cultural activity (the Jewish Museum, the Jewish Cultural Centre, the Ben-Uri Gallery) is located elsewhere, closer to current areas of Jewish residence, but unconnected to the deeper Anglo-Jewish past. Any Jewish heritage activity in the City and Whitechapel focuses on the East End and tells the story of its eastern European Jewish immigrants. But the history of Jews in the City was older and far more diverse than this suggests.
4. The Sephardic story – with its global and diasporic dimensions – has clear resonance today. Highlighting the longstanding presence of this little-known element of the British Jewish community underscores the plural nature of all minority groups: something often absent from the way they figure in public discourse, which tends to elide difference into block categories (British Jews/Muslims/Black British people). In tandem with the new heritage centre at Bevis Marks, this conservation area promises to address both the Jewish heritage deficit in the City of London itself, and its particular Sephardic dimensions. More than simply a line on a map, it defines and protects an area that has an intangible coherent force that is the product of its deep Jewish history and continued importance as a site of Jewish worship.
5. The 2003 English Heritage Outreach Strategy document confirms that reclaiming marginalised narratives, like this one, enhances social cohesion by promoting social and cultural understanding. Preserving this area and its Jewish heritage promises important benefits for social cohesion within the local area, and there is the potential to develop more Jewish heritage activity in this area, for example through Jewish heritage trails. In a time of rising antisemitism, Jewish groups and society in general will benefit. There may also be further social and cultural benefits, not just in relation to the management of Jewish heritage, but to the wider understanding and management of minority or marginalised heritages.
6. The Conservation Area Proposal rightly draws attention to the “*historic interest*” of this area, citing in particular “*enduring presence*” of the Jewish community in the area. (Para 4.10) And the “*association with the very highly significant historic, established, and most importantly enduring Jewish community that was concentrated in the City and to the east up until the early 19th century*” (para 4.12).

7. In that context, the Conservation Area Proposal highlights three key sites: the site of the Creechurch Lane synagogue (Para 4.12), of the Great Synagogue on Duke's Place (Para 4.13) and Grade 1 listed Bevis Marks (Para 4.14, 4.18). Only Bevis Marks survives, but all three sites are of great historic significance to the British Jewish community. Collectively, they comprise the City of London's Historic Jewish District, and tell the history of that community from the earliest years after the re-settlement to the present day.



8. Of the three Options now under consideration, Bevis Marks (left) is included in Options 1 and 2 but only Option 3 also includes the sites of the Creechurch Lane and Great Synagogues, although the draft Conservation Area Proposal rightly makes reference to all three. To protect Bevis Marks without conserving these other two sites and the historic hinterland they represent makes little sense: only when read together can the Jewish story of the City of London and the broader history of British Jews be properly understood.

9. Cunard House is the historic location of the 'Synagogue of the Resettlement' (1657-1701), otherwise known as Creechurch Lane Synagogue. As the first synagogue established in Britain after the expulsion of Jews from England by Edward I in 1290, this is a site of pre-eminent historical importance in British Jewish history. Here, Jews prayed when they were first permitted to worship openly by Oliver Cromwell in

1656. The synagogue was a three storey brick merchants house converted into synagogue in 1657. It was located at the limits of City of London because Jews as aliens were barred from owning any property or land freehold. Instead, Creechurch Lane properties were leased by the Jews from the church of St Katherine Free. In 1674 the synagogue was enlarged to accommodate 150 men and 80 women, who could assemble in the north and south galleries. It became one of the sights of 17th-century London. Samuel Pepys visited on the festival of Simchat Torah and wrote about it in his diary, in a celebrated passage that has become one of the most iconic descriptions of Jewish worship in early modern Europe. Princess Anne, too, visited before she became Queen. The current building's modest massing fits in comfortably with the rest of the Conservation area (including St Katherine Cree opposite it) making it appropriate for inclusion in it. A City of London Blue Plaque on the exterior of the current building marks the site where the Creechurch Lane Synagogue once stood. It is only included in Boundary Option 3.

10. The worshippers at this Creechurch Lane Synagogue went on to found the synagogues established at the other two key sites in this conservation area: Bevis Marks Synagogue (1701 - Sephardi) and the Great Synagogue (1690 - Ashkenazi). Pews, religious art, and ritual objects from this synagogue comprise part of the furniture and collection of Bevis Marks Synagogue today.
11. Grade 1 listed Bevis Marks Synagogue is the single most important historic site for British Jews. In the heart of the City, close to the Bank of England and the Mansion House, it speaks to their history since readmission, and to their status as the only significant Jewish community in Europe

with a continuous history of this kind. Designed by Joseph Avis, a Protestant architect who had worked for Christopher Wren, its history speaks to the close relations that existed between different faith communities in the City itself, and to the intimate connection of London's Sephardic community with its parent community in Amsterdam, which probably donated the central chandelier. This is now the oldest, continually-functioning synagogue in Europe. It remains a living religious community, which preserves a unique liturgy. It lies at the heart of the Sephardic diaspora, rendering it a site of global as well as local and national importance. It is unique in the way that British Jewish history is unique, because it did not experience the rupture of the Holocaust. Its courtyard-setting reflects the disabilities Jews experienced in this country even after the resettlement. As the only non-Christian religious site in the City of London it speaks powerfully to the historic diversity of the City over centuries. This is a site of exceptional - even unique - historical importance for London, the UK, Europe and the world.

12. 1 Creechurch Place is the historic location of the Great Synagogue, otherwise known as Duke's Place Synagogue, which existed on this spot for nearly three centuries from when it was founded in 1690, until it was destroyed in the Blitz in 1941. This synagogue is just off Creechurch Lane and again just east of City limits, where restrictions on Jewish landowning still prevailed. It was created partly in response to growing numbers of German, Dutch and Polish migrants after Glorious Revolution and accession of George I. In its early years the Great Synagogue enjoyed patronage of Abraham Franks and Benjamin Levy, the only two Ashkenazim of twelve 'Jew Brokers' permitted to trade on London stock exchange. Levy was an original subscriber to the Bank of England (one of six or seven Jews on the 1694 list) and also contributed generously to Bevis Marks. This is a site of great historic importance. The Great Synagogue was the origin-synagogue of the now-dominant Ashkenazi Jewish community, the seat of the Chief Rabbi, and the foundation place of the United Synagogue (the umbrella organization for mainstream Ashkenazi Judaism), and the London Beth Din (Jewish court) was also part of the Great Synagogue complex. It lies at



the heart of the history of diversity, equality and inclusion in Britain, because both Sir David Salomons and Lionel de Rothschild were members of this synagogue. These were the key protagonists in the campaign for Jewish emancipation, which was fought from and with the support of the City of London.

Salomons was the first Jewish Sheriff of the City (1835) and later the first Jewish Lord Mayor (1855, see left), while Rothschild was elected as one of the four MPs for the City of London in 1847 and fought for ten years for the right to take his seat in parliament – which he finally did in 1858. While the synagogue has not survived, some of its collections are now in the Jewish Museum London, which held an important exhibition in 1949 to commemorate this lost building and its community. Today, a commemorative plaque is affixed to the exterior of the current building marking its historic location. It is only included in Boundary Option 3.

13. The history of these three synagogues/sites is interconnected: they share the same origins; their members married each other with growing frequency; and they testify to the existence of an increasingly important Jewish community that lived within, and just outside, the boundaries of the City of London. Only when treated as a unity can this unique history be effectively preserved.

14. Synagogues never exist in isolation, but only ever in places where there is a significant local Jewish community. This reflects the requirement to pray with a group of at least 10 other Jewish men, and the prohibition on travelling except by foot on the Sabbath and other Jewish holy days. The narrow streets between these three sites, once home to Portuguese and Yiddish speakers, consequently speak to the broader history of Jewish lives lived here over centuries, and to what Historic England term its communal value, that is to say the connection of a people or community with this place over time (see *Historic England, Conservation Principles and Practice* 2015). A recently rediscovered map produced in 1876 shows that the area immediately surrounding Bevis Marks included Jewish infant schools, religious libraries for advanced Jewish learning, a kosher shop, a mikveh (ritual bath) and community offices. Name carvings on the exterior brickyard reflect that Jewish children once ran around these courtyards. Even today, as the Conservation Area Proposal notes, “the area retains a vibrant and diverse community with religious organisations playing an important welfare role in providing a religious focus and social, and educational activities” (Para 4.17), of which Bevis Marks Synagogue is an important element.

15. There are other tangible traces of Jewish presence in this area. Located right by St. Botolph’s at the edge of the area delineated under Option 3, the Frederick David Mocatta Fountain on Aldgate Street (below) reflects the deep history of Sephardic Jews in this area. The Mocattas were among the very earliest Jewish families to settle in London after the readmission in 1656. This was London’s very first public drinking fountain. Decorated with a Star-of-David motif, it was installed in 1909 to honour the memory of the Jewish financier and communal leader, Frederick David Mocatta. The fountain was a huge benefit to all who lived and worked there.



The Mocattas were among the very earliest Jewish families to settle in London after the readmission in 1656. This was London’s very first public drinking fountain. Decorated with a Star-of-David motif, it was installed in 1909 to honour the memory of the Jewish financier and communal leader, Frederick David Mocatta. The fountain was a huge benefit to all who lived and worked there.

16. The interior of St. Botolphs Church, just inside the boundary of the area outlined in Option 3, also reflects the close relations between Jews and Christians in this area, as well as the important role of Jews in this area and the City of London more generally. From the time of Sir David Salmons onwards, many Jews represented Portsoken ward. Their names are faithfully recorded alongside those of other Portsoken Aldermen on a plaque in the entrance hall. The church itself features stained glass windows bearing the arms of several of London’s Jewish Lord Mayors, notably Marcus Samuel (1st Viscount Bearsted) who served 1902-3, Sir Bernard Waley-Cohen (1960-61), Lord Peter Levene (1998-99) and Sir Michael Bear (2010-2011).



17. The streets around Houndsditch, which forms one of the boundaries if Option 3, were traditionally a place of settlement for foreigners where non-freemen of the City were allowed to trade. The open street markets here (see left: Houndsditch Sunday Fair, 1855, showing the Great Synagogue behind), and in Petticoat Lane, were a vital lifeline for Jewish traders, especially those

active in the “rag trade” and the sale of old clothes, with which Jews were pre-eminently associated.

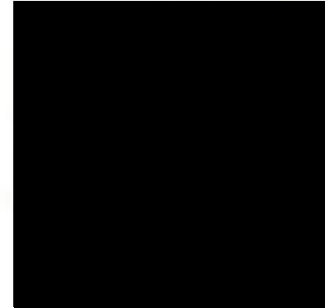
18. While many original buildings in this historic Jewish district no longer survive, the majority of 20th century buildings on the streets within the proposed conservation area have been “*designed to a height, scale and massing that is sympathetic with their neighbours*” (Conservation Area proposal, para 6.03). In this way, despite their destruction, something of the feel of the City’s historic Jewish quarter remains.
19. The predominantly low-scale of the area under consideration is “*a major factor in the setting of the high-status listed buildings in the area, particularly the three Grade I places of worship.*” (Conservation Area proposal, para 6.06). It is hoped that preserving the existing scale of the area will “*help to ensure that their setting continues to be protected and provide a buffer against the cluster of tall buildings to the south and west.*” This is a particularly important consideration for Bevis Marks, due to its secluded courtyard location, and the relatively low light levels in the synagogue that have resulted from large-scale post-war development in the area. These pose a threat to the communal value of the synagogue, which is rooted in function as a place of worship and a place of reflection, spirituality and prayer. Importantly, the secluded courtyard, which is protected by law as part of the synagogue’s curtilage, also functions as an extension of the religious use of the synagogue: it too needs protection from further overshadowing and loss of direct light.
20. The building that currently stands at 1 Creechurch Place (former site of the Duke’s Place Synagogue) has already caused substantial harm to morning light levels in Bevis Marks. It is a good example of why the boundary for the Conservation Area needs to be more inclusive. It demonstrates how an inappropriate redevelopment with a tall building can harm the character and function of an entire neighbourhood. In this context, it is worth noting that a sympathetic redevelopment of this building might allow more light into the synagogue.

CONCLUSION

This area represents a unique heritage ensemble, speaking to the intimate connection of religious, civic and commercial institutions in the City of London, and evidence of the Jewish community’s centrality, in spatial terms, to the development of London as a financial capital. The proposed conservation area would be more than a line on a map. It defines an area that has an intangible coherent force that is the product of its deep Jewish history and continued importance as a site of Jewish worship. The proposal represents a very welcome opportunity to preserve, enhance and sustain this heritage, and to write British Jewish history more clearly into the national heritage narrative, something that is especially important at a time of rising antisemitism. If properly drawn by adopting Option 3, the proposed conservation area will also protect Bevis Marks Synagogue from becoming overshadowed, further destroying its historic setting and ability to function both as a communal centre and a place of worship. The Jewish – and specifically Sephardic – dimension of British history and its role in the evolution of the City of London will be better identified, understood, conserved and explained. More people, and a wider range of people, will have an opportunity to engage with Jewish heritage which, as outlined above, promises clear social and cultural benefits.

Abigail Green

Professor of Modern European History, University of Oxford
Tutorial Fellow in History, Brasenose College



Dear Sirs,

Re: Proposed Creechurch Conservation Area and Equalities Law

I am a barrister at Matrix chambers specialising in planning and equalities law. I am instructed by Bevis Marks Synagogue and the Spanish and Portuguese Synagogue to provide a legal opinion on the equalities impacts of the proposed conservation areas under the Equalities Act 2010.

I have reviewed the three options for the proposed Creechurch Conservation Area which are currently being consulted. These would variously affect the Grade I listed, Bevis Marks Synagogue and other sites of historic Jewish importance.

Option 1 is the City's initial assessment. Option 2 covers the same area with the addition of the building at 31 Bury Street. Option 3, which has been put forward by Bevis Marks Synagogue, includes the same area as Option 2 and takes in a wider area with the addition of the buildings to north of Bevis Marks/Duke's Place, 1 Creechurch Lane and Cunard House at 88 Leadenhall Street.

It is clear the proposals would particularly and disproportionately affect the Jewish community of Great Britain which worships at the Synagogue and for whom the Synagogue and surrounding Jewish sites hold incalculable religious and historic value. The City is bound to have due regard to those impacts.

In simple terms the wider the conservation area the greater the level of protection to the Jewish sites, particularly Bevis Marks Synagogue and its wider setting. Therefore, the option with the most positive impact on the Jewish community and its relations with other groups is Option 3.

Conversely, the alternative options (Options 1 and 2) offer far less protection to the Jewish sites. Indeed, any decision to exclude from the conservation area the sites of the former Creechurch Lane and Great Synagogues and the potential development site of 31 Bury Street would negatively impact the Jewish community. If these things

are not carefully considered and justified then that, in my view, would lead to an unlawful decision.

It is notable that both Options 1 and 2 exclude the sites of neighbouring historic synagogue sites, the Great Synagogue (1690-1941) and the Creechurch Lane synagogue (1657-1701), the first synagogue following the resettlement of the Jews in Britain in the 17th century. These sites have historic value to the Jewish community in and of themselves. Importantly, they also form part of the wider conservation setting of Bevis Marks Synagogue. For the reasons set out by the Synagogue's heritage consultants, only Option 3 offers the full degree of planning protection to the Bevis Marks Synagogue and its setting, as well as to these other Jewish historic sites, that a statutory conservation area entails. If this impact on the Jewish community and wider relations is not considered, that would be breach of the City's duties under the Equality Duty.

These Jewish sites, individually and collectively, are hold incalculable historic and spiritual value. Bevis Marks Synagogue is the oldest functioning synagogue in the UK. Its establishment some 300 years ago reflects the return of Britain's Jews to this country in the 17th century following their expulsion in the medieval period. The Synagogue and its immediate setting is of enormous historic, architectural and religious value not just to the regular worshippers at the Synagogue but to the entirety of Anglo-Jewry. The equalities impacts of any decision to exclude the neighbouring Jewish sites (as set out in Options 1 and 2) and the 31 Bury Street site (Option 1) which form part of Synagogue's setting from the conservation area boundary would affect all, or at least a very large number, of this protected group.

The Synagogue is the only protected non-Christian place of worship within the City. That would make the omission of the sites which form part of Option 3 inappropriate and would lead to differential treatment of these Jewish sites to other Christian sites.

Section 149(1) of the Equality Act 2010 requires a public authority to have due regard not just to the need to (a) eliminate discrimination but also to the need to (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and (c) foster good relations between persons who share a relevant protected characteristics and persons who do not share it.

The potential omission of the Synagogue's wider setting and the neighbouring Jewish historic sites from the proposed conservation areas (i.e. Options 1 and 2) has a poten-

tially discriminatory, differential impact on Jews. Adopting Options 1 or 2 would also fail to take the opportunity to foster good relations between the Jewish community and other communities and residents within the City. If the City is minded to pursue either Option 1 or 2, it will need to justify such a decision having regard to s.149(1)(a) and (c). It is difficult to see what justification there could be for failing to provide these important Jewish sites with equal protection.

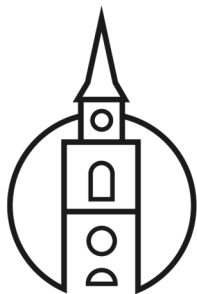
The City's Jews and other Jewish visitors to the Bevis Marks Synagogue have made and continue to make a unique cultural contribution to this part of London. As you will be aware, there was an unprecedented response from across the Jewish community (including the Spanish and Portuguese community, the Chief Rabbi of the United Synagogue, former Lord Mayors and other leading Jewish cultural figures) in opposition to the previous commercial office planning applications at 31 Bury Street and Creechurch Lane which were eventually refused or withdrawn. In that context, establishing the right boundary in equalities and planning terms for a conservation area represents a critical opportunity for the City to discharge its legal obligation under s.149(1)(a) and (c) and foster good relations between the Jewish community and other groups.

In conclusion, and in light of the above, I hope the City considers the matter carefully and that it adopts Option 3.

Yours sincerely,

Sarah Sackman





ST BOTOLPH
WITHOUT ALDGATE

From: The Reverend Laura Jørgensen
Rector of St Botolph without Aldgate

4 November 2023

Response to the City of London Corporation Consultation on a Creechurch Conservation Area on behalf of St Botolph without Aldgate

As the Rector, I write on behalf of the Parochial Church Council of St Botolph without Aldgate with Holy Trinity Minories.

We are grateful to the City of London Corporation for proposing a conservation area that recognises that this area in the eastern part of the City of London has a long and varied history and acknowledges the part the Priory of Holy Trinity played in the medieval streetscape. Acknowledging and conserving the Jewish history of the area, and protecting its current expression is of vital importance.

Though this is framed as the Creechurch Conservation Area, the Jewish history associated with this area is fundamental to its importance. For this conservation area proposal to have significance, it needs to understand and protect the heritage of the Bevis Marks synagogue, being the UK's oldest synagogue, as well as the oldest continually-functioning synagogue in Europe. The architecture is important, but equally so is how the building lives in terms of its light, its worship, its community and its history. Simply drawing lines around buildings fails to understand them beyond cold stone and brick. The light from the spaces in between those demarcations, and the remembrance of what was and what has been lost is key to realising how the building is more than just the physical presence. The present vibrant Jewish community and its history is respected best by Option 3.

We make the following specific comments:

- Paragraph 3.3 of the Creechurch Conservation Area Proposal acknowledges that "Although upstanding remains of [Aldgate Priory] structures are not now visible in the townscape ..., the archaeological potential, placenames, forms and spaces (e.g. Aldgate, Mitre Street and Square, Creechurch Place, St Katherine Cree churchyard) they bequeathed convey a strong sense of special historic interest." This acknowledges that in defining the scope of a conservation area, the historic context of the land of the site (i.e. the area) is an important consideration and not just an individual judgement on the buildings that currently stand within the area. The extension of the area to incorporate spaces such as the Aldgate Pump, the Aldgate Square, and St Botolph's Church without Aldgate, which lie outside of the priory footprint, gives further support to this principle that the context of the area is just as important as current structures.

St Botolph without Aldgate, Aldgate High Street, London, EC3N 1AB

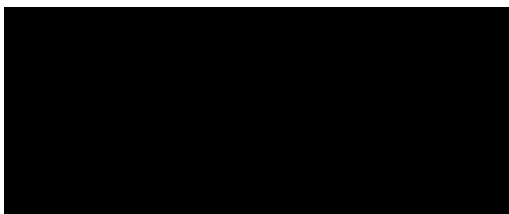
- The exclusion of (1) Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate, (2) No. 31 Bury Street, (3) One Creechurch Place, and (4) Cunard House, from the proposal is made on the basis of the above ground later buildings. However, this ignores the point, made immediately prior to this, that the special historic interest of this area lies in the footprint of the former priory and its environs.

The exclusion of the listed buildings is made more difficult to understand by the inclusion of other modern buildings on Creechurch Lane (No 33), Leadenhall Street (Nos 78-80), and Heneage Lane (No 4).

- The exclusion of the higher modern elevations is justified on the basis that they are unforgiving and not sympathetic in terms of scale and modelling. This impact and juxtaposition will nevertheless continue to exist and to be felt irrespective of whether these properties are included or excluded with the proposed area. As exclusion brings no benefit, these should also be included, justified on the basis (accepted within the proposal) that the site on which they stand is important in terms of defining the historic importance of the area. It is acknowledged that the construction of the current buildings may influence what will be built in their place in the future. However, again this holds true whether they are included or excluded within the proposal, and therefore is not a convincing argument for ignoring their footprint being an integral part of the priory site and part of what makes the area special.
- The exclusion of Cunard House (No 88 Leadenhall Street) should also be reconsidered on the basis of the context of what is being conserved in this proposed area. Page 25 of the proposal acknowledges the importance of this site in the context of the Jewish history of London, being the site of the first synagogue in England following the resettlement of 1656. Section 4.2 of the proposal states the importance in recognising with the proposed area, "Strong and continuing associations with the Jewish community following resettlement in the C17." Additionally, though the current building is modern, it was designed in order to sympathetically retain much of the previous building's Art Deco styling. Favouring the proposal excluding the four named properties may raise questions that the exclusions are based on current and future building plans that would further impact unsympathetically on what is intended to be achieved by this proposal, in terms of scale and modelling.

We are therefore supporting Option 3 of the consultation as the one which encompasses Holy Trinity Priory in its entirety the area around Bevis Marks Synagogue and St Botolph's church.

Yours sincerely,



St Botolph without Aldgate, Aldgate High Street, London, EC3N 1AB

THE VICTORIAN SOCIETY
The champion for Victorian and Edwardian architecture

PlanningPolicyConsultations@cityoflondon.gov.uk

Your reference: N/A
Our reference: 188239

15th November 2023

Dear Planning Team,

RE: Potential new conservation area, known as Creechurch Conservation Area

Thank you for consulting The Victorian Society on the proposal for the creation of a conservation area around Creechurch.

We are pleased that The City of London is considering designating the Creechurch Conservation Area in a part of the City where heritage has historically been under-designated.

We especially support the recognition that the City's report afforded to the contribution made by the warehouses at Creechurch Lane/Mitre Street to the general character of this area. However, while the tea warehouses on Creechurch Lane are Grade II listed, the distinctive Cree House, a former fruit dealer's premises distinguished by terracotta friezes and stone carvings of exotic fruits and flowers, currently has no protections. The designation of a conservation area would help to preserve unlisted commercial buildings like Cree House that augment the setting of heritage assets and bear witness to the commerce that was a major part of the area in the 19th century.

We also support the identification of the Bevis Marks synagogue and area around it as worthy of the protection a conservation area brings. While the fabric of the Bevis Marks' synagogue primarily dates to the late 17th and 18th centuries and is therefore outside of the Victorian Society's area of concern, the façade of the synagogue, its red brick and terracotta vestry and the iron lampposts visible on Heneage Lane date from the 19th century. Altogether, they make Heneage Lane into a charming passageway that gives a sense of the different phases of the synagogue and of its setting away from the main streets.

As England's oldest synagogue, Bevis Marks can also be said to derive significance from its associations with important figures across several centuries, including the

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19th; Bevis Marks was the place of worship of the family of Benjamin Disraeli, and was connected to Isaac D'Israeli's break with Judaism, meaning it is strongly connected to one of the most historically important figures in Victorian England. The synagogue also has clear communal value owing to its importance to London and England's Jewish community, both historically and in the present day.

As The City of London Corporation's proposal and the report of Esther Robinson Wild and Alex Forshaw has already identified and expounded the significance of several more 19th-century warehouses, houses, and Aldgate School, we will refrain from repeating the material here, but wish to express our full support for the inclusion of these buildings in Creechurch conservation area.

It has already been noted in other responses that Creechurch and its surrounds retain a low-rise character in comparison to the neighbouring areas of Whitechapel and Bishopsgate. The creation of the proposed conservation area would provide a buffer around the Creechurch area, ensuring that future development respects the historic character of the area and enhances the setting of the buildings discussed above.

In addition to approving of the designation of a new conservation area, we also wish to express a strong preference for the Option 3+ extension put forward by SAVE Britain's Heritage. There are a number of buildings in this extension that we consider worthy of inclusion in the conservation area, as they share characteristics with the buildings already identified in the City's own report and are also in a low-rise area. As the Option 3+ extension contains several Victorian and Edwardian buildings, we would like to offer the following comments on their significance and their complementary relationship to the buildings in the existing Creechurch Conservation Area proposals for your consideration.

The Significance of buildings within the Option 3+ Extension Aldgate Station

This station was first opened in 1876 as an extension of the Metropolitan Line, which was the world's first underground railway. It retains its 1876 trainshed, which has many original features such as its iron roof, arched brick walls and cast-iron columns with decorative spandrels. As such, this part of the station is a testament to the engineering achievements of the Victorian age and is of historical significance on this basis. The station's distinctive cream faience façade with Roman lettering dates from 1925-26, and has clear aesthetic value.

Aldgate Station shares many similarities with Farringdon, Paddington and Willesden Green Underground stations, in that all are Victorian stations that were rebuilt in a similar style by Charles W Clark. However, while these three stations are Grade II listed, Aldgate Station is not, and consequently has no protections.

Its inclusion in the Creechurch Conservation Area would broaden the type of buildings represented, and would also be a complimentary addition to many of the late 19th-century commercial buildings currently covered by the proposals.

73-78 Aldgate High Street

This terrace of mid-Victorian properties is rare survival in the Eastern part of the City. The buildings retain many original features and show a range of mid-Victorian styles. Nos. 73-75 have a handsome classical front of pilasters and a grand central pediment. No. 77 is particularly noteworthy for the stone detailing, its original arched sash windows and colourful painted band of guilloche decoration. No. 78 has likewise kept its original sash windows.

As such, they collectively have architectural interest and make a positive contribution to the streetscape. The fact that the terrace's 19th-century use was as shops and a pub means that these buildings would compliment the 19th-century warehouses identified in the existing proposals through providing a broader selection of 19th-century commercial buildings.

87-89 Aldgate High Street

87-89 Aldgate High Street sits one junction across from No. 1 Minories in the same position in relation to the street corner and it mirrors the curved form of No. 1, which makes a coherent and pleasing grouping. It is probably of a similar date to 73-78 Aldgate High Street, as Pevsner identifies it with a tender of 1860 issued by Moses & Sons Clothiers and names D.A. Cobbett as the likely architect.

The building is Italianate in style, and has many elaborate features such as the shell-shaped tympanums, ionic columns, Corinthian pilasters and ornately carved entablature separating the ground and first floor.

The grandeur of the building and the way in which No. 1 Minories responds to it adds interest to the streetscape. Its similar scale and date to the terrace at 73-78 Aldgate High Street also creates a positive visual relationship between the buildings.

Nos. 6-12 Minories

These buildings comprise of a row of adjoining late 19th-century buildings, all with identical facades. While the ground floor fronts have been completely replaced with modern shop fronts, the upper floors retain their intricate carvings, so that the row makes a positive contribution to the surrounding area.

These buildings are also unlisted, so inclusion in the conservation area would help retain the visual relationship between this and the terrace on Aldgate High Street/No.1 Minories.

The Former Sir John Cass Institute

The former technical institute was built 1898-1901 to the designs of A.W Cooksey. It is Grade II listed and is executed in a neo-Wren style. It would make an excellent addition to the conservation area, not only for its striking tower and impressive appearance, but also on account of the fact the same architect designed part of the Aldgate School in the same style as this building.

Aldgate and Jewry Street Pump

We support identification of the Grade II listed water pump as a suitable boundary for the conservation area. While this landmark has sadly lost its original 19th-century fixtures, it has been enhanced by the recent restoration work carried out by The City of London and Heritage of London Trust, which has seen the replacement of the iron pediment, handle, and brass wolf-headed tap, and installation of a plaque detailing the pump's history. Its association with a cholera outbreak in 1876 means it offers an insight into living conditions in the East End at this time and the background to later public health reforms.

As such, it anchors the modern surroundings in the history of the area and creates a relationship between this part of Aldgate and the historic buildings further along Aldgate High Street, making it an ideal gateway into the conservation area.

Conclusions

1. The Victorian Society completely supports the creation of the Creechurch Conservation area and the recognition of Bevis Marks synagogue and the 19th-century commercial warehouses as at the heart of this new area.
2. The designation of Creechurch Conservation area is important in ensuring this area retains its historic low-rise character, and would play a crucial role in guiding future development to ensure this character is respected and enhanced.
3. We strongly support the Option 3+ Extension put forward by SAVE Britain's Heritage. The proposed extension would see the inclusion of an important landmark in the form of Aldgate Pump, as well as several significant Victorian and Edwardian buildings that have both aesthetic value and further illustrate the communal and economic history of the area.
4. As many of these buildings are unlisted and therefore unprotected, we would like to advocate for the extension of the conservation area to ensure their historic and aesthetic character is retained. Several of the buildings in Option 3+ evidently compliment those within Options 1, 2 and 3, through their shared commercial character, low-rise nature, and, in one instance, even shared architect. We therefore think that Option 3+ would make a natural and positive addition to the conservation area.

I would be grateful if you could inform the Victorian Society of your decision in due course.

Yours sincerely,

Guy Newton

Conservation Adviser

The proposed designation of the Creechurch Conservation Area

Consultation representations on behalf of WELPUT

6th November 2023

1.0 Introduction

- 1.1 These Representations are prepared by The Townscape Consultancy on behalf of WELPUT and have been made in response to the consultation on the proposed designation of the Creechurch Conservation Area. The Local Planning Authority (LPA) in this case is the City of London Corporation (hereby referred to as 'CoLC'). CoLC is currently consulting on boundary options for the Creechurch Conservation Area; Options 1, 2 and 3 or potentially Option 4, being a further boundary that consultees may propose.
- 1.2 WELPUT are the owners of two freeholds and one long leasehold in Option 1 and one additional freehold in Options 2 and 3. WELPUT is seeking to bring forward a new mixed-use development at 1-4 Bury Street (Holland House), 31 Bury Street (Bury House), and 33-34 Bury Street (Renown House), hereinafter called the 'Site'.
- 1.3 In principle, we are supportive of the overarching objectives of CoLC to formally designate a new conservation area in the Creechurch locality, based on the findings of the Creechurch Conservation Area Proposal prepared by CoLC in July 2023 in respect of Option 1, which provides an overarching summary of the area's special interest:

(i) Strong and visible associations with the Roman and medieval City wall and Holy Trinity Priory, visible in the modern street pattern;

(ii) A characterful group of late C19/early C20 warehouses on Creechurch Lane/Mitre Street that are fine examples of their kind and survivors of a type now rare in the City;

(iii) Three places of worship of (in a City context) unusually diverse origins and of outstanding architectural and historic interest: Bevis Marks Synagogue (first purpose-built since resettlement and now oldest in UK), St Katherine Cree (a former Priory church) and St Botolph Aldgate (an extramural parish church);

(iv) A proliferation of historic open spaces of diverse scales, functionality and appearance; and

(v) Strong and continuing associations with the Jewish community following resettlement in the C17.

- 1.4 We have carefully considered the potential boundary options presented as part of the consultation. Our conclusion is firmly in line with the proposal prepared by the CoLC, supporting Option 1.. The methodology and assessment conducted by CoLC officers aligns with due process and the conclusion is robust. The purpose of any thorough consultation is of course to consider all views to ensure that the best end result is obtained, but in this scenario we do not consider that Options 2 and 3 can be justified based on legitimate conservation requirements. Further detail is included within these Representations to explain our rationale behind this position.

2.0 Legislation, policy, and guidance on conservation areas

The LPA's statutory duty in respect of conservation area designation

Statutory provision

- 2.1 As defined in s69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the '1990 Act'), , a conservation area is an area which has been designated because of its '*special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.*'
- 2.2 In discharging its powers under Section 69 of the Act, the LPA is bound to exercise its discretion reasonably, and to have due regard to the legislation, relevant policy and guidance.
- 2.3 The quality and interest of the whole area, as opposed to the individual buildings, should be the prime consideration in identifying conservation areas. The object, therefore, should not be to protect individual buildings or spaces which are not of demonstrable interest, nor if they do not contribute to the particular character of the conservation area.
- 2.4 For the purposes of these Representations we have not sought to provide commentary on the relative merit of the individual buildings proposed to be covered by the conservation area designation, except for the existing buildings at 1-4 Bury Street (Holland House), 31 Bury Street (Bury House), and 33-34 Bury Street (Renown House) which fall within the ownership of WELPUT and are the subject of emerging development proposals. While Holland House (Grade II listed) clearly contributes to the historic and architectural interest of the proposed Creechurch Conservation Area and Renown House has sufficient architectural merit to be included, 31 Bury Street is of no architectural or historic interest and blocks the historical Heneage Lane's access to Bury Street. 31 Bury Street is identified as a negative contributor even in the report supporting Option 3.

National policy and guidance on conservation areas

- 2.5 The National Planning Policy Framework (2023) sets out at paragraph 191 that:

When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest (our emphasis).

- 2.6 The policy is supported by the National Planning Policy Guidance ('PPG'). The PPG includes a section on the 'Historic Environment' which was last updated in July 2019.



2.7 At paragraph 024, the PPG states that:

Local planning authorities need to ensure that the area has sufficient special architectural or historic interest to justify its designation as a conservation area. Undertaking a conservation area appraisal may help a local planning authority to make this judgment.

Supplementary guidance prepared by Historic England

2.1 Historic England provides supplementary guidance on the purpose and methods of designating and assessing historic areas in its Advice Note on *Understanding Place: Historic Area Assessments* (April 2017). The guidance note sets out how Historic Area Assessments (HAAs) should be undertaken to understand and explain the heritage interest of an area. The note sets out that methods of HAA closely align with methods of Conservation Area Appraisal.

2.2 Under the 'Key Issues' to be considered the guidance states that '*appropriate boundaries*' should be established to keep Historic Area Assessments '*focused and manageable*' and that the relevance of such boundaries should be examined critically.

2.3 Historic England has prepared separate guidance in relation to conservation areas in *Advice Note 1: Conservation Area Designation, Appraisal and Management* (2nd Edition, February 2019).

2.4 At paragraph 11 the Advice Note sets out that the purpose of appraising an area for designation is to consider:

a) whether there is sufficient architectural or historic interest for the area to be considered 'special'?

b) whether this is experienced through its character or appearance?; and

c) whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve.

Suitability for Designation

2.5 At paragraph 72, Advice Note 1 provides examples of the different types of special architectural and historic interest which could justify conservation area designation, including:

- *areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations;*

- *those linked to a particular individual, industry, custom or pastime with a particular local interest;*
- *where an earlier, historically significant, layout is visible in the modern street pattern;*
- *where a particular style of architecture or traditional building materials predominate; and*
- *areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest.*

Assessment of Special Interest

- 2.6 At paragraph 34 the guidance in Advice Note 1 sets out a number of key elements that may assist in defining the special interest of an area, including *‘the still-visible effects/impact of the area’s historic development on its plan form, townscape, character and architectural style and social/ historic associations and the importance of that history’.*
- 2.7 The guidance goes on to state at paragraph 43 that conservation area appraisals *‘should focus on setting out what makes the area special and the impact of its history on its current character and appearance.’*

Summary of policy and guidance

- 2.8 The purpose of designating or extending conservation areas is to preserve or enhance areas of *‘special architectural or historic interest’.* Therefore the designation or extension of a conservation area which is motivated principally by a desire to protect specific buildings would not ordinarily meet the statutory test.

The guidance in the NPPF and PPG emphasises the importance of ensuring that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. This is supported in the guidance produced by Historic England, in particular within Advice Note 1.

- 2.9 On account of the policy and guidance above, we consider that there must be some physical evidence, experienced visually and experientially through the character and appearance of the area’s buildings and spaces, to give rise to an area’s special architectural or historic interest. While there is

archaeological interest identified within the CoLC's appraisal (at Section 3.3) we consider that this in itself would not warrant the designation of a larger boundary where there is no visual or experiential association with the built form above. Equally, in instances where a City Corporation blue plaque is affixed to an unremarkable building to mark the former use of a particular site, this alone is not sufficient to demonstrate the level of special interest required to warrant its inclusion within a conservation area boundary.

- 2.10 It follows that the historic interest of a specific site or group of buildings is not sufficient if they do not contribute to the character and appearance of an area which is worth preserving and enhancing. Conservation areas therefore should not be designated with the purpose of creating a buffer for listed buildings (which already have statutory protection through the consideration of their setting and its contribution to heritage significance), nor to prevent redevelopment of buildings, as this runs contrary to legislation, policy and guidance.
- 2.11 Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 sets out that the LPA has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in exercising their planning functions. Conservation areas do not preclude development and there are many examples of new developments that come forward within conservation area boundaries that preserve or enhance their character and appearance.

3.0 Summary and significance of the Draft Creechurch Conservation Area

- 3.1 We have reviewed the Creechurch Conservation Area Proposal prepared by CoLC in July 2023, and the Proposed Bevis Marks/Creechurch Conservation Area document prepared by consultants for the Bevis Marks Synagogue (May 2022). The CoLC's Creechurch Conservation Area Proposal notes at 'Section 3.3 – Eligibility for Conservation Area Status' that:

'[...] the Creechurch locality is found to be richly historic, with a multi-layered sense of place stemming from the ancient delineation of the Roman and medieval City wall and Aldgate and the layout of the Holy Trinity Priory, foremost amongst the medieval City's monastic foundations, both of which have perceptibly influenced the modern street plan. Although upstanding remains of these structures are not now visible in the townscape (with the exception of the Grade II listed archway to the rear of nos. 39 and 40 Mitre Street), the archaeological potential, placenames, forms and spaces (e.g. Aldgate, Mitre Street and Square, Creechurch Place, St Katherine Cree churchyard) they bequeathed convey a strong sense of special historic interest.

Above ground, there is significant architectural interest in the streets and buildings subsequently developed from the early modern period onwards: the two City churches and Bevis Marks Synagogue offer outstanding examples of their types; Holland House strikes a pleasingly eclectic note; the Creechurch/Mitre Street warehouses are a rare and fine group of their kind. The locality is found to possess a varied, characterful and interesting group of historic buildings studded with highly significant historic places of worship and interspersed with more neutral modern buildings that help to create a consistent sense of townscape and distinctive sense of place.'

- 3.2 We consider that the significance of the listed buildings, individually and as a group, is considerable and along with the 19th century warehouse buildings and the historic remains of the Holy Trinity Priory at 77 Leadenhall Street, they should form the core of the new Creechurch Conservation Area. As such we agree that the area has sufficient architectural or historic interest to be considered 'special' and thus would warrant designation as a conservation area.
- 3.3 In particular, we agree with CoLC's own assessment of the significance of Holland House and Renown House, both of which are identified as making a positive contribution to the proposed conservation area.

4.0 The draft Creechurch Conservation Area and the City Cluster

- 4.1 The Creechurch Conservation Area Proposal notes at section 2.1 that the proposed conservation area is located in part of the City Cluster of tall buildings and as such *'It is notable, like the Leadenhall Market and St Helen's Conservation Areas, for being in amidst the high-rise modernity of the Cluster [...].'* It therefore follows that the taller immediate setting of the Creechurch Conservation Area plays a role in informing its heritage significance and this should be recognised as a characteristic of its special interest.
- 4.2 As with other conservation areas located in the City Cluster of tall buildings, the immediate and wider setting of the conservation area is extremely varied in terms of scale, form, and architectural character. Existing and emerging tall buildings such as 30 St Mary Axe and 100 Leadenhall Street are situated in close proximity to the proposed conservation area boundary.
- 4.3 At section 2.1, the Creechurch Conservation Area Proposal notes that *'[...] there is a strong defining juxtaposition between the area's historic buildings and the tall modern buildings.'*
- 4.4 We have carried out a full review of the conservation areas within the City of London, and in the City Cluster in particular. The Leadenhall Market Conservation Area Character Summary & Management Strategy SPD (2017) is a recent example of a conservation area appraisal which assesses the character of a conservation area, located within the City Cluster. The appraisal considers that presence of contrasting scales in the immediate setting of the conservation area results in *'[...] dramatic townscape views'* (CoLC's Leadenhall Market Conservation Area Character Summary & Management Strategy SPD, 2017, p.8), which are unique to this location. The taller immediate setting of the conservation area is therefore acknowledged as reflective of the continuous evolution of the City of London and, to some extent, is considered to highlight the conservation area's heritage importance by way of the clear contrast in scale between the historic and modern built form.
- 4.5 The St Helen's Place Conservation Area to the west of 30 St Mary Axe is also notable for its location in the City Cluster, albeit the published Character Summary precedes the development of many of the surrounding tall buildings. The St Helen's Conservation Area is tightly defined and, in similarity to the proposed Creechurch Conservation Area derives significance from its medieval layout of streets and alleyways and inclusion of nationally significant religious historic buildings. The immediate setting of the St Helen's Conservation Area comprises of existing and emerging tall buildings which provide a dramatic juxtaposition in scale and style to the historic buildings. Nowhere within the conservation area are tall buildings not perceptible to some degree, and as such they form an intrinsic element of the conservation area's character and a readily appreciable element of its setting.
- 4.6 Likewise, the setting of the Bank Conservation Area and the Bishopsgate Conservation Area, respectively, are highly varied, reflecting the overarching character of the City. Both conservation areas

border onto the City Cluster and as such they are characterised by a backdrop of tall buildings, which provide a strong contrast between old and new. In the case of the Bishopsgate Conservation Area, a tall building within its boundaries, One Bishopsgate Plaza at 80 Houndsditch, was recently completed in 2021.

- 4.7 In similarity to the conservation areas referred to above, we contend that the juxtaposition between the finer grain historic buildings and modern tall buildings is an underlying characteristic of the Creechurch locality and should be recognised as part of its special interest. There are a number of existing tall modern buildings and those under construction that form an appreciable element of the surrounding townscape including 70 St Mary Axe, 6 Bevis Marks, St Botolph Building, St Helen's Tower, 40 Leadenhall Street, 122 Leadenhall Street, One Creechurch Place and 30 St Mary Axe. In addition, there are other tall buildings within the vicinity of the proposed Creechurch Conservation Area that have been granted planning consent, including 100 Leadenhall Street and 24 Bevis Marks. Together the existing and emerging context of tall buildings forms part of the prevailing character of the area and informs its special interest.
- 4.8 The development of larger buildings in the vicinity of the Grade I listed Bevis Marks Synagogue has led to a change in the environment within which the listed building is appreciated. The Bevis Marks Synagogue clearly forms a legible enclave of highly significant historic buildings situated within a multi-layered and hyper-modern wider context of contrasting scales. Fundamentally, the contrast between old and new, insofar as it has not resulted in the loss of the historic network of alleyways and intimate spaces, has not harmed the setting of the Grade I listed Bevis Marks Synagogue, the contribution of which is principally derived from the intimacy of its courtyard from where the Synagogue building can be experienced beyond its façade on Heneage Lane.

5.0 Proposed boundaries for consultation

5.1 In this section we set out our review of the proposed boundary options for the Creechurch Conservation Area in line with Historic England's guidance and the statutory requirement at s69 of the 1990 Act.

5.2 CoLC is currently consulting on boundary options for the Creechurch Conservation Area. The boundary options are as follows:

- Option 1: CoLC's officers' preferred option, based on expert evidence and subject to an appraisal, dated July 2023;
- Option 2: Alternative option by CoLC proposed as a result of members' input into the suggested conservation area consultation. The proposed boundaries are the same as Option 1, with the addition of 31 Bury Street;
- Option 3: Alternative option proposed by Bevis Marks Synagogue. This option includes the same area as Option 2 with the addition of the buildings to the north of Bevis Marks/Duke's Place, 1 Creechurch Lane, and Cunard House at 88 Leadenhall Street; and
- Option 4: Any further alternative boundary as may be proposed by consultees.

Commentary on Option 1

5.3 Option 1 comprises CoLC's preferred option and is accompanied by the CoLC's Creechurch Conservation Area Proposal of July 2023. There are a number of listed buildings that are proposed to fall within the boundary, including;

- The Bevis Marks Synagogue (Grade I);
- The Church of St Botolph (Grade I) and associated iron gateway to the church yard (Grade II);
- The Church of St Katherine Cree (Grade I) and associated gateway in church yard (Grade II);
- Holland House (Grade II*);
- Sir John Cass School (Grade II*);
- Archway between numbers 39 and 40 Mitre Street and at rear of numbers 72 and 73 Leadenhall Street (Grade II); and
- 2-6 Creechurch Lane (Grade II)

5.4 The suggested boundary excludes a number of streets and individual buildings that are considered to depart from the qualities of the conservation area, including:

- Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate;
- Bury House, 31 Bury Street;
- One Creechurch Place, 26 Creechurch Lane and 1 Mitre Square; and



- Cunard House, 88 Leadenhall Street.
- 5.5 With regards to 31 Bury Street, the accompanying Creechurch Conservation Area Proposal appraisal notes at section 3.2 (p. 19) that the building *'[...] was a 1960s extension to Holland House which obliterated the historic James' Court immediately to the west and extinguished the southernmost section of Heneage Lane, which originally ran all the way from Bevis Marks to Bury Street. Of insipid and bland design, the building cannot lay claim to any architectural or historic interest; nor can it be said to be a good visual neighbour to its surroundings because of the way it crashes into the historic street pattern. Accordingly, the building is not considered to meet the criteria for inclusion in a conservation area.'*
- 5.6 In the same section, the appraisal also includes an assessment of the contribution of Holland House and Renown House to the conservation area's special interest. Holland House is described as the most prominent building on Bury Street, with *'[...] a very high quality of detailing and execution'*. Renown House is described as *'[...] a characterful survival of a small-scale early 20th century office building, once a common type in the City.'* Within the Proposed Conservation Area Appraisal, Renown House is considered to make a positive contribution to the conservation area.
- 5.7 We agree with CoLC's assessment of the relative significance of Holland House and Renown House and conclude, in agreement with CoLC, that there are no evident reasons for the inclusion of 31 Bury Street within the conservation area boundary. It is as it is of no architectural or historic interest and blocks the historical Heneage Lane's access to Bury Street and clearly does not meet the criteria for inclusion, in accordance with the requirements of statute and accompanying policy and guidance.
- 5.8 We note that the draft Creechurch Conservation Area Proposal document prepared by CoLC includes a Proposed Boundary Map for Option 1 at Figure 4.1. We contend that the proposed boundary as drawn does not appropriately reflect WELPUT's legal ownership for 31 Bury Street and, if it were to be adopted, it should be amended as shown in **Appendix 1** to these Representations.

Commentary on Option 2

- 5.9 Option 2 presents the same boundary as Option 1, with the inclusion of 31 Bury Street. We strongly contend that the inclusion of 31 Bury Street within the conservation area boundary is not supported with reasoned evidence within CoLC's own Conservation Area Proposal document. There is no contrary argument to suggest that the building is of any architectural or historic interest, nor does it contribute meaningfully to the special interest of the conservation area, as evidenced by CoLC's own assessment, which identifies the building as a negative contributor. Accordingly, the inclusion of 31 Bury Street would only serve to devalue the special architectural and historic interest of the neighbouring historic buildings arranged upon the medieval street plan, which is itself a principal characteristic supporting

the conservation area's designation, and was diminished when 31 Bury Street was built closing off Heneage Lane's access to Bury Street.

The inclusion of 31 Bury Street within the Creechurch Conservation Area would therefore not be supported by the eligibility criteria and would run contrary to paragraph 191 of the NPPF (2023), with CoLC failing in its duty to *'[...] ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'* If its inclusion is principally motivated by a desire to restrain the future development of the Site, this would be: (i) entirely inappropriate when considering the statutory criteria for conservation area designation; and (ii) ill-informed -

Commentary on Option 3

5.10 Option 3 is the boundary option proposed by Bevis Marks Synagogue. This option includes the same area as Option 2, with the addition of the buildings to the north of Bevis Marks/Duke's Place, 1 Creechurch Lane, and Cunard House at 88 Leadenhall Street. The Proposed Bevis Marks/Creechurch Conservation Area document, prepared on behalf of the Bevis Marks Synagogue, states at paragraph 1.02 that:

'[...] Despite the proximity to the cluster of tall buildings in the eastern part of the City, the area under consideration has a remarkably consistent and harmonious low-rise scale of buildings with similar parapet heights which results in a consistent and uniform townscape fronting the narrow streets.'

5.11 We contend that the above is factually inaccurate, as the larger conservation area boundary proposed by the Bevis Marks Synagogue includes a number of existing and consented tall modern developments that, if designated, would form a defining characteristic of the conservation area's character and appearance.

5.12 The proposed boundary would include the existing 19-storey office development at One Creechurch Place. However, the Bevis Mark Synagogue's own appraisal notes that its *'[...] enormous scale is inappropriate for its surroundings, the colour and materials used are alien to its context, and at ground floor level the building makes a dismal contribution to the street, the open space, and the public realm.'* Additionally, the conservation area boundary for Option 3 also includes the consented 19-storey building at 24 Bevis Marks (Bevis Marks House) which has been implemented. Together, the inclusion of these developments within the conservation area boundary proposed by the Bevis Marks Synagogue is unsubstantiated and appears to contradict the apparent low-rise scale of the Creechurch area referred to in the appraisal document.

5.13 It follows therefore that the Option 3 boundary is not intuitive and proposes to include existing and consented built form that does not contribute in a meaningful way to an appreciation and understanding of the proposed conservation area's special interest. The logic of including larger scale, or architecturally undistinguished buildings within the proposed boundary has not been identified within the accompanying appraisal document, and there is not sufficient evidence put forward to justify the designation of a larger boundary as the additional areas identified do not align with the area's special interest as set out in section 4.2 of the CoLC's appraisal.

5.14 In respect of townscape and views, the appraisal report states at paragraph 6.06 that:

'The predominantly low scale of the area under consideration is a major factor in the setting of the high-status listed buildings in the area, particularly the three Grade I places of worship. The preservation of the existing scale of this area would help to ensure that their setting continues to be protected and provide a buffer against the cluster of tall buildings to the south and west.'

5.15 The listed buildings referred to above are highly graded, which affords them and their setting a high degree of protection as set out within legislation and the NPPF. Any development proposal that has the potential to impact the significance of the listed buildings and their settings would need to be duly considered as part of the planning process. We therefore strongly contend that the idea of including buildings with no architectural or historic interest within the boundary of the new conservation area with the purpose of creating a buffer against the City Cluster runs contrary to legislation, policy and guidance for the designation of conservation areas.

5.16 Notwithstanding the above, the Development Plan policies put forward by the City of London in its adopted Local Plan provide the principal planning consideration by which the CoL exercises its planning functions. In particular, there are a number of proposed new policies that relate to the Bevis Marks Synagogue in the version of the draft City Plan 2040 presented to the Local Plan sub-committee (October 2023).

5.17 Emerging Strategic Policy S21: City Cluster sets out that *'The City Cluster Key Area of Change will accommodate a significant growth in office floorspace and employment, including through the construction of new tall buildings, together with complementary land uses, transport, public realm and security enhancements, by;*

[...] 6. Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue. Developments should form a positive relationship with the Synagogue without dominating or detracting from its architectural and historic value; and ensuring that the historic elements of the Synagogue's setting are preserved and enhanced.'

5.18 Emerging Policy HE1: Managing Change to the Historic Environment sets out a number of criteria which, if adopted, would need to be met where development proposals affect heritage assets or their settings. The policy states at part 8 that:

'Development in the immediate setting of historic places of worship, including Bevis Marks Synagogue and St Paul's Cathedral, should conserve and enhance the elements that contribute to the significance of their setting.'

5.19 Once adopted, these Development Plan policies would need to be met as part of any planning application coming forward for determination.

5.20 We note that the appraisal prepared on behalf of the Bevis Marks Synagogue refers to 31 Bury Street as *'architecturally undistinguished but an appropriate scale for its highly significant neighbours.'* This implies that its scale provides the primary justification for its inclusion within the conservation area boundary, contrary to the purpose of the legislation and associated guidance. Our thorough review of other conservation areas within the City of London has determined that there is an established precedent within the City of designating conservation areas with tightly defined boundaries that, in many cases, exclude specific buildings within the wider urban block. This includes the Bank Conservation Area where 20 Gracechurch Street is excluded, and the Leadenhall Market Conservation Area where 70 Gracechurch Street is excluded.

6.0 Conclusions

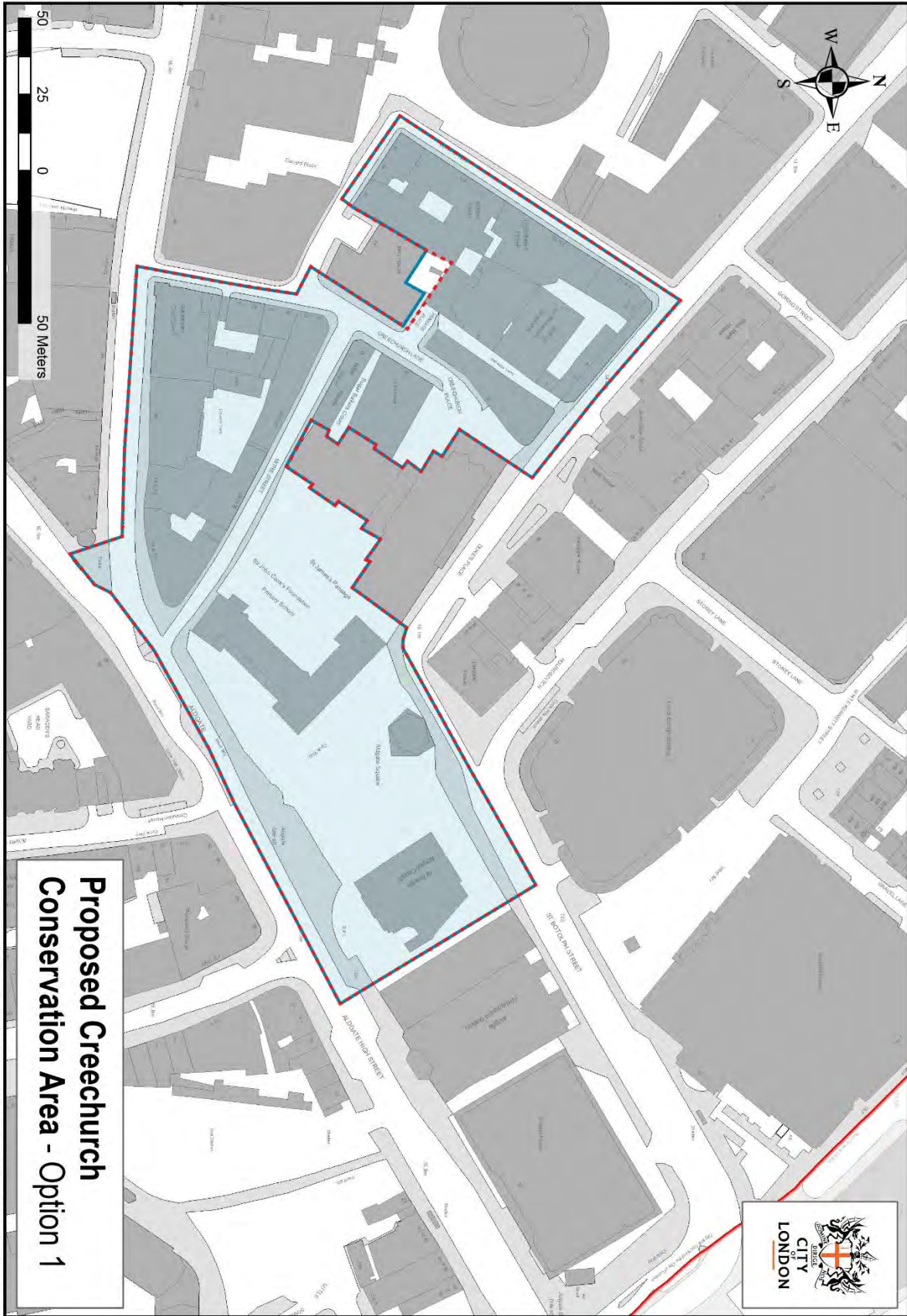
- 6.1 This report has been prepared on behalf of WELPUT in response to the consultation on the proposed designation of the Creechurch Conservation Area by the City of London.
- 6.2 Overall, we are supportive in principle of the proposed designation of the Creechurch Conservation Area. This is on the basis that its location within the City Cluster, and the resulting juxtaposition of scales and architectural styles, is acknowledged as making an integral contribution to the area's special interest and should be recognised as such in any supporting documentation.
- 6.3 We reiterate that the proposed designation of any conservation area must be assessed against the statutory criteria. The quality and interest of the area as a whole, as opposed to individual buildings, should be the primary consideration in identifying conservation areas. While Holland House (Grade II listed) clearly contributes to the historic and architectural interest of the proposed Creechurch Conservation Area and Renown House has sufficient architectural merit to be included, 31 Bury Street is of no architectural or historic interest and blocks the historical Heneage Lane's access to Bury Street. 31 Bury Street is identified as a negative contributor even in the report supporting Option 3. On this basis, it is clear that 31 Bury Street would not meet the criteria for inclusion within the Creechurch Conservation Area boundary.
- 6.4 We submit that the proposed boundary Options 2 and 3 put forward as an alternative by CoLC members and the Bevis Marks Synagogue respectively would be inconsistent with the purpose of the legislation and would not substantiate a claim for '*special architectural or historic interest*' as required for designation under s69 of the 1990 Act.
- 6.5 It is our view that the City's preferred boundary as presented in Option 1 demonstrates the special interest required for the purposes of designation of the Creechurch Conservation Area. The designation of the conservation area on this basis is supported, subject to a minor adjustment to the boundary in relation to the freehold of 31 Bury Street, as explained in Appendix 1 to this Representations.

Appendix 1: Proposed revised boundary for Option 1 in relation to 31 Bury Street

1. The green line in Figure 1 shows the required reduction of the Option 1 boundary to omit the appropriate extent of WELPUT's freehold title NGL424600 for 31 Bury Street, for the purposes of the conservation area boundary.
2. Figure 2 is an amended map for the boundary of Option 1, reflecting the minor modification needed to address the abovementioned reduction in connection to the freehold of 31 Bury Street.



Figure 1: Option 1 boundary (outlined in blue) and extent of the area which relates to the freehold of 31 Bury Street (area bound by the green and blue lines). This area should be excluded from the conservation area boundary.



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**Proposed Crechurch
Conservation Area - Option 1**

Figure 2: Proposed amended boundary for Option 1, with a minor reduction to account for WELPUT’s legal ownership of the freehold of 31 Bury Street.



Koukouthaki, Katerina

From: Peter Twemlow [REDACTED]
Sent: 06 November 2023 10:08
To: Koukouthaki, Katerina; Nancollas, Tom; McNicol, Rob
Cc: [REDACTED]
Subject: [REDACTED]

THIS IS AN EXTERNAL EMAIL

Dear all,

On behalf of our client, WELPUT, I am writing to confirm that we are due to submit representations to the Creechurch Conservation Area consultation today.

This will comprise DP9 providing responses to the 8 questions via the Commonplace platform, and The Townscape Consultancy (TTC) providing a more detailed representations document by email.

The DP9 answers are repeated below, as the online survey does not clearly provide an opportunity to set out who are they written on behalf of.

TTC will reply to this email later today, attaching the detailed representation.

1. **Do you agree that the Creechurch area should be designated as a conservation area?**

Yes.

2. **Which is your preferred option? If you don't like any of them you can offer an Option 4.**

Option 1 is supported, but with a minor change in the boundary around 31 Bury Street, as explained at Appendix 1 of the standalone Representations document submitted by email with this response.

3. **If you choose Option 4, please describe your preferred boundary.**

N/A

4. **Why do you think your selected area is of special architectural or historic interest?**

Please see the standalone Representations document submitted by email with this response.

5. **Please share any additional general information and facts about the area to support your choice.**

Please see the standalone Representations document submitted by email with this response.

6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Explanation of the Equality Act - Section 149 \(external link\)](#)

There will of course be people with various protected characteristics that live, work and/or worship within the area of the City that may become designated as a conservation area, but we do not consider that the boundary location (and whether certain buildings fall in or outside) should impact people with certain protected characteristics more or less than others. Development proposals within the Creechurch area (whether within, or outside, but in the setting of, a future conservation area) will need to be assessed in accordance with the development plan and the City of London will at that stage need to consider again its duty under the Equality Act 2010. Everyone has had equal access to the consultation materials and the ability to express their views for consideration, including in person events within the local area.

7. Please explain your answer to Question 6.

See answer to question 6.

8. Is there anything that could be done to mitigate any impacts identified?

N/A

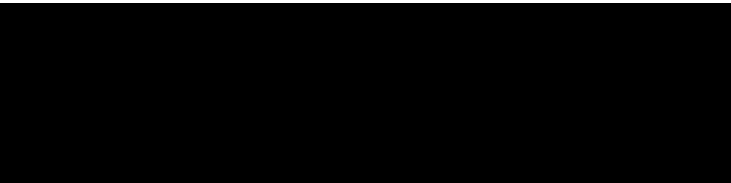
Kind regards,

Peter

Peter Twemlow



DP9 Ltd



This e-mail and any attachments hereto are strictly confidential and intended solely for the addressee. It may contain information which is privileged. If you are not the intended addressee, you must not disclose, forward, copy or take any action in relation to this e-mail or attachments. If you have received this e-mail in error, please delete it and notify postmaster@dp9.co.uk

Koukouthaki, Katerina

From: Nancollas, Tom
Sent: 13 November 2023 18:36
To: Koukouthaki, Katerina; McNicol, Rob
Subject: FW: Re Creechurch Conservation Area

Importance: High

fyi



Tom Nancollas | Interim Assistant Director (Design)
Environment Department | City of London | Guildhall | London EC2V 7HH

www.cityoflondon.gov.uk

From: [REDACTED]
Sent: Monday, November 13, 2023 5:13 PM
To: Nancollas, Tom [REDACTED]
Cc: [REDACTED]
Subject: Re Creechurch Conservation Area
Importance: High

THIS IS AN EXTERNAL EMAIL

Dear Tom,

Our apologies if this has not come through. Please ignore my earlier e-mail - it went before I had finished it. Set out below are the questions asked of all CAAC Members and their responses:-

1. Do you agree that the Creechurch area should be designated as a conservation area? **Yes**
2. Which is your preferred option? If you don't like any of them you can offer an Option 4. **Option 3**
3. If you choose Option 4, please describe your preferred boundary. **N/A**
4. Why do you think your selected area is of special architectural or historic interest? **It contains a number of listed buildings, including three places of worship of the greatest importance and high quality commercial and public buildings of the late 19th and early 20th centuries. The area has a rich history set out in the assessment and benefits from open spaces, including the recently created Aldgate Square.**
5. Please share any additional general information and facts about the area to support your choice. **We believe that the more extensive area proposed in Option 3 includes some buildings of interest and will offer better protection to the buildings which form the core of the area in the light of the advice in the National Planning Policy Framework about the setting of historic assets.**
6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? Explanation of the Equality Act - Section 149. **Yes**
7. Please explain your answer to Question 6. **We believe that the proposal will show and enhance the City's respect for diversity, albeit in some cases (eg. the former Sir John Cass school) with appropriate explanation.**
8. Is there anything that could be done to mitigate any impacts identified? **A well-prepared Conservation Character Study and Management Strategy.**

Kind regards

Julie

Koukouthaki, Katerina

From: Harte, John
Sent: 29 September 2023 11:06
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area consultation

FYI

Kind regards



John Harte
Planning Officer | Policy & Strategy
City of London | Environment Department | Guildhall | London | EC2V 7HH

[REDACTED] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

From: John Schofield <[REDACTED]>
Sent: Friday, September 29, 2023 8:48 AM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
[REDACTED]
Subject: Creechurch Conservation Area consultation

THIS IS AN EXTERNAL EMAIL

Sir/madam

I am pleased to send you comments on the proposal for a Creechurch Conservation Area, put out for consultation.

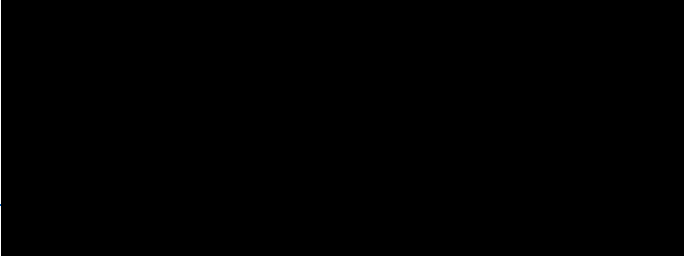
These are the views of the City of London Archaeological Trust (CoLAT: www.colat.org.uk).

We support Option 3 for the boundary of the proposed Area.

The text of the proposal document is missing some important elements. The authors do not appear to have consulted the major report on archaeological investigations of the entire area, J Schofield & R Lea *Holy Trinity Priory, Aldgate, City of London: an archaeological reconstruction and history* (MoLAS Monograph 24, 2005). This includes reporting on excavations ahead of the present building at 71 Leadenhall Street, which contains the medieval arch. The Listing does not include (perhaps because it was from 1972) another larger piece of medieval work: the lower walls of most of a chapel on the south transept of the priory church near the surviving arch. This had to be moved a short distance by crane in 1985 as it was on the site of the future lift shaft. This operation is described in the 2005 volume, pages 204-7, with photographs. Such a movement of a piece of a medieval building would be far less acceptable today. The chapel fragment was enclosed in a store room and access to it is difficult; it is not open to the public like the arch which is in a foyer. But the future of the chapel should be protected just like the arch. There may be other useful information about the heritage of the priory and its buildings in the monograph.

We look forward to the establishment of the Conservation Area.

Sincerely
John Schofield
Secretary, CoLAT



Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 10:24
To: Koukouthaki, Katerina
Subject: FW: Conservation area

FYI

Michelle

From: [REDACTED] <[REDACTED]>
Sent: Saturday, November 4, 2023 4:45 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Conservation area

THIS IS AN EXTERNAL EMAIL

Good Afternoon,
I was delighted to see this message from SAVE.
London is precious and unique. And so much has been lost forever. We must hang on to what is left.
Careful consultation has gone into this, it is thoroughly welcome news, and I hope other areas will follow.
Sincerely
[REDACTED]

NICKIE AIKEN MP
CITIES OF LONDON AND WESTMINSTER



HOUSE OF COMMONS
LONDON SW1A 0AA

Chris Hayward
Policy Chairman
City of London Corporation
Guildhall
London
EC2P 2EJ

30th October 2023

Dear Chris,

Creechurch Conservation Area Consultation

I welcome the decision by the City of London Corporation to create the Creechurch Conservation Area. I also welcome the opportunity for the public to have their say on the proposals through the consultation you have launched.

After discussions with Rabbi Shalom Morris of Bevis Marks, I am fully supportive of Option 3 outlined in the Corporation's consultation document. Option 3 would fully encompass Bevis Marks and the historic grade listed buildings surrounding the synagogue firmly within the conservation area, which includes a church and the only state school in the City of London.

I do not consider Option 1, which the City Corporation has recommended, as appropriate at all as it compromises the ability of the conservation area to to fully protect the historic cultural assets in this area.

I would be delighted to meet with yourself and Rabbi Shalom Morris to discuss the proposed conservation area.

Yours sincerely,



Nickie Aiken MP
Cities of London and Westminster

Koukouthaki, Katerina

From: Pln - CC - Development Dc
Sent: 13 November 2023 11:13
To: Koukouthaki, Katerina
Subject: FW: '*Creechurch Conservation Area' (Incorporating Bevis Marks Synagogue).

Hi Kat,

Please see the email below regarding the proposed Creechurch Conservation Area.

Kind regards,

Davis

-----Original Message-----

From: [REDACTED]
Sent: Sunday, November 5, 2023 4:50 PM
To: Pln - CC - Development Dc [REDACTED]
Subject: '*Creechurch Conservation Area' (Incorporating Bevis Marks Synagogue).

THIS IS AN EXTERNAL EMAIL

Planning Department,
City of London Corporation.

Dear Sirs,

Following extensive research, it has come to my notice that the Corporation is consulting on a potential NEW Conservation Area.

You will know the history of not only the previous absurd planning application(s) to build a *tower block some c.3m to the east of Bevis Marks Synagogue but also which would have impinged upon what had been an existing conservation area incorporating *33 Creechurch Lane, London EC3A 5EB. The Synagogue would have been 'swamped'.

Furthermore, in May, 2022, there was STRONG objection to this *planning application and to another DETERMINING planning application for Bury House, 31 Bury Street, London EC3A 5AR for *33 Creechurch Lane, London EC3A 5EB.

You do not have to be reminded of the history attached to this location and to that of the City of London generally.

I read of a wonderful report drawn up for the Corporation outlining the incredible story of the City of London. This report was terribly interesting and showed the unique way in which the different original buildings had evolved.

Returning to the history of the actual Bevis Marks Synagogue, you will no doubt remember the IMPORTANCE to the Jewish Sephardi Community of this building. You do not have to be reminded that this is the oldest Sephardi (branch of Judaism) Synagogue in the United Kingdom but also the longest-serving regular serving services Synagogue in Europe.

I do hope the City of London Corporation will carry on with yet another new potential Con- servation area for *Creechurch Conservation Area.

Assuring you of my best interest(s) at all times, I remain

Yours faithfully,

[Redacted]

[Redacted]

Koukouthaki, Katerina

From: Harte, John
Sent: 02 October 2023 09:52
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area

FYI

Kind regards



John Harte
Planning Officer | Policy & Strategy
City of London | Environment Department | Guildhall | London | EC2V 7HH

[REDACTED] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

From: [REDACTED]
Sent: Friday, September 29, 2023 2:05 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Creechurch Conservation Area

THIS IS AN EXTERNAL EMAIL

1. Do you agree that the Creechurch area should be designated as a conservation area?
No, I do not believe that it is necessary to designate this area as a conservation area. The current rules and consultations in place are already sufficient to assess new planning applications. The planning process is already restrictive enough without imposing even more restrictions.
2. Which is your preferred option? If you don't like any of them you can offer an Option 4.
Preferred option is 1.
3. If you choose Option 4, please describe your preferred boundary.
N/A
4. Why do you think your selected area is of special architectural or historic interest?
There are buildings of interest in the area, but it is not a museum and should be open to change. This area is right by the Gherkin and other tall buildings in the Eastern cluster. Being a business centre is the main function of the area.
5. Please share any additional general information and facts about the area to support your choice.
Option 1 strikes the right balance between preserving buildings of interest and being open to progress.
6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Explanation of the Equality Act - Section 149 \(external link\)](#)
No

7. Please explain your answer to Question 6. N/a
8. Is there anything that could be done to mitigate any impacts identified? No

Best regards,

██████████

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 02 November 2023 13:52
To: Koukouthaki, Katerina
Cc: Planning Policy Consultations
Subject: FW: SAVE support

Sending over for your records.

Michelle

-----Original Message-----

From: [REDACTED]
Sent: Thursday, November 2, 2023 10:58 AM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: SAVE support

THIS IS AN EXTERNAL EMAIL

Dear sir,

I write to support the work of SAVE , and the heritage zone around the city of London. Please include Aldgate high street and the underground station.

Thank you,

[REDACTED]

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 02 November 2023 13:52
To: Koukouthaki, Katerina
Cc: Planning Policy Consultations
Subject: FW: SAVE support

Sending over for your records.

Michelle

-----Original Message-----

From: [REDACTED]
Sent: Thursday, November 2, 2023 10:58 AM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: SAVE support

THIS IS AN EXTERNAL EMAIL

Dear sir,

I write to support the work of SAVE , and the heritage zone around the city of London. Please include Aldgate high street and the underground station.

Thank you,

[REDACTED]

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 23:16
To: Koukouthaki, Katerina
Subject: FW: Creedchurch Conservation Area consultation

From: J <[REDACTED]>
Sent: Monday, November 6, 2023 4:32 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Creedchurch Conservation Area consultation

THIS IS AN EXTERNAL EMAIL

I would like to comment on the above.

I would like to support the plan described in option 3 (that put together by Bevis Marks)

The reason for my choice is that it provides the greatest protection and wider area covering. I feel of special interest ate the listed Tea warehouses and the Synagogue.

Thank you.

[REDACTED]

[REDACTED]

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 23:15
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area consultation

From: [REDACTED]
Sent: Monday, November 6, 2023 8:53 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Creechurch Conservation Area consultation

THIS IS AN EXTERNAL EMAIL

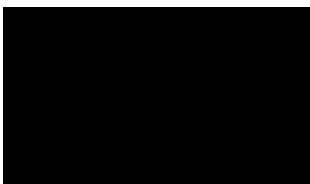
Dear Planning Policy team

I'm a resident of The City in Tower Ward. I'm commenting on the proposed Creechurch Conservation Area

To answer your questions:

1. Do you agree that the Creechurch area should be designated as a conservation area? **Yes, definitely**
2. Which is your preferred option? If you don't like any of them you can offer an Option 4. **Option 3**
3. If you choose Option 4, please describe your preferred boundary.
4. Why do you think your selected area is of special architectural or historic interest? **It's a beautiful old part of The City, full of nooks and crannies, with gorgeous warehouses and other buildings. Once it's gone, it's gone for ever, yet it is these buildings that attract visitors and residents into The City. Importantly, option 3 affords the greatest protection to the tea warehouses and synagogue.**
5. Please share any additional general information and facts about the area to support your choice.
6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? [Explanation of the Equality Act - Section 149 \(external link\)](#) **No A daft question**
7. Please explain your answer to Question 6.
8. Is there anything that could be done to mitigate any impacts identified? **No**

Many thanks and best wishes



Koukouthaki, Katerina

From: Harte, John
Sent: 05 October 2023 11:07
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area Consultation

FYI

Kind regards



John Harte
Planning Officer | Policy & Strategy
City of London | Environment Department | Guildhall | London | EC2V 7HH

[Redacted] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

From: [Redacted]
Sent: Wednesday, October 4, 2023 3:45 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Cc: [Redacted]
Subject: Creechurch Conservation Area Consultation

THIS IS AN EXTERNAL EMAIL



**Historic
Buildings**

London and Middlesex Archaeological Society

Sir,

I write as representative for the London and Middlesex Archaeological Trust Historic Buildings Committee who have reviewed the proposed options for the creation of a new Creechurch conservation area.

It is important that the City of London Corporation should ensure that all possible steps are taken to safeguard the protection of heritage assets in the City of London. In a response to planning application No. 20/00848/FULEIA for the rebuilding of Bury House at 31 Bury Street, Historic England advised that the construction of new tall buildings in the proposed conservation area "will cause considerable harm to the setting and significance of the Grade I listed Bevis Marks Synagogue and as such, they do not meet the planning requirements". The adoption of option 3 is the only option that would provide full protection to this important national heritage asset. Option 3 would also ensure the protection of a key section of the Roman wall, a scheduled monument, a number of Grade I, II* and II statutorily listed buildings which are of outstanding and exceptional heritage significance, and also important non-designated heritage assets for which at present there is no special protection.

The LAMAS HBCC therefore consider that the only way to provide full protection to this important area of the City of London is the establishment of a conservation area as outlined in option 3

Kind Regards
Stephen Gill

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 07 November 2023 13:48
To: Koukouthaki, Katerina
Subject: FW:

One more...

From: [REDACTED]
Sent: Tuesday, November 7, 2023 12:53 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject:

THIS IS AN EXTERNAL EMAIL

Hi There, Apologies I'm a day late. I've only just seen the online docs for the Creechurch Conservation Area Consultation. I'd like to support Option 3 if I may. My details, are as follows

Marcos Duroe
[REDACTED]

(We are on the corner of minories and portsoken street, so may be in the Corporations systems a [REDACTED]
[REDACTED] - It's the same address)

Many thanks,

[REDACTED]

[REDACTED]

[REDACTED]

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 23:16
To: Koukouthaki, Katerina
Subject: FW: Creechurch Lane Conservation Area: Option 3

-----Original Message-----

From: Sharman Kadish [REDACTED]
Sent: Monday, November 6, 2023 12:22 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Cc: [REDACTED]
Subject: Creechurch Lane Conservation Area: Option 3

THIS IS AN EXTERNAL EMAIL

To Whom it May Concern

I am writing in support of the proposed CA Option 3, as proposed by the Georgian Group.

The siting of Bevis Marks Synagogue (Joseph Avis 1699-1701, Grade I Listed) has been threatened all too often in recent years by high rise development in the vicinity. Houndsditch and Aldgate were the heartland of British Jewry since the 'Resettlement' under Oliver Cromwell from 1656. Bevis Marks is the oldest synagogue in the country and one of only three Grade I Listed synagogues in England. It has links back, both architecturally and culturally, to the Esnoga, the Portuguese Great Synagogue of Amsterdam (1675) and itself became the 'mother' synagogue of other Jewish communities in the Western Sephardi world: in the West Indies, the Caribbean, South America - and Sha'ar HaShamayim (rebuilt 1812) in Gibraltar. Thus, the building at Bevis Marks and its immediate neighbourhood are of national and international importance.

Yours sincerely,

Sharman Kadish DPhil (Oxon), FRHistSoc, FSA

Author of 'The Synagogues of Britain and Ireland, (Yale 2011) and companion guidebooks to 'Jewish Heritage in Britain and Ireland' and 'Jewish Heritage in Gibraltar' (2006, 2007, 2015)

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.sharmankadish.com%2F&data=05%7C01%7CKaterina.Koukouthaki%40cityoflondon.gov.uk%7Cdfd4e7baf145489da66c08dbdf1e60c0%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638349093775590960%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6Ik1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=YnKOA%2FLpTpOdnC%2F7065xAvuSKXd6SXPxERb8JAw%2B7eA%3D&reserved=0>

She/her
London, Manchester and Jerusalem

Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 06 November 2023 23:15
To: Koukouthaki, Katerina
Subject: FW: proposed Creechurch Conservation area

From: Christina Emerson [REDACTED]
Sent: Monday, November 6, 2023 10:59 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Re: proposed Creechurch Conservation area

THIS IS AN EXTERNAL EMAIL

Dear Planning Team,

We write in response to your consultation on the designation of a new conservation area in the City of London in the area occupied by Creechurch, Bevis Marks and Aldgate.

The Society for the Protection of Ancient Buildings (SPAB) is the oldest amenity society in the country, founded by William Morris in 1877. Today, we have a statutory role in the secular and ecclesiastical planning systems, with a focus on buildings with fabric dating from 1720 or earlier.

We have reviewed the options and accompanying reports put forward by the City Corporation and Bevis Marks Synagogue. We have also had sight of the alternative proposal formulated by SAVE Britain's Heritage and supported by the Georgian Group. We attended the public consultation held on 20th October and conducted a site visit to assess the area and its buildings in detail.

In responding, we do not propose to assess in detail the significance of the designated and undesignated heritage assets in the area under examination, as this has been done exhaustively by others and we generally concur with the assessments, with the exception of the specific point raised below.

We very much welcome the decision by the City Corporation to consider a new conservation area. We do however have considerable concerns in relation to the conclusion drawn by the accompanying report that Bevis Marks/Duke's Place (north side), from Goring Street to Aldgate, No. 31 Bury Street, and Cunard House should be excluded from the area. You will be aware that the Society objected to a planning application for a very tall building at 31 Bury Street, which was refused planning permission on 5th October 2021, against officer advice. This clearly evidenced the threat to the Bevis Marks Synagogue from ill-conceived development on the adjacent site. Excluding this and the other sites mentioned above from the conservation area would perpetuate the threat to the synagogue from inappropriate development and (in the case of Cunard House) a similar threat to the exceptional Grade I listed St Katherine Cree.

The rationale presented by the report for this decision is that these buildings are not of special architectural or historic interest and therefore do not meet the criteria set out by Historic England for inclusion in a conservation area (Historic England's Conservation Area Appraisal, Designation and Management Second Edition, Advice Note 1). In our view, this constitutes an overly narrow interpretation of the guidance, which does not require that all buildings in a conservation area meet this threshold, rather the area as a whole must meet the requisite tests. The guidance does however state 'conservation area designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest' (P.5 para 10): the inclusion of buildings of neutral significance with the express purpose of

creating a buffer zone to counter the threat of development is therefore clearly sanctioned by the guidance.

In addition, we do not agree with the Corporation's assessment of these buildings as being entirely without significance. Although of varying architectural merit, they are of similar height, mass and scale to their more important neighbours and so contribute to their setting. Their inclusion in the conservation area will be key to ensuring the ongoing protection of that setting and a conservation management plan will be an essential tool in ensuring any change is respectful.

The additional sites proposed for inclusion by SAVE Britain's Heritage are outwith our date remit so we defer detailed comment to others. Nevertheless, a robust and convincing argument has been made for their inclusion in terms of historic and architectural interest and commonality of scale: we support the SAVE proposal as meeting the criteria set out in the Historic England guidance for conservation area designation.

Best wishes

Christina Emerson

Head of Casework



The Society for the Protection of Ancient Buildings
37 Spital Square, London E1 6DY

[Support the SPAB, become a member](#) | spab.org.uk
[Facebook](#) | [Twitter](#) | [Instagram](#) | [LinkedIn](#) | [YouTube](#)



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Koukouthaki, Katerina

From: Planning Policy Consultations
Sent: 03 November 2023 06:50
To: Koukouthaki, Katerina
Subject: FW: Planning consultation

Sending over.

Lisa

-----Original Message-----

From: [REDACTED]
Sent: Thursday, November 2, 2023 8:41 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Planning consultation

THIS IS AN EXTERNAL EMAIL

Hi,

I choose & prefer Option 3.

[REDACTED]

Koukouthaki, Katerina

From: Harte, John
Sent: 02 October 2023 09:52
To: Koukouthaki, Katerina
Subject: FW: Creechurch Conservation Area Consultation
Attachments: Proposed Creechurch Conservation Area Response FR.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

FYI. [REDACTED]

Kind regards



John Harte
Planning Officer | Policy & Strategy
City of London | Environment Department | Guildhall | London | EC2V 7HH

[REDACTED]
[REDACTED] | www.cityoflondon.gov.uk

Bob Roberts
Interim Executive Director Environment

From: [REDACTED]
Sent: Saturday, September 30, 2023 8:48 PM
To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>
Subject: Creechurch Conservation Area Consultation

THIS IS AN EXTERNAL EMAIL

Hi,

My response to the consultation attached. Please acknowledge receipt.

I note that there is reference to buildings being of “special architectural or historic significance” but this is the test for listing, not for inclusion in a conservation area. Please explain the use of these words.

Best regards,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

RESPONSE TO PROPOSED CREECHURCH CONSERVATION AREA CONSULTATION

Below is the text of my unanswered email to Ben Eley, Assistant Director Design, Planning and Development Division of 17 July 2023. The current consultation offers alternative boundaries for the area but none is as extensive as that proposed in my email. To clarify, this should be St Mary Axe, Bevis Marks, St Botolph Street, Aldgate Underground Station, Aldgate High Street and Leadenhall Street.

Dear Ben,

Although I appreciate that, if approved by PT&C on Tuesday, there will be a subsequent public consultation on the proposed CA but my second reaction from reading Appendix 2 was surprise. I'll deal with my first reaction later. Firstly though:

1. Why has Aldgate underground station not been included? I appreciate it's separated from St Botolph Without Aldgate by Dorsett City Hotel:

The building's design is deliberately restrained to ensure an appropriately contextual neighbour to St Alphage Aldgate Church which is the principal focal point in the townscape. [Paragraph 33 (Detailed Design) officer's report to committee, 05 November 2013 re 13/00590/FULMAJ]

suggests a contextual relationship with the Church that would justify the station's inclusion in the CA. In any event the eastern boundary of the CA, along St Botolph Row, includes the new Aldgate Centre, due for completion later this year but seemingly missed by you - your plan is out of date here. Although development may be needed to provide step-free access at the station, the protection of being in a CA, rather than being a narrow block away from one, would give some comfort to the community when that day arrives.

https://en.wikipedia.org/wiki/Aldgate_tube_station

2. I can understand the exclusion of 31 Bury Street because:

The existing character and appearance of the area, together with the setting of several highly graded statutorily listed buildings, such as the Synagogue of Bevis Marks, has been threatened by two recent planning applications for very tall buildings on sites within the area, namely 33 Creechurch Lane (Ref.18/00305/FULMAJ), awaiting determination, and 31 Bury Street (Ref. 20/00848/FULEIA) which was refused planning permission on 5th October 2021, against officer advice.[Paragraph 1.03, Draft of XX May 2022]

Further I understand from Alex Morris, that a revised proposal is planned and I presume it has already been subject to pre-application discussions. However, isn't there a conflict of interest here in your Division?

Certainly, it would seem appropriate to let the response to public consultation to determine the inclusion or otherwise of 31 Bury Street. Although, as Rabi Morris suggests, P&TC could agree to add this property on Tuesday.

3. The exclusion of Bevis Marks/Duke's Place (north side) should be from Goring Street to St Botolph's Street and not Aldgate, unless you mean Aldgate Square. As the block between Goring Street and Camomile Street/Houndsditch isn't included, this "exclusion" is irrelevant anyway.

4. There is an obvious payback in that you propose the exclusion of One Creechurch Place. This is primarily as a result of planning permissions which have been approved by City Corporation over the years on the recommendations of successive chief planning officers. That:

It has a wholly negative relationship with the Creechurch locality, and harmed the street pattern, architectural quality and materials to the buildings immediately neighbouring and surrounding, it establishes hard visual and physical barriers between them, save for a link between Creechurch Place and Mitre Square that reorientates a historic connection and creates an unforgiving visual setting for much of the buildings in the locality.

sums up City Corporation's planning regime admirably. However, this block is so positioned that any significant change to it will seriously impact on the CA, so its exclusion makes no logical sense.

5. Cunard House - actually 88 Leadenhall Street - built in 1999 is said to have retained much of the Art Deco styling of the actual Cunard House, which was built on the site in 1930. Although may be outside a natural boundary, it appears to be no higher than many buildings within the CA.

However, it may well be worth reconsidering the CA's southern boundary as Aldgate High Street/Leadenhall Street and its eastern as St Mary Axe. This would enable the inclusion of 30 St Mary Axe as well as the Grade I listed St Andrew's Undershaft and the Grade II listed 38 St Mary Axe.

Then, of course, there is the notable, and, especially for both The Barbican Association (BA) and Golden Lane Estate Residents' Association (GLERA), insulting, difference between the presentation of the Creechurch CA and the presentation of the response to the proposed BA/GLERA Barbican and Golden Lane CA in November 2017. I appreciate there may be both a new Department and a new "regime" but that doesn't excuse the mendacious hatchet job with its arbitrary five zones, produced as a "sop" to residents:

<https://democracy.cityoflondon.gov.uk/documents/s86817/BARBICAN%20AND%20GOLDEN%20LANE%20CONSERVATION%20AREA%20FINAL%20COMMITTEE%20REPORT.pdf>

Worse, though, is the different approach used in 2017 to that used in 2023. For instance existing complete pre-WW2, and earlier, road patterns north of Beech Street in Zone 2 were

ignored in 2017 but not in Creechurch in 2023. As a result, an important section of this area, comprising 45 Beech Street, Bridgewater House, The Cobalt Building, Tudor Rose Court, Eglwys Jewin, Clarendon Court and 1 Golden Lane, unreasonably lost a level of protection, notwithstanding the latter's status failing to protect it from the ongoing assault on its listed eastern facade.

Other approaches adopted in 2017, although shown to have been interpreted subjectively and mostly incorrectly, led to the exclusion of virtually all of Zones 4 and 5. Also strips of land on the north of Golden Lane Estate were excluded with no explanation offered.

The majority of responses to the subsequent public consultation supported the inclusion of all five zones but were ignored. This meant that virtually all of both Zones 2 and 4 and the whole of Zone 5, were excluded, despite the latter including the Brewery CA! If there is justification for proposing the creation of the Creechurch CA, then there is more than enough justification for revising the Barbican and Golden Lane CA in line with that proposed by BA and GLERA. Please confirm that this will be implemented.

Best regards,

■

30 September 2023

■
■
■

1. Do you agree that the Creechurch area should be designated as a conservation area?

- Yes No I don't know

(Please select only one answer)

2. Which is your preferred option? If you don't like any of them you can offer an Option 4.

- Option 1 Option 2 Option 3 Option 4

3. If you chose Option 4, please describe your preferred boundary.

4. Why do you think your selected area is of special architectural or historic interest?

A natural addition to the City's CAs
It is surprising that St. Katharine Cree & St.
Bololph Aldgate have not been so recognised
before now. It helps knit together the place names
and neighbourhood identity

5. Please share any additional general information and facts about the area to support your choice.

The area linkages in place names - Henenge -
bubble up in Whitechapel - Henenge, Finch, Osborn
Chicklands & Old Montague St. ~ the Osborn
family estate interests in King Charles Nursery Gdns
for 12 generations (Chicklands Bedfordshire)

Conservation Area Support documentation could pick up
on place name and ownership of estates.

Pick up on popular culture - Oranges & Lemons verses
forgotten "Bells of St. Katharine" "Old Father Bald Pate" (Aldgate)
Jewish community seems well covered. Anything from literature?

Daniel Deanda! George Elst.

6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

7. Please explain your answer to Question 6.

8. Is there anything that could be done to mitigate any impacts identified?

Please tell us your name and association with the proposed conservation area.

LESTER HILLMAN
Farringdon Within & W. Ward Member (Life)
Born in the City.
Member of City Conservation Area Advisory Committee

> 10 years. Adviser to Friends of Chickensands Priory Bedfordshire
Member RTP1 (retd)

If you wish to receive updates about this consultation, please tell us your email address.

1. Do you agree that the Creechurch area should be designated as a conservation area?

- Yes No I don't know

(Please select only one answer)

2. Which is your preferred option? If you don't like any of them you can offer an Option 4.

- Option 1 Option 2 Option 3 Option 4

3. If you chose Option 4, please describe your preferred boundary.

4. Why do you think your selected area is of special architectural or historic interest?

These are non-listed buildings that
~~are~~ an excellent example should be preserved
for the general 'ambiance' of the area.

5. Please share any additional general information and facts about the area to support your choice.

6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

NOT RELEVANT.

7. Please explain your answer to Question 6.

8. Is there anything that could be done to mitigate any impacts identified?

Please tell us your name and association with the proposed conservation area.

[REDACTED]
ACTIVE MEMBER OF BRUIS HILLS SYMPOSIUM.

If you wish to receive updates about this consultation, please tell us your email address.

[REDACTED]

1. Do you agree that the Creechurch area should be designated as a conservation area?

- Yes No I don't know

(Please select only one answer)

2. Which is your preferred option? If you don't like any of them you can offer an Option 4.

- Option 1 Option 2 Option 3 Option 4

3. If you chose Option 4, please describe your preferred boundary.

4. Why do you think your selected area is of special architectural or historic interest?

Because of the Central Position of
of Bevis Marks Synagogue, opened 1701,
which is a listed Building.

5. Please share any additional general information and facts about the area to support your choice.

6. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

7. Please explain your answer to Question 6.

8. Is there anything that could be done to mitigate any impacts identified?

Please tell us your name and association with the proposed conservation area.

If you wish to receive updates about this consultation, please tell us your email address.

Committee(s)	Dated:
Planning and Transportation Committee	12 December 2023
Subject: Planning for Sustainability Supplementary Planning Document	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2, 5, 11, 12
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	£0
What is the source of Funding?	n/a
Has this Funding Source been agreed with the Chamberlain's Department?	n/a
Report of: Bob Roberts, Interim Executive Director Environment	For Decision
Report author: Kerstin Kane, Principal Planning Officer (Sustainability), Environment Department, Policy & Strategy	

Summary

This report presents the Planning for Sustainability Supplementary Planning Document (SPD), which sets out guidance, requirements and processes for the environmental sustainability aspects of proposed development in the Square Mile. The SPD seeks to achieve an ambitious and high quality outcome for the environmental sustainability of development in the City of London, in line with the Local Plan 2015 and the forthcoming City Plan 2040.

The report sets out the planned public consultation exercise for at least six weeks in spring 2024, subject to approval by the Planning & Transportation Committee.

Recommendation(s)

Members are asked to:

- Approve the draft Planning for Sustainability SPD attached at Appendix 1 for public consultation.

Main Report

Background

1. The City of London Climate Action Strategy (CAS), approved by the Court of Common Council in October 2020, includes a Square Mile Built Environment workstream with high level actions of which Action 7.4 refers to the tightening of standards for new buildings through planning guidance.
2. The London Plan 2021 and the City of London Local Plan 2015 contain policies on sustainable development and climate change as well as circular economy principles. The emerging City Plan sets out further, more ambitious policies to push forward the environmental sustainability of new development. The draft Planning for Sustainability SPD seeks to provide further detailed guidance, requirements and recommendations to applicants on these policies, informed by extensive experience of working on applications in the Square Mile and drawing on best practice from a wide range of sources. The SPD builds on and complements the City Corporation's Carbon Options Guidance planning advice note, adopted in 2023, through providing guidance, requirements and processes in relation to retrofit and reuse of existing buildings and building elements, as well as promoting exemplary standards for new buildings.
3. The guidance provided by the draft SPD is designed to be specific to the City of London's built environment on relevant topics and sets out requirements and recommendations to demonstrate exemplary practice. The SPD was informed by work undertaken by consultants Buro Happold and has been developed by City of London officers.
4. Subject to approval from Planning & Transportation Committee, an engagement exercise will be undertaken in accordance with the City of London Statement of Community Involvement (SCI) and The Town and Country Planning (Local Planning) (England) Regulations 2012, to gather responses to the approach presented in the SPD.

The draft Planning for Sustainability SPD

5. The Planning for Sustainability SPD has been informed by internal consultation and a review of an extensive range of sustainability guidance prepared by other authorities and expert organisations. It provides planning guidance for developers on sustainability topics relevant to the City's built environment and will help developers to meet the requirements of the Development Plan policies that relate to sustainability. The SPD covers approaches to the design, delivery and operation of buildings and spaces with high quality sustainability standards.
6. The document sets out:

- Relevant policy, guidance, and strategies
 - Guidance on addressing the relevant sustainability topics - Retrofit and Reuse, Greenhouse Gas Emissions and Energy Use, Circular Economy, Climate Resilience, Urban Greening and Biodiversity – in the planning process. This includes key actions, key measures and detailed measures for developments, relevant background and case studies to support the design development.
 - Key considerations and requirements – these are grouped by application stage and consist of a list of issues to be considered by applicants for a sustainable development of the highest quality, and how these should be presented in an application.
 - Recommended standards, certifications and guidelines as well as the LETI Retrofit process in appendices A and B.
7. The SPD encourages developers to address sustainability at an early stage to inform the design development for the application proposal. Using this guidance, appointing experienced and creative consultants and designers, and establishing a dialogue with officers of the City of London Corporation will contribute to achieve best practice outcomes.

Public consultation and engagement

8. The City Corporation in collaboration with Buro Happold carried out preliminary engagement in May 2023 with key stakeholders, including statutory authorities like Historic England and Greater London Authority, Business Improvement Districts, and environmental industry experts. This engagement was conducted to seek views and ensure that the SPD was focussed on the most important and relevant issues.
9. The City Corporation will consult on the draft SPD for a period of at least six weeks during early spring 2024, in accordance with the City Corporation’s Statement of Community Involvement (this is a longer timeframe than the statutory consultation period for a SPD of four weeks, as required by the The Town and Country Planning (Local Planning) (England) Regulations 2012). A comprehensive engagement plan will be developed for the SPD to include residents, businesses, workers, consultants and other relevant stakeholders. Copies of the SPD and any other relevant documents will be made available on the City Corporation’s website as well as physical copies in the locations specified in the City Corporation’s SCI. The consultation will include:
- Public meetings to introduce and receive feedback on the SPD
 - Publish the SPD on the City Corporation’s website
 - Material for onward distribution by City Corporation Members
 - Use of City Corporation social media channels
 - Use of the City Corporation’s Commonplace platform for online consultation
 - Emails to stakeholders and those signed up to the Corporation’s planning consultation database
 - Workshops with industry professionals.

10. The aims of the public consultation are:

- To obtain feedback from stakeholders on the draft SPD and use that feedback to improve the document and inform the final version
- To ensure stakeholders are aware of the SPD and use it to inform development proposals
- To seek broad consensus, where possible, from stakeholders and experts for the final SPD to support a consistent high standard for new development.

11. A Sustainability Appraisal/Strategic Environmental Assessment screening will be conducted to determine whether a full assessment is required. Since the SPD will provide further guidance to policies in the adopted City Plan, a full assessment is normally only required in exceptional circumstances. The Sustainability Appraisal screening will be published with the SPD during the public consultation.

12. Following the public consultation, the SPD will be revised and brought again to the Planning and Transportation Committee for approval in 2024, along with the Sustainability Appraisal screening/full assessment and a consultation statement setting out who was consulted, the main issues raised, and how those issues have been addressed in the SPD. Once the SPD is adopted it will become a material consideration in the determination of planning applications.

Corporate & Strategic Implications

13. **Strategic implications-** The consultation strategy will help to ensure the Planning for Sustainability SPD supports the delivery of the following outcomes in the Corporate Plan:

- Outcome 1: People are safe and feel safe
- Outcome 2: People enjoy good health and wellbeing
- Outcome 5: Businesses are trusted and socially and environmentally responsible
- Outcome 11: We have clean air, land and water and a thriving and sustainable natural environment
- Outcome 12: Our spaces are secure, resilient and well-maintained.

14. **Financial implications-** There are no financial implications arising from this report.

15. **Resource implication-** Delivery of the consultation on the SPD will be through existing Environment Department staff resources.

16. **Equalities implications-** Section 149 of the Equality Act 2010 requires that the City Corporation, as a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 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.

The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.

Communications and events will be designed to be accessible. An Equality Impact Assessment (EqIA) screening of the draft SPD has been undertaken to evaluate the implications for people with protected characteristics. The EqIA screening concluded that a full Equality Impact Assessment is not necessary because none of the nine protected characteristics demonstrated a negative or adverse impact resulting from the implementation of the proposed Planning for Sustainability SPD. The EqIA screening is attached as Appendix 2.

17. **Climate implications-** Delivery of the SPD will contribute towards meeting the objectives of the Climate Action Strategy. Ensuring buy-in from a wide range of stakeholders, including sustainability experts, will help to ensure the SPD is making the best possible contribution to sustainable development.
18. **Legal implications** -There are no legal implications arising from this report. The SPD is being developed in line with the requirements of The Town and Country Planning (Local Planning) (England) Regulations 2012. The Levelling-up and Regeneration Act 2023 received Royal Assent on the 26th of October 2023. This Act introduces changes to the plan making system but the dates for the initial commencement of the relevant sections is yet to be appointed, meaning these sections don't yet apply. Once the relevant sections are commenced, local planning authorities will no longer be able to produce supplementary planning documents. It is unlikely that the relevant sections will be commenced before this SPD is adopted and whilst the legislation allows the Secretary of State to make transitional arrangements, we don't yet know what these will cover and how they will deal with SPDs which have already been adopted or are in the process of being made. In the event that a date is appointed before the SPD is adopted, it is likely that the SPD could still be treated as a material planning consideration and officers consider it will still provide useful guidance to inform the planning process.
19. **Risk implications** - There are no additional new risks arising from this report.
20. **Security implications** - There are no security implications arising from this report.

Conclusion

21. This report presents Members with the draft Planning for Sustainability SPD and seeks approval for the public consultation strategy including expert

engagement which will help to ensure that the SPD is a robust, practical document. Subject to public consultation and approval by this Committee, the SPD will be published and will become a material consideration in the determination of planning applications, helping the City to reach its goal of achieving net zero for the Square Mile by 2040.

Appendices

- Appendix 1 – Planning for Sustainability Supplementary Planning Document
- Appendix 2 – Equality Impact Assessment Screening

Report author

Kerstin Kane, Principal Planning Officer (Sustainability) – Policy and Strategy, Environment Department

E: kerstin.kane@cityoflondon.gov.uk

T: 07598 404355



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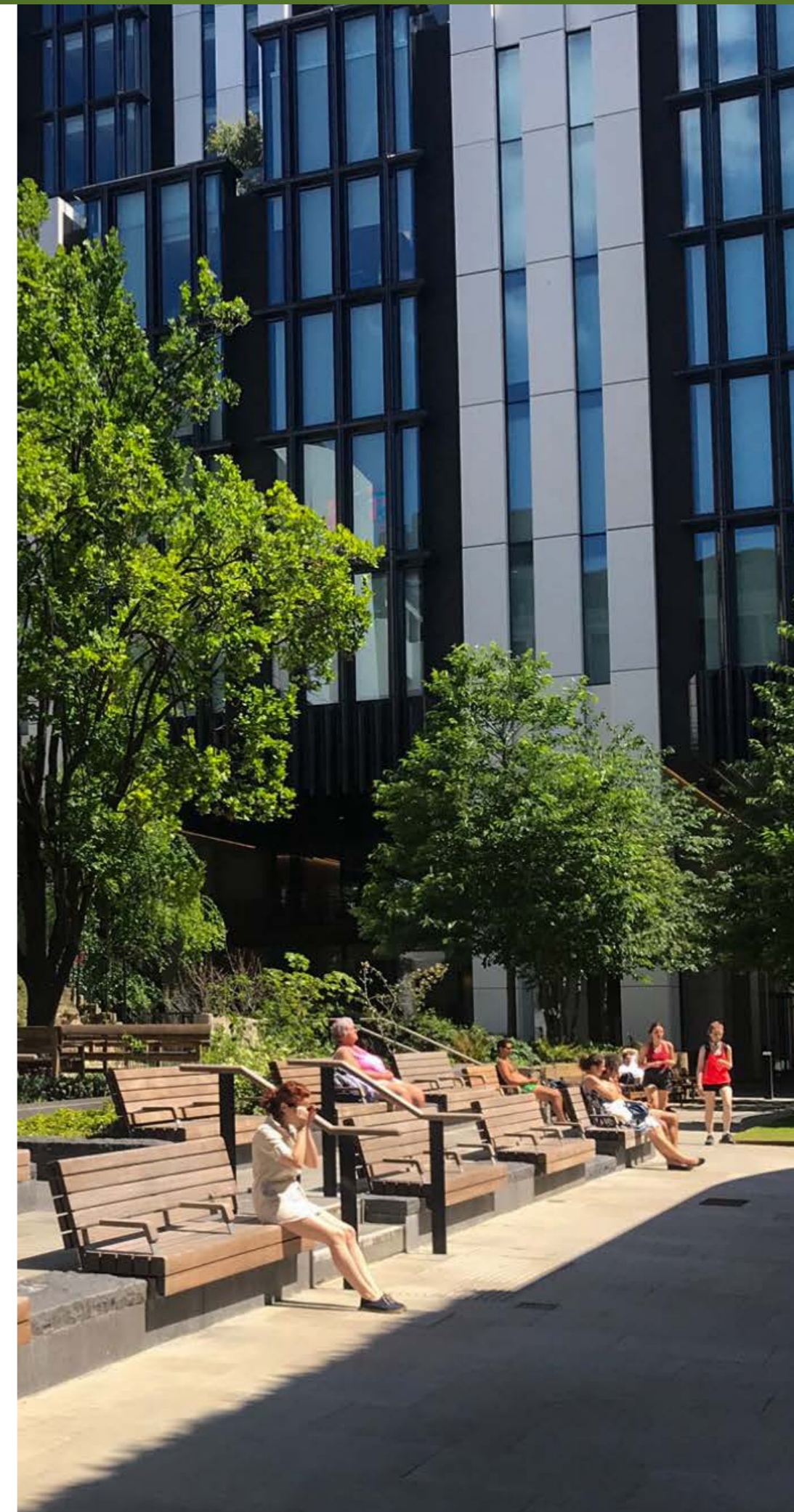
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ABBREVIATIONS

Abbreviation	Definition
AEP	Annual Exceedance Probability
ASHP	Air Source Heat Pump
BGI	(urban) Blue-Green Infrastructure
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environmental Assessment Method
CCAS	Clean City Awards Scheme
CE	Circular Economy
CFD	Computational Fluid Dynamics
CIBSE	Chartered Institution of Building Services Engineers
CIL	Community Infrastructure Levy
CoLC	City of London Corporation
DEFRA	Department for Environment Food and Rural Affairs
DSY	Design Summer Year
EA	Environmental Agency
EAF	Electric arc furnace
ERIC	Eliminate, Reduce, Isolate, Control
GGBS	Ground Granulated Blast-furnace Slag
GHG	Greenhouse Gas
GLA	Greater London Authority
GWP	Global Warming Potential

HVAC	Heating, ventilation, and air conditioning
LAEP	Local Area Energy Plan
LETI	Low Energy Transformation Initiative
LFRMS	Local Flood Risk Management Strategy
LISI	London Invasive Species Initiative
LLC	Life cycle costing
LLFA	Lead Local Flood Authority
MEP	Mechanical, electrical and plumbing
NABERS UK	National Australian Built Environment Rating System (UK version)
NPPF	National Planning Policy Framework
PAN	Planning Advice Note
PV	Photovoltaic
SINCS	Sites of Importance for Nature Conservation(s)
SPD	Supplementary Planning Document
SuDS	Sustainable Drainage Systems
TSE	Treated Sewage Effluent
UGF	Urban Greening Factor
UKBGC	UK Building Green Council
UTCI	Universal Thermal Climate Index
WLC	Whole Life Carbon
WLCA	Whole Life-cycle Carbon Assessment



INTRODUCTION TO THIS DOCUMENT

01

1. INTRODUCTION TO THIS DOCUMENT

City of London context

The City is one of the world’s leading international financial and professional services centres and a driver of the UK economy, continually innovating and developing new business areas and flexible ways of working. The quantity and quality of new development, particularly office-led development, will need to meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City’s operations. The demand for additional office floorspace and high land values within the Square Mile have resulted in a high-density and rapidly changing townscape which presents challenges and opportunities to ensure that new development delivers right amount of development in the right places.

The future growth of the City needs to take place in a sustainable and inclusive way, incorporating the principles of Good Growth set out in the London Plan. These principles ensure that London remains resilient to our changing climate and is green and healthy; with clean air, easy access to green space and more efficient buildings supplied by cleaner energy.

The new Local Plan, called City Plan 2040, sets out the City of London Corporation’s vision, strategy and objectives, providing a framework for future development in the Square Mile. This framework outlines priorities for our people, businesses, places, and spaces until 2040 and beyond.

In the context of widespread climate action, the CoLC has adopted an ambitious Climate Action Strategy which sets out how the organisation will achieve net zero, build up climate resilience and champion sustainable growth. It has also identified climate-related risks that are likely to affect the City in the future, including flooding, overheating, water stress, biodiversity losses, pests and diseases, and disruption to infrastructure.

A sustainable and more resilient City will contribute to reducing the impact on the climate and mitigating future risks. However, it will also enhance the quality of the environment for residents and occupiers by improving air quality, thermal comfort, natural amenities, public realm quality, and accessibility. Developments should aim to support, contribute to, and enhance the quality and sustainability of the environment throughout their life-cycle, including demolition, construction, operation and end-of-life.

Furthermore, a sustainable and more resilient City will appeal to landowners and commercial occupiers who are increasingly focussed on high environmental, social and governance (ESG) standards to ensure that risks and opportunities affecting their buildings are managed effectively and in the long term.

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Source: City of London Corporation

1. INTRODUCTION TO THIS DOCUMENT

The aim of this SPD

The purpose of this Supplementary Planning Document (SPD) is to provide guidance on how applicants should approach sustainability in their developments through the application process.

It has been prepared to provide additional detail and guidance on how to fulfil policies of the current Local Plan, as well as emerging policies. Specifically, this SPD:

- Sets out the key approaches that the City of London Corporation (CoLC) is targeting on different sustainability themes and outlines key actions to be taken into consideration to develop an exemplar scheme
- Identifies a list of key actions to be considered throughout the design process and provides details specific to the City of London for each sustainability theme
- Provides guidance on what, how and when relevant sustainability aspects should be taken into consideration during the planning application process and sets out submission requirements throughout the life-cycle of the development, from the pre-application process to post-completion
- Provides a collation of relevant recommended standards, certifications and guidelines.

Applicant teams should work through all topics to reach an optimal package of design bespoke for their site.

The SPD provides further detail on how to interpret policies and is a material consideration in determining planning applications. The SPD sets out what planning officers expect to see addressed through the design and an indication of what the CoLC is looking for in applications.

This SPD is for the use of applicant teams, CoLC officers and decision makers. The content of this document applies to all development proposals that include building and landscape work. Measures highlighted here are applicable to all major and minor developments to include new buildings, refurbishment or retrofitting of existing buildings, extension and alterations, works to open spaces and landscaped areas on sites, and relate to all types of land uses.

This document recognises that the guidance contained within it should consider the implications for people within the protected characteristics under The Public Sector Equality Duty set out in the Equality Act 2010. Regard should be given to the principles of inclusive and accessible design in all developments and initiatives, and consideration given to vulnerable groups, including the elderly and children, whenever climate change mitigation and adaptation measures are implemented.



1. INTRODUCTION TO THIS DOCUMENT

Structure and themes of the SPD

This SPD is divided into thematic chapters, each with subtopics identified as key sustainability considerations for all development proposals within the City. Despite this separation, it is important to consider the inter-linkages between elements, which can include positive synergies (such as nature-based SuDS supporting biodiversity), as well as trade-offs between different sustainability issues. For example, high performing thermal insulation materials improve energy efficiency, however, they contribute to the embodied carbon intensity of a building.

The CoLC seeks a holistic approach to development and its thorough integration into the strategic sustainability aims of the local and wider context. Opportunities and constraints will vary for each site and schemes must balance all facets of sustainability with the needs of applicants, tenants, residents and the public and local ecosystem.

Chapter 1 - INTRODUCTION

Introduces the overall purpose and structure of this document and how to use the information contained.

Chapter 2 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Explains the current policy context and provides an overview of the current strategies adopted by CoLC to address climate change mitigation and adaptation. It also introduces the sustainability themes identified as key to the City.

Chapter 3 - RETROFIT AND REUSE

Outlines the CoLC's aspiration to achieve sustainable development through the retrofit and reuse of the existing building stock. It provides guidance on light retrofit, deep retrofit and retrofit with new-build.

Chapter 4 - GREENHOUSE GAS EMISSIONS AND ENERGY USE

Whole Life-Cycle Carbon - provides guidance on how to reduce or mitigate the carbon emissions resulting from the construction and use of a building over its entire life, including its demolition and disposal.

Operational emissions and energy use - examines how to reduce the emissions generated from the day-to-day operation of a development, which are principally driven by energy use and efficiency.

Chapter 5 - CIRCULAR ECONOMY

Circular Economy in Construction - provides guidance on how to shift from a linear to a more circular construction model, where a long-life, loose-fit, low-energy approach is taken to all new and existing buildings and materials.

Operational Circular Economy - focuses on reducing waste produced by occupants, and how to ensure waste that is produced is sorted, stored and treated appropriately.

Chapter 6 - CLIMATE RESILIENCE

Flood Risk and sustainable drainage systems - sets out how flood risk management and sustainable drainage systems should be approached for developments within the City.

Water Resource Management - outlines considerations for a typical development related to water resource management.

Building and Urban Overheating - provides guidance on preventing overheating in a dense and urbanised environment such as the City.

Pests & Diseases - defines the risks associated with animals, insects, weeds in an urban context and provides guidance for a typical development in the City.

Infrastructure Resilience - outlines key considerations for designing efficient and resilient infrastructure for a building and its external plot interface with the City.

Chapter 7 - BIODIVERSITY

Urban greening - provides guidance on how to connect green spaces and increase biodiversity and amenity value of urban greening in the City. It includes suggestions for interventions that can be used in different areas of a typical development.

Urban Greening Factor - defines the Urban Greening Factor and describes the approach needed to achieve the desired outcomes.

Biodiversity Net Gain - advice on how to meet and exceed policy targets in a typical development in the City

Chapter 8 - KEY CONSIDERATIONS AND SUBMISSION REQUIREMENTS

Key considerations, recommendations and submission requirements for all stages of the planning process.

APPENDICES

A list of recommended standards, certifications, guidelines and further guidance to take into consideration.

CLIMATE CHANGE
MITIGATION AND
ADAPTATION

02

2. CLIMATE CHANGE MITIGATION AND ADAPTATION

Introduction

Transforming the built environment is fundamental to combating the climate crisis and achieving sustainable development. In 2020, 67% of London's direct carbon emissions were attributable to buildings¹. This figure does not account for indirect 'embodied' emissions. Embodied carbon makes up 15% of the total direct and indirect emissions in buildings. In the Square Mile, commercial buildings are responsible for the majority of emissions.

National policies

The **National Planning Policy Framework (NPPF)** sets out the government's planning policies for England and how these should be applied. The NPPF reiterates that the purpose of the planning system is to "contribute to the achievement of sustainable development", acknowledging the role planning can play in securing radical reductions in greenhouse gas emissions and adapting to climate change. The NPPF states that "The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change".

The NPPF indicates that local authorities should plan for new development in ways which reduce greenhouse gas emissions consistently with the targets set out in the Climate Change Act 2008 policy and reflect nationally described standards.

Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain (BNG) from November 2023. BNG will be measured using DEFRA's biodiversity metric and habitats will need to be secured for at least 30 years from the completion of the development. Secondary legislation from DEFRA will set out the detailed implementation requirements.

Local policies and key guidance

The London Plan (2021) and associated guidance published by the Greater London Authority (GLA) will be used alongside CoLC's policies when determining planning applications. This SPD has been produced in conformity with the policies in the London Plan and these are referenced throughout the document where relevant.

For applications referable to the mayor, this document should be interpreted as supplementary to the submission requirements set by the GLA. For non-referable schemes, this document should be interpreted as primary guidance on how to achieve sustainable development in the City.

The current London Plan is committed to ensuring the capital leads the way in tackling climate change by making London a net zero-carbon city by 2030. To support this goal, the GLA expects that new homes are environmentally sustainable and meet emissions targets. The Plan also introduces circular economy principles, with a focus on reducing waste, material re-use and recycling throughout the whole life-cycle of a development. It also requires developments to achieve an urban greening factor score and for major schemes to demonstrate that they are 'Air Quality Neutral' developments. On the public realm side, the Plan also introduces and promotes the Mayor's 'healthy streets' agenda, with a focus on walking and cycling, freight consolidation and green infrastructure.

The **City of London Local Plan**, adopted in 2015 is the strategy for planning the City. It sets out the vision for shaping the Square Mile up to 2026 and contains the policies which guide planning decisions within the City. The Plan is currently under review and will be replaced by the new City Plan once it is adopted in 2025.

The emerging Local Plan, called City Plan 2040 (previously City Plan 2036), is a plan for the future development of the City, setting out what type of development CoLC expects to take place and where. It sets out CoLC's vision, strategy and objectives for planning up to 2040, together with policies that will guide future decisions on planning applications. Climate change mitigation and adaptation are key priorities and threaded throughout the Plan across many policies.



Source: City of London Corporation

¹ London Energy and Greenhouse Gas Inventory (LEGGI).

2. CLIMATE CHANGE MITIGATION AND ADAPTATION

Connectivity and the City of London Transport Strategy

The City of London is very well-connected, via sustainable transport modes, with the surrounding London boroughs and the wider regional context having the highest possible Public Transport Accessibility (PTAL) rating of 6b. The Department for Energy Security and Net Zero states in its 2021 Local Authority and Regional Greenhouse Gas Emissions Report that “London has the lowest emissions per capita of any region due to the urban nature of the transport system, a high population density and its lower level of large industrial facilities than other regions”. The City of London is named as one of the local authorities that had the largest decreases in greenhouse gas emissions since 2005, mostly due to decreases in the commercial electricity sector. The correlation between high levels of sustainable connectivity, the concentration of mixed commercial activities and the associated commuting, contributes to the carbon efficiency of the Square Mile and supports a compact, high density, built environment in designated areas of the City.

People walking and cycling make up more than two-thirds of all observed travel activity in the City, whilst cycles made up a greater proportion of traffic than cars and private hire vehicles counted on our streets in 2022.

The City of London Transport Strategy addresses the challenges and opportunities presented by a growing and evolving City. It provides the framework for continuously improving connectivity between places and accessibility of its public realm. Accessibility to individual buildings and public facilities as part of private developments is subject to detailed negotiations with applicants, in particular to:

- Improve quality and permeability of the City’s streets and spaces in ways that enhance inclusion and accessibility, and enable more people to choose to walk, wheel and cycle in the City as part of the Healthy Streets Approach that provides the framework for the City of London’s Transport Strategy
- Create new pedestrian routes through buildings and development sites, where feasible, and respecting, maintaining and restoring, the City’s characteristic network of accessible buildings, streets, courts and alleyways
- Achieve publicly accessible ground floors and external amenity spaces for improved pedestrian movement, where feasible

- Design inclusive, attractive and convenient building entrances, including for cyclists
- Reduce detrimental impacts, such as severance of amenity spaces and pedestrian routes, through servicing access to buildings, by incorporating flexible and innovative servicing solutions for the design of the public realm

Applicants in the City of London will be required to provide design solutions for improving connectivity and accessibility, thus ensuring the environmental sustainability of the City. In particular, the increasing use of sustainable transport modes by occupiers and visitors will support the transition to net zero carbon.

The topic chapters include recommendations about sustainable design considerations for the public realm, private open spaces and buildings.

Climate Action Strategy 2020-2027

The CoLC has long been a champion of clean air, open space provision, sustainability and, more recently, green finance, recognising that a healthy environment is critical to business and personal well-being.

In 2020, CoLC adopted a radical Climate Action Strategy which breaks new ground and sets out a pathway to achieving net zero emissions for both CoLC’s activities and the wider activities of businesses and residents in the Square Mile. In adopting the strategy, CoLC has committed to:

- Achieve net zero carbon emissions from our own operations by 2027
- Achieve net zero carbon emissions across our investments and supply chain by 2040
- Support the achievement of net zero for the Square Mile by 2040
- Climate resilience in our buildings, public space and infrastructure

The City of London Corporation is investing £68m between 2020-2027 to support these goals of which £15m is dedicated to preparing the Square Mile for extreme weather events.

The Strategy and the actions outlined in the document will help enable the Square Mile achieve net zero carbon by 2040, tackle climate change, and create opportunities while transitioning to a low-carbon economy.

The CoLC is also enacting a variety of measures to mitigate the impacts of climate change on the Square Mile and to ensure that the City’s public spaces and infrastructure are resilient to the effects of climate change. These include:

- A Local Area Energy Plan which sets out the road map to achieve a net-zero energy system in the City by 2040, to be delivered in partnership with our key stakeholders
- A programme of transport measures to introduce further pedestrian priority and pavement widening across the Square Mile as well as freight consolidation
- The Cool Streets and Greening Programme which is introducing climate resilience measures to the City’s streets and public spaces. The measures include sustainable urban drainage systems, integrated water management, climate resilient greening and enhancements to biodiversity.
- Guidance and case studies on building refurbishment in the City as a way of incentivising retrofit within the construction sector.
- A Heritage Building Retrofit Toolkit to support the adaptation of the 600+ listed buildings in the City.
- As the local planning authority, the Corporation has adopted a Planning Advice Note on Carbon Options Guidance which seeks to reduce the operational and embodied carbon emissions of schemes in the City
- An Embodied Carbon Action Plan to reduce the built environment’s embodied carbon in the Square Mile
- The Skills for a Sustainable Skyline Taskforce established by the Corporation has recently reported on its finding to ensure we have the skills, capacity and capability to deliver on our net-zero goals.
- Smart lighting upgrades to the CoLC’s buildings

2. CLIMATE CHANGE MITIGATION AND ADAPTATION

The CoLC seeks to use the planning process to implement a range of resilience measures in the Square Mile including green roofs, urban greening, landscaping interventions, flood resilience and climate resilient new buildings. This document provides an expanded range of guidance.

Local Area Energy Plan 2023

CoLC's 2023 Local Area Energy Plan sets out the details of what the future energy system could look like in the Square Mile with a view to achieving Net Zero across the Square Mile and CoLC's operations by 2040. It combines robust technical analysis with stakeholder engagement to develop priority action areas.

The Plan sets out actions that need to be taken by key actors in the City, including CoLC itself, local and national government, energy providers, regulators, industry and residents.

Further details are set out in the Operational Energy Use section of this SPD.



Festival Gardens © Clive Totman, 2023

RETROFIT AND REUSE

03

3. RETROFIT AND REUSE

Introduction

While changes in technology, policy and culture are increasing the number of energy-efficient new buildings, it is critical that the large existing urban building stock is retrofitted in order to meet the UK's net zero carbon targets.

Demolition and new build can be very impactful on the environment, due to the embodied carbon associated with the extraction, transportation, and production of new materials, energy required for the construction work itself and from unrecycled building waste materials. There are also noise, and air quality impacts of construction sites to be considered.

Retrofitting existing buildings is a principal way of reducing the carbon emissions of the construction industry and in the City. Different levels of retrofit can help strike the right balance between a low-carbon project and one that works for final users.

The opportunity to retain and retrofit existing buildings, which follows circular economy principles, must be fully explored and prioritised before a project team considers demolition of any kind. This decision must be explored at the earliest possible stage, ideally brief development stage, to achieve the maximum impact.

CoLC requires the consideration of retrofit as a key means of improving the sustainability of existing buildings, reducing carbon emissions from development and maintaining or introducing a vibrant mix of building types and uses within them, to contribute to future-proofing the City and transitioning to a net zero carbon City by 2040. A retrofit scheme is likely to result in a more sustainable development than new-build when considering the whole-life impact on the environment. This approach is supported by City Plan Strategic Policy S8 which requires applicants to take a "retrofit-first" approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options

Key approaches for the City

In the City of London context, retrofitting existing buildings contributes to preserving and enhancing the sensitive character of conservation areas, creating an architecturally innovative environment, and contributing towards making the City a leading leisure and culture destination. The CoLC will welcome applications that set strong precedents in this regard and that promote new ways of thinking about repurposing buildings as the most effective way to drive down carbon intensity of development and create a unique sense of place. Thus, retrofit and reuse respond to developers' and occupiers' wishes to create, live or work in the most sustainable environment possible. CoLC is strongly supporting shifting the creative focus of architects, engineers and designers to the transformation of existing buildings into sustainable, characterful and interesting architecture.

Adopting a retrofit approach which reduces waste and disturbance to the surrounding context during construction also helps support these aims. The most important actions for achieving success in retrofitting projects generally and in heritage contexts are outlined on the next pages.

The earlier the potential for retrofitting is discussed, the more likely it is to be a success. Retrofitting measures should aim to maximise building retention (or minimise new work), improve energy efficiency and introduce other sustainability benefits, such as improving climate resilience, enhancing health and well-being of the occupants, contributing to biodiversity and urban greening and saving water resources.

Further retrofitting guidance including institutional guidance based on best practice as set out by LETI are provided in Appendix A and B.

London Plan 2021

- D3: Optimising site capacity through the design-led approach
- SI2: Minimising greenhouse gas emissions
- GLA Circular Economy Statement Guidance

Local Plan 2015

- CS12: Historic Environment
 - DM12.1: Managing change affecting all heritage assets and spaces
- CS15: Sustainable Development and Climate Change
- CS17: Waste
 - DM17.2: Designing out construction waste

Draft City Plan 2040

- S8: Design
 - DE1: Sustainable Design
- S11: Historic Environment
 - HE1: Managing Change to Historic Environment

Additional Guidance

Carbon Options Guidance Planning Advice Note

Key actions to develop an exemplar City scheme

- Adopt a retrofit first approach that is informed by a carbon optioneering assessment (see Carbon Options Guidance Planning Advice Note)
- Consider the optimal use of an existing building that would enable a retrofit approach while supporting strategic land use policies
- Engage creative architects, engineers and designers that focus on the opportunities of existing buildings and transform the exterior and interior to the highest environmental and design quality
- Ensure that retrofit schemes achieve the highest possible level of energy efficiency, climate resilience, health and well-being, and occupier amenity
- Assess the opportunities of the local context and sustainability aspirations for a site to develop the best practice circular economy and low carbon strategy
- Seek specialist heritage expertise for historic buildings to identify sensitive solutions for retrofit

3. RETROFIT AND REUSE

Retrofit first approach

Initial considerations about the extent of retrofit should be based on the opportunities and challenges of a site using the design approach set out in the GLA's Circular Economy Statement Guidance 2022. Ideally, this process occurs at the project definition stage and includes:

1. Undertaking a pre-redevelopment audit to understand the state of repair of existing structures, buildings, infrastructure and public realm on site, and how feasible it is to retain these (see GLA guidance for audit requirements)
2. Considering whether the current structures and buildings can be developed to suit the evolving requirements of the site and the needs of the site and surrounding area. This involves the consideration of three key strands:
 - i. The development plans, heritage matters, and sustainability drivers for the whole area (e.g., local plans and community consultations)
 - ii. The development and sustainability aspirations for the site (e.g., developer brief, pre-app engagement, project sustainability brief)
 - iii. Resulting circular economy and low WLC carbon development opportunities identified for the site.
3. Major applications and schemes where demolition of the majority of the existing building structure is proposed must prepare a pre-redevelopment audit that will assess retention and development scenarios in accordance with the Carbon Options Guidance. The number of options are discussed as part of the pre-application stage and include a refurbishment baseline in addition to at least one deep retrofit option (with or without extension, as applicable) and a substantial demolition option where applicable. The options must be evaluated according to whole life-cycle carbon, circular economy and other relevant sustainability criteria.

4. The options assessment and evolving circular economy strategy must be based on a pre-demolition audit to identify salvageable materials for reuse and recycling. This could be developed in the form of a "reuse catalogue" with more in-depth considerations about how materials can be reused at their highest values. This should be supplemented with salvage/demolition drawings from the architects and deconstruction drawings from structural engineers. Materials brokers to claim the salvaged materials, and a storage strategy also need to be identified.

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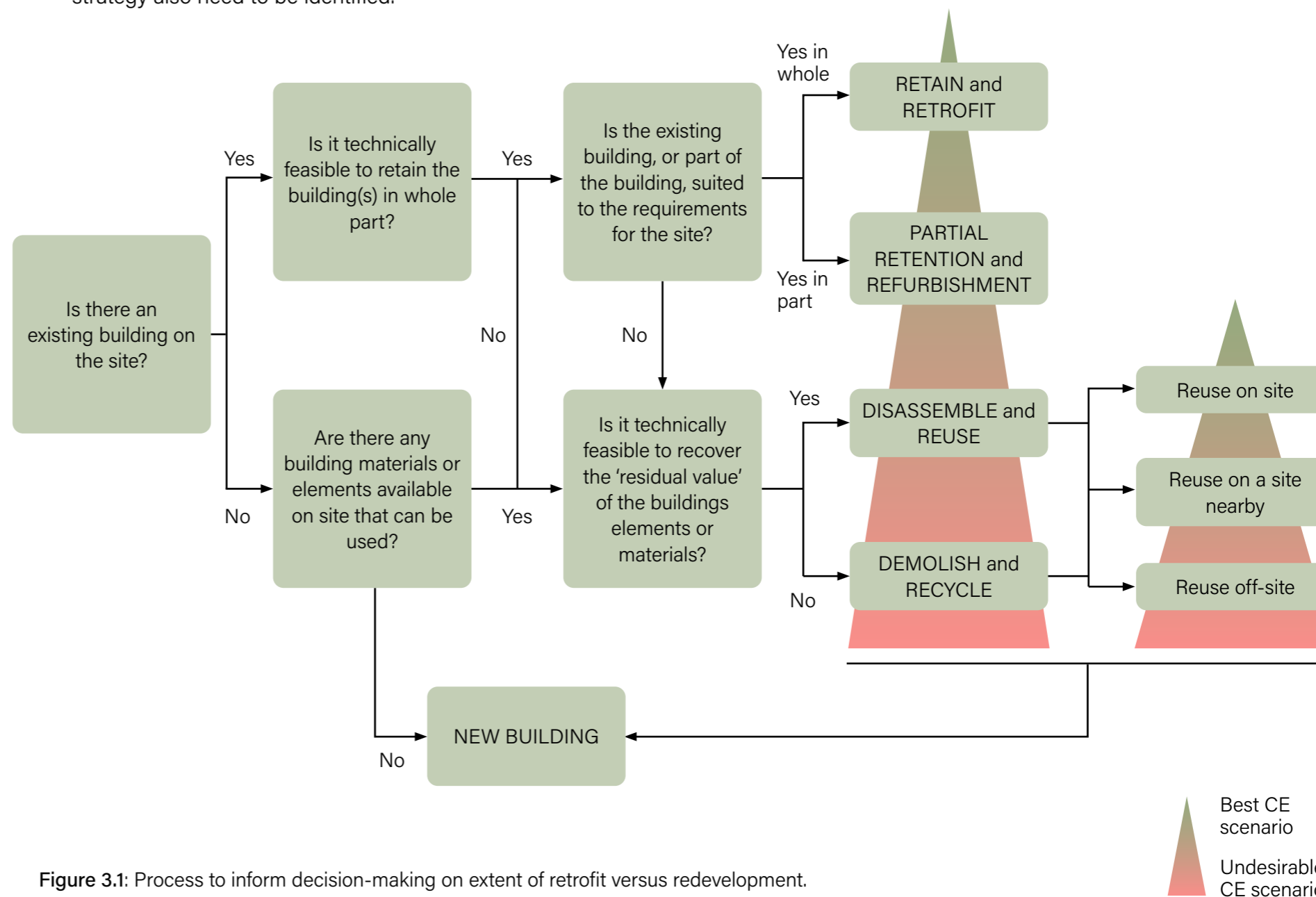


Figure 3.1: Process to inform decision-making on extent of retrofit versus redevelopment. Source: Adapted from GLA (2022) Circular Economy Guidance.

3. RETROFIT AND REUSE

Types of retrofit

This section defines the different approaches to retrofitting relevant to the City. A range of retrofit interventions may be deployed, typically grouped as 'light', 'deep' and 'retrofit with new-build'. Definitions have been adapted from UKGBC Guidance Delivering Net Zero: Key Considerations for Commercial Retrofit.

Typical interventions required to redevelop a building to meet contemporary market needs include; enlarging cores and lifts, adequate floor-to-ceiling heights, installing amenity terraces, new plant rooms and greening. These alterations can impact the feasibility of retention and thus the type of retrofit pursued.

Light retrofit

Light retrofit involves energy performance optimisation through basic fabric improvements, replacement or adaptation of existing building elements and typically focusses on individual building components. Light retrofit is usually minimally invasive and is often carried out in conjunction with energy efficiency surveys and stakeholder need assessments to further increase the efficiency or maintain good performance of a building.

Typical interventions include: improving insulation and sealing gaps, lighting upgrades, installing building service monitoring and optimisation technologies. These may be accompanied by 'low/no cost' interventions such as fine tuning and behaviour change measures.

Deep retrofit

Deep retrofit might involve a collection of light retrofit measures and works of a more significant size or scale that result in a fundamental change to the building structure or services, while aiming to retain the existing structure and substructure. The structure of a tall building is usually the most carbon-intensive element and should be retained wherever possible. Although involving greater disruption to building occupants than light retrofit, long term resource efficiency gains of deep retrofit are significant while the approach is also likely to result in less embodied carbon emissions than a new build alternative.

Typical interventions include: adapting the structure to facilitate alterations such as to cores or basements to include end of trip facilities, changes to the building envelope including glazing and openings, façade and roof elements, central MEP upgrades including creating new locations for plant, consolidation of roof areas to include amenity terraces, urban greening and biodiversity.

Retrofit with new-build

Retrofit projects may also consider a combined approach with both deep retrofit and new-build elements. In this case, works go beyond extensive refurbishment of existing structures. This combined approach is typically taken where additional floor space is needed or the existing building is unfit for its new use. The end result usually combines partial retrofit with demolition and new build or extension, such as the construction of additional floors.

A combined retrofit with new-build approach can be significantly more intrusive and carbon intensive than light or deep retrofits but can enable a marked increase in capacity and quality whilst delivering substantial carbon savings overall compared to complete demolition and rebuild.

Typical interventions include: Adapting the structure and substructure/foundations to facilitate extensions and alterations, new strengthening or transfer structures and relocation or changes to cores, changes to the building envelope including façade and roof elements, central MEP upgrades including creating new locations for plant, creation of terraces with amenities, urban greening, biodiversity and climate resilience measures.

Case Study: One Exchange Square Major refurbishment and extension



Visual of the proposed main entrance.
Source: Planning Application: DAS, CE Statement

Use: Commercial Office

- Key facts:**
- 90% retention of existing structure including foundations (no additional substructure)
 - Retention and restoration of the existing granite façade elements
 - Cantilevering 11 storey extension to rear and of upper levels with new façades designed to be replaceable in component parts
 - Structural grid and elements of the extensions designed to be adaptable and flexible
 - Natural ventilation incorporated as part of mixed mode ventilation system
 - 62.2% reduction in carbon emissions over Part L 2013 overall, of this 45.5% through energy demand reduction
 - Aspiring to BREEAM "outstanding" rating and engagement with NABERS UK benchmarking
 - Embodied carbon intensity targeted to meet and exceed the GLA Aspirational Benchmark
 - Incorporation of extensive landscaping on roofs and on the ground to include wildlife habitats and blue roof

3. RETROFIT AND REUSE

Retrofit in historic buildings

The City is home to many designated heritage including over 600 listed buildings and 27 conservation areas. The City's unique historic environment is of exceptional richness and significance and makes a vital contribution to its commercial and cultural vibrancy.

In the case of historic buildings, CoLC recognises that the Planning (Listed Buildings and Conservation Areas) Act will need to be considered in relation to some improvements to building fabric and thermal performance in particular. Work should not harm the special architectural or historic interest of a building or increase the risk of long-term deterioration to the fabric or fittings.

In many instances, it is possible to make energy efficiency improvements without detriment to the heritage value of a historic building with the support of expert advice. In fact, it may even be possible to enhance heritage value through simultaneous refurbishment, repair or cleaning of historic materials during retrofitting.

In collaboration with Purcell, CoLC has developed a Historic Building Retrofit Toolkit to provide clear and actionable guidance for owners, occupiers and caretakers of historic and listed buildings, to help them take steps to reduce carbon and build climate resilience in their heritage buildings.

The toolkit aims to collate and signpost best practice principles and examples, providing a resource that will allow building owners to confidently start the process of responsible retrofit, build a business case and deliver the adaptations necessary.

The Toolkit includes a Heritage Retrofit Roadmap comprising of 9 defined steps for undertaking a successful retrofit project in the Square Mile:

1. *Start from a position of knowledge*
2. *Identify the risks*
3. *Evaluate the opportunities:*
4. *Develop a Retrofit Plan*
5. *Build a business case*
6. *Detail design and specification*
7. *Seek relevant approvals*
8. *Installation and work on site*
9. *Testing, evaluation, and feedback*

The toolkit will be accessible at this website:

<https://www.cityoflondon.gov.uk/services/environmental-health/climate-action/climate-action-projects/supporting-the-square-mile-achieve-net-zero>

Case Study: Museum of London:
Major refurbishment of and alterations to four former Smithfield Market buildings (including Grade II listed Poultry Market)



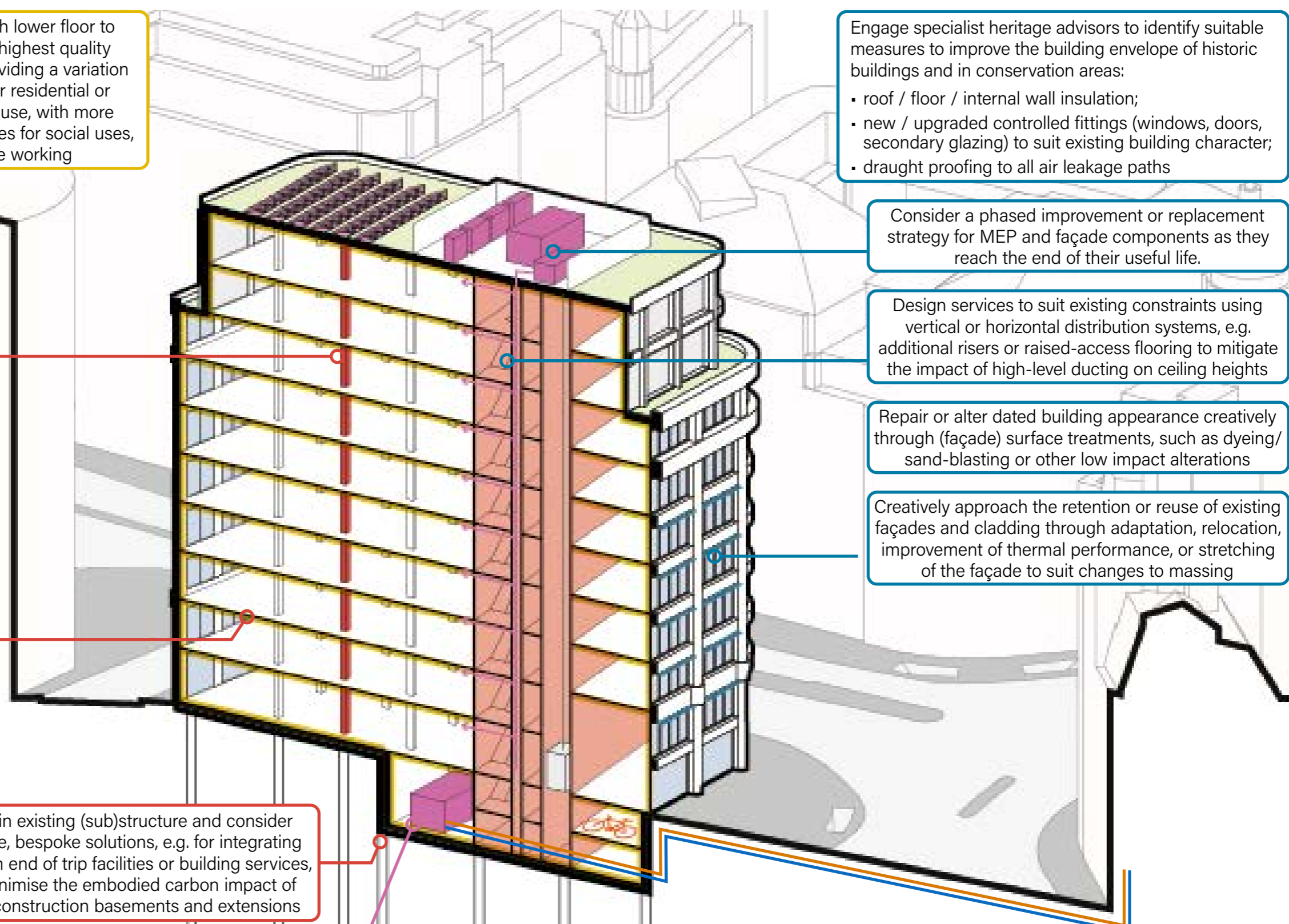
View from Charterhouse Street. Source: Design and Access Statement

Use: Museum and ancillary uses including offices and retail

- Key facts:**
- High proportion of retention of substructure, superstructure, façades and roof (varies between buildings)
 - Incorporating upgrades to windows, roofs and walls
 - High level of reuse of salvaged historic deconstruction material
 - Incorporating natural ventilation and utilising thermal mass to maintain required conditions
 - Overall 72% reduction of carbon emissions over Part L 2013, the majority due to energy efficiency measures, 9% through energy provided by nearby district heat network and 1% through PV panel installation on roofs
 - BREEAM "excellent" rating
 - Embodied carbon intensity targeted to meet and exceed the GLA Standard Benchmark
 - Installation of green roofs and biodiverse landscaping on the roofs
 - Incorporation of rainwater harvesting.

3. RETROFIT AND REUSE KEY MEASURES FOR CITY DEVELOPMENTS

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Create interior spaces that work with lower floor to ceiling heights through thoughtful, highest quality design and specifications, and by providing a variation of areas such as intimate spaces for residential or individual work and virtual meeting use, with more generous (double height, atrium) spaces for social uses, winter gardens or collaborative working

Embrace existing conditions and constraints to create characterful refurbishments, such as by exposing the structure or services

Optimise existing structural capacity for alterations and extensions

Maximise opportunities to improve energy efficiency (e.g. minimise use of deep plan spaces requiring high levels of HVAC)

Undertake a structural audit (including relevant testing) early to understand the condition / capacity of the existing structure

Design lightweight and creative structural solutions to minimise the embodied carbon of any alterations, extensions or necessary structural interventions

- Detailed measures**
Typical approaches for developments in the City by building element:
- STRUCTURE**
 - ENVELOPE**
 - MATERIALS**
 - PLANT & MEP**
 - WHOLE BUILDING**
 - BEYOND THE BUILDING**

Retain existing (sub)structure and consider flexible, bespoke solutions, e.g. for integrating modern end of trip facilities or building services, to minimise the embodied carbon impact of new construction basements and extensions

Replace energy inefficient MEP systems with low operational and embodied carbon alternatives (robust, durable, loose-fit, easily maintainable).

Install building performance monitoring / optimisation technologies to manage energy and resource use. Engage building management in systems design.

Engage specialist heritage advisors to identify suitable measures to improve the building envelope of historic buildings and in conservation areas:

- roof / floor / internal wall insulation;
- new / upgraded controlled fittings (windows, doors, secondary glazing) to suit existing building character;
- draught proofing to all air leakage paths

Consider a phased improvement or replacement strategy for MEP and façade components as they reach the end of their useful life.

Design services to suit existing constraints using vertical or horizontal distribution systems, e.g. additional risers or raised-access flooring to mitigate the impact of high-level ducting on ceiling heights

Repair or alter dated building appearance creatively through (façade) surface treatments, such as dyeing/ sand-blasting or other low impact alterations

Creatively approach the retention or reuse of existing façades and cladding through adaptation, relocation, improvement of thermal performance, or stretching of the façade to suit changes to massing

Decarbonise heat supply by electrification, connection to heat networks, and sharing resources such as waste heat with, or from, neighbours.

GREENHOUSE GAS
EMISSIONS AND
ENERGY USE

04

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

Introduction

Greenhouse gas emissions are a principal driver of climate change. With 25% of the UK's total emissions directly attributable to the built environment² it is essential to tackle emissions associated with the construction, use and operation of buildings as a matter of urgency.

The City is a very dense and intensely used area with a high overall level of emissions, largely as a result of the energy needed to serve over 600,000 daytime users. A significant amount of CO₂e emissions also arise from the demolition and construction of new buildings, including embodied carbon associated with the production, transportation and disposal of products and materials.

Key approaches for the City

As buildings become more energy-efficient and the grid decarbonises, the share of embodied carbon will become a more significant element of the whole life-cycle carbon emissions. Low carbon design and construction measures as well as efficient and robust building services systems need to be employed to drive down whole life-cycle carbon emissions. Innovation, new insights and technologies evolve continually and should be considered throughout all stages of the planning and design process, to allow for improved outcomes overall.

Approaches to minimise carbon emissions include the reuse of existing buildings, designing new build with exemplary whole life-cycle carbon reduction, to include material retention, sharing of resources, use of low-carbon materials and modular construction methods. All developments must employ circular economy principles (see Chapter 5) and maintain and reuse as many building components as possible.

Developments are required to aim for net zero operational carbon dioxide emissions (and other emissions). This can be achieved through retrofitting existing buildings or designing new builds with a high energy efficiency, heat & transport electrification and connections to local heat networks.

Key policies and guidance

Table 4.1 Greenhouse gas emission and energy planning policies

London Plan 2021	
SI 1: Improving Air Quality	
SI 2: Minimising greenhouse gas emissions	
SI 3: Energy Infrastructure	
GLA Whole Life-cycle Carbon Assessment Guidance	
GLA Energy Assessment Guidance	
Local Plan 2015	
CS15: Sustainable Development and Climate Change	
DM15.1: Sustainability requirements	
DM15.2: Energy and CO ₂ emissions assessments	
DM15.3: Low and Zero Carbon Technologies	
DM15.4: Offsetting of carbon emissions	
DM15.5: Climate change resilience and adaptation	
DM15.6: Air quality	
DM15.7: Noise and light pollution	
Draft City Plan 2040	
CR1: Overheating and Urban Heat Island Effect	
DE1: Sustainability Standards	
DE8: Daylight and sunlight	
DE9: Lighting	
S1: Healthy and inclusive city	
HL2: Air Quality	
S10: Active Travel and Healthy Streets	
AT1: Pedestrian Movement, Permeability, and Wayfinding	
AT2: Active Travel including Cycling	
Other guidance	
CoLC Carbon Options Guidance	

Key actions to develop an exemplar City scheme

- Undertake an options appraisal following the CoLC's Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits
- Prioritise retrofit over redevelopment solutions
- Pursue best practice in lowest carbon design and construction principles
- Enable attractive, comfortable and inclusive access to and connectivity between public and private realm and within buildings
- Develop a bespoke, optimised energy strategy for a development focussing on adaptable and loose fit, robust and low embodied carbon MEP systems, floorspaces and building envelopes.
- Prioritise the objectives of the City of London Local Area Energy Plan (LAEP) to create or link into local energy networks and waste heat sources, and include opportunities for heat and coolth transfer to/from nearby developments
- Consider testing innovative measures to drive forward best practice in sustainable development

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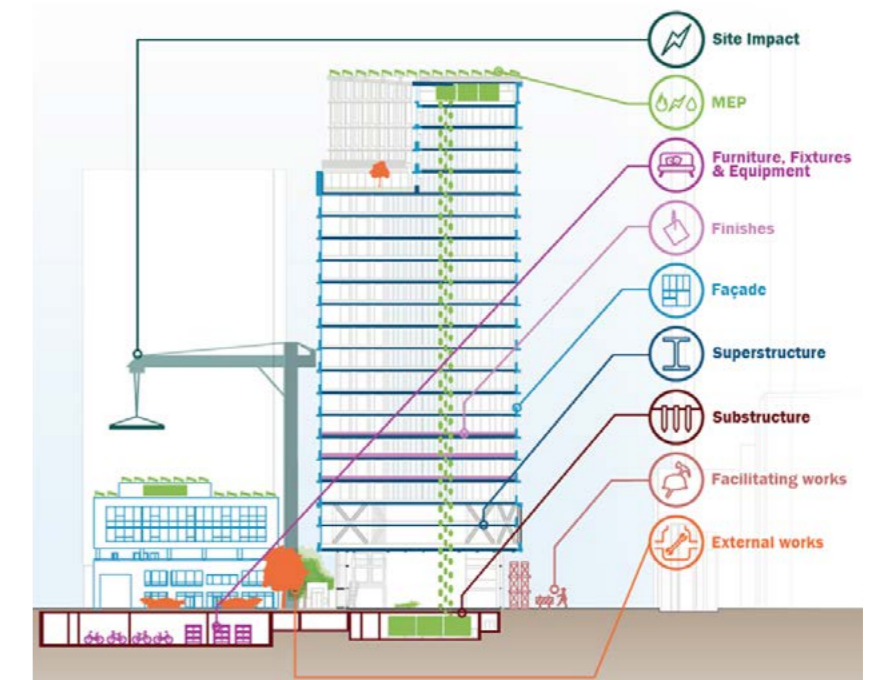


Figure 4.1 Elements of upfront carbon (modules A1-A5)
Source: 55 Old Broad Street, Sustainability Statement

2 UKGBC [Net Zero Whole Life Carbon Roadmap](#)

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

WHOLE LIFE-CYCLE CARBON

What is whole life-cycle carbon?

Whole life-cycle carbon is the total carbon emissions resulting from the construction and use of a building over its entire life, including its construction, demolition and disposal. It captures a building's operational carbon emissions (both regulated and unregulated energy use), as well as embodied carbon emissions - that is, emissions associated with raw material extraction, manufacture and transport of building materials, the construction process and the emissions associated with maintenance, repair and replacement, as well as dismantling, demolition and eventual material disposal.

Key measures

Whole building

Refurbishment and retrofit are to be prioritised where possible to reduce carbon emissions, especially in the short term. Upfront savings are particularly important to address the Paris Agreement's target of limiting global warming to 1.5 degrees Celsius above pre-industrial levels. Applications should demonstrate how adapting the building rather than demolishing and rebuilding has been fully considered.

Applicants should follow the CoLC's Carbon Options Guidance to conduct a thorough carbon impact assessment of a range of options that include retention, retrofit and development as relevant to the site. This is important for demonstrating that retention options have been thoroughly evaluated and should be given a prominent position within application documents, such as in the Design and Access Statement.

Sustainable Life-Cycle Cost or Life-Cycle costing (LCC) analysis should be conducted to measure the added value of reducing embodied and operational carbon for finances, construction time-frames, management, and occupants. This analysis will provide a robust insight into the long-term costs and savings across the lifetime of different design options.

Whole life-cycle carbon emissions targets and planning stage calculations must be reported against best practice upfront and whole life-cycle carbon benchmarks, as set out by the Greater London Authority guidance, UKGBC Net Zero Carbon Buildings Framework Definition or any new evolving standards such as the UK Net Zero Carbon Buildings Standard, that are appropriate for the typology of a development proposal and which reflect science-based targets for a 1.5 degrees Celsius climate change scenario.

Planning stage whole life-cycle carbon emissions are detailed predictions of the outcome of the subsequent design and procurement stages of the development process. Carbon emissions targets set by applicants initially may change, either positively, such as due to technical advances and improvements to details and manufacture of materials, or negatively, such as due to problems in the supply chains. This may result in an embodied carbon gap between planning stage and practical completion. To manage this process more constructively in collaboration with applicants, the submission of RIBA Stage 4 whole life-cycle carbon data including a review of related details of the proposals will be required for major developments by condition attached to a permission.

Aspects of whole life-cycle carbon emission reduction are covered by certification schemes such as BREEAM and NABERS UK. Applicants are required to carry out a BREEAM assessment that demonstrates the pathway to an 'Outstanding' rating (with the final rating to be confirmed after practical completion), and to commit to a minimum NABERS UK rating of 5 stars.

Lastly, creative thinking and innovation should be applied to all layers of a building design in order to deliver a site-specific solution which exemplifies best practice.

Beyond the building

Large scale new development will result in considerable environmental impacts on the quality of the local context and beyond, ranging from the nearby road network, amenity, the health and well-being-supporting quality of the public realm to urban heat island effects, microclimatic and embodied carbon impacts of the building. Applicants will be expected to mitigate those impacts through incorporating their proposals into the environmental context of existing networks of urban greening, biodiversity, climate resilience, energy exchange and other resources, in accordance with the opportunities of the site and local area.

Given the high number of concurrent developments in the City and Central London, synergies with nearby developments to share services, facilities, technologies and materials should be sought out to increase efficiency and reduce carbon emissions. Particular attention should be given to the ability to exchange thermal load (heating and cooling) via heat networks or otherwise. These synergies could benefit local schools, churches, community facilities and public realm, as well as support sensitive historic buildings to improve their sustainability and competitiveness in a property market that is increasingly driven by energy performance and sustainability credentials.

Case Study: 85 Gracechurch Street - Redevelopment for a 32-storey tower



View of 85 Gracechurch Street.
Source: Planning Application, DAS

Use: Offices, retail and cultural space

- Key facts:
- Re-use of existing 1935 limestone façade with cast iron spandrels and granite portal
 - Aiming for low embodied carbon materials such as GGBS cement replacement, façade aluminium made using hydro-electrically produced billets, 15% of structural steel from Electric Arc Furnace (EAF) and raised floors from recycled materials
 - Rationalised grid structure to promote pre-fabrication and modularization
 - Façades designed to include natural ventilation panels, external shading, and replaceable in component parts
 - Full CAT A fit-out only to 3 levels to leave fit-out to incoming tenants' needs and taste
 - Supporting the adjacent Grade II* listed Leadenhall Market with future heat network connection and plant rationalisation opportunity
 - BREEAM "outstanding" rating
 - Embodied carbon intensity targeted to reach close to and meet through detailed design development the GLA Standard Benchmark
 - Substantial landscaping incorporated into the public terrace at level 5 and planters integrated into the façades, as well as a blue/green roof.

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

WHOLE LIFE-CYCLE CARBON - CASE STUDIES

Case Study: 65 Crutched Friars
Redevelopment for mixed-use scheme



Ground floor view of 65 Crutched Friars
Source: 65crutchedfriars.co.uk 2023

Use: Student accommodation, museum

- Key facts:**
- Operational carbon emissions reduction of 70% beyond Part L 2021, due to high proportion of space and water heating of overall energy demand, provided by renewable and low carbon technologies
 - Wastewater heat recovery from 770 bedrooms/bathrooms
 - Natural ventilation through openable panels in each bedroom
 - Air source heat pumps and PV panels
 - BREEAM "outstanding" rating
 - Upfront whole life-cycle carbon emissions exceed GLA's standard benchmark (693kgCO2/m2)

Case Study: Ibex House (Grade II listed)
Refurbishment with ground and top-level extensions



Visual showing new Steel Crittall Windows to match original style.
Source: Design and Access Statement.

Use: Offices, retail and cultural space

- Key facts:**
- Restoration of original fabric and matching repairs
 - Minimal demolition, mostly of internal modern partitions and plant installations
 - Replacement of balustrades and previous replacement windows with new steel crittall windows
 - Gradual phasing out of gas boilers and incorporation of high-performance electric plant
 - 35.9% carbon emissions reduction over Part L 2013
 - BREEAM "very good" rating
 - Installation of green roofs on new built ground level extensions and at upper floor levels

Case Study: 115-123 Houndsditch -
Redevelopment for a 24-storey tower



Street view of 115-123 Houndsditch.

Source: Planning Application, Design and Access Statement.

Use: Office, retail, café, community space

- Key facts:**
- Ambitious circular economy strategy incorporating retention of part basement, low carbon materials with high recycled content, prioritising pre-fabricated products, bolted structural connections (design for eventual deconstruction), design to be adaptable to future needs with flexible floorspace layouts, omission of additional finishes and considering take back schemes for fittings
 - Overall reduction of carbon emissions of 44% over Part L 2013, with high level energy efficiency of 17% through envelope performance, solar shading, using thermal mass of exposed concrete slabs, passive ventilation and extensive urban greening on roofs and terraces to provide cooling
 - Use of green leases to achieve energy efficient tenant space fit-out and operation
 - Waste heat storage and proposal to share heat with neighbouring residential estate
 - BREEAM "outstanding" rating, and commitment to highest scores in WELL and LEED standards
 - Embodied carbon intensity targeted to meet and exceed the GLA Aspirational Benchmark
 - Reduction of water demand through rainwater recycling and harvesting systems
 - Incorporation of extensive landscaping on roofs, terraces and at public realm level to include planted balconies, cascading terraces and a "woodland understorey" on the ground.

4. GREENHOUSE GAS EMISSIONS

KEY MEASURES FOR CITY BUILDINGS - WHOLE LIFE-CYCLE CARBON

Specify new materials with lower carbon emissions, such as steel from electric arc furnaces(EAF), concrete products with cement replacement (GGBS, calcium sulphate), aluminium from hydroelectrically-produced billets

Prioritise long-lasting, adaptable components and materials which use bolted connections

Consider testing innovative production and construction methods e.g. 3D printing construction with materials such as concrete, steel, rubber and plastics

Prioritise salvaged, recycled, low carbon, natural, and bio-based materials and components, e.g. reclaimed steel beams or natural insulation

Consider a wider use of timber in hybrid structural solutions, such as mass timber or cross laminated timber (CLT)

Limit areas of CAT B full fit-out works (for marketing purposes) to avoid material waste associated with changes made to meet tenant specific fit-out requirements

Reduce embodied carbon impact of façade systems through careful material choices and selection of façade systems that are adaptable and replaceable in parts

Investigate lightweight façade options to support structural efficiency

Demonstrate approaches to massing and loading that prioritise the retention of existing structures, minimal use of new material, modularity, and off-site construction, disassembly and reuse.

Design for innovative, efficient and hybrid-material structural solutions with high material efficiency e.g. non-timber floors for fire compartmentation

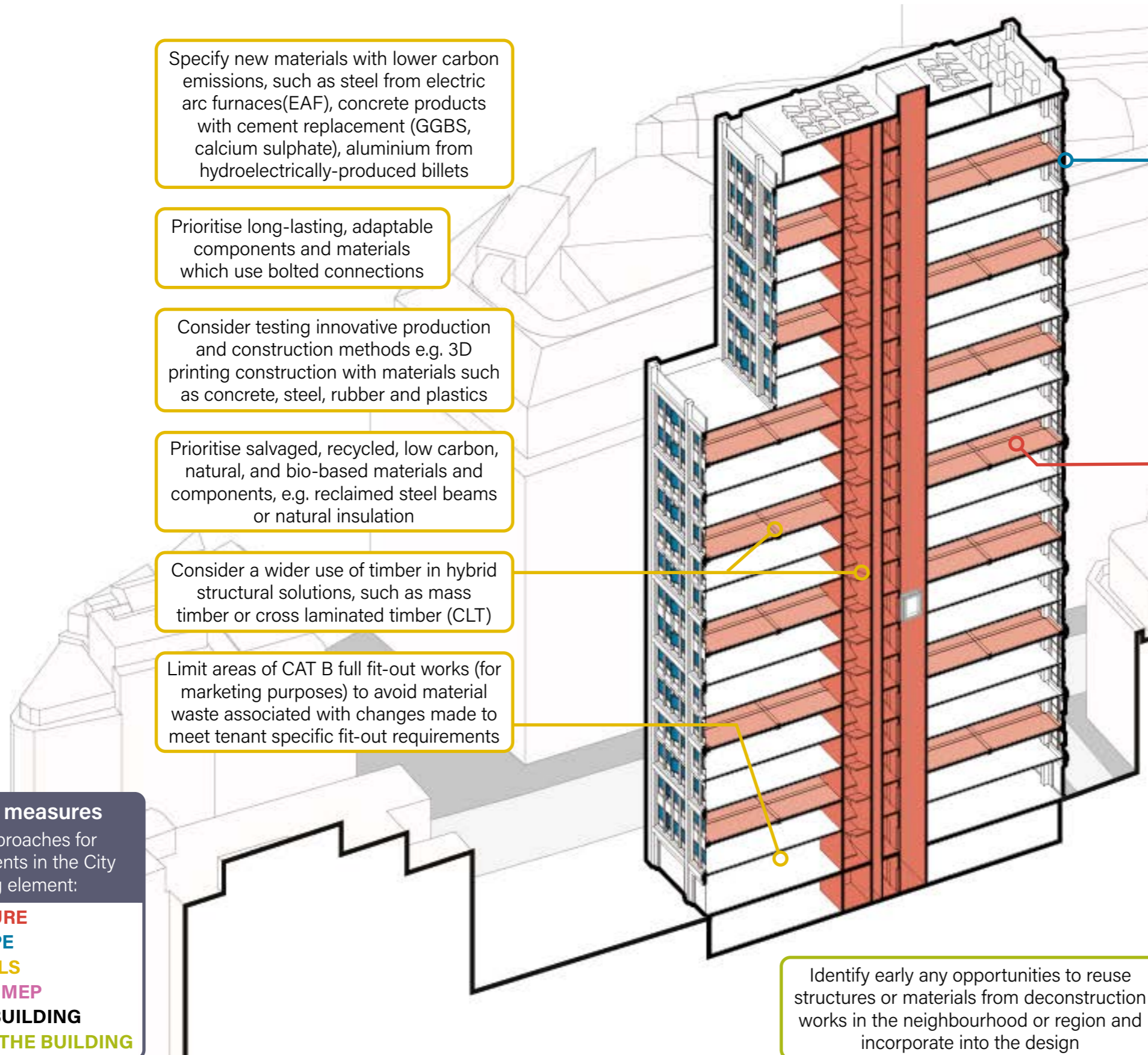
Choose all electric heating / cooling systems which use low levels of refrigerant or refrigerant types with low global warming potential

Prioritise robust and long-lasting MEP systems with adaptable/replaceable parts to drive longevity

Explore leasing options for MEP and floorspace fit-out to minimise embodied carbon emissions and ensure easy replacement/upgrade

Identify early any opportunities to reuse structures or materials from deconstruction works in the neighbourhood or region and incorporate into the design

Identify synergies with neighbouring developments to share plant, services, facilities, technologies, or materials, or to exchange thermal load for heating / cooling



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Detailed measures
 Typical approaches for developments in the City by building element:

- STRUCTURE**
- ENVELOPE**
- MATERIALS**
- PLANT & MEP**
- WHOLE BUILDING**
- BEYOND THE BUILDING**

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

OPERATIONAL ENERGY USE

What are operational emissions and energy?

Operational emissions are those generated from the operation of a development once it has been constructed. This includes both the emissions of electricity from the National Grid as well as emissions generated on-site via gas-burning boilers, refrigeration and other emitting processes. Operational emissions are largely a result of energy consumption. There will be increasing demand for electric power as fossil fuels are phased out in favour of electric heating, vehicles and other technologies. The type of energy technologies and the use of energy in buildings will be considered in planning applications. Proposals need to develop a strategy to reduce energy use through passive energy efficiency measures and low and renewable energy technologies, including for back-up technologies both for emergencies and fluctuations in grid supply.

Key measures

Whole building

In accordance with the GLA's energy hierarchy, development in the City will need to be designed to achieve highest possible efficiency levels and provide the lowest possible energy use intensity (EUI). Progressive and innovative measures should be incorporated to reduce carbon emissions as soon and significantly as possible.

For refurbishments and retrofits, the existing energy performance needs to be assessed prior to the design of any interventions and alterations. The level of energy efficiency should be optimised and at least meet Minimum Energy Efficiency Standards (MEES) Regulations and other drivers such as alignment with Carbon Risk Real Estate Monitor (CRREM) decarbonisation pathways, increasingly being adopted by investors and asset managers in commercial real estate in order to avoid the risk of asset stranding.

For historic buildings (with or without statutory listing), heritage significance will need to be considered alongside any impacts of energy efficiency interventions and impacts should be positively balanced to achieve both heritage and energy efficiency benefits.

The most effective way to reduce operational carbon (and other GHG) emissions is to reduce energy demand and - where possible - move to operations powered by electricity or low-carbon alternatives. This includes considering connecting buildings to local heat and cooling networks. If a site is not covered by an existing networks, the provision of future connection points is required. Large developments may be able to facilitate new locations for heat and cooling networks (see

'Beyond the building' section). The incorporation of all electric or low-carbon energy technologies into refurbishment schemes can help avoid asset stranding as energy performance requirements increase in the future.

The operational energy performance gap is expected to be addressed by committing to certification schemes such as NABERS UK. The incorporation of climate clauses into commercial agreements and legal documents, 'climate contracting', can also be used. Example clauses can be found from sources such as [The Chancery Lane Project](#).

Beyond the building

The CoLC has identified the development of low-carbon heat networks as a key enabler to reduce operational emissions and enhance energy efficiency in the Square Mile. As referenced in the London Plan Guidance, connection to local existing or planned heat networks, and the use of zero-emission or local secondary heat sources, are key criteria of the heating hierarchy for new developments.

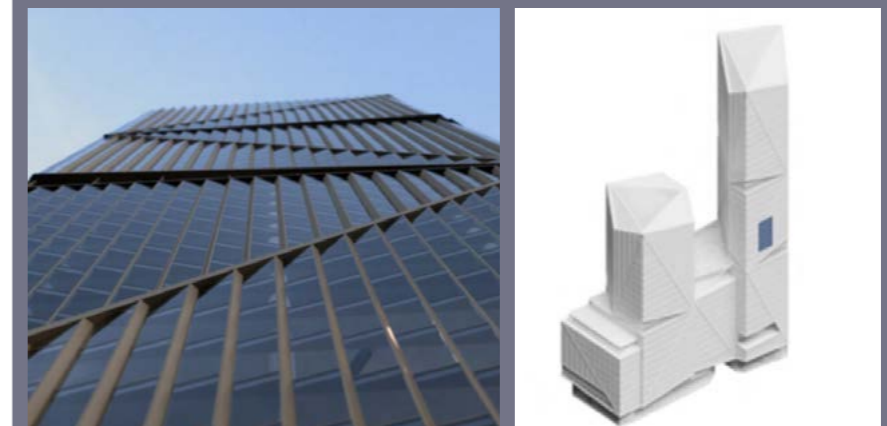
The City's Local Area Energy Plan (LAEP) sets out a route map and actions to transition the Square Mile energy system to net-zero by 2040:

- Ensuring high energy-efficiency of new buildings and the use of low-carbon technologies.
- Incorporating connections to existing and planned energy networks
- Facilitating the installation of an energy centre for areas consisting of several developments
- Providing locations for network extensions
- Heat capture through circular systems to enable cooling heat recovery and reuse either on-site or recovered into energy networks
- Support the development of EV charging infrastructure (where needed), modal shift and freight consolidation.
- Maximising Photovoltaic Panel installations in all feasible locations in combination with urban greening and façade and roof cladding
- Supporting the uptake of flexibility technologies through demand management, smart systems and energy storage, to deliver resilient energy systems.

The UK Government considers heat networks an essential component of clean and cost-effective decarbonisation of UK heat, supporting its net-zero goals. It is introducing heat zoning regulations which will designate areas where heat networks are expected to offer the lowest-cost solution for decarbonising heat. The forthcoming regulations are expected to significantly influence future heat network supply options and will set minimum standards for existing and new networks.

Heat network development is identified in the Local Area Energy Plan (LAEP) as a central route to meeting the City's ambition of a net zero Square Mile by 2040. The CoLC is participating in the Government's Advanced Zoning Programme (AZP) and the Square Mile is expected to be a priority zone for heat networks.

Case Study: 2-3 Finsbury Avenue Redevelopment for a 38-storey tower



Detail of tower façade with glazed and ventilation panels
Source: Planning application DAS

- Use:** Commercial office with mixed use including an Open Learning Hub
- Key facts:**
- Operational carbon emissions reduction of 47% beyond Part L 2013 overall
 - Passive design to include a building envelope balancing heat loss, solar gains / glare, maximising daylight, achieving 17.3% reduction in operational carbon emissions from energy efficiency measures alone and exceeding the GLA's target of 15%.
 - Incorporation of natural ventilation through openable panels to facilitate night purges, reducing energy use and operational emissions by a further 3%
 - Uses heat recovery and air source heat pumps

4. GREENHOUSE GAS EMISSIONS AND ENERGY USE

OPERATIONAL ENERGY USE

Developments in the City should consider the implications of these regulations. It is likely that all future new developments and major refurbishments will be required to connect to a nearby heat network within a defined timeframe; whereby heat is supplied to the building from the network, and any waste heat is fed back to the network. A body will be designated to a zone coordination role to support management, data collection, delivery and stakeholder engagement.

By preparing in advance, the CoLC is seeking to enable new developments to assess the cost and carbon advantages of heat networks, and to mitigate any future risks of mandated connection (with respect to any future necessary re-design or change of heating/cooling strategy). The CoLC strongly encourages new developers to take a pro-active approach by:

- Requiring the incorporation of a heat network connection into their development
- Designing in flexibility solutions including smart systems and energy storage technologies
- Engaging with CoLC and district network providers to facilitate extensions to and new networks

There are other opportunities for heat sharing with neighbouring buildings or for the use of heat sources from nearby infrastructure that should be investigated. Major developments may have the potential to share resources and plant installations with neighbouring historic buildings to relieve these from modern plant installations and interventions that are detrimental to their heritage value, and to improve the energy efficiency of historic buildings as a heritage benefit.

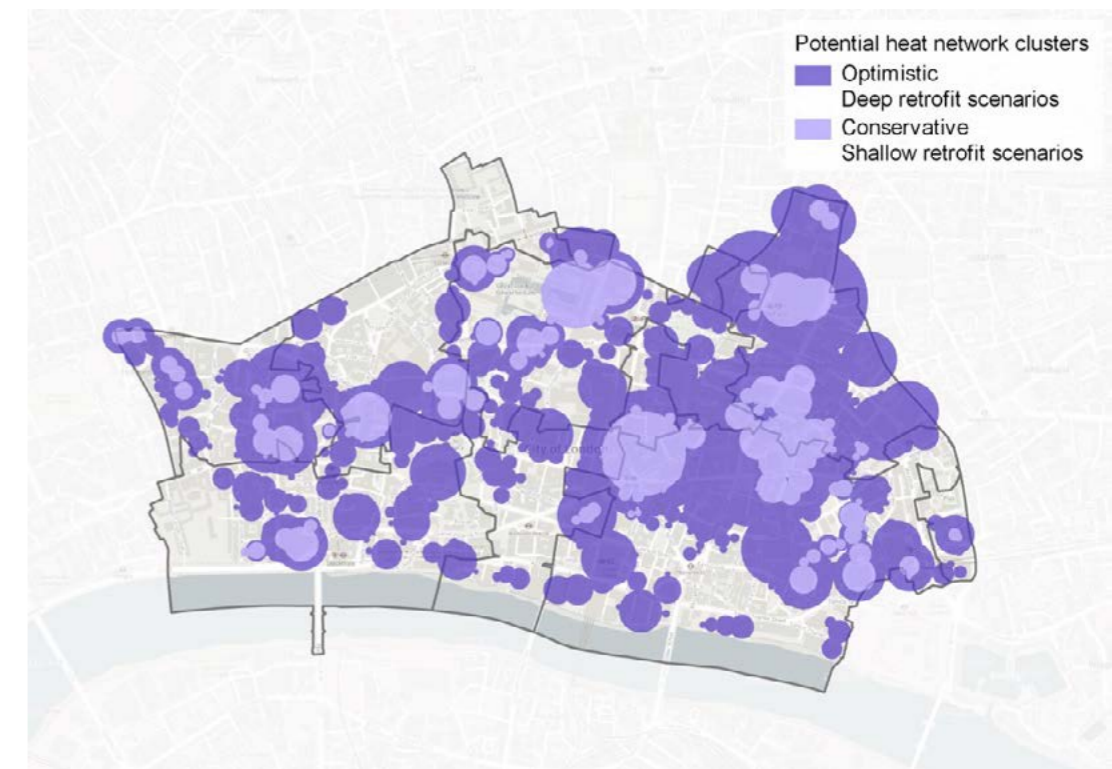
Meeting the increased electricity demand due to growth and a shift to electrified transport and heat is likely to need electrical infrastructure network upgrades. This is identified as a priority action within the LAEP to allow new local renewable assets to connect to the electricity grid. The CoLC will continue to engage and coordinate with UKPN to understand the implications of growth and electrification on the electricity infrastructure and to work collaboratively to deliver additional capacity where required.

To minimise the need for further grid infrastructure and to deliver a resilient energy system to businesses and residents, the LAEP encourages the uptake of flexibility technologies including demand side response and smart appliances, thermal/battery storage and vehicle-to-grid technologies. The CoLC will look to embed flexibility technologies in their own assets and developers should review opportunities to provide energy storage and demand management to tie in with local and national energy security priorities

City of London Potential Heat Network Clusters

This map shows potential heat network clusters in the City. The 'Optimistic' layer is based on multiple blended scenarios, all of which involve deep retrofit, varying degrees of future building growth and demand changes. The 'Conservative' scenario assumes only shallow retrofit, along with high growth of future buildings. Modelling has shown that heat networks could supply 75% of heat in the Optimistic scenario, but only 34% in the Conservative scenario.

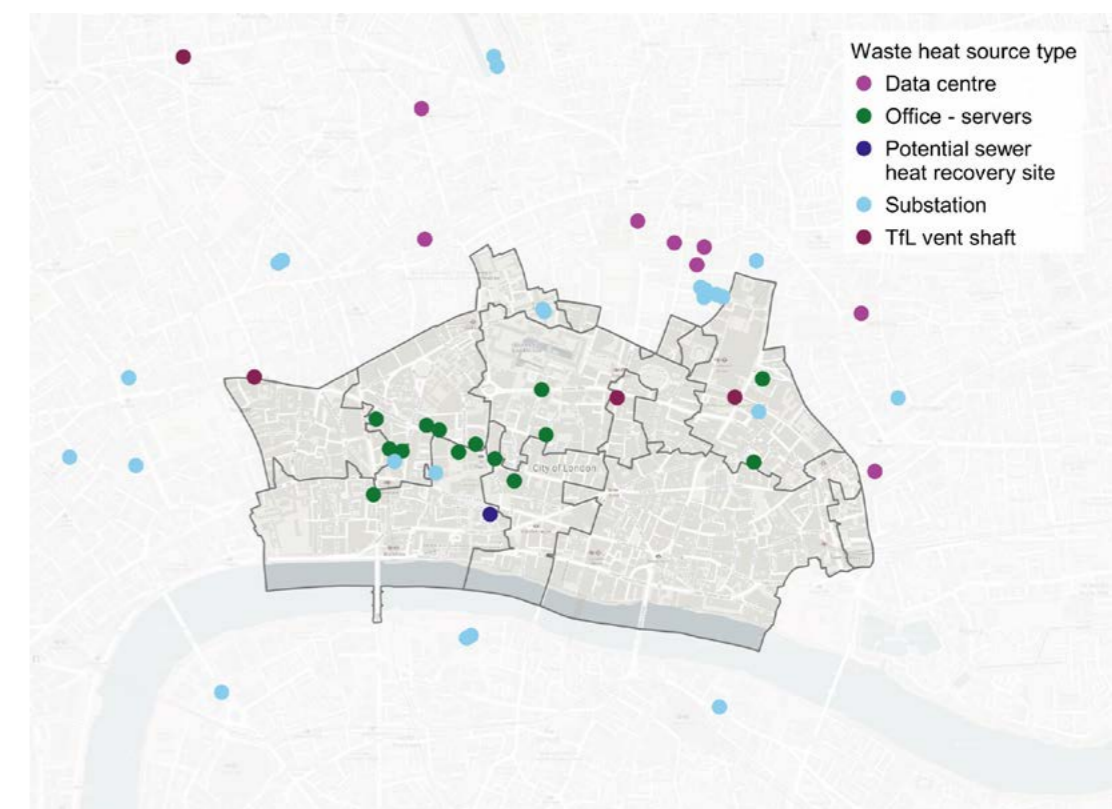
Figure 4.2 Optimistic and Conservative potential heat network clusters. *Source: City of London Local Area Energy Plan – Draft (March 2023)*



City of London Waste Heat Opportunities

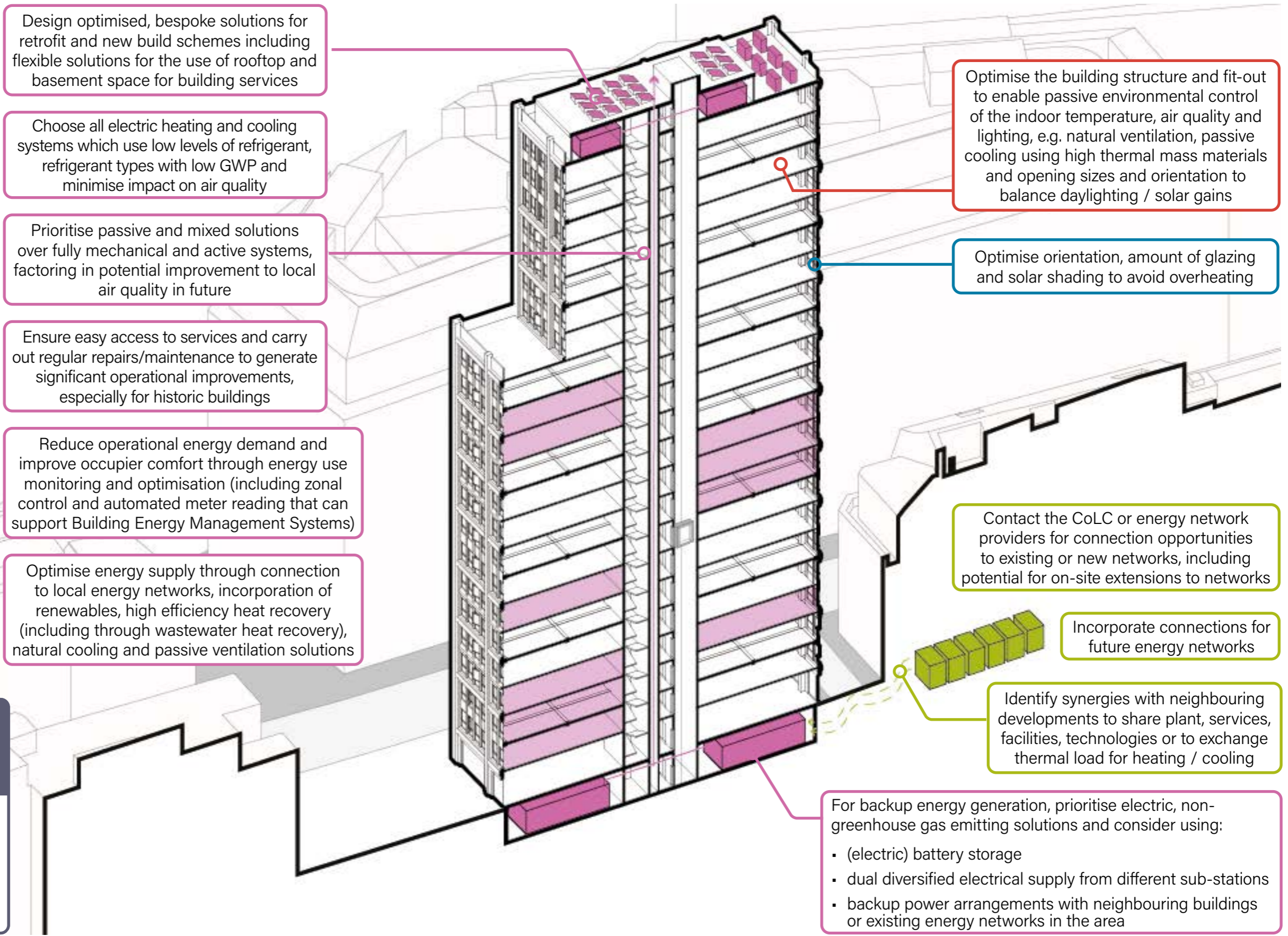
Waste heat from sources indicated on the map could be captured, reused and shared between buildings by both building level or network scale systems.

Figure 4.3 Map of potential waste heat sources. *Source: City of London Local Area Energy Plan – Draft (March 2023)*



4. GREENHOUSE GAS EMISSIONS

KEY MEASURES FOR CITY DEVELOPMENTS - OPERATIONAL ENERGY USE



Design optimised, bespoke solutions for retrofit and new build schemes including flexible solutions for the use of rooftop and basement space for building services

Choose all electric heating and cooling systems which use low levels of refrigerant, refrigerant types with low GWP and minimise impact on air quality

Prioritise passive and mixed solutions over fully mechanical and active systems, factoring in potential improvement to local air quality in future

Ensure easy access to services and carry out regular repairs/maintenance to generate significant operational improvements, especially for historic buildings

Reduce operational energy demand and improve occupier comfort through energy use monitoring and optimisation (including zonal control and automated meter reading that can support Building Energy Management Systems)

Optimise energy supply through connection to local energy networks, incorporation of renewables, high efficiency heat recovery (including through wastewater heat recovery), natural cooling and passive ventilation solutions

Optimise the building structure and fit-out to enable passive environmental control of the indoor temperature, air quality and lighting, e.g. natural ventilation, passive cooling using high thermal mass materials and opening sizes and orientation to balance daylighting / solar gains

Optimise orientation, amount of glazing and solar shading to avoid overheating

Contact the CoLC or energy network providers for connection opportunities to existing or new networks, including potential for on-site extensions to networks

Incorporate connections for future energy networks

Identify synergies with neighbouring developments to share plant, services, facilities, technologies or to exchange thermal load for heating / cooling

For backup energy generation, prioritise electric, non-greenhouse gas emitting solutions and consider using:

- (electric) battery storage
- dual diversified electrical supply from different sub-stations
- backup power arrangements with neighbouring buildings or existing energy networks in the area

Detailed measures
Typical approaches for developments in the City by building element:

- STRUCTURE**
- ENVELOPE**
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- WHOLE BUILDING**
- BEYOND THE BUILDING**

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CIRCULAR ECONOMY

05

5. CIRCULAR ECONOMY

Introduction

The London Plan 2021 defines a circular economy as ‘one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.’ It is a move away from the current linear economic model, where materials are mined, manufactured, used and discarded.

In the built environment this means keeping buildings, products and materials in use for as long as possible through redesign, refurbishment, repair, recycling and other systems. This includes minimising construction waste throughout a building’s life-cycle, as well as operational waste while the building is in use.

Key approaches for the City

Construction and deconstruction form a significant proportion of the emissions and waste generated in the City due to high levels of redevelopment. The process of circular design and designing out waste must begin early in site development and must include all those involved throughout the planning and construction of the development. In the City and Greater London materials designated for removal from site should be deconstructed, salvaged, reused and shared between projects wherever possible to reduce waste and the need for new materials. Where new buildings are constructed, they should prioritise reused materials / materials with high recycled content, and be flexible, adaptable, modular, durable, built in layers and easy to deconstruct.

Development and refurbishment projects within the City should target zero construction waste to land fill and follow the GLA’s Circular Economy Hierarchy for Building Approaches (See Design Policy D3 of the London Plan 2021). This prioritises use of existing assets and efficient use of materials, followed by low carbon alternatives.

New developments in the City should be designed with the aim of being zero-waste when in operation. Their internal systems can adapt to new reuse, recycling and waste collection systems and categories that may be introduced in the future.

New developments should also encourage reuse and repair of materials and the sharing and exchange of assets, goods, materials and appliances within and between developments, businesses and residents in the City.

The GLA’s Circular Economy Guidance (2022) encourages applicants to “identify opportunities for the use of reused or recycled materials; and aim for at least 20 per cent recycled or reused content, by value, for the whole building.”

The circular economy strategy for a development should be updated regularly in line with the stages of the development process. In order to support this process constructively in collaboration with applicants, the submission of a RIBA Stage 4 circular economy update will be required for major developments by condition attached to a permission.

Key policies and guidance

Table 5.1 Circular Economy key planning policies

London Plan 2021	
D3:	Optimising site capacity through the design-led approach
D4:	Delivering good design
SI 7:	Reducing waste and supporting the circular economy
SI 8:	Waste capacity and net waste self-sufficiency
GLA Circular Economy Statement Guidance	
Local Plan 2015	
CS17:	Waste
DM:	17.1 Provision for waste in development schemes
DM:	17.2 Designing out construction waste
Draft City Plan 2040	
CE1:	Sustainable waste facilities and transport
S8:	Design
DE1:	Sustainable Design
S16:	Circular Economy and Waste

Key actions to develop an exemplar City scheme

- Demonstrate maximum retention and reuse of existing buildings and materials through a Pre-Redevelopment Audit, including the consideration of options (where applicable reference the optioneering carried out as per the Carbon Options Guidance, 2023)
- Incorporate recycled materials and support material efficiency, e.g. optimise structure and floorspaces, in accordance with circular economy principles, into the design of any new development
- In cases of demolition, identify any item, materials, components and fittings for reuse through a Pre-Demolition Audit and feed them into the secondary materials market as early as possible
- Where removal is necessary, deconstruct instead of demolish to maximise the amount and types of items and materials that can be salvaged
- Seek coordination opportunities with nearby development sites and public realm works as well as partnerships with specialist manufacturers for materials exchange, modification of materials for re-use, re-certification and storage of deconstruction materials from an early stage
- Demonstrate flexibility, adaptability and ease of maintenance in the design to support different uses of space, allow adaptive reuse in the future, and to extend the useful life of the building in response to evolving working and living patterns
- Prepare building material data (i.e. material passports) for demolition, retained and new materials; commit to an end-of-life strategy that supports as-built information management and updates, through the life of the development

5. CIRCULAR ECONOMY

CIRCULAR ECONOMY IN CONSTRUCTION

What is circular economy in construction?

Developments should follow the Circular Economy hierarchy maximising reuse of existing materials and components whilst minimising use of new materials. Materials, structural elements and spaces should be designed for adaptability and flexibility (to extend a building's useful life), whilst weighing up the impact of any additional carbon emissions incurred as a result.

Based on GLA Guidance, these terms are defined as:

- **Adaptability:** the measurement of how well a building or development accommodates change with the primary goal being to support longevity of the building. Adaptable design allows for long-life elements to be retained, while short-life elements can easily be reworked, re-organised or rebuilt as needs change – e.g. the spatial layout and services may need to be changed and replaced over time, usually in response to changes in use/needs.
- **Flexibility:** The design of spaces to accommodate more than one use. This may be more than one use at the same time, or various uses throughout the day, week, or year (seasonally). This principle can be applied to both indoor and outdoor spaces.

Key Measures

Whole building

All major developments must undertake a pre-redevelopment audit to establish whether existing buildings, structures and materials can be retained, refurbished, or incorporated into the new proposal. The Circular Economy Statement and Whole Life-Cycle Carbon Assessment should present the same options, with the former focusing on circular economy principles and retention volumes, and the latter on embodied carbon.

Where substantial demolition is proposed, a pre-demolition audit must be carried out and updated throughout the planning process. It must include a structural survey to support any reasoning for demolition and set out management approaches for demolition material and maximising reuse and recycling.

Developments should identify synergies between waste reduction and whole life-cycle carbon reduction, transitioning towards zero waste construction sites.

All new construction must be designed and built in layers. Each layer should function as a separate system so that shorter life layers can be replaced and adapted without impacting the use and integrity of longer life layers. This involves designing and determining a realistic lifespan for independent layers of the building.

To design for circularity in the City, the following key principles need to be addressed;

- **Multi-use layers (long-life elements):** design long-life structural elements to be adaptable for a variety of uses, this can include incorporating generous floor-to-floor heights, clear spans, non-structural partitioning.
- **Deconstructability (short-life elements):** Design systems and elements, particularly shorter life-elements (furniture, fittings, joinery, space layout/partitioning, services, façade elements) for disassembly so they can be reused on other projects.
- **Ease of accessibility:** Consider the accessibility of spaces for different user groups and activities when testing different layouts. Consider ease of access to components for servicing and replacement.
- **Modular construction:** this may involve standardised components, to reduce construction waste and make it easier to adapt the building. Modularity can also be applied to building layers so they can easily be modified. Modular approaches may still be carbon intensive. Therefore, prioritise take-back and standardised modular schemes that use low-carbon materials.
- **Flexible programming:** integrate flexible spaces into the masterplan which can change use at different times of the day or year, e.g. a gallery space, that can double up as a workshop or collaboration area.

As part of the development proposal, a maintenance and deconstruction strategy should be developed in close collaboration with the design team at an early stage. This is an important consideration, as the reusability of materials depends on ease of disassembly and on how well they are maintained during the building life-cycle.

Case Study: 100 Fetter Lane

Redevelopment for a 13-storey office



100 Fetter Lane. Source: Planning Application, DAS

Use: Commercial office and Public House

- Key facts:**
- Use of recycled materials, including for the primary façade (rammed concrete with recycled aggregates or bricks to form façade panels)
 - Minimising material consumption and incorporating future flexibility in the structure and configuration of internal spaces
 - Selecting materials that are easy to install and durable, with low wastage rate and less energy use in manufacture, as well as requiring less maintenance and replacement cycles
 - Piloting material passports to facilitate future materials reuse with information, such as a 3D model, contractor's records, products' specifications and certificates, held in a database as part of the online platform 'Circuland'.

5. CIRCULAR ECONOMY

CIRCULAR ECONOMY IN CONSTRUCTION

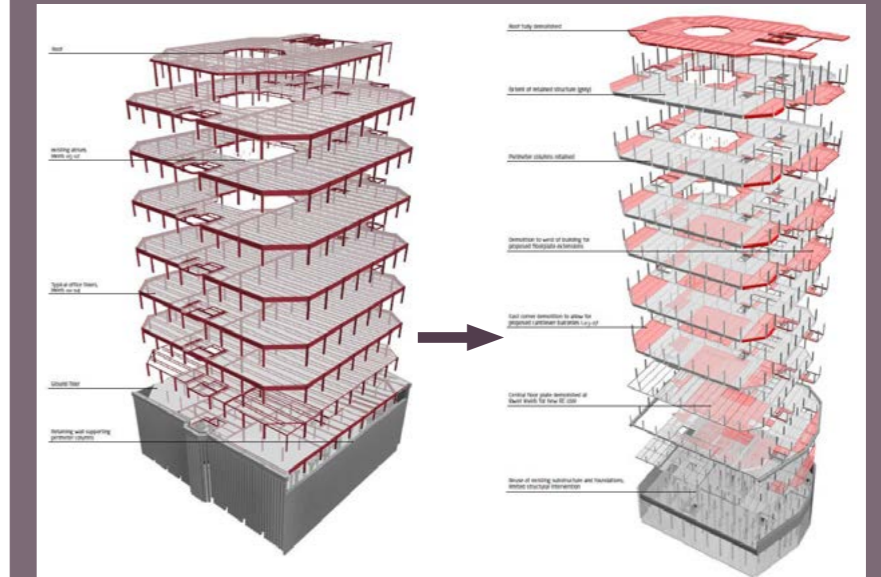
Data and Information Management

Design and construction information should be compiled and stored in a single accessible format. Ensure design and construction teams record information on the materials and construction methods used. This includes clear as-built drawings (responsibility of the architects), and deconstruction drawings (responsibility of the contractor).

Alterations that occur within the building's life should be regularly monitored and added to the building's record or passport to ensure that information is up-to-date for future building managers, and at the end-of-life stage.

Newer systems, such as materials passports are likely to become established practice in the near future and should be explored during later stages of design and construction. Passport information would be accessible to building owners, building managers, and occupiers as necessary, so that it can be updated throughout the building's life-cycle.

Case Study: 1 Appold Street - Major refurbishment and extension



Existing vs. new structure, 1 Appold Street.
Source: Planning Application, Circular Economy Statement

- Use:** Commercial office with restaurant, gym and pool
- Key facts:**
- Retention of a minimum of 55% of the existing basement and 8-storey structure
 - Addition of 6 floors and some extensions to existing floor plates and new façades
 - Insertion of new core, designed to allow retention of primary beams without trimming
 - Mechanically fixed façade that can be easily deconstructed and replaced in parts
 - Target of use of 20% of recycled and reused building materials by value
 - Low embodied whole life-cycle carbon intensity due to level of reuse (life-cycle modules A1-A5: 415kgCO₂/m², modules A-C exclusive B6/B7: 621kgCO₂/m² -compared to 970kgCO₂/m² GLA Aspirational Benchmark)
 - Minimising material consumption and incorporating future flexibility in the structure and configuration of internal spaces
 - Material passports created to meet client brief requirements.

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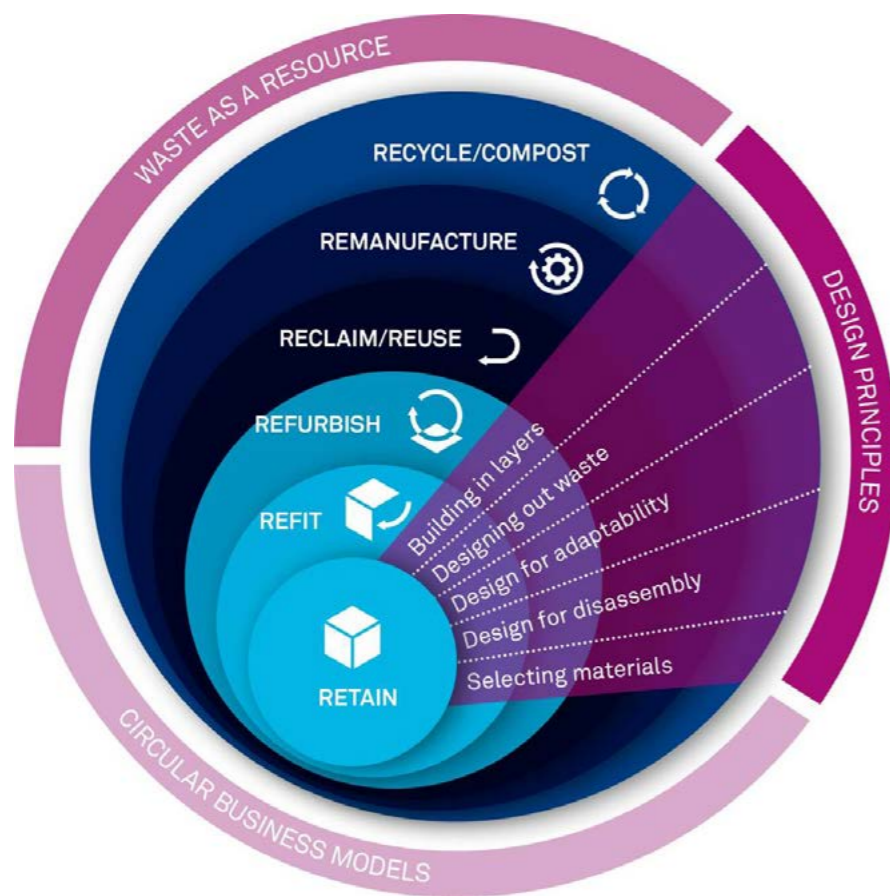
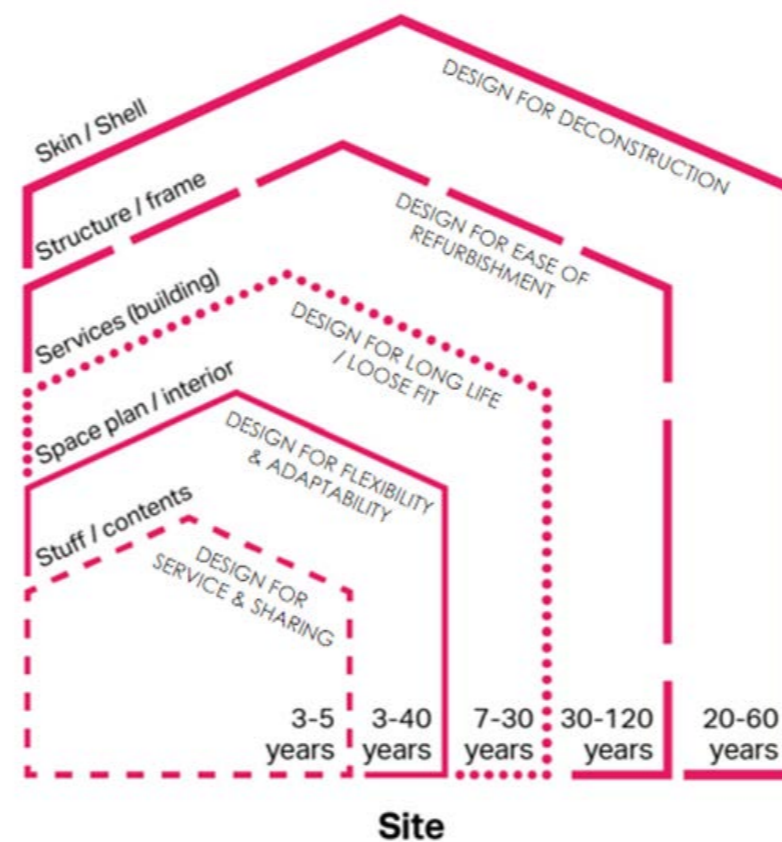


Fig. 5.1 - Circular Economy Hierarchy
Building Revolutions (2016) D. Cheshire, RIBA Publishing



Fi 5.2 - Building layers and their indicative lifespans
Frank Duffy's 'Shearing Layers' concept described in *How Buildings Learn* (1994) S. Brand.

5. CIRCULAR ECONOMY

CIRCULAR ECONOMY IN CONSTRUCTION

During the design phase, additional future functions of the buildings should be anticipated and tested which may include changes to technology, creation of buffers, or building in redundancy if deemed appropriate (this should be informed by relevant studies, area development plans, consultation findings).

Proposals should also consider current and future resource scarcities and address these issues through loose fit in design, construction and operational approaches e.g. use of water audits to support material specification during design or application of rainwater harvesting to support net water positivity on site (See Chapter 6 - Water Resource Management).

Digitisation may be an opportunity to replace hardware with software which does not require material/physical modification and can typically be updated digitally as new tools and requirements emerge.

Beyond the building

It is recognised that there is limited space to store recycled building items and materials in the City, however, the CoLC welcomes proposals that consider opportunities to share materials with other ongoing construction and public realm projects in the City or Greater London. This would be expected if the applicant had multiple sites in London. Alternatively, materials should be advertised on material reuse platforms as early as possible to maximise the opportunities for off-site reuse.

Developments should consider facilitating meanwhile use of sites awaiting vacancy or construction such as affordable workspace, cultural / community space, pop-up commercial or green spaces. Meanwhile use has the potential to drive economic outputs, increase positive environmental impacts and deliver social value³ to the public, local businesses and the developer, for both the short and long term.

Space on construction sites could also be made available to enable the storing of recycled and reusable materials from the site or other sites.

The installation of hard infrastructure that is difficult to adapt should be avoided.

Case Study: City Place House, Aldermanbury Square - Redevelopment of commercial building



Visualisation of main entrance
Source: Planning Application DAS

- Use:** Offices
- Key facts:**
- Optimising the structural design to minimise quantity of materials and enable pre-fabrication and modularisation
 - Materials with high recycled content, confirmed by a Sustainable Procurement Plan, such as aluminium with 50% recycled content), cement replacements in concrete, 97-100% recycled content for steel reinforcement bars, recycled steelwork and using recyclable mineral wool insulation
 - Use of refurbished raised access flooring
 - Designing for ease of disassembly, e.g. through bolted steelwork connections
 - Existing steelwork from site confirmed to be reused in a different project.

Case Study: Fleet House, 8-12 New Bridge Street - Major refurbishment and extension



Visualisation of New Bridge Street facade
Source: Planning Application DAS

- Use:** Commercial office with public house
- Key facts:**
- Optimisation of the structural design to maximise retention with 72% of the existing basement and superstructure to be retained
 - Modular façade design to enable off-site manufacture and minimising waste
 - Minimising material usage and optimising the design to achieve durable and adaptable spaces
 - Adaptable and flexible MEP systems to suit low floor to floor heights.

5. CIRCULAR ECONOMY

OPERATIONAL CIRCULAR ECONOMY

What is operational circular economy?

The application of circular economy principles during the operational period of a building's life-cycle includes anticipating future occupant needs to help reduce waste generation, designing for flexibility to facilitate the sharing of assets, and consideration of maintenance and repair requirements during the life of the building.

It also involves the design of site-level waste management systems that encourage circularity such as conveniently placed recycling facilities.

The City runs the Clean City Awards Scheme (CCAS) to drive sustainability amongst member businesses in key areas related to waste, such as communication and engagement, resource efficiency and circular economy practices and reducing plastic waste.

Key measures

Whole building

Waste reduction needs to be considered from the outset of the operational stage of the building's life-cycle. When occupants consider office refurbishments, focus should be placed on repairing over replacing, choosing elements for longevity and flexibility.

After reducing waste production as far as possible, it is important to ensure that adequate space is made for the separation and storage (for a convenient period) of dry recycling and food waste from the outset. This includes the provision of segregated disposal, in alignment with the major waste streams generated in all bin locations, with clear signage. For example, if collecting residual, dry mixed recycling, organics, ensure all three bins are in all waste locations.

In developments with kitchens that are likely to produce large volumes of organic waste, the design proposal should allow for the accommodation of food waste digestion technologies which can produce greywater outputs for reuse on-site and reduce carbon emissions of food waste.

Waste stores should be constructed using materials that are robust, secure, and non-combustible, with a water outlet for bin washdown, a foul drainage connection, as well as adequate lighting and ventilation. The temperature of waste management spaces should be considered to reduce the risk of odours and vermin based on the nature of the proposed activities, volume and length of waste storage. Additionally, the servicing areas need to be designed for waste vehicles, which typically require a clear height of 5.5m.

Waste bins within the waste store must be arranged so that they are easily accessible without obstruction. Waste storage areas should be located so that occupiers and waste operatives should not have to transport waste for a distance greater than 30m. Equally, occupiers and waste operatives should not have to move bins along a gradient steeper than a 1:20 slope. In commercial buildings with high waste outputs, separate units for different recyclable goods and waste compactors should be considered to allow for efficient transportation.

Developments should include provision of shared storage space/library for tools and other appliances to reduce the need for purchasing them individually. Developments should also provide space for the deposit of unwanted or bulky items in preparation for re-use or recycling in a convenient location - especially for the many commercial spaces in the City which may experience frequent refitting for new tenants. Where reuse of equipment is not possible, signpost or provide on-site recycling opportunities for complex waste items (such as electrical equipment).

In-building waste management and storage solutions should be well integrated with the collection systems used by the contractor serving the development. Developers should be mindful that collection systems may change over time as new collection contracts are let or in response to changing legislation. Systems that rely on hard infrastructure may not be resilient to these types of change.

Solutions that facilitate the collection and reporting of Management Information (MI) on the amount and type of waste generated by waste stream which can be used to identify performance issues and evaluate impacts of additional interventions will be also welcomed for both commercial and residential use.

The proposed waste management systems should encourage a sense of personal responsibility for correct segregation of waste and use of waste management service/infrastructure. This could include linking use of service to individuals, households, or businesses via technology (e.g. smart bins) and/or monitoring (via CCTV and care-taking staff).

To raise awareness of the on-site waste management service and to encourage desired recycling behaviours, clear multi-channel communication and signage for commercial and residential use need to be in place. Signage needs to reflect what the appropriate contractor collects (this may evolve over time).

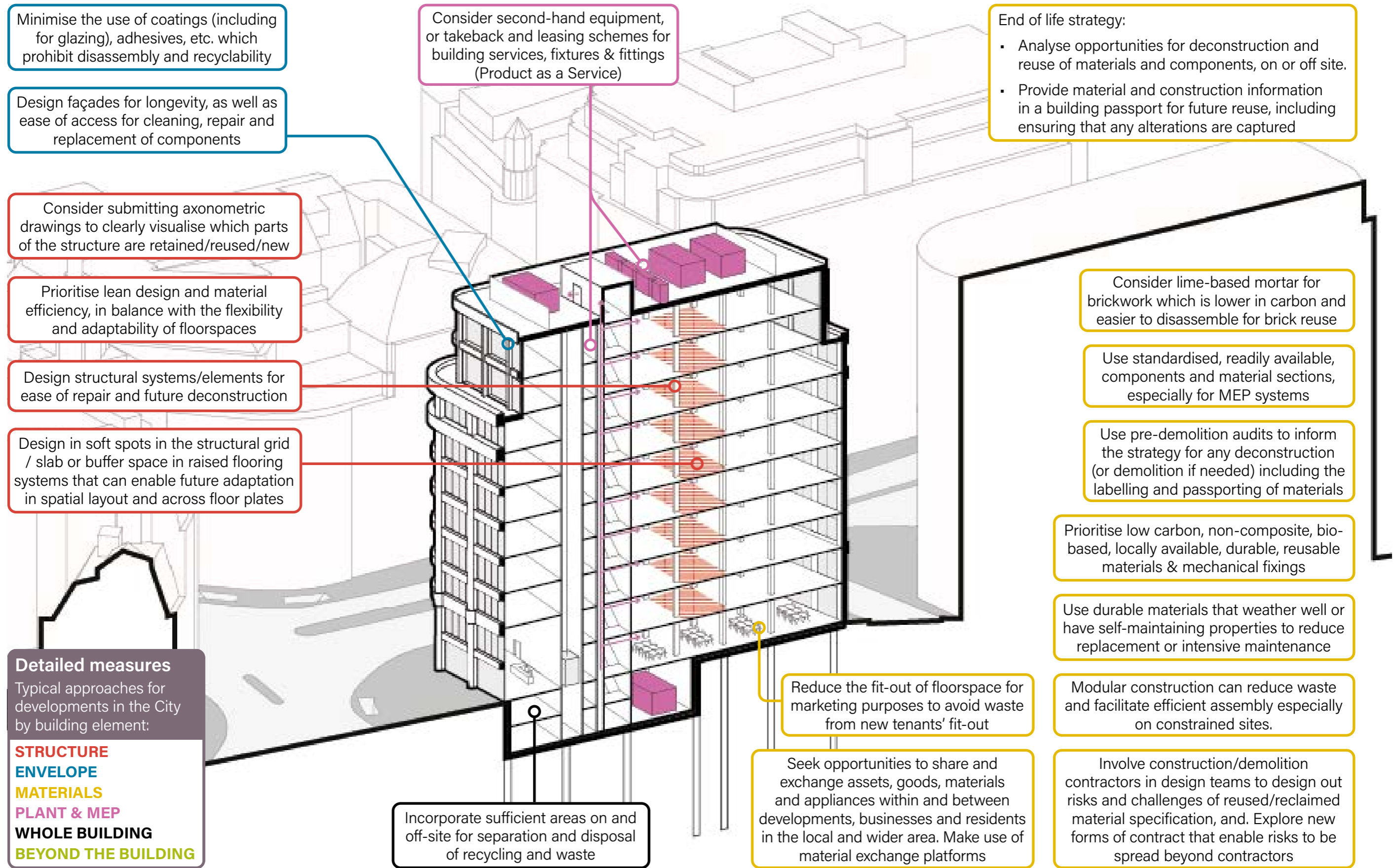
Freehold, leasehold and rental conditions should include clear obligations on commercial tenants/residents to use waste management facilities in the correct way and employ building caretaker(s) with a clear waste management role which includes the engagement of residents and businesses to encourage good recycling behaviours, possibly through incentives. Occupiers should prioritise the use of multiple-use over single-use products and suppliers with packaging take-back or refill schemes.

Occupiers should be encouraged to incorporate requirements for using recycled goods into procurement contracts (considering waste that is produced across the whole supply chain), and for following the waste hierarchy.

5. CIRCULAR ECONOMY

KEY MEASURES FOR CITY DEVELOPMENTS

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Detailed measures
 Typical approaches for developments in the City by building element:

- STRUCTURE**
- ENVELOPE**
- MATERIALS**
- PLANT & MEP**
- WHOLE BUILDING**
- BEYOND THE BUILDING**

- End of life strategy:
- Analyse opportunities for deconstruction and reuse of materials and components, on or off site.
 - Provide material and construction information in a building passport for future reuse, including ensuring that any alterations are captured

Consider lime-based mortar for brickwork which is lower in carbon and easier to disassemble for brick reuse

Use standardised, readily available, components and material sections, especially for MEP systems

Use pre-demolition audits to inform the strategy for any deconstruction (or demolition if needed) including the labelling and passporting of materials

Prioritise low carbon, non-composite, bio-based, locally available, durable, reusable materials & mechanical fixings

Use durable materials that weather well or have self-maintaining properties to reduce replacement or intensive maintenance

Modular construction can reduce waste and facilitate efficient assembly especially on constrained sites.

Involve construction/demolition contractors in design teams to design out risks and challenges of reused/reclaimed material specification, and. Explore new forms of contract that enable risks to be spread beyond contractors

Reduce the fit-out of floorspace for marketing purposes to avoid waste from new tenants' fit-out

Seek opportunities to share and exchange assets, goods, materials and appliances within and between developments, businesses and residents in the local and wider area. Make use of material exchange platforms

Incorporate sufficient areas on and off-site for separation and disposal of recycling and waste

5. CIRCULAR ECONOMY

CASE STUDIES

1 Broadgate

New build

Use: Office-led mixed use building

- Key facts:
- 50,000 sqm
 - Generous terraces and balconies provide over 4,000 sqm of amenity and green space
 - British Land awarded a BREEAM innovation credit for the UK's first large-scale use of a materials passport
 - 27% of materials reclaimed from demolition were reused either on site or within the Broadgate campus
 - Additionally, 139 tonnes of steel are being reused in two other developments in Southwark
 - First NABERS UK Design for Performance registered building
 - BREEAM Outstanding and WELL Platinum target ratings



Visualisation of the proposed 1 Broadgate development
Source: Planning Application DAS

Together with architects GXN, British Land began working with Madaster at the start of 2021 to use their materials data platform. Throughout the development, the project team will update the platform with information on the quality, origin and location of materials and products that will be used in the structure, façade and MEP of the building, thereby creating its materials passport.

The development approach acknowledges circularity as a crucial part of real estate's future; ensuring materials and products are kept in use for as long as possible, extracting the maximum value from them while in use, then recovering and regenerating them when they reach their end of service life.

55 Old Broad Street

Part refurbishment, part new-build

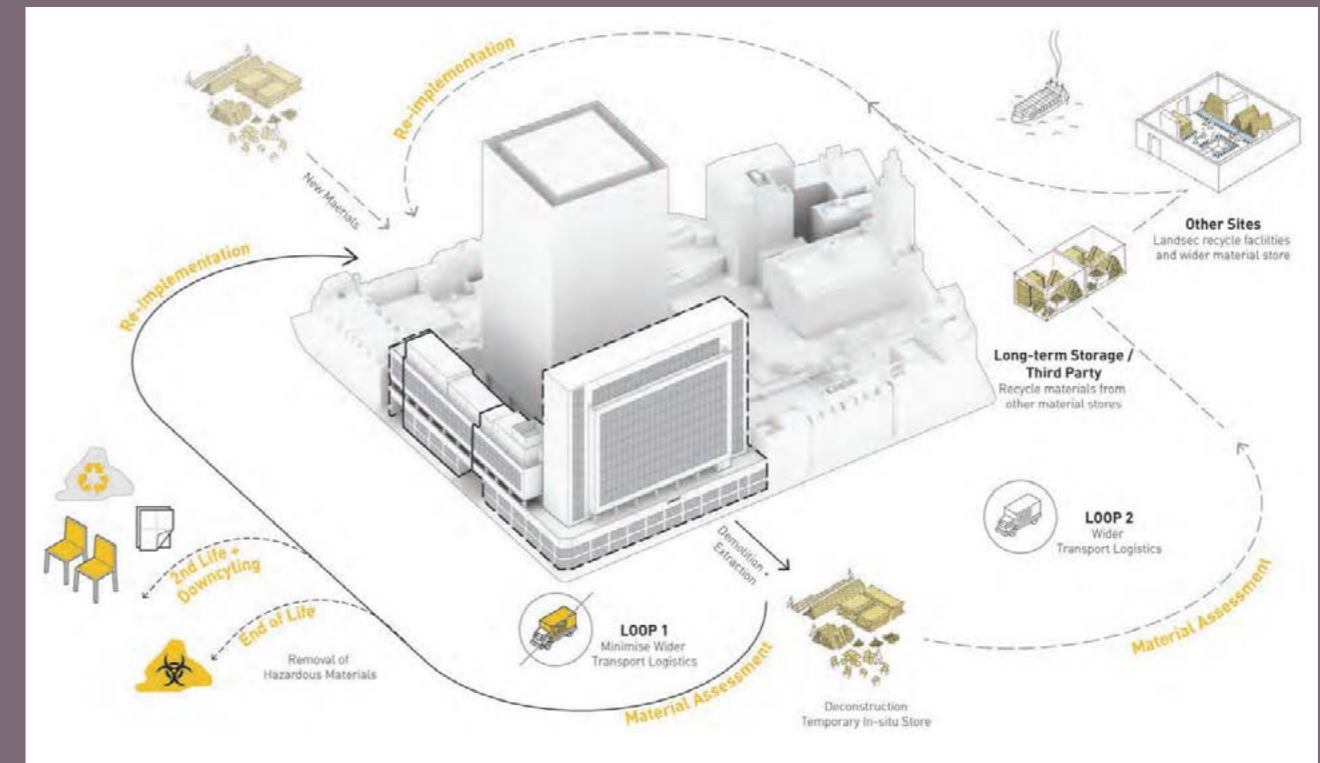


Diagram showing circular flows of materials to and from the development site.
Source: Planning Application Circular Economy Statement

Use: Office-led mixed use development

- Key facts:
- 40,584 sqm
 - Natural ventilation and passive solar shading will reduce operational energy use
 - The proposal aims to use primarily mechanical fixings for structural components (steel and CLT), except for the lower level transfer truss structure where heavy loads limit suitability.
 - Materials, components and furnishings in the existing building have been painstakingly catalogued, creating an extensive material passport database that will allow their reuse.
 - Materials are assessed according to a set of specification metrics including condition and how visible they will be in their next use, to inform decisions on their processing and reuse/recycling. Material quantities and embodied carbon are key factors.

5. CIRCULAR ECONOMY

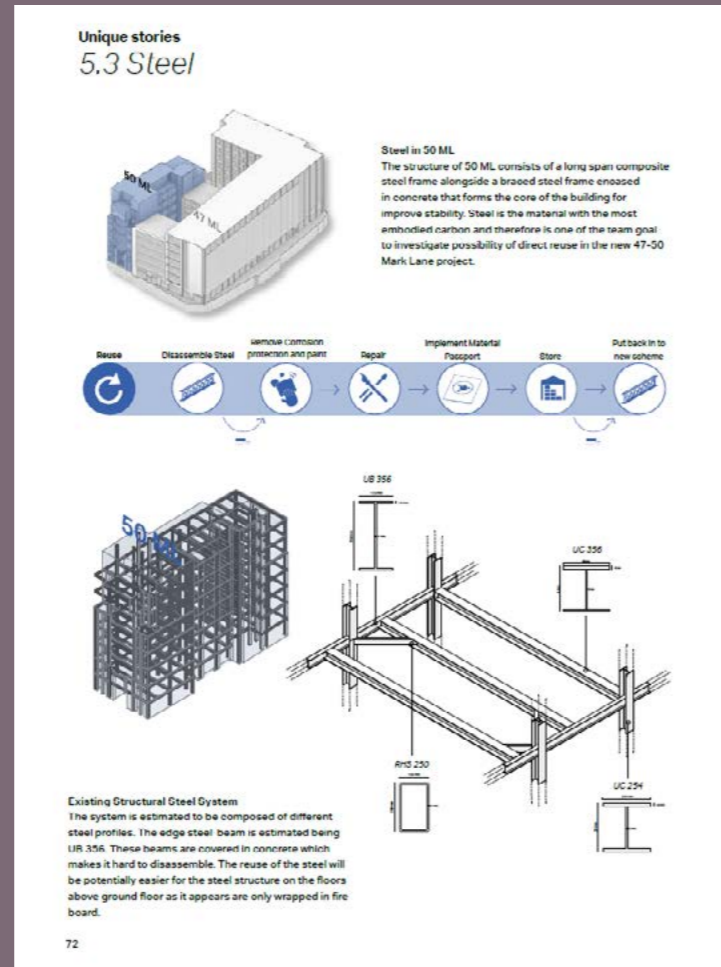
CASE STUDIES

Mark Lane

New build

Use: Office-led mixed use building

- Key facts:
- 50,000 sqm
 - Generous terraces and balconies provide over 4,000 sqm of amenity and green space
 - British Land awarded a BREEAM innovation credit for the UK's first large-scale use of a materials passport
 - 27% of materials reclaimed from demolition were reused either on site or within the Broadgate campus
 - Additionally, 139 tonnes of steel are being reused in two other developments in Southwark
 - First NABERS UK Design for Performance registered building
 - BREEAM Outstanding and WELL Platinum target ratings



'Unique stories' - an exploration of potential ways to re-use steel
Source: Planning Application Circular Economy Statement

Together with architects GXN, British Land began working with Madaster at the start of 2021 to use their materials data platform. Throughout the development, the project team will update the platform with information on the quality, origin and location of materials and products that will be used in the structure, façade and MEP of the building, thereby creating its materials passport.

The development approach acknowledges circularity as a crucial part of real estate's future; ensuring materials and products are kept in use for as long as possible, extracting the maximum value from them while in use, then recovering and regenerating them when they reach their end of service life.

1 Golden Lane

Alteration and extension

Use: Office with ground floor community space

- Key facts:
- 10,725 sqm office space
 - Plentiful green terraces, window boxes and a planned green wall on the southern façade.
 - 95% retention of the existing building structure
 - BREEAM Outstanding, NABERS 5* and WELL Platinum target ratings
 - Various products and materials including ceiling / floor finishes and light fittings have been made available on reuse marketplace Globechain, with purchasing priority given to developers working within the City



View showing the retained grade II listed facade
Source: Planning Application DAS

Working with the client team (Castleforge, Hawkins Brown and G&T), London Structures Lab established a world-first methodology for the deconstruction, re-fabrication and recertification of steelwork to deliver reuse within the same development site.

Ribbon cutting (to increase the depth of the sections and give uniformity) enables a 40% increase in the reusable tonnage over standard reuse techniques. The process also means that the structural zone across the floorplate could be regularised, giving a consistent service zone and ceiling line, producing the high-quality office space expected.

Sophisticated analysis techniques also allowed steel bracing and historic masonry to be assessed as a single system, avoiding the need for any foundation enhancement even with the increased massing.

CLIMATE RESILIENCE

06

6. CLIMATE RESILIENCE

Introduction

This chapter contains guidance aimed to ensure that climate resilience principles are embedded within the design process of each development in the City.

It includes sections on:

- Flood risk and sustainable drainage systems: management of flood risk through water retention and flow control
- Water resource management: how to effectively manage and optimise the use of the available resources
- Building and urban overheating: preventing overheating in a dense and urbanised environment such as the City
- Pests and diseases: risks associated with animals, insects, weeds etc. in an urban context and guidance for a typical development in the City.
- Infrastructure resilience: key considerations for designing efficient and resilient infrastructure for a building and its external plot interface with the city.

Key approaches for the City

The City's Climate Action Strategy and Adaptive Pathways study identified six key risks to the City as a result of climate change. These include flooding, water stress, overheating, new and emerging pests and diseases, disruption to food trade and infrastructure and impacts to biodiversity.

It is important to design developments with built-in resilience to these changes and disruptions, anticipating future climate changes throughout the design life of sites and buildings. Many of these solutions can simultaneously deliver a range of wider benefits which address climate change mitigation, enhance biodiversity and improve health.

Proposals within the City must consider this guidance from an early stage of the design and use it as a checklist when submitting a planning application and/or during any pre- and post-application discussions with the council.

Key policies and guidance

Table 6.1 Climate resilience key planning policies

London Plan 2021
D6: Housing quality and standards
D11: Safety, security and resilience to emergency
GG6: Increasing efficiency and resilience
SI 4: Managing Heat Risk
SI 5: Water Infrastructure
SI 6: Digital Connectivity Infrastructure
SI 12: Flood Risk Management
SI 13: Sustainable drainage
Local Plan 2015
CS10: Design
DM10.2: Design of green roofs and walls
DM10.4: Environmental enhancement
CS15: Sustainable Development and Climate Change
DM 15.2: Energy and CO2 emissions assessments
DM 15.5: Climate change resilience and adaptation
CS18: Flood Risk
DM 18.1: Development in the City Flood Risk Area
DM 18.2: Sustainable drainage systems (SuDS)
DM 18.3 Flood protection and climate change resilience
Draft City Plan 2040
S7: Infrastructure and Utilities
IN1: Infrastructure provision and connection
S15: Climate Resilience and Flood Risk
CR1: Overheating and Urban Heat Island Effect
CR2: Flood Risk
CR3: Sustainable drainage systems (SuDS)
CR4: Flood protection and Flood Defences

Key actions to develop an exemplar City scheme

- Avoid urban heat island effects and the risk of overheating in the building by incorporating passive solar shading and by minimising the need for active cooling
- Reduce the risk of local flooding by attenuating water on-site and controlling the run-off rate
- Incorporate an integrated potable water management system
- Design green spaces, building spaces and services with a focus on nature, health and well-being to reduce the risk of emerging pests and diseases to develop and spread



Source: City of London Corporation

6. CLIMATE RESILIENCE

The City's climate resilience risks

There are six key areas of climate-related risk identified for the City as part of the [Adaptive Pathways Study](#) carried out by Buro Happold for the development of the City of London Climate Action Strategy 2020-27. These risks need to be addressed within development and other planning processes to ensure that the City is resilient to climate change.

Flooding

It is anticipated that the City will experience a change in both the frequency, intensity and season variability of rainfall in the future, which will put pressure on our drainage system.

Water stress

Changes in rainfall patterns will impact on London's capacity to meet its water demand and lead to drought. Droughts are expected to get longer and occur more frequently, with double the number of days of drought predicted in 2050 compared to 2020.

Overheating

Increasing temperatures as well as the frequency and length of heatwaves will be made worse in the City due to the urban heat island effect. This is when dense urban areas remain significantly warmer than the surrounding countryside, due to roads and buildings absorbing and retaining heat in the day and re-emitting it at night.

Pests and diseases

Changing seasonal conditions and global patterns will influence the spread of new and emerging diseases, while pests and invasive non-native species may also increase in number and range in a warmer, wetter atmosphere.

Trade, food and infrastructure

Weather-related impacts, geopolitical changes and altered climate conditions are likely to negatively impact upon major infrastructure, such as the power grid and transport network, as well as disrupting food production and trade on a domestic and international scale.

Biodiversity losses

Changes to the climate can fundamentally alter natural trends and cause decline and loss within ecosystems. This includes disruption to fundamental ecological processes such as pollination, carbon storage capacity and our dependence on the natural environment for our well-being and resources. See [Chapter 7 Urban Greening and Biodiversity](#).

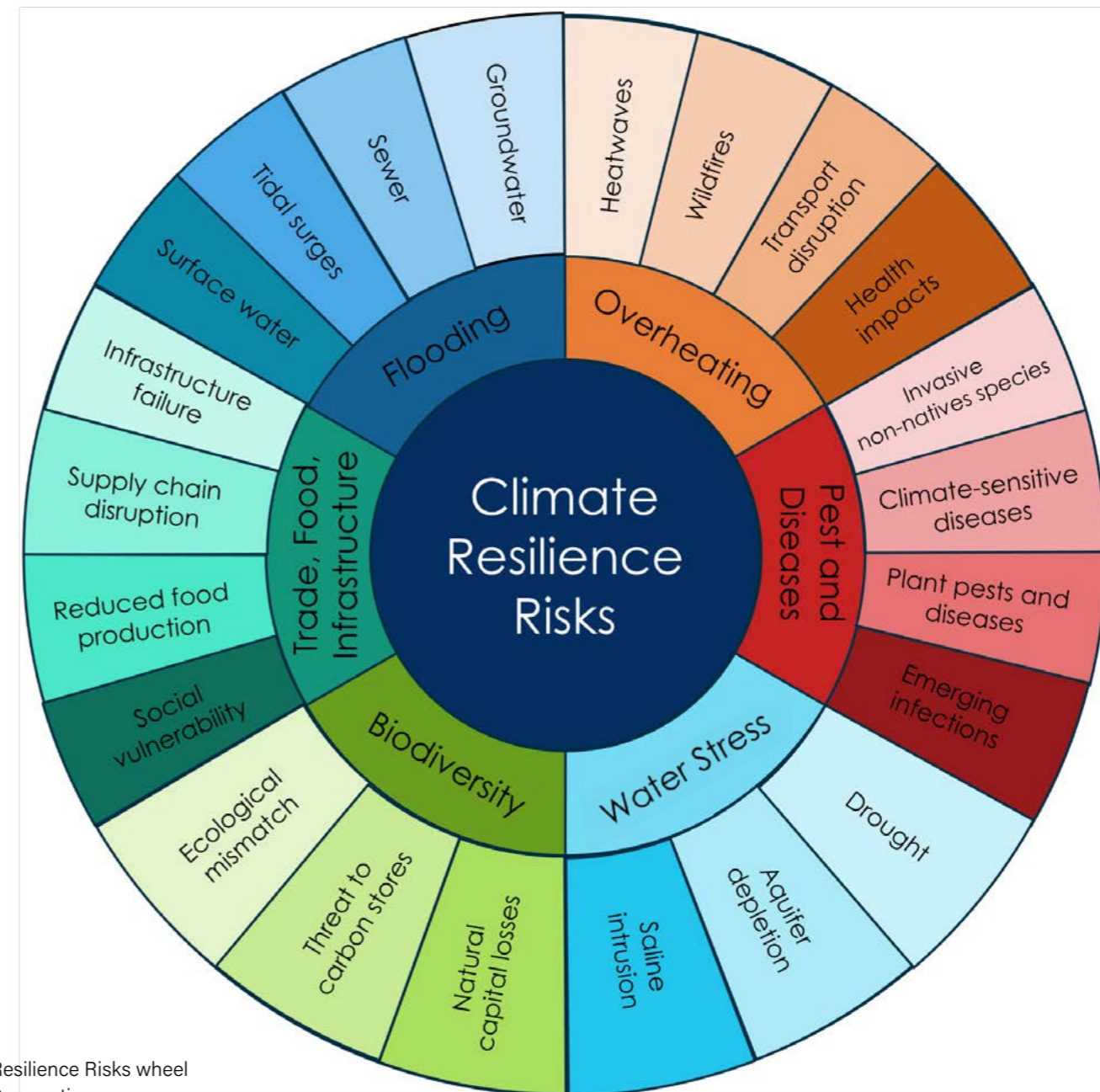


Figure 6.1 CoL Climate Resilience Risks wheel
Source City of London Corporation

6. CLIMATE RESILIENCE

FLOOD RISK MANAGEMENT AND SUSTAINABLE DRAINAGE SYSTEMS

What is flood risk management

The term 'flood risk' refers to the probability of flooding within an area and the associated consequences. The likelihood is based on historical and forecast data. Flood Risk Management identifies how the risk of flooding can be reduced and managed sustainably.

What are Sustainable Drainage Systems (SuDS)

SuDS are designed to manage surface water volumes and pollution risks locally by mimicking natural processes as far as practicable. When done well this results in reduced runoff, improved water quality, amenity benefits and enhanced biodiversity and habitat.

Sources of flood risk

The risk of flooding from all sources, including fluvial, tidal, surface water, sewer, groundwater and other artificial sources must be assessed. In the City of London, the primary sources of flood risk are fluvial/tidal flood risk along the riverside and surface water/sewer flooding in the surface water hotspots identified around Farringdon Street and New Bridge Street areas.

Flood zone categorisation

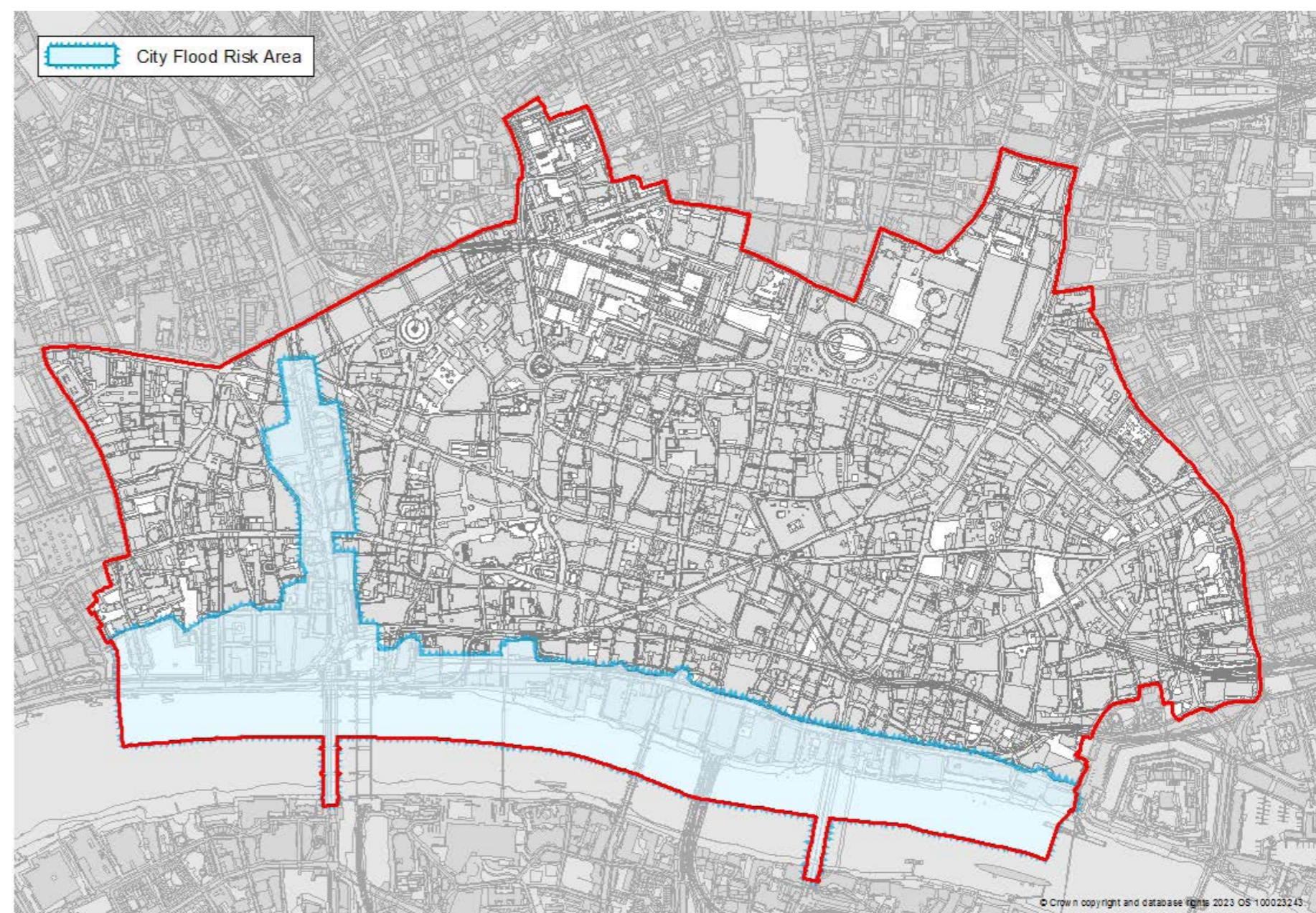
Flood risk is defined for all areas of London and shown on the Environment Agency (EA) "Flood risk maps" and "Flood maps for planning." The flood zone associated with the development will dictate the building types/usages permitted by the EA. Depending on a site's location within a flood zone and its proposed use, a development might need to pass the Exception Test. More information on applying the Exception Test is available in the City of London Strategic Flood Risk Assessment.

- Flood Zone 1 has a low probability of flooding (Annual Exceedance Probability (AEP) <0.1%) and is appropriate for all land uses.
- Flood Zone 2 has a medium probability of fluvial (0.1% < AEP > 1%) and coastal (0.1% < AEP > 0.5%) flooding. This prohibits highly vulnerable developments. Designs should consider measurements to minimise the risk and impact of flooding.

- Flood Zone 3a has a high probability of fluvial (AEP > 1%) and coastal (AEP > 0.5%) flooding. It should be noted that large areas of London are within this flood zone. All land uses may be permissible within this zone, provided that flood risk has been assessed fully and appropriate mitigation provided. Mitigation may include, but will not be restricted to, measures such as raising flood defences in accordance with Thames Estuary 2100 Plan measures, ensuring no critical infrastructure is located at basement level, podium levels are set above breach levels, a Flood Emergency Plan is in place.

- It is vital that the information within and the limitations of the EA maps are fully understood.
- Flood Zone 3b categorises the functional floodplain (AEP > 5% or designed to flood in an extreme event). Only water compatible development is permitted within this zone to ensure that there is no impact on the functionality of the floodplain.

Figure 6.2 City Flood Risk
Source City of London Corporation



6. CLIMATE RESILIENCE

FLOOD RISK MANAGEMENT AND SUSTAINABLE DRAINAGE SYSTEMS

Approach to flood risk management

Flood risk must be assessed on a site-specific basis. Management measures must appropriately mitigate the risk, whilst considering the wider impacts to flooding elsewhere. Flood risk can be managed sustainably by utilising the following steps:

- Assess the risk to the site from each source of flooding
- Understand the flood mechanisms for each source of flooding. This could include the location, speed and consequence of flooding on a site
- Establish an acceptable risk threshold. This should be done in conjunction with interested parties including future occupants and with reference to relevant flood risk policy
- Mitigate the risks to an acceptable level. This could include moving vulnerable uses to less vulnerable areas, utilising sustainable drainage features or providing flood resistance and flood resilience measures
- Prepare in advance for the consequence of flooding and develop procedures to enable recovery. A Flood Emergency Plan can be implemented in order to notify site users of a flood event, provide a safe and efficient route away from danger and ensure the flooded site can return to functional use as soon as possible

Proposals should consider solutions that combine sustainability and flood risk management measures, for example; solar panels that double up as water collectors during rainfall or green roof features that provide biodiversity and flood risk benefits. Surface water attenuation may provide an opportunity for greywater reuse.

Drainage for all developments must have separate foul and surface systems. As far as practicable the systems must not be reliant on pumping. If pumping is required, such as from basements, then appropriate backup systems must be provided.

Critical infrastructure

All infrastructure that is critical to the functioning of a building, such as heating and lighting, must be flood-proofed and situated above anticipated flood levels. This includes risks associated with breach events.

Safe egress and access must be provided in the event of a flood event, ideally to a safe area offsite.

Most buildings in Flood Zone 2 or Flood Zone 3 must have a bespoke Flood Emergency Plan in place. This is a requirement of the Lead Local Flood Authority (LLFA).

Careful substation and plant positioning in relation to flood risk from overland flow, rising river or groundwater can enhance resilience as well as tanking measures and raised threshold positions.

Key Measures

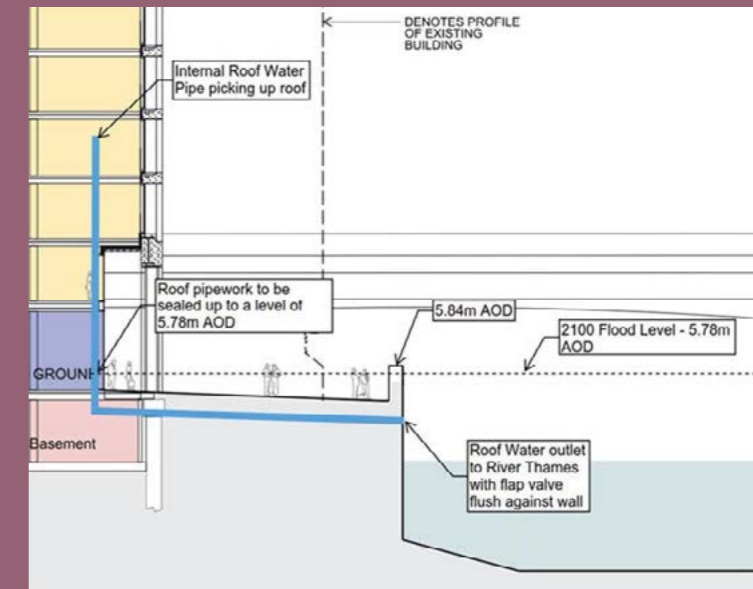
Whole building

Flood risk management vision and objectives

All developments must aim to ensure that the risk of flooding is managed sustainably, taking into consideration the evolving impacts of climate change on flood risk throughout the project's lifetime, while minimising impact on the natural environment. To achieve this, proposals must:

- Ensure that the development is suitable for the flood zone it is situated in and its defined land use vulnerability
- Ensure that the development does not increase flood risk off site and, if possible, achieve a reduction in this risk
- Respect the inherent flooding pathways and make space for water within the proposed development as far as practicably possible
- Assess all sources of flood risk and provide mitigation as required
- Maximise the use of green infrastructure and SuDS to manage flood volumes throughout the development. Make use of available public realm to accommodate stormwater, improve water quality and provide amenity
- Ensure the safety of building occupants during flood events through the identification of suitable access and egress routes

Case Study: Seal House



Roof Water Strategy. Source: Planning Application, Flood Risk Assessment and Outline Drainage Strategy

Use: Commercial Office, retail, restaurant

- Key facts:
- Internal north-south access designed to ensure that safe egress and access is provided in the event of a breach in the Thames Tidal Defences
 - Less vulnerable land uses are located on the ground and basement floors
 - Levels slope away from the building, so that surface water flows away from the asset
 - Green roofs are provided, which reduce runoff, create habitat and visual amenity
 - Attenuation is provided that takes account of tide-lock to surface water discharge from the site
 - Surface water is discharged direct to source (River Thames) in accordance with the SuDS hierarchy

6. CLIMATE RESILIENCE

FLOOD RISK MANAGEMENT AND SUSTAINABLE DRAINAGE SYSTEMS

Beyond the building

SuDS and urban blue-green infrastructure (BGI) are effective measures to manage and reduce flood risk and should be integrated into the public realm or open spaces within the development where possible. The design of these spaces can include tree planting, swales, natural detention basins, or soakaways and can play a key role in supporting the urban ecosystem.

These solutions can:

- Reduce runoff and flood risk - impervious surfaces in urban developments increase run-off volumes and often overwhelm drainage networks/sewers.
- Restore the natural water balance – by reducing impervious surfacing, SuDS/BGI promote natural infiltration and encourage aquifer recharge.
- Support biodiversity by restoring natural habitats.
- Provide carbon reduction benefits – through sequestration and as an alternative to grey infrastructure with higher embodied carbon.
- Increase health and well-being in the urban realm – SuDS/BGI can help to reduce the Urban Heat-Island effect and improve air quality

For developments along or near the riverbank, surface water should be discharged directly to the Thames, provided the required permissions are secured. This can present an opportunity to incorporate elements from the Estuary Edges guidance therefore also contributing to marine/terrestrial biodiversity.

CoLC will develop a Climate Resilient Planting Catalogue which will include advice on the best planting species and solutions for water attenuation and drainage.

Ground infiltration

It is important to understand that opportunities for discharge to ground in the City can be limited due to two reasons:

1. Many areas of London are built over contaminated land. Discharging to ground can result in the mobilisation of these contaminants, which can then enter watercourses;
2. For large parts of the City the underlying geology is not sufficiently permeable to enable the volume of discharge to ground required.

Local flood risk management strategy

As a Lead Local Flood Authority, CoLC has the responsibility to develop, maintain, apply and monitor the strategy for local flood risk management in the area, including in the form of the Local Flood Risk Management Strategy 2021-2027 (LFRMS). In this LFRMS, CoLC sets out commitments to achieve flood risk mitigation objectives, these include:

- Implementing procedures to maximise the use of SuDS in new public realm works and new developments
- Identifying all historic assets in the Square Mile at risk of flooding and working with building owners to adopt resilient design
- Working with utilities providers and infrastructure owners to create a public register of assets at risk of flooding and supporting owners to take action
- Producing guidance specific to retrofitting flood resistance and increasing resilience in commercial buildings

Where space or other constraints mean that urban blue-green infrastructure are not feasible, water may need to be attenuated in more traditional tanked systems. Where these are unavoidable, intelligent rainwater management systems should be utilised to enable rainwater to be stored and then used on site.



Source: City of London Corporation

6. CLIMATE RESILIENCE

WATER RESOURCE MANAGEMENT

What are water resources and water resource management?

Water resources are the various types of water which are used or pass through a development. These include potable supply from utilities systems, rainwater and other greywater sources, as well as recycled water from within the development.

Water resource management can enable the effective and optimised use of available resources.

Key measures

Whole building

Water resources must be reliable, sustainable, secure and safe. To achieve this, a development should aim to:

- Reduce per capita consumption water demands through the smart optimisation of water usage and specifying water efficient devices
- Ensure that per capita consumption water demand in residential developments is 105 litres per day or less
- Forecast supply and demand to avoid inefficiencies
- Ensure that distribution is efficient and effective throughout the development by optimising systems and minimising leaks
- Where possible, make use of alternative water sources
- Recycle water sources, including treated sewage effluent (TSE) and greywater to reduce potable water demand. Regenerative water systems should be considered as standard to recycle water
- Minimise sewage outflow through efficient flushing, this prevents obstructions and helps avoid overwhelming the sewage systems

Measures for the management of potable water

- Measure and record usage in order to identify water and energy saving opportunities
- The use of leak detection technology to improve the performance of networks and reduce wastage
- Water saving technologies within the building such as low flow taps and aerated showers
- Ensure supply network has sufficient capacity
- Use of timed-release systems to reduce usage
- Incorporate rainwater and greywater recycling to reduce the demand of potable water

Measures for the management of rainwater

- Optimise collection opportunities for recycling. This includes irrigation and non-potable uses
- Make use of recycled water in heating and cooling system

Measures for the management of wastewater

- Minimise volumes of water required to be treated. Measures include ensuring effective flushing
- Ensure a network has sufficient capacity
- Consider the use of recycled water for toilet flushing. For example, in a large development, capturing water from one third of a building's showers could meet the toilet flushing demand of the entire development

Measures to reduce water demand in plant and MEP systems

- Improve the supply and demand efficiency of plant and MEP systems by ensuring distribution networks are operating effectively and are regularly maintained
- Create a more efficient supply and use system, such as separating the supply of potable and non-potable water (use of greywater for non-potable and a blend of recycled and utility water for potable water)
- Consider resource scarcity management systems that might need to be instituted to manage periods of water stress, drought, or during extreme weather events

Case Study: 100 Liverpool Street - Major refurbishment and extension



100 Liverpool Street, view from the Circle looking towards the proposal and the northern office entrance. Source: Planning Application: DAS

Use: Office, retail, leisure

Key facts:

- BREEAM rating 'Outstanding'
- WELL Standard 'Gold'

- 40% reduction in water consumption against BREEAM defined baseline in 2016
- Water demand partially met through rainwater harvesting and greywater reuse
- Drought resistant planting

6. CLIMATE RESILIENCE

WATER RESOURCE MANAGEMENT

Beyond the Building

To lower the need for potable water for irrigation, the possibility of harvesting and reusing rainwater in the public realm or using rainwater collected from a building for nearby public realm planting should be explored. Any opportunities to combine SuDS with water recycling and to use climate resilient planting types with low water demand must also be considered.

These measures will help to maintain the quality of urban greening during periods of water shortage. The drought in summer 2022 had a significant impact on existing trees and planting in the Square Mile. Silver birches appear to have been particularly effected, but many trees displayed 'false autumn' characteristics due to stress.

Interconnected neighbourhood systems should also be considered with buildings of different roof size and demand profiles, right-sizing of on-site storage, and shared storage facilities.

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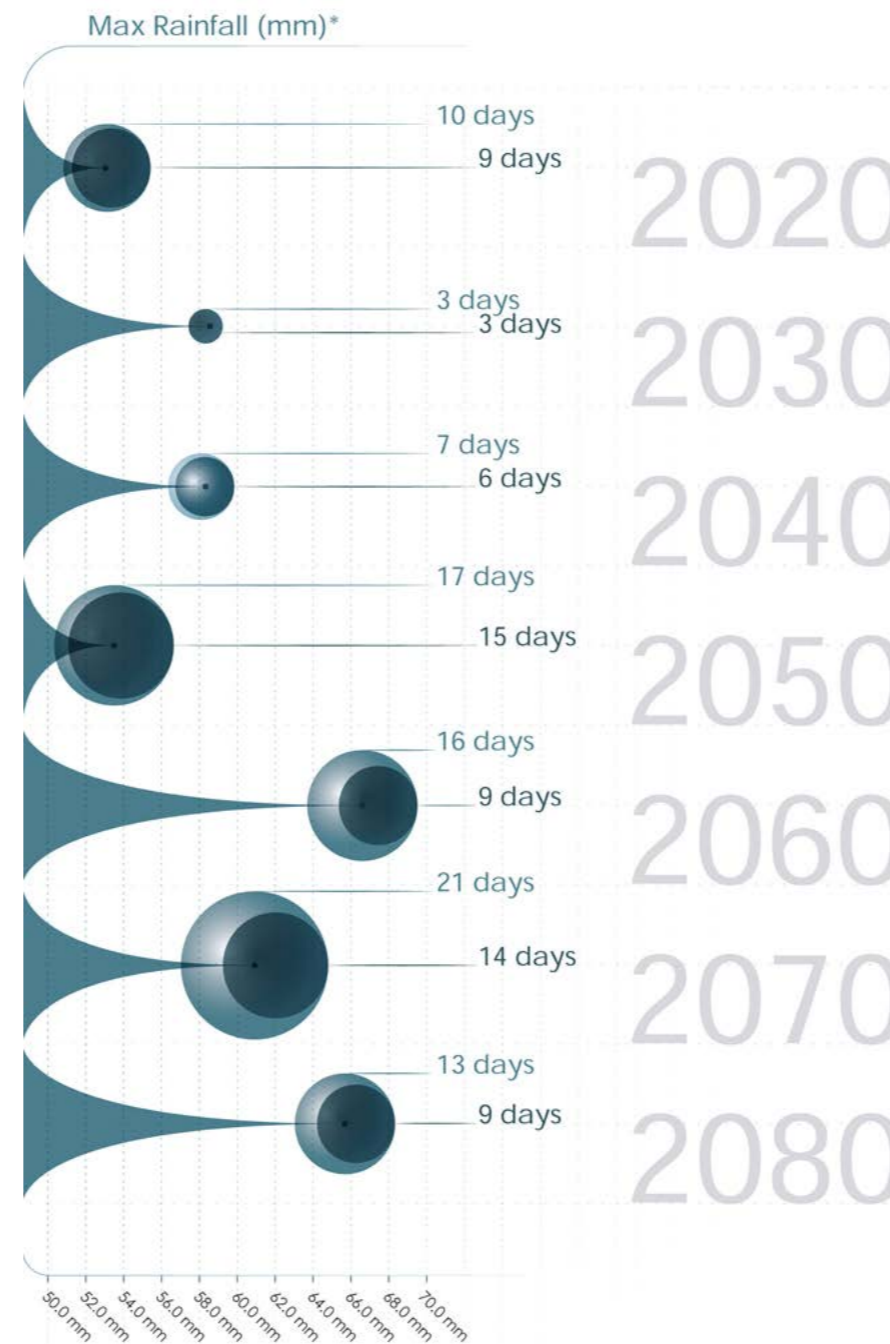


Figure 6.3 Anticipated days and periods of drought per year, 2020 - 2080, compared to anticipated monthly maximum rainfall (mm)
Source: Buro Happold

Days of drought
Longest period of drought

*Drought is defined at 15 days or more with less than 0.2mm of rainfall. Periods less than 15 days are listed here since the analysis involves calculating predicted days of drought, using this definition, for 12 separate models under UKCP18. The final number shown here is the average of the models' results. Since some models predict 0 days of drought, this may give a result which is smaller than 15 days.

Case Study: 100 Fetter Lane

Redevelopment for a 12-storey office



View of 100 Fetter Lane.

Source: Planning Application Design & Access Statement

Use: Commercial office with public house

- Key facts:**
- Blue roof with 'smart' attenuation tank, to collect rainwater for use in WC flushing and irrigation, supplemented by grey water from showers
 - Specification of low water consumption sanitary ware
 - 50% improvement over baseline building water consumption
 - Smart tank water to be supplemented by grey water from shower areas

6. CLIMATE RESILIENCE

BUILDING AND URBAN OVERHEATING

What is overheating?

Overheating occurs when temperatures inside buildings and in the public realm reach levels that are uncomfortable for humans, animals and plants. This can cause health issues, disrupt infrastructure and damage ecosystems and biodiversity. In the City key drivers of overheating include the increase in heatwaves, increase in average daily temperatures and the urban heat island effect. It is important to consider the impact of overheating on building fabric and how this in turn impacts internal conditions during overheating events. Consideration should be given to stresses and shocks on materials to avoid infrastructure failure.

The Urban Heat Island

An Urban Heat Island (UHI) refers to an urban area that is significantly warmer than its surrounding areas. This is most commonly a result of intensive land use, trapping of heat in materials with low reflectivity and a high thermal mass (e.g. concrete), discharge of waste heat from building systems and heat generated by other human activities. The Urban Heat Island effect can cause night-time temperatures to be 4°C+ higher than outside the centre of London.

Heatwave

In London, a heatwave is defined as 3 or more days with maximum daily temperatures above 28°C.

Key measures

Whole building

The City's dense and urbanised environment is at high risk of extreme heat. It is therefore important that all development actively contributes to reducing the heat island effect and improving thermal comfort within the City by utilising green and blue infrastructure, and design optimisation, as well as avoiding the expulsion of waste heat into the environment.

Ventilation and cooling strategies should be underpinned by thermal modelling with best practice utilising Computational Fluid Dynamics (CFD) modelling. Strategies could also consider potential future changes of building use.

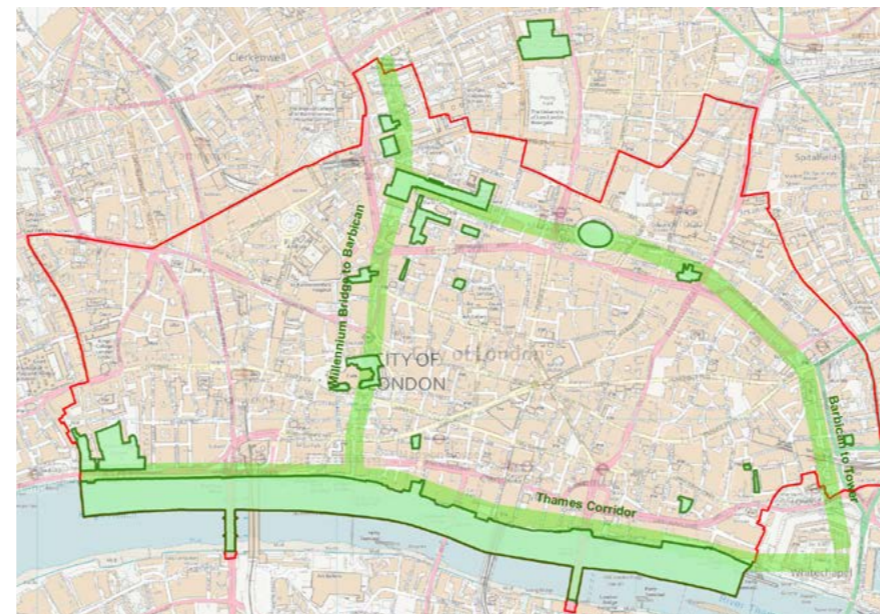
All developments, must assess the impact of current and future weather data (for example by using CIBSE Design Summer Year weather datasets), alongside local acoustic and air pollution levels.

Beyond the Building

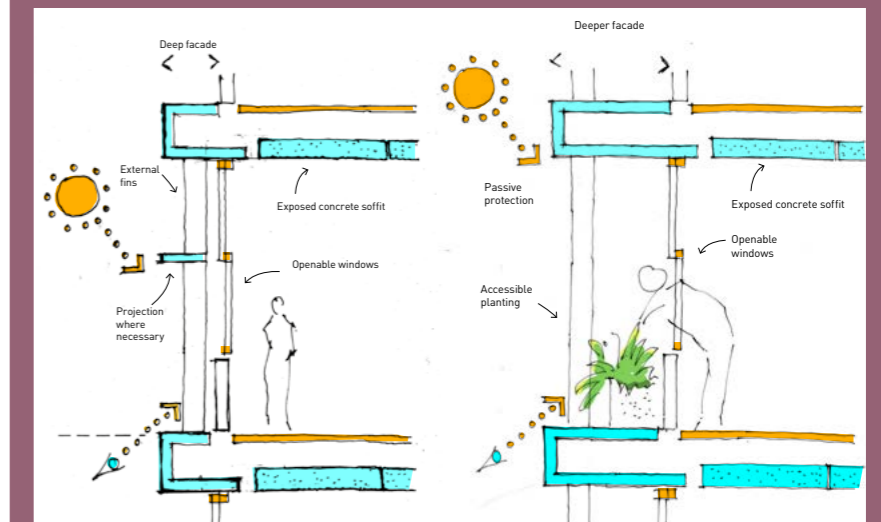
Development proposals must provide measures to alleviate heat stress on the ground, within the site and around the building. Blue and green infrastructure and shade can cool open spaces and offer respite during heat waves.

Applicants are advised to incorporate interventions recommended as part of The City of London's [Cool Streets and Greening Programme](#).

Figure 6.4 Cool Streets and Greening 'green corridors' and SINCs (current & proposed)
Source: City of London Corporation



Case Study: 100 Fetter Lane - Redevelopment of commercial building



View of new publicly accessible link access.
Source: Planning Application, Design & Access Statement

Use: Office and public house

- Key facts:
- Exposed soffits to allow cooling
 - Deep reveals in the building fabric to create shade
 - Landscaping to include multiple green terraces with edgeplanting at eight different levels and a shaded sunken garden open to the public
 - Mixed mode ventilation that combines natural ventilation and automated windows to enable night purging

6. CLIMATE RESILIENCE

BUILDING AND URBAN OVERHEATING

Materials for landscape and site access routes should be selected accounting for increasing temperatures, such as using high albedo surfaces to reflect the radiation. Specifications for asphaltic surfaces should include appropriate additives to reduce chances of failure and deformation in high temperature events. Wider or more frequent jointing may be necessary to allow for increased movement of susceptible surfaces or bases such as hard paving caused by wider temperature ranges and cycles.

What is Thermal Comfort?

Thermal comfort takes into account a range of environmental and physiological factors to determine a comfortable temperature range.

Computational Fluid Dynamics (CFD) modelling can be undertaken to inform the location and massing of buildings as well as landscaping. Best practice entails assessment of the Universal Thermal Climate Index (UTCI) which considers metrological parameters and physiological effects on comfort.

City of London strategy

CoLC is using a one-to-one virtual model of the City, a 'digital twin', to simulate the impacts of extreme heat events and the ideal placement of green roofs. This model is being integrated with CoLC's ground-breaking Thermal Comfort Guidelines. These guidelines – believed to be the first of their kind globally – provide a unique technical tool which enhances the understanding of the microclimatic qualities of the City's public spaces (by merging wind, sunlight, temperature and humidity data). They include a methodology to assess the potential impact of new developments and can serve as an additional reference to help mitigate overheating risk.

CoLC is leading by example through the implementation of its Cool Streets and Greening Programme, as part of which it has begun planting tree-shaded cool routes. In some cases this has reduced air temperatures between 3-8°C during heatwaves.



Figure 6.2 Thermal comfort map
Source: City of London Corporation 2020

Usage Category	% of hours with acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use 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)

6. CLIMATE RESILIENCE

BUILDING AND URBAN OVERHEATING

City of London overheating map

Figure 6.2 shows which areas of the City will be affected by the highest average heatwave temperatures as well as distribution of key public spaces that may support impact mitigation by providing cooling (green spaces) or shelter from heat. Temperature data is drawn Heat Wave Average Max Temperatures taken from the GLA 2016 study on the London Urban Heat Island Effect.

Under Regional UCKP18 projections 'high emissions scenario' the Square Mile is set to see an increase in the maximum daily air temperature, the annual number of days of heatwaves and the period of consecutive days of heatwave. By 2080 the number of days on heatwaves will have increased to 56 days per year compared to 14 days in 2020, with heatwaves lasting up to 22 days and a maximum daily air temperature of 39°C.

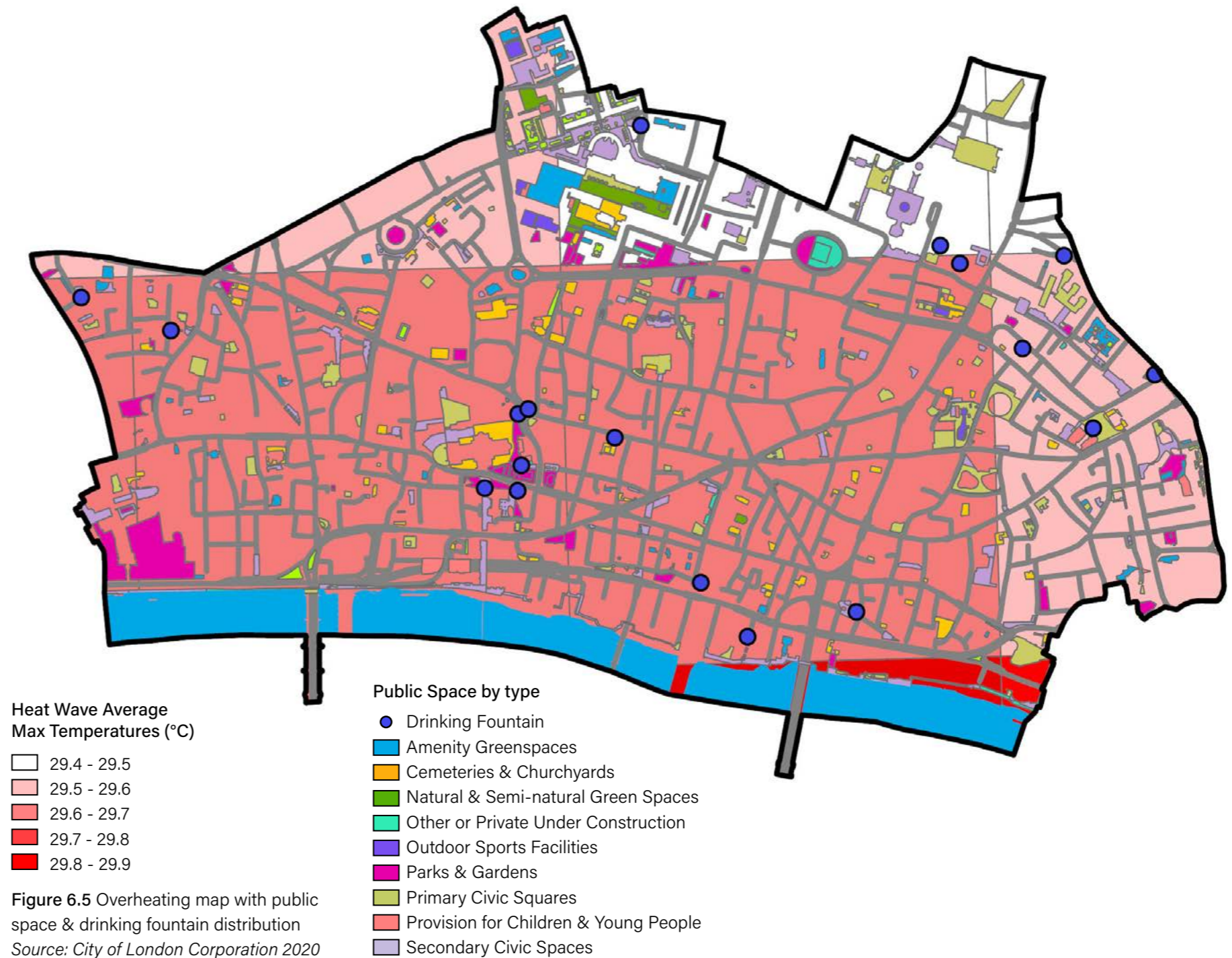
At 27°C indoor temperatures in well-insulated homes can result in overheating, at 30°C some commercial buildings will be vulnerable to power outages and at 35°C health adults can begin to experience heat stroke risk.

Impact of future weather files

A future weather file portrays a location's anticipated annual weather stream in 10, 25, 50, 80, and 100 years into the future. Based on projections derived from numerous global climate models for various scenarios of greenhouse gas emissions, future weather files can be utilised in building energy modelling to get insights into future energy requirements.

The design approach for any development in the City must take into consideration the future weather file and their impact as recommended by BREEAM 2018 Hea 04: Thermal Comfort.

CIBSE Design Summer Year (DSY) for London is the most appropriate year of weather data to assess the summertime cooling needs of buildings in London. It enables designers to analyse the summer performance of their buildings and investigate the impact of urban macroclimatic factors and climate change when carrying out overheating risk assessments for buildings in London.



6. CLIMATE RESILIENCE

PESTS AND DISEASES

What are pests and diseases?

In an urban context, pests can include non-native and established wildlife and invasive plants which can affect the health of people and other flora and fauna. Diseases can include human, animal, and plant infections that can be spread through zoonotic, airborne, waterborne and contact based transmission.

Warmer, wetter winters and hotter, drier summers will significantly raise the threat of pests and diseases in the UK, with these conditions facilitating the spread and emergence of vectors like ticks, mosquitoes and rats, and increase both transmission rates and overwinter survival rates.

The UK is currently free of many pests and diseases that afflict plants overseas. However, international movements are an identified pathway in which new pests and diseases are introduced. In urban environments this can be a particular risk to green infrastructure.

Urban trees, which are of significant value to climate change adaptation in urban areas, are at particular risk of new pathogens and pest outbreaks.

The increase in prolonged periods of heat stress and risk of flood events also poses a significant threat to spread of waterborne and communicable disease.

Key measures

Whole building

Developments must increase the levels of urban greening and take a landscape-based approach to developing habitat networks of resilient species that can help to tackle risk of biodiversity loss and spread of ecosystem pests. Proposals should consider solutions able to increase the resilience of the treescape on site and the wider area.

Design should discourage disease-carrying fauna and ensure biological security through procurement and management of trees and other green infrastructure, to avoid introduction of new plant pests and diseases.

Species should be selected for their ability to cope with extreme weather conditions and adapt to the urban landscape. Applicants must consider biosecurity within their proposals including how they will procure a diverse range of species, use resilient plants, their choice of supplier and how they will deal with imported plants when they arrive into their care.

Considerations for health and well-being

Management of the facilities and open spaces within in the development should consider the risk to public health through design and relevant protocols. These can include:

- Minimising touch points throughout the design of the building
- Ensuring facilities meet cleaning protocols such as clear desk policies where possible
- Ensuring adequate ventilation and air quality within the building and reducing other respiratory stresses (see BREEAM Hea 02 Indoor Air Quality)
- Effective management of operational waste to reduce risk of pests and disease vectors (see Wst 03 Operational Waste).

Beyond the building

Care must be taken to avoid planting non-native invasive species listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and in the London Invasive Species Initiative (LISI). It is illegal to plant these species in the wild and we should aim to prevent development becoming a pathway for further spread of these specimens into London's green spaces.

If present within or around the development site suitable specialists to remove non-native invasive species if these are found on site such as Japanese knotweed (*Fallopia japonica*) and Himalayan balsam (*Impatiens glandulifera*) should be employed.

Consideration should be given to how the development will reduce biosecurity risk in its landscaping programme and manage future impacts of pests and diseases to occupiers and green infrastructure.

Plan for future climate scenarios in terms of temperature and humidity ranges, ensuring all plant, HVAC and water systems negate the risk of bacterial, viral or fungus growth. Particular consideration must be given to legionnaires disease and the supply of potable water. Applicant teams should refer to regulation of these systems and ensure there are multiple methods to maintain conditions and reduce contamination risk.

Case Study: City of London, Vine Street Public realm planting



Vine Street tree planting. Source: Planning Application, DAS

Use: Public realm

Key facts:

- Included two species (*Zelkova serrata* and *Koelreuteria paniculata*) that are fast growing and resistant to a range of tree pests and diseases. Once grown, these will provide shade from canopy cover for pedestrians and cyclists along Vine Street to combat street level overheating.

6. CLIMATE RESILIENCE

PESTS AND DISEASES

A landscape-based approach to planting should be adopted within the development site and the adjacent public realm. Informed decision-making on the selection of species should ensure cohesion with and support for local habitat networks. For landscaping and public realm interventions, species should be diversified and, where possible, native/naturalised species with high biodiversity value are encouraged to support ecological functions. Species or genera that could be vulnerable to any new diseases that may be introduced in the future should be avoided, and species not yet affected by pests and diseases present in the UK are to be prioritised. The UK Plant Health Database should be consulted during the design process to determine species and genera of higher risk.

To avoid importing pests and diseases from abroad, the procurement of plants grown in reputable nurseries in the UK should be a priority. Where plants need to be imported, all the relevant biosecurity protocols and import checks must be adhered to. The potential for species to become invasive needs to be assessed by referring to the European Alien Species Information Network (EASIN) notification system for early detection in Europe.

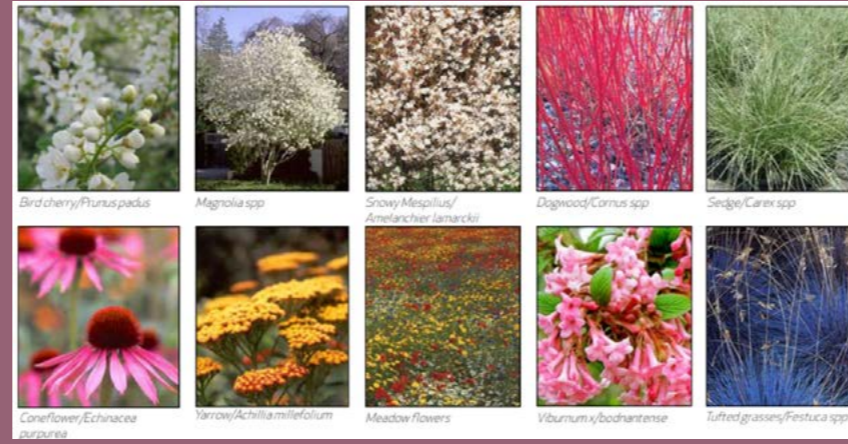
Soft landscaping proposals for a new development must not include non-native invasive species - further information can be found in Schedule 9 of the Wildlife and Countryside Act 1981(as amended), the Non-Native Species Secretariat of Great Britain and Ireland, and the London Invasive Species List.

Maintenance of green infrastructure should be implemented as necessary for each habitat to ensure that no non-native invasive species settle and spread. Within the management and maintenance plans to be submitted to the City of London before implementation there should be a process in place to 'alert' responsible authorities of any pest or disease outbreaks within new and established green infrastructure.

Advice about climate resilience planting

CoLC is preparing a Climate Resilient Planting Catalogue, which will provide guidance on the design of public realm and planting selection including species tolerances, response to pests and diseases and to extreme heat (and other weather events). The function of species (ecosystem services, i.e. biodiversity enhancement, cooling, interception, sequestration) and the planting environment (site types and conditions) are also important criteria to be included.

Case Study: **London Wall Place**
Commercial redevelopment offering an acre of landscaped public gardens



London Wall Place planting palette. Source: Planning Application, DAS

Use: Commercial office, retail

Key facts:

- Use of native species for planting, including: silver birch trees, bird cherry and cornelian cherry, hellebore, fern, and foam flowers



Source: City of London Corporation

6. CLIMATE RESILIENCE

INFRASTRUCTURE RESILIENCE

What is infrastructure resilience?

At a wider level, infrastructure resilience is defined as the ability of infrastructure such as utilities, transport, and digital networks to withstand the potential shocks or stresses faced during its design life including those that London will experience owing to the inevitable effects of climate change.

At a developmental level, buildings within the City of London will need to consider how to minimise disruption to building operation during extreme events of flooding, high heat and drought. The aim is to ensure that a building is designed to operate safely and effectively throughout its design life whilst minimising its loads and impact on the City network as a whole.

A risk assessment should determine the level of investment in resilience measures, taking into account climate risks as one set of factors that may affect the asset's performance. Investment in more costly resilient measures may not be justified immediately, and so timing along with any complimentary additional benefits should be weighed in the assessment. To evaluate climate risk consistently across all aspects of the development, resilience-based measurement frameworks and reporting standards should be used. This will enable confidence in adaptive business strategies that are based on robust future scenario modelling of likely climate impacts.

Key measures

Whole building

Buildings should be designed to maintain basic functioning and safety during adverse events wherever possible, but the more critical the function of the building the higher the level of protection that should be considered appropriate.

Demand reduction for utilities such as water and power will have the triple effect of reducing running costs and operational emissions, as well as reducing the peak strain on the wider city infrastructure networks. This would permit reduced supply from alternative sources or on-site back-up storage to go further, which will ultimately improve the resilience of the building through an increased level of self-sufficiency.

Multiple and diverse connection points to City networks should be provided, ensuring buildings maintain well-considered back-up supply for critical loads, whilst maximising the level of on-site renewable generation options available. This will ensure the building has a higher level of function during shock events.

Data infrastructure resilience measures should be considered and include: dual connections; careful data centre and plant room positioning in relation to flood risk from overland flow, rising river or groundwater; tanking measures and raised threshold positions as well as the incorporation of cooling plant. Tanked basements that are water and gas-tight should be considered.

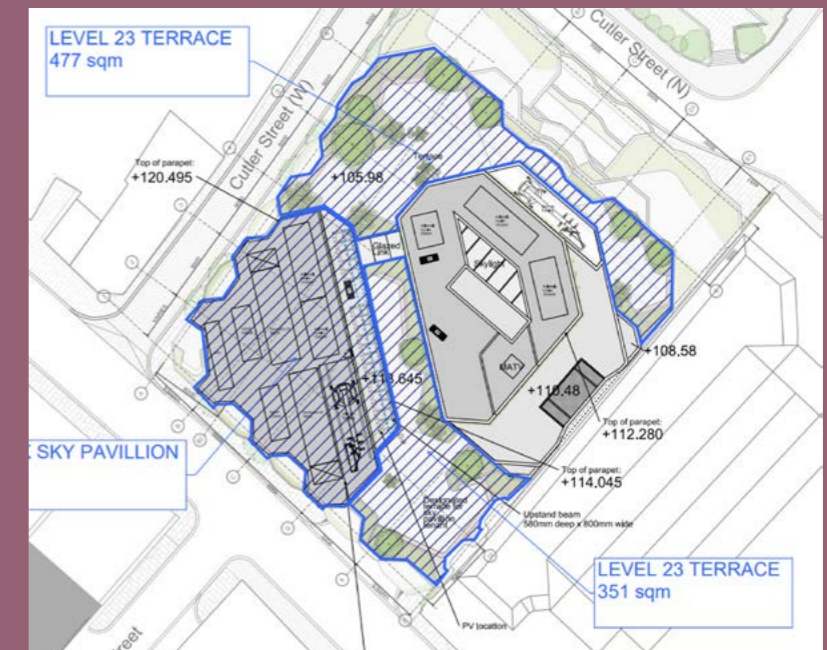
Beyond the building

Even within the City, risks will vary with location. Proposals should include an assessment of localised risks to recognise areas of vulnerability and put in place appropriate measures. These could include early warning systems, maintaining evacuation pathways, and establishing community protocols and emergency response plans for extreme climate events such as emergency hubs that would provide access to safe space and services during extreme weather events.

Any building is part of a greater set of networks so it is crucial that designers consult with all relevant stakeholders (Thames Water, Greater London Authority, Environment Agency, UK Power Networks etc) to understand how the design of the building and its surrounding environs coordinate with, complement and build on city-wide planning that is continuously evolving.

The City is a very dense and highly connected area, so opportunities should be sought to establish local resilience measures between buildings and assets to provide backup power, water or data connectivity beyond plot boundaries during widespread disruption events.

Case Study: 115-123 Houndsditch - Redevelopment for a 24-storey tower



Proposed Blue Roofs.

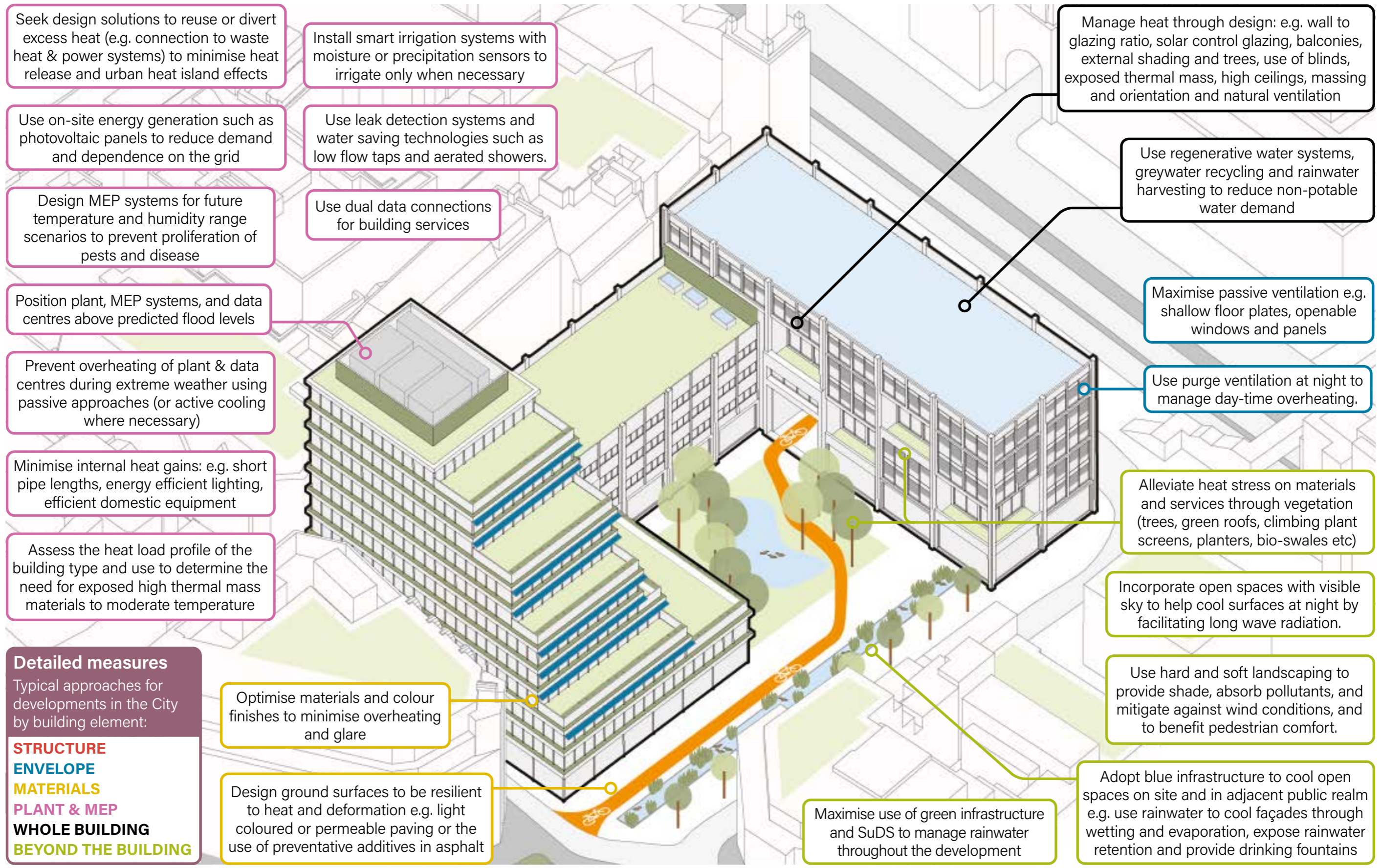
Source: Planning Application, Flood Risk and Drainage Strategy

- Use:** Commercial office
- Key facts:**
 - Site located in Flood Zone 1
 - Rainwater harvesting and attenuation tanks, with water to be re-used for non-potable purposes, basement tank to discharge into public sewer with demarcation chambers suspended from ground floor as high as possible rather than the basement, to avoid flooding from sewers
 - Exploration to incorporate blue roofs of up to 1,265m²
 - Building Management System for water metres and water consuming plant to double up as leak detection
 - SuDS to mitigate flooding
 - Energy centre incorporates thermal storage and plate heat exchangers to facilitate connection to a district heating or cooling network
 - Two intake rooms for data connections in the building's basement

6. CLIMATE RESILIENCE

KEY MEASURES FOR CITY DEVELOPMENTS

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URBAN GREENING AND BIODIVERSITY

07

7. URBAN GREENING AND BIODIVERSITY

Introduction

This chapter provides guidance on how to incorporate habitats that enhance biodiversity, and support Greater London urban greening initiatives, including green infrastructure, into developments in the Square Mile. The chapter advises on how to meet and exceed policy targets set out for the London Urban Greening Factor and the national Biodiversity Net Gain. It provides suggestions for interventions that can be used in different areas of a development that are relevant to the City's urban setting.

Key approaches for the City

The City has just under 33 hectares of open space, most of which consists of pocket parks smaller than 0.1 hectares. Although small, these spaces are used intensively and provide an important resource for biodiversity in the Square Mile. Given limited space on the ground, building surfaces such as rooftops and walls are becoming an increasingly important space for cultivating a variety of flora and fauna through interventions such as terrace planting, green roofs and walls.

Proposals submitted for development in the City should strive for the best biodiversity outcomes on individual sites, while showing consideration for the wider urban environment including providing external amenity spaces. This will require biodiversity risks and opportunities to be discussed with CoLC before, during and after planning application submission.

Proposals must provide high quality greening in open spaces and on buildings within the site and include an Urban Greening Factor calculation. Biodiversity Net Gain (BNG) is mandated by the Environment Act (2021) for development assessed under the Town & Country Planning Act 1990 and for Nationally Significant Infrastructure Projects. The BNG is a statutory requirement from January 2024 and requires a minimum of 10% biodiversity net gain.

Improving the connectivity and biodiversity value of green spaces and enhancing the habitats of priority species are the focus of the CoLC's Biodiversity Action Plan (BAP) and must be considered from the outset of the design process; informing design decisions including potential opportunities to link on-site greening into the wider green infrastructure network.

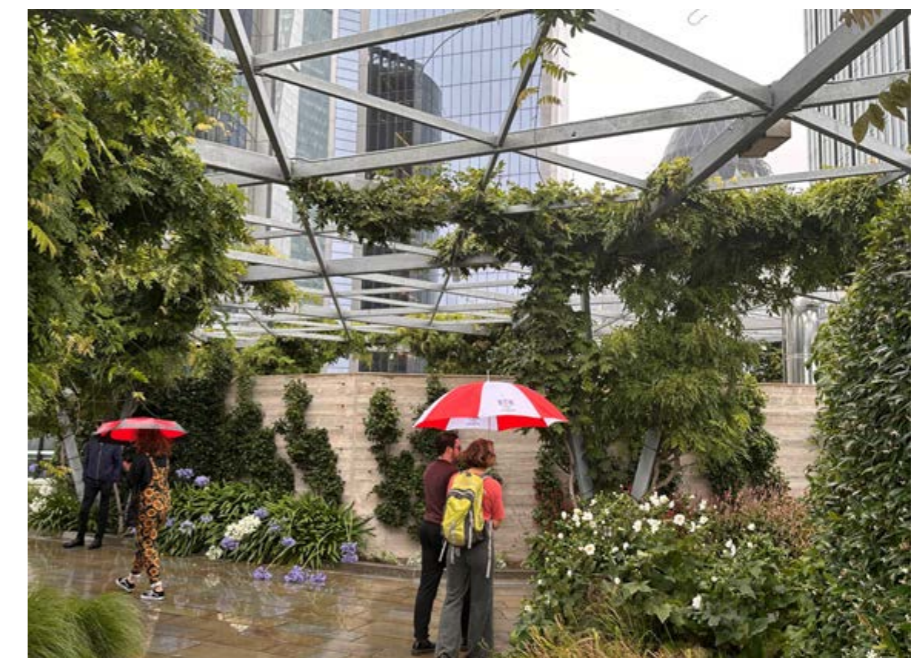
Key policies and guidance

Table 7.1 Biodiversity & green infrastructure key planning policies

London Plan 2021	
D8	Public realm G1: Green infrastructure
G5	Urban Greening
G8	Food growing
GG2	Making the best use of land
SI 14	Waterways
SI 17	Protecting and enhancing London's waterways
Local Plan 2015	
CS10	Design
DM 10.2	Design of green roofs and walls
DM 10.4	Environmental enhancement
CS15	Sustainable Development and Climate Change
DM 15.5	Climate change resilience and adaptation
CS19	Open Spaces and Recreation
DM 19.1	Additional open space
DM 19.2	Biodiversity and urban greening
Draft City Plan 2040	
S8	Design
DE3	Public Realm
DE5	Terraces and Elevated Public Spaces
S14	Open Spaces and Green Infrastructure
OS1	Protection and provision of open spaces
OS2	Urban Greening
OS3	Biodiversity
OS4	Biodiversity Net Gain
OS5	Trees

Key actions to develop an exemplar City scheme

- Develop a strategy that maximises the extent and quality of urban greening and biodiversity on a site
- Adopt a strategic approach to urban greening and biodiversity enhancements by linking with existing biodiversity corridors, surrounding pockets of green space and cool routes
- Incorporate nature-based solutions in the development that provide co-benefits for both humans and biodiversity such as bio-solar roofs, Sustainable Drainage Systems (SuDS) and green amenity spaces
- Create an urban greening scheme that is resilient to the changing climate and conditions in the City and contributes to the climate resilience of the site and wider context
- Promote the use of native and non-native species that are recognised for their benefit to UK pollinators and climate resilient species planting
- Target priority species set out in the Biodiversity Action Plan (BAP)
- Balance the amenity requirements with biodiversity benefits in response to the location, development type and use of a site



7. URBAN GREENING AND BIODIVERSITY

URBAN GREENING

What is urban greening?

Urban greening includes all landscaping, planting, trees and other natural features vital to the sustainability of any urban area. This includes planting in planters, roofs and walls as part of biodiverse roofs, in amenity spaces and green balconies, terraces and walls. Ideally, all urban greening should be integrated into a network of green infrastructure that forms biodiversity corridors to support diversity and natural habitats. A green network will also create walking and cycling routes through the City protected from overheating, pollution and noise.

Key measures

Urban greening and biodiversity benefits will need to be incorporated into the design concept stage of a project to ensure the highest quality outcome.

CoLC has a series of area-based public realm strategies that target key green infrastructure locations. A range of projects across the City have been identified through the 'Cool Streets and Greening Programme', funded by CoLC. These projects aim to enhance the climate resilience of the City so that it is better equipped to deal with issues such as overheating, flooding, and new pests and diseases. The 'Cool Streets and Greening Programme' has taken a strategic approach by targeting the green connectivity around the City's Sites of Importance for Nature Conservation. This includes managing a network of over 200 green spaces in the Square Mile. Applicants will be supported in connecting and growing this network as part of their schemes.

CoLC is looking to establish additional green infrastructure in the Square Mile through climate resilient street greening to address the current lack of open space. New developments will be key in creating a wider green network that allows flora and fauna to flourish, and applicants should actively engage in contributing to its development. There are many benefits to green infrastructure including the provision of shade, street cooling, improved air quality, contribution to carbon storage and sequestration and the enhancement of amenity places for residents and visitors alike.

Wider species context

Green infrastructures are key for the movement of wildlife across the City landscape. The River Thames provides a significant corridor for movement and foraging across London for a variety of wildlife including bats which use vegetation and water bodies to commute and forage.

Urban greening can be positioned to form stepping stones for wildlife and it can be developed into green infrastructure to support species and maximise benefits to wildlife. Brownfield sites may not at first glance appear to offer much value to wildlife, however they can develop important habitats on roofs and walls for species such as black redstart and pollinators including bumblebees and solitary bees.

Opportunities to integrate urban greening into any type of development should be taken, both on external ground and upper-level surfaces of a building.

Whole building

The location and extent of green spaces within a site should be considered with the end-users in mind to incorporate aspects such as visual amenity, access and maintenance.

Potential indirect impacts to species using green pockets and corridors should be considered, such as light pollution for bats and disturbance of nesting birds. In accordance with best practice guidance relating to lighting and biodiversity, any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors, such as bat species, including incorporating dark spaces.

Case study: 55 Bishopsgate - Green wall



View from Bishopsgate. Source: DAS

- Use:** Commercial office with mixed use (retail, culture, learning, community use, public viewing gallery)
- Key facts:**
- Incorporation of a modular seeded living wall system between the proposed two towers
 - Benefits include: mitigating air and noise pollution, capturing CO2 while releasing O2, combating the heat island effect, improving biodiversity
 - Additional benefit to making the public realm more attractive and improving the well-being of people
 - Fire safety measures to be incorporated in collaboration with the GLA and the London Fire Brigade.

7. URBAN GREENING AND BIODIVERSITY

URBAN GREENING FACTOR

What is the urban greening factor?

The Urban Greening Factor (UGF) is a tool that evaluates and quantifies the amount and quality of urban greening that a scheme provides. To ensure schemes contribute to the greening of the City, the London Plan 2021 (Policy G5) introduced the requirement for major development proposals to submit an UGF calculation that meets a minimum target of 0.4 for developments that are primarily residential, and 0.3 for predominantly commercial buildings. The use of the London target was supported by a Local Plan evidence base study conducted in 2018.

The UGF should not be viewed as the sole method of assessing green infrastructure proposed as part of a development scheme. It is not a tool to measure the ecological and biodiversity benefits of greening proposals, and not all urban greening may be inherently good for wildlife. In addition, although the UGF metric increases greening which contributes to biodiversity, certain habitat features and renewables would not contribute towards the UGF target score. Biodiversity Net Gain (BNG) is a separate requirement, which provides the opportunity to unlock additional space for biodiversity by steering associated soft landscaping towards habitat creation, therefore providing more biodiversity on-site which is of benefit to local wildlife.

The CoLC has provided adjusted scoring metrics for the GLA's UGF that is suited to the City's specific context and development typologies. This scoring framework prioritises tree planting and the establishment of high-quality green roofs and green walls. The target scores should be considered as a minimum requirement and seen as part of a wider ecological approach to development.

The Square Mile is a unique environment that is affected by a combination of conditions such as heat island effects, wind tunnels, rain shadows from tall buildings, mild winters and increasing summer temperatures. By 2080 it is predicted that there will be an average of 56 days of heatwave at 39.0 C. In addition, underground utilities and tunnels constrain the depth needed for substantial planting. These factors all have a bearing on what can be planted and grown in developments in the City.

Key measures

Whole building

Development proposals must demonstrate how different types of urban greening (from water features and green roofs to flower-rich planting), their quality and permeability (for water to filter into the ground or blue infrastructure), have been integrated into the design of buildings and public realm. Evaluation of greening options should inform the earliest stages of the design process to accommodate the required specification and meet the UGF target score.

Major applications should employ landscape experts who prepare a landscape plan as part of the planning documents that includes details of species of trees and shrubs, sizes, numbers and densities. An operational maintenance plan that details how the greenery will be maintained throughout the building's life-cycle is also required.

The aim for City development is to incorporate high scoring surfaces such as intensive green roofs (typically with a minimum substrate depth of 80mm), flower-rich perennial planting and rain gardens wherever possible.

In spatially constrained urban environments green roofs are an effective solution to provide co-benefits for people and biodiversity offering enhanced amenity, habitat and food for wildlife, and helping to attenuate roof run-off, reduce urban heat island effect, and insulate buildings.

Green roof proposals should be Green Roof Organisation (GRO) compliant to maximise the benefits delivered.

Where intensive green roofs and green walls require irrigation, it should be provided with the most efficient, water resources saving and low carbon equipment to future proof the installation.

Heavy planting features such as trees may require additional structural support which should be balanced against the associated embodied carbon impact.

Any planting which is fully enclosed and not exposed to the natural elements must not be included in the UGF calculations.

Case Study: 81 Newgate Street - Major refurbishment and extension



Visualisation showing green walls and terraces
Source: Planning Application: DAS, Landscape Statement, Sustainable Development Report

Use: Mixed-use Office

- Key facts:
- Extensive landscaping and greening, achieving an urban greening factor of 0.397, above the target 0.3 of the London Plan
 - 4928m² of planting, including intensive and extensive green roofs, a rooftop wildflower meadow, terraces with trees in planters, as well as clipped yellow hedges, and trees planted directly into soil at the ground level.
 - A permeable decking area with draining stones to support rainwater attenuation will cover 722m².
 - The green roofs will also be publicly accessible, while much of the planting will also be visible from the street, creating social and health benefits for direct users as well as passers-by and contributing to the overall amenity of the neighbourhood

7. URBAN GREENING AND BIODIVERSITY

BIODIVERSITY

Biodiversity in the City

A Tailored approach

There are many opportunities to enhance biodiversity in the highly urbanised area of the Square Mile. Urban greening can be incorporated in a variety of ways into buildings, open spaces and public realm and develop into valuable habitats to support biodiversity. Any enhancements should be in line with the CoLC Biodiversity Action Plan 2021-2026 (BAP) which outlines the target species and habitats for the City and identifies the locations of designated Sites of Importance for Nature Conservation (SINCs).

Priority habitats in the City

There are two priority habitats for the City that offer an opportunity to create or enhance biodiversity in new or existing green spaces:

- Open mosaic habitat on previously developed land – The loss of this priority habitat is likely to require offsetting and is unlikely to be adequately replaced on site. However, biodiverse roofs can be created to replicate this habitat by establishing a range of conditions to support flora and invertebrate communities. The quality and distinctiveness of new habitats should be equal to or an improvement on the existing.
- Standing Open Water - create new ponds and incorporate access to water into the design of biodiverse roofs. SuDS can also provide valuable wetland habitat for wildlife if sensitively designed. Standing waters should be carefully designed and monitored to minimise risks of pests and diseases or poor water quality.

Priority Species in the City

There are seven priority species identified within the BAP which should be considered during biodiversity enhancement design.

- House sparrow *Passer domesticus*
- Black redstart *Phoenicurus ochruros*
- Common swift *Apus apus*
- Peregrine falcon *Falco peregrinus*
- Bats
- Wild bees (bumblebees and solitary bees)
- Stag beetle *Lucanus cervus*

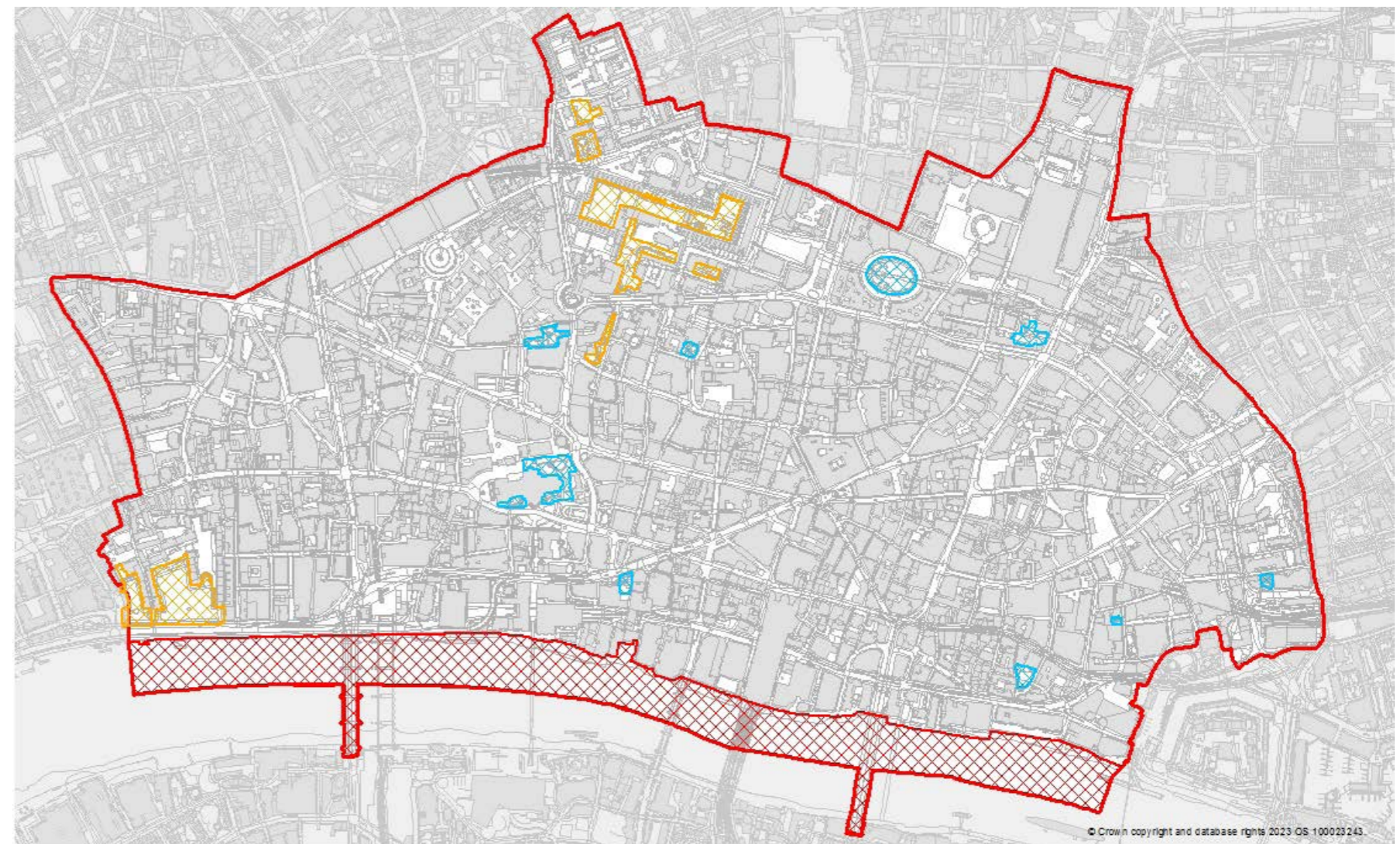
Artificial nests and bird boxes can be used to provide nesting opportunities for swifts and house sparrows, with tailor-made nest boxes to encourage usage. For all nests and boxes, care needs to be taken for siting and positioning in relation to the habitat context, exposure, aspect and height. Planning and installation should be conducted by a qualified ecologist.

Designated sites for conservation in the City

The City does not contain any statutory designated sites for nature conservation, however there are several non-statutory designated sites identified by local authorities and recognised as part of the planning process. In London, sites are categorised by importance at a Metropolitan, Borough and Local level.

Developments in the City will need to ensure that nature on these sites is not damaged but enhanced to develop core green infrastructure across the borough. Developments within the vicinity of Sites of Importance for Nature Conservation (SINCs) should contribute financially to the maintenance of the conservation sites and incorporate complementary enhancements to the designatory features of the SINC.

As part of the data search, London's Local Environmental Records Centre (LERC) Greenspace Information for Greater London (GiGL) should be consulted for comprehensive data on London's habitats, species and protected sites, including SINCs.



Site of Metropolitan Importance for Nature Conservation
 Site of Local Importance for Nature Conservation - City Plan 2040
 Site of Borough Importance for Nature Conservation - City Plan 2040

Figure 7.1 Sites of Importance for Nature Conservation (SINCs) in the City
 Source: City of London Corporation

7. URBAN GREENING AND BIODIVERSITY

BIODIVERSITY NET GAIN

What is biodiversity net gain (BNG)

Biodiversity is the term used to describe the variety of life. The aim of Biodiversity net gain (BNG) is to leave the natural environment in a measurably better state than it was prior to development. BNG will be measured using Defra's biodiversity metric and habitats will need to be maintained for a minimum of 30 years. This would apply to all off-site and significant on-site development. Provision on smaller sites through the Small Sites Metric will be required from 2024.

Calculating the value of habitats

The biodiversity metric is a tool that calculates changes in the extent and quality of habitats as a proxy for nature and compares the habitat found on a site before and after development. This tool should be used by a suitably qualified and experienced ecologist. Four key factors underpin this comparison:

- Habitat size
- Habitat distinctiveness (conservation value)
- Habitat condition, and
- Strategic significance (local priorities for habitat creation/enhancement).

The metric should be used early on in the design process to evaluate different design options to maximise biodiversity gain within the parameters of the development.

The Mitigation hierarchy

When applying the Mitigation Hierarchy (Figure 7.3), impacts to sensitive ecological features are avoided and minimised as a priority. This approach reduces risk, and ultimately costs for a project, as compensation and offsetting strategies are more expensive than avoidance.

1. Avoid: retain and protect ecologically valuable or sensitive receptors.
2. Minimise: Where avoidance is not possible impacts should be minimised as far as practicable by reducing the area of direct impact or loss.
3. Mitigate: Implementing measures to reduce impact through construction and providing the replacement of lost habitat and features within the development boundary.
4. Offset: Only utilised where the previous options have been exhausted.

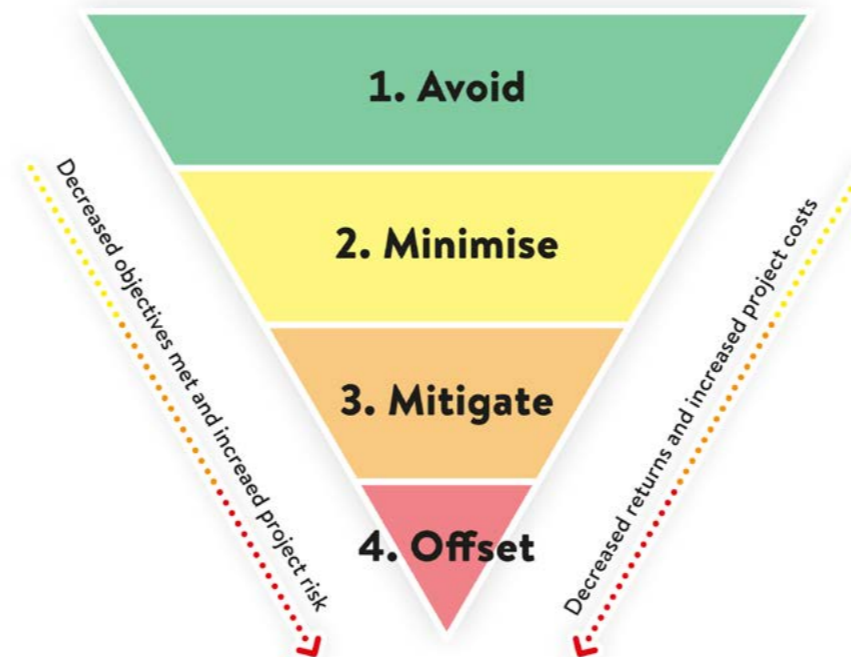


Figure 7.3 Mitigation hierarchy diagram

Source: Buro Happold

Case Study: 120 Fleet Street Redevelopment for a 21-storey tower



Visualisations capturing the extent of terraces

Source for both images: Planning Application townscape views

Use: Retail, commercial, office and service

- Key facts:
- Multiple benefits for native biodiversity planting and habitat creation to provide net gain for biodiversity
 - 12 cascading terraces with urban greening and amenity spaces
 - 1 bio-solar roof
 - Rainwater harvesting for irrigation
 - Biodiverse, blue roof to provide SuDS and habitats



7. URBAN GREENING AND BIODIVERSITY

BIODIVERSITY NET GAIN

Biodiversity net gain delivery

The CoLC commissioned a [Biodiversity Net Gain Feasibility Study](#) for the Square Mile. Due to the dense urban nature and high proportion of zero baseline sites within the Square Mile, the mandatory BNG of 10% within the Environment Act 2021 is not considered an appropriate measure for the delivery of meaningful BNG within new developments. To meet the requirements of delivering BNG in the City, developments are expected to achieve at least 3.0 BU/ha on site. Where development falls short of the 3 BU/ha target, offsetting measures should be agreed with planning officers.

A Preliminary Ecological Appraisal Report (PEAR) needs to be submitted at planning application stage, along with the Defra Biodiversity Metric (DBM) spreadsheet. Prior to commencement, a Biodiversity Net Gain Plan will need to be submitted that will set out the strategy for achieving BNG, including information not captured in the biodiversity metric such as species factors, as well as a Habitat Management Plan that outlines how the net gains will be managed and maintained for a minimum of 30 years.

In cases where the biodiversity baseline is zero due to an absence of habitats, the development should still demonstrate a BNG process whereby habitats and green infrastructure of suitable scale are incorporated into the development design - minimum requirements are to be agreed in coordination with the CoLC.

Ecosystem services

The value of biodiversity extends beyond supporting the thriving of habitat and species to the provision of ecosystem services such as reduction of the heat island effect, flood resilience and improving air quality.

Future-proof the development

Integrating biodiversity measures will help to future-proof the development for climate change. Biodiversity measures should be designed to respond to local species and the surrounding climate to ensure the longevity of the proposed habitats. Green roofs, green walls, street trees and areas of semi-natural vegetation are all climate positive initiatives and benefit health and well-being.

Strategic approach

Any created or enhanced habitats will have more strategic significance and therefore a higher value in the metric if they adhere to local priorities such as those outlined in the CoLC's Biodiversity Action Plan (BAP). By focusing on target species and habitats and linking up with existing green spaces, enhancements will have a greater benefit to the wildlife of the City.

The Environment Act (2021) has introduced the Local Nature Recovery Strategy (LNRS) to help local authorities to incorporate nature recovery objectives and support delivery of BNG through spatial strategies.

Each LNRS must:

- agree priorities for nature's recovery
- map the most valuable existing areas for nature, and
- map specific proposals for creating or improving habitat for nature and wider environmental goals.

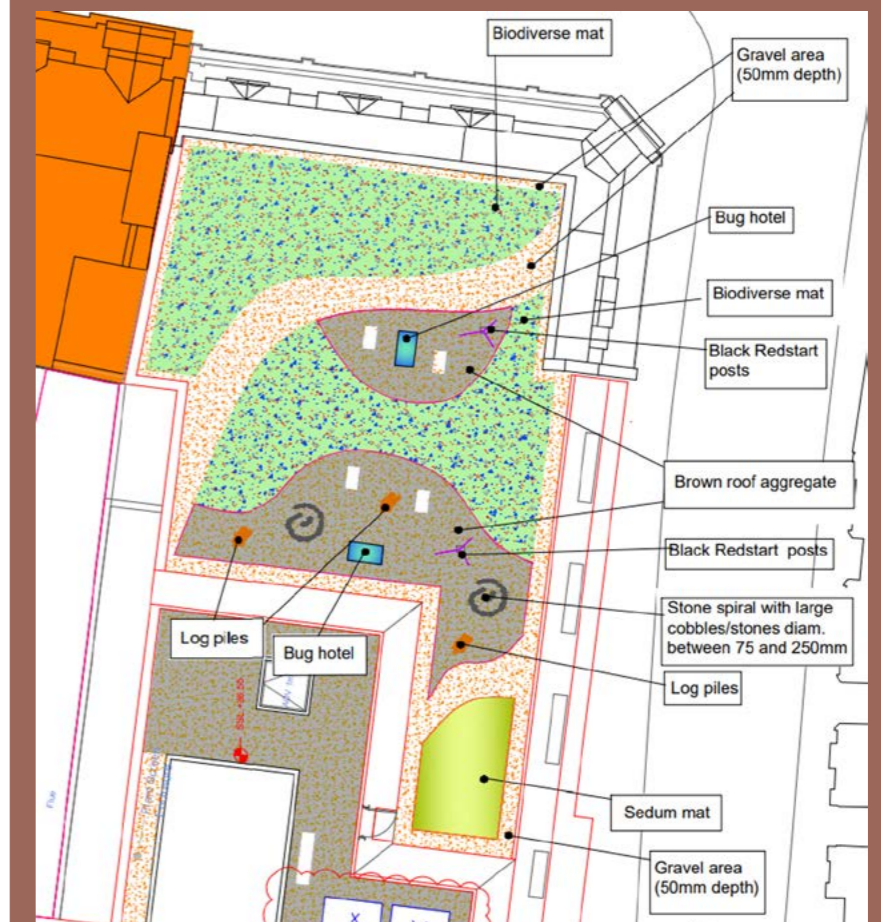
The CoLC will be developing a Nature Recovery Strategy following implementation of the Mayor of London's LNRS. This strategy complements the City's Biodiversity Action Plan. By 2026 the City of London will report on its biodiversity duties and strategies through a Biodiversity Report.

The CoLC's Climate Resilient Planting Catalogue will provide guidance on a variety of parameters that will aid the design of public realm and planting schemes including:

- species tolerances (to pests and diseases, extreme heat and weather events etc.)
- species functions (ecosystem services, i.e. biodiversity enhancement, cooling, interception, sequestration)
- planting environment (site types and conditions)

Applicants are advised to fully consider current GLA and CoLC guidance for urban greening and biodiversity for the design of development proposals.

Case study: Creed Court Hotel, 3 Ludgate Hill
Redevelopment with retained facade



Biodiverse Roof

Source: Planning Application, Drawing - Landscape Areas Roof

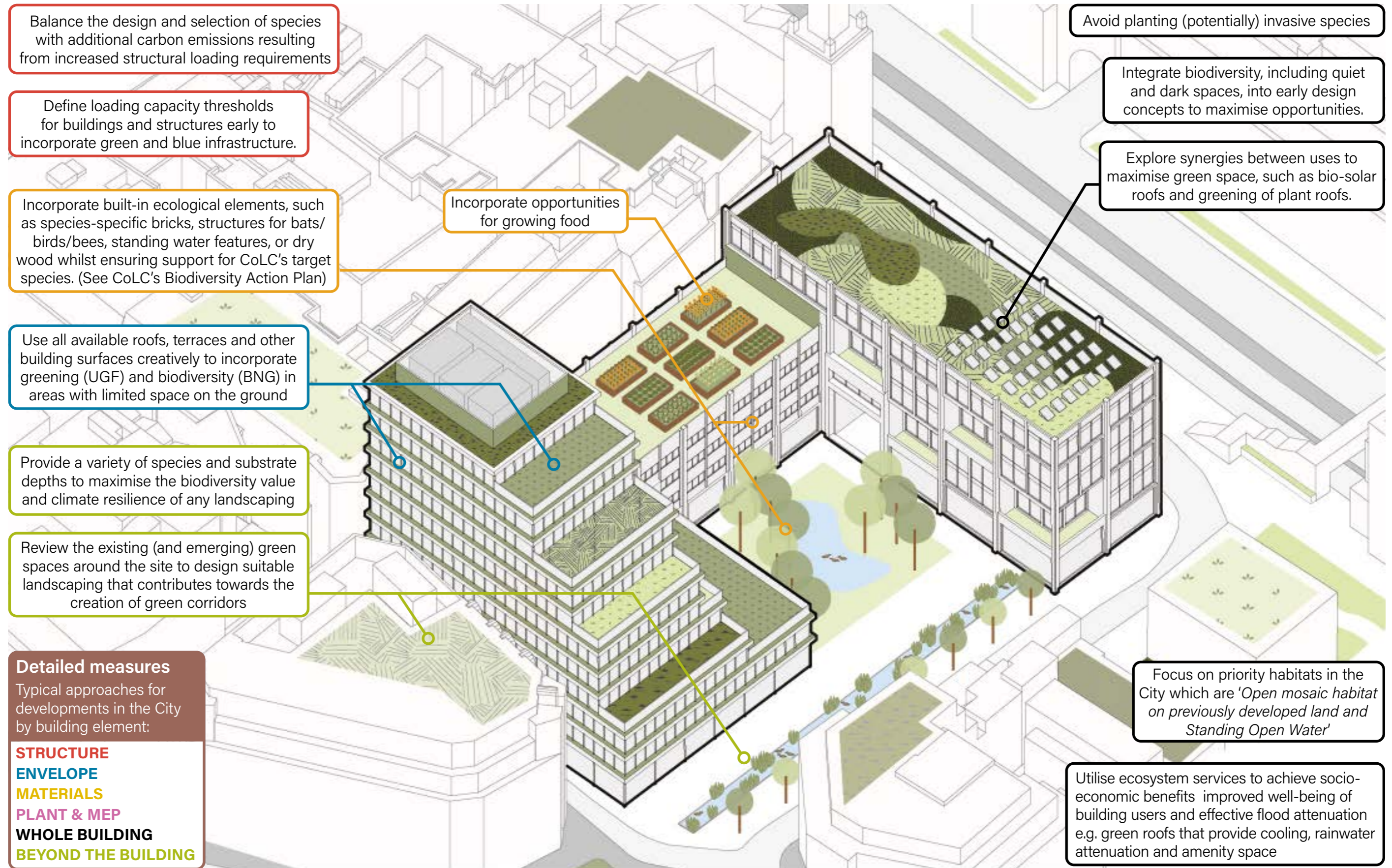
Use: 7-storey Hotel, restaurant, services

- Key facts:
- Green roof designed to create habitat that will help support populations of declining species including black redstart, common blue butterfly, toadflax brocade moth and bats
 - Key features include sedum, wildflower turf, gravel ballast and crushed aggregate, bug hotels, log piles and black redstart posts.

7. URBAN GREENING AND BIODIVERSITY

KEY MEASURES FOR CITY DEVELOPMENTS

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KEY CONSIDERATIONS AND SUBMISSION REQUIREMENTS

08

8. KEY CONSIDERATIONS AND SUBMISSION REQUIREMENTS

Introduction

Planning applications pass through a planning process that covers all RIBA stages and can be particularly complex for major applications. The planning application process concentrates on RIBA stages 1-5, however, there are important considerations and actions to be addressed throughout all RIBA stages that impact on the success of both the application and the completed development.

This section provides details and examples of those considerations and actions that are recommended for applications in the City of London. The following pages outline the required application documents and recommended supplementary information to demonstrate exemplary practice that would support an application and contribute to a high quality outcome.

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Source: City of London Corporation

8. KEY CONSIDERATIONS AND SUBMISSION REQUIREMENTS

CONCEPTION / RIBA STAGE 0

Application stage	Key considerations	Submission requirements and recommendations
<p>Conception/ RIBA Stage 0</p>	<ul style="list-style-type: none"> ▪ Detailed building survey to assess the opportunities and constraints of the existing structure and fabric ▪ Applicant’s sustainability aspirations for the City location ▪ Engaging creative and experienced architects, engineers and designers that can develop the optimal sustainable, attractive and bespoke solution for a site ▪ The City’s priorities and focus relating to environmental, social and economic sustainability aims ▪ Opportunities and constraints from heritage and townscape impacts on the proposed design ▪ Local context, such as relating to <ul style="list-style-type: none"> ▪ availability of energy infrastructure and energy sharing opportunities ▪ contact with supporting Business Improvement Districts ▪ existing and emerging green infrastructure and biodiversity networks ▪ local climate resilience measures to include SuDS, urban greening and cool routes ▪ requirements for on-site climate resilience measures ▪ other synergy opportunities ▪ Opportunities for the re-use of materials and building elements from applicant’s/ construction company’s other projects or material exchange websites to inform the design of new building elements ▪ Expert audit of existing biodiversity value and safeguarding existing on-site habitats 	

8. KEY CONSIDERATIONS AND SUBMISSION REQUIREMENTS

CONCEPTION / PRE-APPLICATION / RIBA STAGE 1

Application stage	Key considerations	Submission requirements and recommendations
<p>Conception / Pre-application / RIBA Stage 1</p>	<ul style="list-style-type: none"> • Entering into a Planning Performance Agreement, or a series of relevant pre-application meetings relating to the topics Carbon Optioneering, Sustainability, and Climate Resilience (to be agreed with planning officers). • Alignment of the proposal with planning officers' recommendations on: <ul style="list-style-type: none"> • priorities relating to the locality, the City as a whole and connectivity within the City and with the wider London context • specific environmental sustainability policies and the CoLC's vision • the contributions to the environmental quality of the site context and expected public benefits from the proposals (see application stage below) • health and well-being issues • Development of the concept options, application proposal and identification of sustainability issues to be developed in more detail and, if applicable, those that need to be mitigated to achieve solutions of the highest quality • Discussion of the requirements of optioneering in accordance with the Carbon Options Guidance Planning Advice Note (2023). In order to make informed decisions about the proposed circular economy and whole life-cycle carbon strategy, development options must be tested for carbon impacts and evaluated in terms of alignment with the CoLC's vision, the applicant's brief, and potential viable alternatives to the brief • Design to be informed by a pre-redevelopment audit (aligned with the carbon options) exploring opportunities for maximum retention and material use • Development of a circular economy strategy, prioritising the retention, re-use and recycling of building elements, materials and fit-out items, to include for example deconstruction strategies and including fit-out take-back schemes, before designing any new build elements for maximum flexibility and adaptability • Adopting an embodied, operational or whole life-cycle carbon standard, such as LETI's embodied carbon primer, the UKGBC's EUI targets or the UK Net Zero Carbon Buildings Standard to demonstrate commitment for exemplary net zero performance • Prioritising the objectives of the City of London Local Area Energy Plan (LAEP) to include creating links to or extensions of local energy networks and waste heat sources; and consider waste heat transfer from commercial to other uses nearby. 	<p>All development</p> <ul style="list-style-type: none"> • Pre-application documents on topics such as: <ul style="list-style-type: none"> • Existing site and buildings analysis • Site context – opportunities • Project aspirations on sustainability • Technical solutions • Others as required depending on site <p>Major development (including applications referable to the Mayor):</p> <ul style="list-style-type: none"> • Carbon options assessment and Excel tool as required by Carbon Options Guidance Planning Advice Note 2023 to carry out 3rd party review. • Draft pre-redevelopment audit & pre-demolition audit in line with GLA guidance 2022 • Study of opportunities to incorporate collective infrastructure such as energy networks, smart grids and energy storage (e.g. batteries) where possible <p>Recommended material to demonstrate exemplary practice:</p> <ul style="list-style-type: none"> • Existing building survey and analysis of context in as much detail as possible to inform opportunities and constraints • Public engagement material

8. KEY CONSIDERATIONS AND SUBMISSION REQUIREMENTS

CONCEPTION / PRE-APPLICATION / RIBA STAGE 1 (CONTINUED)

Application stage	Key considerations	Submission requirements and recommendations
<p>Pre-application/RIBA Stage 1 (continued)</p>	<ul style="list-style-type: none"> ▪ Consultation with specialist officers as required, such as with regard to <ul style="list-style-type: none"> ▪ environmental resilience ▪ biodiversity ▪ building services and structural engineers ▪ circularity principles ▪ air quality <p>This will be particularly advisable where bespoke and innovative solutions are sought, e.g. initiatives to</p> <ul style="list-style-type: none"> ▪ deliver the objectives of the biodiversity action plan ▪ achieve the highest quality balance between benefits of amenity, urban greening, biodiversity and climate resilience ▪ integrate climate resilience and energy infrastructure (to include solutions for non-combustible fuel energy back up technologies). The CoLC will support developers in implementing proposals and interventions to support heat networks in the City, including through meetings, initiatives and further City-specific guidance. ▪ drive forward low embodied carbon design and construction such as timber/CLT building elements (or other bio-based materials) and construction methods <ul style="list-style-type: none"> ▪ Commitment to certification schemes and targeted ratings ▪ Discussion about public consultation and engagement arrangements and content ▪ Confirmation of required application documents 	

8. KEY CONSIDERATIONS AND SUBMISSION REQUIREMENTS

PLANNING APPLICATION / RIBA STAGE 2-3

Application stage	Key considerations	Submission requirements and recommendations
<p>Planning application / RIBA Stage 2-3</p>	<ul style="list-style-type: none"> ▪ Incorporation of refinements and amendments into the proposals, resulting from the: <ul style="list-style-type: none"> ▪ carbon optioneering process ▪ pre-application process ▪ public consultation responses ▪ Ensuring all issues identified in the pre-application, carbon optioneering process and public engagement phase are comprehensively and prominently covered in the application documents ▪ Ensure that any public benefits of the development include environmental benefits for the local area and City as a whole. These should be clearly laid out and demonstrated in the application documents ▪ Designing for loose fit - Identification of opportunities of the application design for future proofing of the proposed development including improvements to the sustainability performance before and after practical completion, such as from the design, fit-out, repair and maintenance and end of life phases of a development. <p>Future proofing in this context is designing in flexibility and adaptability to incorporate measures or to alter development details as easily as possible to improve its environmental performance. Examples are replacing proposed materials or building element systems, enabling natural ventilation at a later date, adapt the building services strategy for new, leaner technologies.</p> <ul style="list-style-type: none"> ▪ Further development of an offer for innovative measures to be tested, in particular where they can provide solutions for site specific issues and concerns. This could include mitigation measures, material optimisation through design of building elements to perform multiple functions, design for deconstruction strategies, renewable energy generation, energy storage solutions and testing new materials, building element systems and services. ▪ Include separate operational carbon emissions for refurbishments with new build extensions over 1,000m2. For deep refurbishments, also provide calculations using a new build baseline for the whole development. ▪ Include green leases/clauses for tenanted floorspace to ensure energy efficiency design and low carbon fit-out and operation across the whole development ▪ Publication of pre-demolition audits in suitable online databases and other media as early as possible in order to support reuse marketplaces 	<p>Major development (including applications referable to the Mayor):</p> <ul style="list-style-type: none"> ▪ Sustainability Statement to include a summary of all relevant separate technical assessments, and detailed information on how the development addresses climate resilience risks ▪ Carbon Options Assessment (standalone document preferred) - clearly labelled and presented ▪ Whole Life-Cycle Carbon Assessment (in accordance with GLA guidance and including spreadsheet) (standalone document preferred), to include provision of data through the GLA WLCA template and including updates where applicable ▪ Energy Assessment (in accordance with the GLA guidance, and including spreadsheet) (standalone document preferred) ▪ 'Be Seen' Energy Monitoring- upload information and performance data and confirmation of subsequent metering plan and portal updates ▪ BREEAM pre-assessment – minimum 'Excellent' rating, expected 'Outstanding' rating, with maximum credits for the Energy, Materials, Waste, Pollution and Water categories including credit Wst05 'Adaptation to climate resilience'. To include a BREEAM pre-assessment tracker indicating achievable, possible and non-achievable credits and rationale ▪ Commitment to a minimum NABERS UK 5 Star certification ▪ Circular Economy Statement (in accordance with GLA guidance), to include: <ul style="list-style-type: none"> ▪ pre-redevelopment audit with options appraisal ▪ pre-demolition audit ▪ the exploration of options (agreed as part of the Carbon Options Assessment) with regard to optimising circularity principles ▪ Preliminary Ecological Appraisal Report (PEAR), including details of biodiversity baseline assessments, and Defra Biodiversity Metric (DBM) spreadsheet ▪ Landscape Strategy, including details of proposed greening, irrigation system, and other supporting measures to enhance biodiversity, and Urban Greening Factor (UGF) plans and calculations ▪ SuDS and Drainage Plan ▪ Flood Risk Assessment ▪ Flood Emergency Plan, where applicable

8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

PLANNING APPLICATION / RIBA STAGE 2-3 (CONTINUED)

Application stage	Key considerations	Submission requirements and recommendations
<p>Planning application / RIBA Stage 2-3 (continued)</p>	<ul style="list-style-type: none"> Considerations of development details that potentially can be optimised at later design stages and confirmed through appropriate conditions that allow for flexibility, improvements and incorporation of latest technologies, materials and building element and services systems into the design Make use of GiGL data search reports to inform urban greening and biodiversity proposals and upload any new biodiversity data gathered as part of the planning application to GiGL 	<p>Recommended material to demonstrate exemplary practice:</p> <ul style="list-style-type: none"> Presentation of innovative solutions and best practice outcomes to reduce energy use, carbon emissions, demolition and construction waste and other exemplary sustainability features under the relevant topics Maintenance and Deconstruction Strategy, to demonstrate how waste is reduced during the lifetime of the building, and how material recovery is maximised at end of life Reuse or Upcycle Catalogue, to demonstrate material resource efficiency Axonometric drawings to clearly visualise which parts of the structure are retained/reused/new <p>Minor Development</p> <ul style="list-style-type: none"> Design & Access Statement to include a Sustainability section for all relevant design measures and actions to address the sustainability issues as listed in the list of documents for major applications, to include carbon optioneering as required <p>Or alternatively</p> <ul style="list-style-type: none"> Sustainability Statement with all information relevant to the proposed works <p>Recommended material to demonstrate exemplary practice for applications where carbon optioneering is not required:</p> <ul style="list-style-type: none"> Demonstrate consideration of different development options and their carbon impacts, with prioritisation of lower whole life-cycle carbon options wherever possible. <p>All applications:</p> <p>List of approved drawings, to include (where applicable):</p> <ul style="list-style-type: none"> (Future) connection to a heat network Details of urban greening and biodiversity measures including type and extent of proposed greening Green/bio-solar and blue roofs, green walls Heat pump ventilation surfaces PV panels Natural ventilation intake areas and ventilation panels

8. SUBMISSIONS REQUIREMENTS AND CONSIDERATIONS

POST APPLICATION CONDITIONS / POST OCCUPANCY / RIBA STAGE 4-7

Application stage	Key considerations	Submission requirements and recommendations
<p>Post application, conditions / Post occupancy / RIBA Stages 4-7</p>	<ul style="list-style-type: none"> Entering into a Conditions Planning Performance Agreement to ensure resources are available to discharge conditions relating to details of the highest quality Demonstrating how further details have been developed, to include reasons for changes to details or performances in relation to whole life-cycle carbon and circular economy considerations and confirmation of reuse and recycling of building elements and materials on site and in other construction projects. This should include actions to limit carbon emissions from unnecessary extent of CAT B fit out needed for marketing. Developing the energy strategy in accordance with up-to-date technologies and insights, to achieve the best outcome for energy efficiency and carbon emissions, and to reduce offsetting requirements as much as possible. Consider providing a tenant manual or drafting a tenant agreement to optimise the system operation and tenant-related carbon emissions. Reviewing extent and quality of urban greening, biodiversity and climate resilience measures on site in accordance with updated opportunities and constraints Provision of a case study of, or a report setting out the lessons learnt from, the scheme to share important insights and contribute to the promotion of best practice in the City Engaging with the City's Clean City Awards Scheme (CCAS) to drive sustainability amongst member businesses in key areas related to waste, such as communication and engagement, resource efficiency and circular economy practices and reducing plastic waste. Best performances are awarded and Environmental Best Practice meetings and workshops are hosted. 	<p>All developments</p> <ul style="list-style-type: none"> Detailed drawings and studies as required by planning conditions 'Be Seen' Energy Monitoring – update contextual data and upload energy performance predictions Post completion Climate Change Resilience Sustainability Statement (CCRSS) Post completion Circular Economy Statement Post construction Whole Life-Cycle Carbon assessment BREEAM assessment final certificate NABERS UK final certificate Biodiversity Gain Plan (BGP) Habitat Management and Monitoring Plan (HMMP) Confirmation of maintenance requirements for urban greening, rainwater collection and other relevant installations <p>Recommended material to demonstrate exemplary practice, to include:</p> <ul style="list-style-type: none"> Material passports e.g. via the Circuland platform Confirmation of availability/performance of materials and components (e.g. recycled content of steel products, associated emissions, test certificates), such as an EPD (Environmental Product Declaration) certification Evidence confirming method for overcoming regulatory, insurance or other issues outside planning required for development proposals Case study for publication. Submit project information to the Built Environment Carbon Database (BECD)

**Appendix A:
RECOMMENDED
STANDARDS,
CERTIFICATIONS
AND GUIDELINES**

A

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

RETROFIT AND REUSE

Document	Key Considerations
The GLA's Circular Economy Statement Guidance (March 2022 or latest version)	Guidance on how to pursue the waste hierarchy and set out Circular Economy Statements required by the GLA for referable developments, but also provides the circular economy principles that all developments should be encouraged to incorporate
City of London Carbon Options Guidance Planning Advice Note (May 2023 or latest version)	Pre-applications should show that both minor and major refurbishment options and their carbon impacts have been considered. Options should be well-considered, realistic and feasible. Where substantial refurbishment or demolition is not being considered, an options appraisal is not required, but a WLCA is required.
Arup & the Ellen MacArthur Foundation's 'Realising the value of the circular economy in real estate' (February 2020 or latest version)	Guidance on how to integrate circular economy principles into the real estate business model, but also provides the circular economy principles that all developments should be encouraged to incorporate.

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Reference and further guidance

City of London (2022) [Planning Advice Note. Whole Life-cycle Carbon Optioneering](#). City of London Corporation

C40 Cities. (2020). [The Multiple Benefits of Deep Energy Retrofits: A Toolkit for Cities](#). C40 Cities Climate Leadership Group

Acharya, D., Boyd, R., & Finch, O. (2020). From Principles to Practices: Realising the value of circular economy in real estate. Ellen MacArthur Foundation & Arup.

GLA (2022) [London Plan Guidance. Circular Economy Statements](#). Greater London Authority

LETI (2020) [LETI Climate Emergency Design Guide. How New Buildings can Meet UK Climate Change](#). London Energy Transformation Initiative

LETI (2021) [Climate Emergency Retrofit Guide](#). London Energy Transformation Initiative

UKGBC (2022) [Delivering Net Zero: Key Considerations for Commercial Retrofit](#). UK Green Building Council

Guidance related to historic building retrofit

Balson, K., Summerson, G., and Thorne, A. (2014) [Sustainable Refurbishment of Heritage Buildings](#) BREEAM

Grosvenor (2013) [Sustainable Refurbishment: a Toolkit for Going Green](#) Grosvenor Estates

Historic England (2018) [Energy Efficiency and Historic Buildings](#) English Heritage

Miles, N (2013) [Retrofitting Historic Buildings for Sustainability](#) Westminster City Council

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

GREENHOUSE GAS EMISSIONS AND ENERGY USE

Whole life-cycle carbon

Document	Key Considerations
LETI Embodied Carbon Primer Embodied Carbon Best Practice Targets	Staggered emissions targets between now and 2030 for residential, commercial and educational buildings with emphasis on material reuse
Exceeding BREEAM v6 'Excellent' (v6)	<p>Aim to achieve 'Outstanding'</p> <p>Strong recommendation to achieve:</p> <ul style="list-style-type: none"> Man03 –minimum 2 credits rather than 1 Mat01 –maximise the credits under this criteria
Greater London Authority -Whole Life-Cycle Carbon Assessment Guidance	While not mandatory for non-referable development, strong recommendation to either complete WLCA or demonstrate consideration of whole life-cycle carbon in Design and Access Statement
City of London Carbon Options Guidance Planning Advice Note (May 2023 or latest version)	All major developments must assess both operational and embodied carbon emissions over a whole life-cycle. Non-major developments should align with the GLA guidance and pre-application reporting

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Operational emissions and energy

Document	Key Considerations
Exceeding BREEAM 'Excellent'	<p>Ideally, target 'Outstanding'</p> <p>Ene01 credits targeted to be in line with BREEAM outstanding minimum requirements where feasible</p>
RIBA Sustainable Outcomes Guide v2 2021, 2030 Climate Challenge Targets	<p>Incrementally increasing energy use intensity standards to 2030 for domestic and non-domestic buildings</p> <p>Domestic buildings GIA: (current- business as usual) <120kWh/m2/y, (2025) <60 kWh/m2/y, (2030) <0 to 35 kWh/m2/y</p> <p>Non-Domestic buildings GIA(new build offices): (current- business as usual) <130 kWh/m2/y DEC D (90) rating, (2025) <75kWh/m2/y or DEC B rating and/or NABERS Base Build 5, (2030) < 55 kWh/m2/y DEC B (40) and/or NABERS Base build 6</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

GREENHOUSE GAS EMISSIONS AND ENERGY USE

Operational emissions and energy (continued)

Document	Key Considerations
NABERS Design for Performance Certification (New office development and major refurbishments)	Commit to design and build development to achieve Rating of 5 or more stars, nominate target at outset and rating achievement plan, post-construction quarterly reports on performance during occupational period
Historic England: Energy Efficiency in Historic Buildings Guidelines	Traffic-light coded interventions according to combined cost and impact levels
London Plan Guidance - Housing Design Standards - Consultation Draft February 2022	<ul style="list-style-type: none"> Use local energy resources (such as secondary heat and local heat networks) and supply energy efficiently and cleanly using efficient low carbon heating solutions, such as heat pumps. (All development) Appraise and optimise network efficiency by minimising distribution heat losses and by locating vertical risers within buildings in positions that reduce horizontal pipe runs to a practical minimum. (New Builds, Change of Use) On-site renewables: developments should be designed to maximise renewable energy by producing, storing and using renewable
Levitt Bernstein – Passivhaus Easi Guide	<p>Space Cooling Demand <15 kWh/m2/yr</p> <p>Primary Energy Demand (PER) including all energy uses <60 kWh/m2.yr</p> <p>Air tightness: <0.6 ACH</p>
UKGBC Renewable Energy Procurement & Carbon Offsetting: Guidance for net zero carbon buildings	<p>For existing buildings: create plan to phase out fossil fuels as primary energy source for heating, hot water and cooking by next system replacement cycle.</p> <p>For new and existing buildings:</p> <ul style="list-style-type: none"> Prioritise on-site renewables (e.g. PVs) wherever possible Procure minimum 15 year Power Purchase Agreement (PPA) with new, unsubsidised renewable generation (including private wire) Procure minimum 15 year PPA with new, unsubsidised renewable generation Procure electricity through a high quality green tariff supplier that is 100% renewable sourced only (providing future additionality) <p>New UKGBC guidance on green energy procurement and offsetting expected in 2023.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

GREENHOUSE GAS EMISSIONS AND ENERGY USE

Reference and further guidance

- AHMM, IEDE (2022) Delivering Net Zero In Use. A guide for architects. The Bartlett Institute for Environmental Design and Engineering & Allford Hall Monaghan Morris
- City of London (2022) Planning Advice Note. Whole Life-cycle Carbon Optioneering. City of London Corporation
- City of London (2023) [City of London Lighting, Supplementary Planning Document](#). City of London Corporation
- Clark, G. (2019). RIBA Sustainable Outcomes Guide. Royal Institute of British Architects: London, UK.
- DGBC(2021) Whole Life Carbon Position Paper. Dutch Green Building Council
- GLA (2018) Energy, Daylight and Overheating Study in Tall Buildings. Greater London Authority
- GLA (2021) London Plan Guidance Documents. 'Be Seen' energy monitoring guidance. Greater London Authority
- GLA (2022) Energy Assessment Guidance. Greater London Authority
- GLA (2022) Housing Design Standards LPG Consultation Draft. Greater London Authority
- GLA (2022) London Plan Guidance. Whole Life-Cycle Carbon Assessment. Greater London Authority
- GLA (2023) Air Quality Neutral (AQN) guidance. Greater London Authority
- GLA (2021) London Heat Network Manual II - Guidance for planners, designers & developers
- <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/energy/london-heat-network-manual-ii>
- Historic England (2018) Energy Efficiency and Historic Buildings English Heritage
- IEMA, ARUP (2017) Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance. IEMA
- LETI (2020) LETI Climate Emergency Design Guide. How New Buildings can Meet UK Climate Change. London Energy Transformation Initiative
- LETI (2020) LETI Embodied Carbon Primer. Supplementary guidance to the Climate Emergency Design Guide. London Energy Transformation Initiative
- LETI (2023) LETI Unpicker. Retrofit vs rebuild: Unpicking the carbon argument Retrofit vs rebuild unpicker (leti.uk). London Energy Transformation Initiative
- Levitt Bernstein (n.d) Easi Guide to Passivhaus Design. Levitt Bernstein
- NABERS UK (2021) Guide to Design for Performance. NABERS United Kingdom
- RIBA (2021) Sustainable Outcomes Guide v2. Royal Institute of British Architects
- UK Net Zero Carbon Buildings Standard (online) UK Net Zero Carbon Buildings Standard
- UKGBC (2019) Net Zero Carbon Buildings: A Framework Definition. UK Green Building Council
- UKGBC (2021) Renewable Energy Procurement & Carbon Offsetting Guidance for net zero carbon buildings. UK Green Building Council
- WPA (2021) Zero Carbon Westminster: A Focus on Retrofit in Historic Buildings. Westminster Property Association

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CIRCULAR ECONOMY

Circular Economy in Construction

Document	Key Considerations
City of London Carbon Options Guidance Planning Advice Note	Align development/demolition/construction options between both the Whole Life Carbon Optioneering process and Circular Economy Statement
The Chancery Lane Project – Sustainable and Circular Economy Principles in Leasing Arrangements for Repairs and Alterations	Committing to green leases as a way to ensure fit-out stages and post-occupation building work support circular economy objectives, see The Chancery Lane Project for useful green contract clauses and templates.
The GLA's Circular Economy Statement Guidance (March 2022 or latest version)	Guidance on how to pursue the waste hierarchy and set out Circular Economy Statements required by the GLA for referable developments, but also provides the circular economy principles that all developments should be encouraged to incorporate
UK Green Buildings Council: Building Glass into a Circular Economy	Ensure that in buildings involving glass being disassembled or demolished, glass is recycled, this requires early engagement; to enable quality control, remove the glazing units from the building site to a factory environment for disassembly; seal skips and train staff around contamination issues
Living Building Challenge	Progressive targets and guidance for construction material use

Operational circular economy

Document	Key Considerations
BREEAM Waste Credits	Achieve maximum credits
Living Building Challenge	Includes a series of progressive targets in the materials section

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CIRCULAR ECONOMY

Reference and further guidance

Arup (online) Circular Buildings Toolkit

C40 (2016) Sustainable Solid Waste Systems. C40 Cities Climate Leadership Group

Cheshire, D. (2016) Building Revolutions: Applying the Circular Economy to the Built Environment. Royal Institute of British Architects

City of London (2014) Waste Strategy 2013-2020. Planning a sustainable future for the City of London. City of London Corporation

City of London (2019) Code of Practice for Deconstruction and Construction Sites. City of London Corporation

City of London (2022) Planning Advice Note. Whole Life-cycle Carbon Optioneering. City of London Corporation

City of London (online) Clean City Awards Scheme. City of London Corporation

NetPositive Solutions (online) Excess Materials Exchange Enfield Council

GLA (2020) Design for a Circular Economy. Primer. Greater London Authority

GLA (2022) Circular Economy Statement Guidance. Greater London Authority

Heyne Tillett Steel, HTS Stockmatcher. A tool to help procure reclaimed steel for use in new construction projects

International Living Future Institute (2019) Living Build Challenge 4.0. A visionary path to a regenerative future. International Living Future Institute

LETI (2020) Circular Economy 1-Pager. London Energy Transformation Initiative

Living Future (2019) Living Building Challenge International Living Future Institute

NLA(2023) Circular London, Building a renewable city, Circular-London-Report-6.pdf (nla-production-media.s3.eu-west-2.amazonaws.com), New London Architecture

Material Reuse Portal (online) Material Reuse Portal Circuit Project

OPDC (2018) Waste in Tall Buildings Study Final Report. Old Oak and Park Royal Development Corporation

The Chancery Lane Project (2022) Sustainable and Circular Economy Principles in Leasing Arrangements for Repairs and Alterations (online resource)

UKGBC (2018) Building glass into the circular economy How to guide. UK Green Building Council

UKGBC (2019) Circular economy actor and resource map. UK Green Building Council

UKGBC (2019) Circular economy guidance for construction clients: How to practically apply circular economy principles at the project brief stage. UK Green Building Council

UKGBC (2022) How Circular Economy Principles can impact carbon and value. UK Green Building Council

UKGBC (2022) System Enablers for a Circular Economy UK Green Building Council

UKGBC (online) Circular Economy Implementation Packs for Reuse and Products as a Service. UK Green Building Council

University of Sheffield (online) Regenerate Toolkit

WBCSD (2021) The business case for circular buildings. World Business Council for Sustainable Development

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CLIMATE RESILIENCE

Flood Risk and SuDS

Document	Key Considerations
National Policy Planning Framework	<p>The framework defines the type of infrastructure that is permitted within Flood Zones across the city. Infrastructure is divided according to its vulnerability. Some examples are shown below:</p> <ul style="list-style-type: none"> ▪ Essential Infrastructure: essential transport infrastructure, essential utilities, wind turbines and solar farms. ▪ Highly vulnerable: Emergency service stations and basement dwellings. ▪ More Vulnerable: Hospitals, residential units, health services and educational services. ▪ Less Vulnerable: Commercial units, waste treatment and water and sewage treatment works ▪ Water compatible: Water and sewage transmission infrastructure, docks and marinas and open space. <p>Where development is required within an area of high risk, guidance on how to ensure safety is provided.</p>
EA Flood Guidance	<p>Committing to green leases as a way to ensure fit-out stages and post-occupation Guidance to indicate risk of flooding across the City and what is required to secure the planning of the development. Guidance is also provided regarding the developments design including and not restricted to set backs from river walls, freeboard allowances and habitat creation.</p> <p>All development proposals must comply with the requirements of TE2100.</p> <p>As well as following EA guidance, it is recommended that any project engages with the EA technical experts as early as possible.</p>
Lead Local Flood Authority (LLFA) Strategic Flood Risk Assessment (SFRA)	<p>Provide local, tailored guidance on how to develop, maintain, apply and monitor a strategy for local flood risk management. The LLFA will conduct a SFRA that demonstrates area of localised flooding therefore guiding projects and designs.</p>
London Plan Drainage Hierarchy from London Plan (2021)	<p>A Development should utilise Sustainable Drainage Systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the SuDS hierarchy.</p> <p>Designs should make use of CIRIA design guides.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CLIMATE RESILIENCE

Water Resource Management

Document	Key Considerations
RIBA Sustainable Outcomes Guide 2019	<p>Potable water use targets</p> <ul style="list-style-type: none"> For domestic buildings: <ul style="list-style-type: none"> (current) <110L/p/day, (2025) <95L/p/day, (2030) <75L/p/day For non-domestic buildings: <ul style="list-style-type: none"> (current) <16L/p/day, (2025) <13L/p/day, (2030) <10L/p/day
BREEAM	<p>Wat 01 Water consumption. Reducing the demand for potable water through the provision of efficient sanitary fitting, rainwater collection and water recycling systems</p> <p>Wat 02 Water monitoring. Specification of a water meter/s on the mains water supply to encourage water consumption management and monitoring to reduce the impacts of inefficiencies and leakage.</p> <p>Wat 03 Leak detection. Recognition of leak detection systems capable of detecting a major water leak on the mains water supply. Flow control devices that regulate the supply of water to each WC area/ facility to reduce water wastage.</p> <p>Wat 04 Water efficient equipment. Identifying a building's total unregulated water demand and mitigating or reducing consumption through systems and/or processes.</p>
Water Resource Planning Guideline	<p>Guidance for the development of a Water Resource Management Plan for the development that complies with all relevant statutory requirements and governments policy: Water resources planning guideline - GOV.UK (www.gov.uk)</p>

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CLIMATE RESILIENCE

Building and Urban Overheating

Document	Key Considerations
London Plan Guidance Housing Design Standards - Consultation Draft February 2022	<p>Reduce the risk of overheating, through orientation, layout, the natural cross-ventilation afforded by dual aspect, window design, and shading devices; active cooling should be a last resort.</p> <p>Daylight and overheating assessments should be analysed together to determine the optimal balance. South and west facing façades are most at risk to overheating, and the use of shading should be used to prevent direct sunlight from entering the home during at risk periods.</p> <p>Maximise the benefit of passive ventilation by providing a variety of window opening options that allow controlled ventilation through smaller openings and purge ventilation through larger windows and/or doors.</p>
GLA Energy Assessment Guidance – Cooling Hierarchy	<p>Minimise the amount of heat entering the building, minimise heat generation, manage heat through exposed internal mass and high ceilings, adopt passive ventilation prior to mechanical ventilation and active cooling systems.</p>
BREEAM	<p>Hea 04 Thermal comfort.</p> <ul style="list-style-type: none"> Thermal modelling carried out to appropriate standards. Projected climate change scenarios considered as part of the thermal model. The thermal modelling analysis has informed the temperature control strategy for the building and its users.
BCO Guide to Specification 2019, to be read in conjunction with the Position Paper Guide to Specification Key Criteria Update – February 2023	<p><40 W/m², averaged over the 4.5 m deep perimeter zone for each façade</p> <p>When averaged over the perimeter zones, the peak solar + fabric gain must not exceed 40 W/m²</p> <ul style="list-style-type: none"> The worst performing space must not exceed 50 W/m² (BCO limit) The percentage of time a space spends above 40 W/m² for any given space should not exceed 3% of occupied hours for example (07:00 – 19:00) for all days <p>The methodology of testing should be in line with BREEAM Hea-04 thermal comfort looking at current and future weather files (DSY1, DSY2 and DSY3) – for both 2020 and 2050 as per CIBSE TM46 – current and new BCO are not providing any clarity around this at the moment.</p>

APPENDIX A RECOMMENDED STANDARDS, CERTIFICATIONS AND GUIDELINES

CLIMATE RESILIENCE

Pests and Diseases

Document	Key Considerations
BREEAM	Health and Well-being -ventilation and air circulation - for reducing the spread of airborne diseases.
WELL	22 Pest Control – follow pest reduction and inspection measures.
LISI species of concern and action plan	List of species of concern in London with a LISI designation category assigned, and action plans. (LISI species of concern and action plan Excel)

Infrastructure Resilience

Document	Key Considerations
IEMA EIA Guide to Climate Change Resilience	<p>A project’s ability to adapt to climate change should:</p> <ul style="list-style-type: none"> • Consider the whole life of the project • Have a win-win outcome that can provide economic, social and environmental benefits • Favour flexible future options rather than being too prescriptive and specific • Delay details that are subject to the greatest risk and uncertainty from climate change until more evidence is collected • Follow a hierarchy: avoid, control then manage risk
BREEAM	Wst 05 Adaptation to climate change. Encourage consideration and implementation of measures to mitigate the impact of more extreme weather conditions arising from climate change over the lifespan of the building.

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CLIMATE RESILIENCE

Reference and further guidance

- BCO (2019) Guide to specification. Best practice for offices. British Council for Offices
- BCO (2023) BCO Guide to Specification Key Criteria Update – February 2023. British Council for Offices
- BREEAM (2022) UK New Construction v6.
- CIBSE (2014) TM49 Design summer years for London (2014). Chartered Institution of Building Services Engineers
- CIBSE (2014) TM49 Design summer years weather data for London. Chartered Institution of Building Services Engineers
- CIBSE (2017) TM59 Design methodology for the assessment of overheating risk in homes. Chartered Institution of Building Services Engineers
- CIBSE (2017) TM59 Design methodology for the assessment of overheating risk in homes. Chartered Institution of Building Services Engineers
- CIBSE (2020) Guide L Sustainability. Chartered Institution of Building Services Engineers
- CIBSE (2020) Guide L Sustainability. The Chartered Institution of Building Services Engineers
- CIRIA (2015) The SuDS Manual (C753). Construction Industry Research and Information Association
- City of London (2020) Strategic Flood Risk Assessment. City of London Corporation
- City of London (2021) Flood Risk Management Strategy. City of London Corporation
- City of London (2021) Riverside Strategy. City of London Corporation
- City of London (2022) Biodiversity Action Plan 2021-2026. City of London Corporation
- City of London (2022) Thermal comfort guidelines. City of London Corporation
- Clark, G. (2019). RIBA Sustainable Outcomes Guide. Royal Institute of British Architects: London, UK.
- Code for Sustainable Homes (online) Code for Sustainable Homes: Technical Guide. November 2010 (publishing.service.gov.uk)
- DEFRA (2015) Non-Statutory Technical Guidance. Department for Environment Food and Rural Affairs
- DEFRA (2018) Tree Health Resilience Strategy 2018. Department for Environment, Food and Rural Affairs
- DEFRA (online). UK Plant Health Information Portal. Department for Environment, Food and Rural Affairs
- DLUHC (2022) Overheating: Approved Document O. Department for Levelling Up, Housing and Communities
- DLUHC (2023) Building Regulations: Approved Document L. Conservation of fuel and power. Department for Levelling Up, Housing and Communities
- EA (2022) Flood Risk Assessment Standing Advice. Environment Agency
- EA (2023) Water resources planning guideline. Environmental Agency
- EASIN. European Alien Species Information Network. European Commission
- Estuary Edges (online) Design Principles.
- Forest Research (online). Pest and disease resources.
- GLA (2016) London's Urban Heat Island. Greater London Authority
- GLA (2021) London Plan. Greater London Authority
- GLA (2022) Housing Design Standards LPG Consultation Draft. Greater London Authority
- GLA (online) Sustainable Drainage Action Plan and Sustainable Drainage Guidance. Greater London Authority
- Greater London Authority (2021) Urban Greening for Biodiversity Net Gain: A Design Guide
- HM Government (2021) Overheating: Approved Document O. Department for Levelling Up, Housing and Communities
- HM Government (2021) The Future Homes Standard: changes to Part L..
- HR Wallingford (online) Greenfield Runoff Rate Estimation Tool.
- HR Wallingford (online) Surface Water Storage Volume Estimation Tool.
- HR Wallingford (online) Water Quality Assessment for SuDS Developments Tool.
- ICE (2022) ACO SuDS Route Map. Institute of Civil Engineers
- IEMA (2020) IEMA EIA Guide to: Climate Change Resilience and Adaptation. Institute of Environmental Management and Assessment
- International Living Future Institute (online) Living Building Challenge Resources
- LASOO (2016) Non Statutory suds standards for sustainable drainage. Local Authority SuDS Officer Organisation
- NNSS (online) Non Native Species Secretariat. GB,
- MHCLG (2021) National Planning Policy Framework. Ministry of Housing, Communities & Local Government
- Passivhaus (online resource) www.passivhaustrust.org.uk
- RELi (2021) Resilience Action List + Credit Catalog. The RELi Collaborative
- TDAG (2021). First Steps in Urban Heat: For Built Environment Practitioners. Trees and Design Action Group, UK
- UKGBC (2022) A Framework for Measuring and Reporting of Climate-related Physical Risks to Built Assets. UK Green Building Council
- UKGBC (2022) Climate Change Resilience In The Built Environment: Principles for adapting to a changing climate. UK Green Building Council
- UKGBC (2022) Delivering Net Zero: Key Considerations for Commercial Retrofit. UK Green Building Council

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URBAN GREENING AND BIODIVERSITY

Green Infrastructure

Document	Key Considerations
Natural England - Green Infrastructure Framework	Natural England's Framework provides a list of principle to develop stronger GI policy and delivery and a mapping database which bringing together data from over 40 individual environmental and socio-economic datasets
UKGBC Principles for Delivering Urban Nature Based Solutions	<p>Key recommended interventions include SuDS, Street trees, green roofs, green walls, urban parks & green space</p> <p>Quality of Nature Based Solutions is important – e.g. level of biodiversity enhancement, weighted against capacity for local economic uplift or contribution to operational efficiencies. Encourage developers to use existing frameworks for context-specific appraisal of multifunctional NBS quality in projects – assessment of climate resilience, well-being, water, wildlife.</p> <p>'Building with Nature' standards and accreditation</p> <p>'Wildlife Trust 'Biodiversity Benchmark'</p>
UKGBC Practical how-to guide: Developing and implementing a green infrastructure strategy	The guide provides a practical guide for the formulation of Green Infrastructure strategy for projects
IGNITION Project	<p>Use of nature-based solutions across the built environment.</p> <p>Key nature-based benefits include climate change mitigation and adaptation, resource use (circular economy), nature and biodiversity, health and well-being, and socio-economic impact.</p> <p>Developed a range of tools, evidence and resources to help better understand and implement nature-based solutions.</p>
ILP Guidance Note 08/18 – Bats and artificial lighting in the UK	<p>This document outlines the impacts of artificial lighting on bats and recommends mitigation for various scenarios within the built environment.</p> <p>The presence, or potential for, roosts, commuting habitat and foraging habitat should be determined and categorised on importance.</p> <p>Lighting on key habitats and features should be avoided and existing dark corridors protected.</p> <p>Mitigation methods to reduce lighting should be applied. These include dark buffers, illuminance limits, zonation, appropriate luminaire specifications, screening, sensitive site configuration, applying glazing treatments, creation of alternative valuable bat habitat on site, and dimming and part-night lighting.</p> <p>Compliance with illuminance limits and buffer is required to be demonstrated at the designing and pre-planning phase, baseline and post-completion light monitoring surveys, and post-construction/operational phase compliance-checking.</p>

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URBAN GREENING AND BIODIVERSITY

Green Infrastructure (continued)

Document	Key Considerations
<p>CIEEM Guidelines for Preliminary Ecological Appraisal (GPEA)</p>	<p>Preliminary Ecological Appraisal and/or Ecological Impact Assessment (EclA) where required including any protected species survey recommended in the PEA or required by the LPA.</p> <p>When assessing the impacts of a development on biodiversity it is essential to first examine the current status of biodiversity on site and the surrounding areas. A desk study by an ecological consultant, which should include a background data search, is therefore the first step towards understanding whether a development can potentially have an adverse effect on biodiversity and can highlight the need for further site-based assessments.</p>
<p>Tree planting and species selection</p>	<p>Additional guidance to support tree planting and species selection are provided by BS5837:2012 Trees in relation to design, demolition and construction – Recommendations</p> <ul style="list-style-type: none"> ▪ Arboricultural Tree Survey ▪ Arboricultural Impact Assessment ▪ Arboricultural Method Statement <p>Planting pit design should be designed for the specific location and for resilience – large rooting area, gaseous exchange and water availability.</p> <p>Forest Research - Right Trees for Changing Climate Database: www.righttrees4cc.org.uk/</p> <p>TDAG documentation: www.tdag.org.uk/our-guides.html</p>

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URBAN GREENING AND BIODIVERSITY

Urban Greening Factor

Document	Key Considerations
Urban Greening Factor for London, The Ecology Consultancy, 2017	<p>London Plan Policy G5 requires all major developments to include urban greening as a fundamental element of site and building design. A UGF calculator has been prepared to help applicants calculate the UGF score of a scheme and present the relevant information as part of their application.</p> <p>Policy G5 recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.</p>
GLA Urban Greening Factor Study	<p>A total of nine schemes were analysed using the GLA's UGF method.</p> <p>The study recommends to operate a UGF scheme in the CoL to promote green infrastructure and increase the quantity and quality of green infrastructure.</p> <p>Green roofs and green walls are encouraged to be incorporated in taller buildings.</p> <p>The UGF study proposes a revised scoring system specific for the CoL, to encourage certain categories, particularly tree planting, green roofs and green walls.</p>
CoL Local Plan	<p>Policy DM19.2 states that development should contribute to UGF by incorporating green roofs and walls, soft landscaping and trees. The planting should be resilient to a range of climate conditions and suitable for local conditions, pollution and wind effects. Additionally, good urban greening should be applied to replace any green infrastructure disturbed, removed or damaged as a result of a development.</p>
City of London Biodiversity Action Plan 2021-2026	<p>Section 3 (Local policy context) of the City of London Biodiversity Action Plan highlights the importance of urban greening as natural carbon sinks, and their contribution to biodiversity and overall well-being.</p> <p>Major development proposals will be required to include a UGF score of 0.3 as a minimum.</p>

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URBAN GREENING AND BIODIVERSITY

Biodiversity Net Gain

Document	Key Considerations
City of London Biodiversity Action Plan (2021-2026 or latest version)	The Biodiversity Action Plan provides a strategic focus to ensure species and habitats are understood and considered throughout the decision-making process. See Biodiversity Action Plan for further information on key local priorities.
Natural England Biodiversity Metric	<p>Minimum of 10% Biodiversity Net Gain achieved throughout site as calculated via the Natural England Biodiversity Metric from November 2023 onwards.</p> <p>On sites with little or no biodiversity features, aim for a meaningful amount of biodiversity and not focus on the minimum.</p>
RIBA Sustainable Outcomes Guide (5. Sustainable Land Use & Ecology)	<p>Leave site in better 'regenerative' ecological condition than before development</p> <p>Carry out sustainable remediation of site pollution</p> <p>Retain existing natural features</p> <p>Create mixed use development with density appropriate to local context</p> <p>Create 'productive' landscapes for urban food production</p> <p>Zero local pollution from the development</p>
Biodiversity Net Gain. Good practice principles for development.	<p>Sets out the UK principles on good practice to achieve BNG.</p> <p>It includes a series of Technical Notes to support the document which includes, but not limited to, aligning BNG with BREEAM and Environmental Impact Assessments and achieving BNG on sites with limited or no impact on biodiversity.</p>
Wildlife Trust - Building with Nature (BwN)	<p>The 12 BwN Standards define "what good looks like" by offering a set of quality standards for placemaking and place-keeping, covering the themes of Well-being, Water and Wildlife.</p> <p>Accreditation is likely to be most applicable to larger sites incorporating areas of public realm.</p> <p>The BwN Standards support cross-disciplinary decision making about the master-planning and detailed design, implementation and construction, or management and maintenance of green infrastructure in development.</p>
Wildlife Trust - Building with Nature (BwN)	Where possible make connections between wild spaces
UKGBC Innovation Insights - NBS to Climate Resilience	Recommends using digital tools such as NATURE Tool, ENVI-met, GREENPASS, GI-VAL, EcoservR, iTree Eco to assess optimal natural capital interventions at the project scale and their economic value

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URBAN GREENING AND BIODIVERSITY

Biodiversity Net Gain (continued)

Document	Key Considerations
<p>BREEAM Land Use and Ecology (LE01 – LE05)</p>	<p>The Land Use and Ecology category encourages sustainable land use, habitat protection and creation, and improvement of long term biodiversity for the building’s site and surrounding land.</p> <p>The category has two routes. Route 2 is the Ecologist route, which comprises a more detailed assessment of the ecological approach.</p> <p>Biodiversity Net Gain is used as evidence to support LE03 (Managing impacts on ecology) and LE04 (Ecological change and enhancement).</p>
<p>Pollinating London Together - Valuing the importance of green spaces and Suggested pollinator-friendly trees</p>	<p>There are pollinator friendly trees and shrubs which are suitable for urban London settings, including certain plants for transitional points between seasons that ensure a year round availability of pollinating plants.</p>
<p>London Biodiversity Partnership – Guide to Living Roofs</p>	<p>Designers should ensure that the existing waterproofing is sound and that the structure can support the load. To make the most of a living roof, designers should incorporate a range of microhabitats, use native seeds or plug plants, and ensure safety measures are in place.</p>

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URBAN GREENING AND BIODIVERSITY

Reference and further guidance

Bat Conservation Trust (online). Bat Boxes - Buildings, planning and development. Bat Conservation Trust, UK.

Bat Conservation Trust (online). Artificial Lighting Guidance. Bat Conservation Trust, UK.

British Standards Institution (2012) BS5837:2012 Trees in relation to design, demolition and construction

British Standard Institution (2013) BS42020:2013: Biodiversity. Code of Practice for Planning and Development

British Standard Institution (2021) BS8683:2021: Process for designing and implementing Biodiversity Net Gain

British Standard Institution (2022) BS42021:2022: Integral nest boxes - selection and installation for new developments. Specification

CIEEM, IEMA, CIRIA (2016). Biodiversity Net Gain. Good practice principles for development. Chartered Institute of Ecology and Environmental Management. UK

CIEEM, IEMA, CIRIA (2019). Biodiversity Net Gain. Good practice principles for development. A practical Guide. Chartered Institute of Ecology and Environmental Management. UK

City of London (2021). Biodiversity Action Plan 2021-2026. Corporation of the City of London, London, UK.

City of London (2015) Open Space Strategy. City of London Corporation, UK.

City of London (2015). Local Plan. Corporation of the City of London, London, UK.

City of London (2015). City of London Open Space Strategy SPD. London, UK

City of London (2023) [City of London Lighting, Supplementary Planning Document](#). City of London Corporation

City of London (2012) Tree Strategy Part 1 (SPD) & Part 2. City of London Corporation, UK.

City of London (2018). Urban Greening Factor Study. Corporation of the City of London, London, UK.

Clark, G. (2019). RIBA Sustainable Outcomes Guide. Royal Institute of British Architects: London, UK.

DCLG (2014) Tree Preservation Orders and trees in conservation areas - GOV.UK (www.gov.uk)

DEFRA (2022) Policy Paper: Nature Recovery Network. Department for Environment, Food and Rural Affairs. UK.

DEFRA (2022). Biodiversity Metric Milestone. Department for Food and Rural Affairs: UK

Forest Research (online) The Right Trees for Changing Climate

Database. Forest Research

GLA & Design for London (2008) Living Roofs and Walls - Technical Report: Supporting London Plan Policy. London, UK.

GLA & Design for London (2008) Living Roofs and Walls - Technical Report: Supporting London Plan Policy. UK.

GLA (2018). London Environment Strategy. Greater London Authority

GLA (2023). London Plan Guidance. Urban Greening Factor. Greater London Authority

GMCA (2021). IGNITION Project. Greater Manchester Combined Authority. UK

GRO (2021). The Gro Green Roof Code Anniversary Edition 2021. Green Roof Organisation, UK.

GiGL, Foui (2020). Biodiversity Evidence - Better Outcomes from Planning Policies and Legislation Related to biodiversity and planning in London. Greenspace Information for Greater London CIC. UK

GiGL, Foui (2022). Biodiversity Evidence - Better Outcomes from Planning Final Report. Greenspace Information for Greater London CIC. UK

GiGL (online) Biodiversity Hotspots for Planning. Greater London Authority, UK

ILP (2018) Guidance Note 08/18. ILP Guidance Note 08/18 – Bats and artificial lighting in the UK. ILP Guidance Note 08/18 – Bats and artificial lighting in the UK

London Biodiversity Partnership (n.d.) Guide to living roofs

Natural England (2023) Green Infrastructure Framework. Online resource

Pollinating London Together (online). Pollinating London Together

RIBA (2019) Sustainable Outcomes Guide 2019. Royal Institute of British Architects. UK.

TDAG (online). Our Guides. Trees and Design Action Group, UK

The Ecology Consultancy, (2017). Urban Greening Factor for London. Greater London Authority, London, UK

The Wildlife Trust (2020) Nature Recovery Network Handbook. The Wildlife Trusts

UK Government (2020). Nature Recovery Network.UK

UKGBC (2020) Practical how-to guide: Developing and implementing a green infrastructure strategy. UK Green Building Council

UKGBC (2021) Principles for delivering urban Nature-based Solutions. UK Green Building Council

UKGBC (2022) Innovation Insights: Nature-Based Solutions & Climate Resilience. UK Green Building Council

Appendix B: LETI RETROFIT PROCESS

B

APPENDIX B LETI RETROFIT PROCESS

Retrofitting guidance

This section introduces the LETI's Climate Emergency Retrofit Guide which illustrates best industry practices to retrofit existing buildings and make them fit for the future while supporting UK's Net Zero targets.

LETI has set out best practice targets for retrofit, which can be easily achieved in the vast majority of buildings within the City. CoLC strongly encourages to follow this approach when retrofitting existing building within the City.

The diagrams on this page depict the LETI Retrofit Process which provide a simple, widely applicable framework to help guide building owners, developers, designers, and contractors through the stages of their retrofit project.

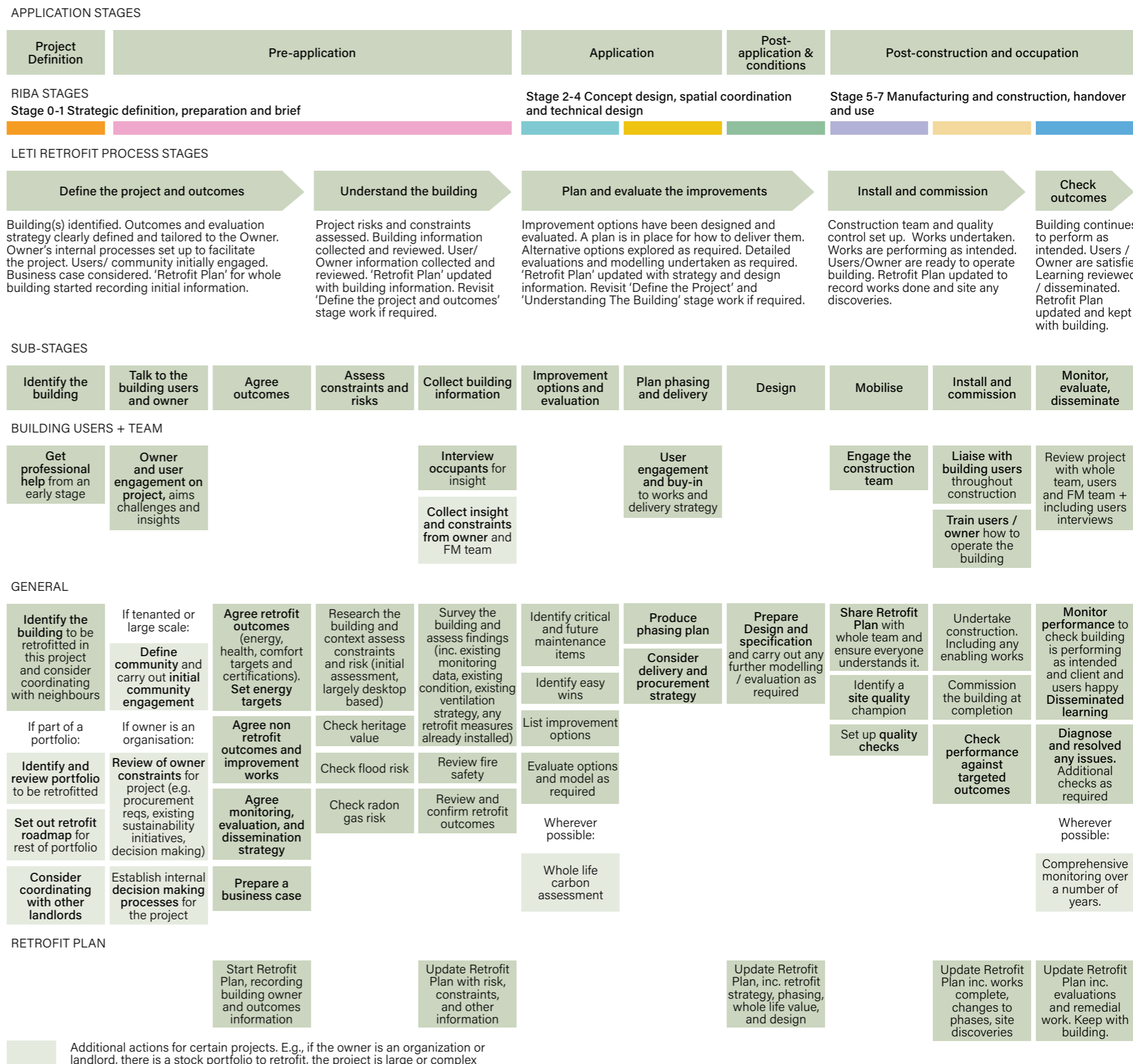


Figure B1 LETI Retrofit Process flowchart mapped onto RIBA work stages and CoLC planning application stages. Source: adapted from LETI (2021) Climate Emergency Retrofit Guide.

Appendix C: GLOSSARY

C

APPENDIX C GLOSSARY

A

Air Quality Neutral An Air Quality Neutral development is one that meets, or improves upon, the air quality neutral benchmarks published in guidance from the GLA. The benchmarks set out the maximum allowable emissions of NOx and Particulate Matter based on the size and use class of the proposed development. Separate benchmarks are set out for emissions arising from the development and from transport associated with the development. Air Quality Neutral applies only to the completed development and does not include impacts arising from construction, which should be separately assessed in the Air Quality Assessment.

Amenity Element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.

B

Beneficial use (excavation waste) The placement of excavation waste to land in a way that provides environmental benefits, particularly through the restoration of priority habitat, flood alleviation or climate change adaptation/mitigation; or contributes towards the restoration of landfill sites and mineral workings while minimising adverse impacts to the environment or communities (for example transport, air quality and other considerations); and demonstrating that the waste cannot be recycled or treated and managed in a more sustainable way.

Biodiversity This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

Biodiversity offsets Measures to improve existing or create replacement habitat where there are unavoidable impacts on wildlife habitats resulting from development or change of land use.

Blue and water space Areas covered by water including the River Thames and other rivers, canals, reservoirs, lakes and ponds.

Blue-green infrastructure - see Urban blue-green infrastructure.

Blue roofs Attenuation tanks at roof or podium level.

C

Carbon dioxide (CO2) Principal greenhouse gas related to climate change.

Circular economy An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.

Circular economy in construction The London Plan 2021 defines a circular economy as 'one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste.' It is a move away from the current linear economic model, where materials are mined, manufactured, used and discarded. The primary focus when applying circular economy principles in building design and construction should be on working with existing and avoiding new materials as far as possible to reduce waste, environmental impacts and excessive carbon emissions from manufacturing. Circular economy principles can also be applied to the life-cycle of the building by designing materials and structural elements to be adaptable and flexible (to extend a building's useful life), an approach which must be carefully weighed up against additional carbon emissions it might produce.

Commercial waste Waste arising from premises which are used wholly or mainly for trade, business, sport, recreation or entertainment as defined in Schedule 4 of the Controlled Waste Regulations 1992.

Communal heating systems A communal heating system supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.

Conservation (heritage) The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Construction, demolition and excavation waste This is waste arising from the excavation, construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.

D

Decentralised energy A range of definitions exists for decentralised energy. In the context of the London Plan, it refers to low- and zero-carbon power and/or heat generated and delivered within London. This includes microgeneration, such as photovoltaics on individual buildings, through to large-scale heat networks.

Design and access statement A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with. The access element of the statement should demonstrate how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.

Designated heritage asset A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development This refers to development in its widest sense, including buildings, and in streets, spaces and places. It also refers to both redevelopment, including refurbishment, as well as new development.

Development Plan The London Plan, Local Plans, other Development Plan Documents and Neighbourhood Plans.

Development proposal This refers to development that requires planning permission.

Digital infrastructure Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

Display Energy Certificate Display Energy Certificates (DECs) are designed to show the energy performance of public buildings. They use a scale that runs from 'A' to 'G' - 'A' being the most efficient and 'G' being the least.

District Heating Network (DHN) A network of pipes carrying hot water or steam, usually underground, that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.

Drainage hierarchy Policy hierarchy helping to reduce the rate and volume of surface water run-off.

APPENDIX C GLOSSARY

E

Embodied carbon / energy / emissions The total life cycle carbon / energy / greenhouse gases used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

Energy efficiency Making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience.

Energy hierarchy The Mayor's tiered approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean) and the third step is using renewable energy (be green).

Energy masterplanning Spatial and strategic planning that identifies and develops opportunities for decentralised energy and the associated technical, financial and legal considerations that provide the basis for project delivery.

Environmental assessments In these assessments, information about the environmental effects of a project is collected, assessed and taken into account in reaching a decision on whether the project should go ahead or not.

Environmental statement This statement will set out a developer's assessment of a project's likely environmental effects, submitted with the application for consent for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

F

Flood risk management and sustainable drainage systems The term 'flood risk' refers to the probability of flooding within an area and the associated consequences. The likelihood is based on historical and forecast data. Flood Risk Management identifies how the risk of flooding can be reduced and managed sustainably.

Fuel cell A cell that acts like a constantly recharging battery, electrochemically combining hydrogen and oxygen to generate power. For hydrogen fuel cells, water and heat are the only by-products and there is no direct air pollution or noise emissions. They are suitable for a range of applications, including vehicles and buildings.

Future-proofing Ensuring that designs are adaptable and take account of expected future changes. For example, ensuring a heating system is designed to be compatible with a planned district heat network to allow connection in future.

G

Green corridors Relatively continuous areas of open space leading through the built environment, which may link to each other and to the Green Belt or Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

Green cover The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens.

Green infrastructure Comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services.

Green roofs/walls Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

Green space All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape.

Greenfield runoff rates The Greenfield runoff rate is the runoff rate from a site in its natural state, prior to any development. This should be calculated using one of the runoff estimation methods set out in Table 24.1 of CIRIA C753 The SuDS Manual.

Greenhouse gas Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.

Greening The improvement of the appearance, function and wildlife value of the urban environment through use of vegetation or water.

Health Impact Assessment (HIA) Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and well-being of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.

H

Health inequalities Health inequalities are systematic, avoidable and unfair differences in mental and/or physical health between groups of people. These differences affect how long people live in good health and are mostly a result of differences in people's homes, education and childhood experiences, their environments, their income, jobs and employment prospects, their access to good public services and their everyday opportunities to live healthier lives.

Heritage assets Valued components of the historic environment. They include buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of historic significance meriting consideration in planning decisions. They include both designated heritage assets and non-designated assets where these have been identified by the local authority (including local listing) during the process of decision-making or plan making.

Historic environment All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

APPENDIX C GLOSSARY

Household waste This includes waste from collection rounds of domestic properties (including separate rounds for the collection of recyclables), street cleansing and litter collection, beach cleansing, bulky household waste collections, hazardous household waste collections, household clinical waste collections, garden waste collections, and any other household waste collected by the waste authorities.

I

Impermeable surface Mainly artificial structures (such as pavements, roads, driveways, parking areas and rooftops) that are covered by materials impenetrable to water (such as asphalt, concrete, brick and stone). Impermeable surfaces also collect solar heat in their dense mass. When the heat is released, it raises air temperatures (see 'Urban heat island').

Industrial waste Waste from any factory and any premises occupied by industry (excluding mines and quarries) as defined in Schedule 3 of the Controlled Waste Regulations 1992.

Infrastructure Includes transport, energy, water, waste, digital/ smart, social and green infrastructure.

Infrastructure resilience At a wider level, infrastructure resilience is defined as the ability for infrastructure such as utilities, transport, and digital networks to withstand the potential shocks or stresses that it may face during its design life including those that London will experience through the inevitable effects of climate change.

Innovation The creation of new products and services, technologies, processes, or business models.

M

Major development For a full definition, see Part 1 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. Generally, major developments are: Development of dwellings where 10 or more dwellings are to be provided, or the site area is 0.5 hectares or more; Development of other uses, where the floor space is 1,000 square metres or more, or the site area is 1 hectare or more.

Material Passport A digital document listing all the materials that are included in a product or construction during its life cycle in order to facilitate strategising circularity decisions in supply chain management. Passports generally consist of a set of data describing defined characteristics of materials in products, which enables the identification of value for recovery, recycling and re-use.

Municipal solid waste It includes all household waste, street litter, waste delivered to council recycling points, municipal parks and gardens wastes, council office waste, Civic Amenity waste, and some commercial waste from shops and smaller trading estates where local authorities have waste collection agreements in place. It can also include industrial waste collected by a waste collection authority with authorisation of the waste disposal authority. Waste under the control of local authorities or agents acting on their behalf is now better known as 'Local Authority Collected Waste'.

N

Nature conservation Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

O

Open space All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Operational circular economy Operational circular economy is the application of circular economy principles to the operational period of a building's life-cycle. This means anticipating future occupant needs such avoidance of waste generation and designing for flexibility to allow for asset sharing to maximise use and considering requirement for materials for maintenance and repair during the life of the building.

Operational emissions & energy Operational emissions are generated from the operation of a development once it has been constructed. This includes both the emissions of electricity from the National Grid as well as emissions generated on-site via gas-burning boilers and other emitting processes. Operational emissions are largely a result of energy consumption. There will be increasing demand for electric power as fossil fuels are phased out in favour of electric heating, vehicles and other technologies. Proposals need to consider how to transition from reliance on fossil-fuel to electric and low-carbon alternatives.

P

Pests & diseases In an Urban context, pests can include non-native and established wildlife and invasive plants which can affect the health of people and other flora and fauna. Diseases can include human and plant infections that can be transmitted through zoonotic, airborne, waterborne and contact based transmission.

Photovoltaics (PV) The direct conversion of solar radiation into electricity by the interaction of light with electrons in a semiconductor device or cell.

Priority habitat London's priority habitats are those areas of wildlife habitat which are of most importance in London. Most areas of priority habitat are protected within Sites of importance for Nature Conservation.

Priority species These are species that are a conservation priority because they are under particular threat, or they are characteristic of a particular region.

Protected species Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended).

Public realm Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.

R

Recovery Refers to "forms of recovery other than energy recovery and other than the reprocessing of waste into materials used as fuels or other means to generate energy. It includes preparing for re-use, recycling and backfilling and other forms of material recovery such as the reprocessing of waste into secondary raw materials for engineering purposes in construction of roads or other infrastructure. Depending on the specific factual circumstances, such reprocessing can fulfil the definition of recycling if the use of materials is based on proper quality control and meets all relevant standards, norms, specifications and environmental and health protection requirements for the specific use" – EU Directive 2018/851.

APPENDIX C GLOSSARY

Recycling Involves the reprocessing of waste, either into the same product or a different one. Many non-hazardous wastes such as paper, glass, cardboard, plastics and metals can be recycled. Hazardous wastes such as solvents can also be recycled by specialist companies, or by in-house equipment.

Refurbishment The process of improvement by cleaning, decorating and re-equipping. It may also include elements of retrofitting with the aim of making a building more energy efficient and sustainable.

Renewable energy Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

Retrofit The addition of new components, features or technology not fitted during manufacture or during initial construction. It is often used in relation to the installation of new building systems or building fabric, such as heating systems, insulation or double glazing added in order to improve efficiency and/or reduce environmental impacts.

Re-use The operation or process of checking, cleaning or repairing materials that have been discarded and are waste so that they can be used again for their original purpose as non-waste without any other pre-processing. Adapted from Environment Agency, Guidance – Decide if a material is waste or not: general guide, May 2016.

S

Secondary heat To recover useful energy, in the form of heat, from sources where processes or activities produce heat which is normally wasted (for example recovering heat from the Underground network) or from heat that exists naturally within the environment (air, ground and water).

Secondary materials (waste) Waste materials that can be used in reuse, recycling and re-manufacturing processes instead of or alongside virgin raw materials. This can include waste materials from demolition and excavation, or discarded items such as furniture and electrical products.

Self-sufficiency In relation to waste, this means dealing with wastes within the administrative region where they are produced.

Significance (heritage) The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives 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.

Site of Importance for Nature Conservation (SINC) Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs, SINCs are not legally protected, but their value must be considered in any land use planning decision. Procedures for the identification of SINCc are set out in Appendix 5 of the Mayor's London Environment Strategy.

Special Areas of Conservation Designated under the EC Habitats Directive (1992), areas identified as best representing the range and variety within the EU of habitats and (non-bird) species.

Special Protection Areas Designated under the EC Birds Directive (1979), areas of the most important habitat for rare and migratory birds within the EU.

Strategic developments (applications referable to the Mayor) The planning applications that must be referred to the Mayor under the Town and Country Planning (Mayor of London) Order 2008 and any amendments thereto.

Sustainability Appraisal A process of considering ways by which a Development Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. Sustainability Appraisal is required by the Planning and Compulsory Purchase Act 2004.

Sustainable drainage systems Using sustainable drainage techniques and managing surface water run-off from buildings and hardstandings in a way that reduces the total volume, flow and rate of surface water that runs directly into drains and sewers.

T

Thames Policy Area A special policy area to be defined by boroughs in which detailed appraisals of the riverside will be required. A land-use planning tool to help determine the amount of greening required in new developments.

U

Urban blue-green infrastructure Network of nature-based features situated in built-up areas, either based on vegetation (green), water (blue), or both. Green roofs and walls, grassed areas, rain gardens, swales (shallow channels, or drains), trees, parks, rivers and ponds are all examples of this type of architecture.

Urban greening Urban greening describes the act of adding green infrastructure elements. Due to the morphology and density of the built environment in London, green roofs, street trees, and additional vegetation are the most appropriate elements of green infrastructure in the city.

Urban heat island The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, the centre of London can be up to 10°C warmer than the rural areas around the city. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

W

Water resource management Water resources are the various types of water which are used or pass through a development. This can include a potable supply from utilities systems, rainwater and other greywater sources, as well as recycled water from within the development. Water resource management identifies how to effectively manage and optimise the use of the available resources.

WELL Standard Wellness-focused certification scheme, ratings level range from 'silver' to 'platinum'

Whole life-cycle carbon Whole life-cycle carbon emissions are the total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/construction, operation, maintenance and eventual material disposal.

Planning for Sustainability - Rev 01

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TEST OF RELEVANCE: EQUALITY ANALYSIS (EA)

The screening process of using the Test of Relevance template aims to assist in determining whether a full Equality Analysis (EA) is required. The EA template and guidance plus information on the Equality Act and the Public Sector Equality Duty (PSED) can be found on City of London Intranet at: [Equality and Inclusion](#)

Introduction

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149).

This requires public authorities, in the exercise of their functions, to have statutory 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not.

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sexual orientation

It is also Corporation policy to give voluntary (non-statutory) 'due regard' to the impact upon Social Mobility

What is due regard?

- Statutorily, it involves considering the aims of the duty in a way that is proportionate to the issue at hand.
- Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision.
- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative.

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Even in cases where it is considered that there are no implications of proposed policy and decision making on the PSED it is good practice to record the reasons why and to include these in reports to committees where decisions are being taken.

It is also good practice to consider the duty in relation to current policies, services and procedures, even if there is no plan to change them.

The Corporation has also adopted a voluntary (non-statutory) due regard of the impact upon social mobility issues. This should be considered generally and, more specifically, against the aims/objectives in the Social Mobility Strategy, 2018-28.

How to demonstrate compliance

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker.
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient Information** - The decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty
- **No delegation** - public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is continuing applying when a policy is developed and decided upon, but also when it is implemented and reviewed.

However, there is no requirement to:

- Produce equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make services homogeneous or to try to remove or ignore differences between people.

The key points about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications
- Keep adequate records of the full decision making process

Test of Relevance screening

The Test of relevance screening is a short exercise that involves looking at the overall proposal and deciding if it is relevant to the PSED.

Note: If the proposal is of a significant nature and it is apparent from the outset that a full equality analysis will be required, then it is not necessary to complete the Test of Relevance screening template and the full equality analysis must be completed.

The questions in the Test of Relevance Screening Template to help decide if the proposal is equality relevant and whether a detailed equality analysis is required. The key question is whether the proposal is likely to be relevant to any of the protected characteristics.

Quite often, the answer may not be so obvious, and service-user or provider information will need to be considered to make a preliminary judgment. For example, in considering licensing arrangements, the location of the premises in question and the demographics of the area could affect whether section 149 considerations come into play.

There is no one size fits all approach, but the screening process is designed to help fully consider the circumstances.

What to do

In general, the following questions all feed into whether an equality analysis is required:

- How many people is the proposal likely to affect?
- How significant is its impact?
- Does it relate to an area where there are known inequalities?

At this initial screening stage, the point is to try to assess obvious negative or positive impact.

If a negative/adverse impact has been identified (actual or potential) during completion of the screening tool, a full equality analysis must be undertaken.

If no negative / adverse impacts arising from the proposal it is not necessary to undertake a full equality analysis.

On completion of the Test of Relevance screening, officers should:

- Ensure they have fully completed, and the Director has signed off the Test of Relevance Screening Template.
- Store the screening template safely so that it can be retrieved if for example, Members request to see it, or there is a freedom of information request or there is a legal challenge.
- If the outcome of the Test of Relevance Screening identifies no or minimal impact refer to it in the Implications section of the report and include references to it in the Background Papers when reporting to the Committee or other decision making process.



1. Proposal / Project Title: Planning for Sustainability Supplementary Planning Guidance (SPD)

2. Brief summary (include main aims, proposed outcomes, recommendations / decisions sought):

The purpose of this Supplementary Planning Document (SPD) is to provide guidance on how applicants should approach sustainability in their developments through the application process. It has been prepared to provide additional detail and guidance on how to fulfil policies of the current Local Plan, as well as emerging policies.

Specifically, this SPD:

Sets out the key approaches that the City of London Corporation (CoLC) is targeting on different sustainability themes and outlines key actions to be taken into consideration to develop an exemplar scheme;

- Identifies a list of key actions to be considered throughout the design process and provides details specific to the City of London for each sustainability theme;
- Provides guidance on what, how and when relevant sustainability aspects should be taken into consideration during the planning application process and sets out submission requirements throughout the life-cycle of the development, from the pre-application process to post completion, and
- Provides a collation of relevant recommended standards, certifications and guidelines.

3. Considering the equality aims (eliminate unlawful discrimination; advance equality of opportunity; foster good relations), indicate for each protected group whether there may be a positive impact, negative (adverse) impact or no impact arising from the proposal:

Protected Characteristic (Equality Group)	Positive Impact	Negative Impact	No Impact	Briefly explain your answer. Consider evidence, data and any consultation.
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The proposed SPD will have a positive impact on older and younger people, who are disproportionately affected by the effects of climate change such as extreme weather conditions, flooding and poor air quality resulting from greenhouse gas emissions.
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The proposed SPD will have a positive impact on people with disabilities who are disproportionately affected by the effects of climate change such as extreme weather conditions, flooding and poor air quality resulting from greenhouse gas emissions. Sustainable construction methods will benefit people with disabilities through achieving accessible and adaptable buildings in line with building regulations.
Gender Reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed SPD will not have a specific impact on people experiencing gender assignment.
Marriage and Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed SPD will not have a specific impact on people who are married or in civil partnerships.
Pregnancy and Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed SPD will not have a specific impact on people who are pregnant or have recently given birth.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed SPD will not have a specific impact on specific races.
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed SPD will not have a specific impact on religions or beliefs
Sex (i.e. gender)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed SPD will not have a specific impact on specific sex/genders.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The proposed SPD will not have a particular impact on gay, lesbian and bisexual people.

4. Are there any potential social mobility or wider issues? Yes No **Briefly explain your answer:** The proposed SPD is not considered to have any impact on social mobility or wider issues.

5. There are no negative / adverse impact(s) Please briefly explain and provide evidence to support this decision:
The nine categories of protected characteristics were assessed, and the proposed SPD has been assessed as having no negative impact on any of the characteristics.

6. Are there positive impacts of the proposal on any equality groups or Social Mobility? Please briefly explain how these are in line with the equality aims or social mobility strategy: The nine categories of protected characteristics were assessed. The proposed SPD has been assessed as having a positive impact on the categories of age and disability, however, the implementation of the SPD will create a more sustainable environment, which will benefit everyone.

7. As a result of this screening, is a full EA necessary?

Please check appropriate box

Yes

No

Briefly explain your answer:

A full EA screening is not considered to be necessary as none of the categories of the nine protected characteristics have been assessed as having a negative or adverse impact resulting from the implementation of the proposed Planning for Sustainability SPD.

8. Name of Lead Officer: Lisa Russell

Job title: Planning Officer

Date of completion: 24/11/2023

Name: Rob McNicol

Date: 24/11/2023

Agenda Item 8

Committee(s):	Date(s):	Item no.
Planning and Transportation Committee	12 December 2023	
Subject: Salisbury Square Development - Appropriation for Planning Purposes	Public	
Report of: City Surveyor	For Decision	
Ward (if appropriate): Farringdon Within Castle Baynard Ward		
<p><u>Summary</u></p> <p>This report seeks your approval for the appropriation of land for planning purposes in order to engage the provisions of Section 203 of the Housing and Planning Act 2016 (“Section 203”) to facilitate the carrying out of the redevelopment of Salisbury Square (the “Redevelopment Site”).</p> <p>The City Corporation (in its capacity as local planning authority) granted planning permission to the City Corporation (in its capacity as landowner of the Redevelopment Site) for a scheme for the Redevelopment Site on 30 July 2021 under planning reference 20/00997/FULEIA (“the Development”). The Development provides for a new combined law courts building, a new police station, offices and public realm. There is a critical path for the Development arising from the programme for Her Majesty’s Courts and Tribunals Service (“HMCTS”) to occupy the new City of London Law Courts building for the administration of justice within 3 months of Practical Completion on 28 September 2026 and from the need for the City of London Police to occupy the new police station by March 2027 when its lease on existing premises at 21 New Street ends.</p> <p>Delva Patman Redler, Rights of Light consultants to the City of London have advised that the Development is at risk due to injunctable Rights of Light which are most unlikely to be released on the basis of reasonable compensation negotiations within the foreseeable future.</p> <p>Implementation of the Development within the critical path programme would be facilitated by the appropriation of the Main Development Site for the planning purposes of the Development. This would remove the injunction risk pursuant to Section 203. Section 203 authorises interferences with Rights of Light and Section 204 provides that compensation is payable for any interference with a right or interest or breach of a restriction which is authorised by Section 203. Negotiations to settle compensation payments would continue after any appropriation and all existing offers made to rights holders would be honoured.</p> <p>Recommendation</p> <p>It is recommended that it be resolved that:</p>		

1. The Main Development Site is no longer required for the purpose for which it was acquired;
2. The Main Development Site to be appropriated for the planning purpose of the Development (in its current form or as it may be varied or amended); and
3. All existing offers made to rights holders be honoured.

Main Report

1. Background

1.1 The Development Site (see Site Plan at **Appendix 2**) comprises:

1.1.1 **Chronicle House, 72-78 Fleet Street; 80-81 Fleet Street; 2-3 Salisbury Court; Greenwood House, 4-7 Salisbury Court; 1 Salisbury Square and 8 Salisbury Court; Fleetbank House 2 -6 Salisbury Square; 35 Whitefriar’s Street and 36-38 Whitefriar’s Street** acquired by the City Corporation in its City Fund (local authority) capacity under Section 7 of the City of London (Various Powers) Act 1958 for “strategic purposes”, prior to the Development being contemplated by the City Corporation (“The Main Development Site”); and

1.1.2 **69, 70 and 71 Fleet Street** acquired by the City Corporation in its City Fund (local authority) capacity under Section 7 of the City of London (Various Powers) Act 1958 in 2018 for the purposes of the Development.¹

1.2 The City Corporation (in its capacity as local planning authority) resolved to grant planning permission for the Development on 22nd April 2021. The Development was supported by the Mayor. Planning permission was granted for construction of a new combined law court, a new police station, and a new office building together with public

¹ The delegated report of 17/9/2018 which authorised the acquisition of 69-71 Fleet Street states that “*It is intended to hold 70 Fleet Street as a strategic property within the overall City Fund Estate*” However, in respect of the related disposal of Eden House, the Report to 10/10/2018 Property Investment Board of the Action taken Between Meetings states that the purchase of 70 Fleet Street is to be funded from the allocation of funds approved by Court of Common Council to proceed with a Combined Courts, Police and Commercial project on the Fleet Street Site. It can therefore be reasonably inferred that the 69, 70 and 71 Fleet Street site was acquired for the purposes of the proposal and therefore the requirement set out at section 203(2)(d) and (5)(d) of the Housing and Planning Act 2016 is satisfied.

realm works on 30th July 2021 under planning reference 20/00997/FULEIA. An image of the permitted Development is at **Appendix 3**.

- 1.3 As set out in the Planning and Development Director's Report to the Special Planning and Transportation Committee of 22nd April 2021 ("the Planning Report"), the proposal was considered to be in substantial compliance with the policies that relate to it including the strategic objective to promote the City as the leading international financial and business centre and London Plan Policy S1 that supports the development of London's social infrastructure. The scheme provides a development that would reinforce the City's reputation as a global centre for business (especially legal business), with the state-of-the-art Court and police station supporting the vision to modernise and upgrade the justice system such that it works for everyone. The scheme delivers a high-quality commercial building which will meet business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses, especially in the legal services sector. The buildings would be designed to high sustainability standards with dedicated areas of planting and greening being incorporated to significantly increase the biodiversity on site. The scheme will preserve the special architectural and historic interest, as well as heritage significance of many of the buildings within the area.
- 1.4 The buildings formerly on the Redevelopment Site have been demolished and redevelopment has commenced.
- 1.5 There is a critical path for the Development arising from the programme for Her Majesty's Courts and Tribunals Service ("HMCTS") to occupy the new combined law courts building for the administration of justice within 3 months of Practical completion of 28 September 2026 and from the need for the City of London Police to occupy the new police station by March 2027 when its lease on existing premises at 21 New Street ends. Were the programme to be impeded or delayed the provision of public services and delivery of public benefits would be compromised, as set out in **Appendix 1**.
- 1.6 The Development raises Rights of Light issues as there are properties surrounding the Development Site which enjoy rights of light over the Development Site. A Right of Light is an interest in land (i.e. an easement) which entitles a neighbouring land owner to enjoy light across their neighbour's land. Development that causes interference with the right often entitles the rights holder to claim compensation and/or an injunction preventing development. In this case there are affected Rights of Light that could give rise to injunction applications to prevent the Development ("injunctable Rights of Light") (see List of Affected Properties at **Appendix 4**).

2. Appropriation and the operation of Section 203

- 2.1 A person may carry out building or maintenance work or may use land even if it involves interfering with a relevant right or interest (including rights of light) if the four conditions set out in Section 203(2)(3)(5) and (6) are satisfied (as applicable).² A person is liable to pay compensation for any interference with a relevant right interest which is authorised by section 203. Therefore where the statutory override provisions of Section 203 are engaged, no injunction may be obtained to prevent development causing such interference.
- 2.2 69-71 Fleet Street was acquired by the City Corporation (acting as local authority) after 13th July 2016 for the purposes of facilitating the Development and all four conditions referred to in Section 203(2) and (5) are satisfied in relation to that land.³
- 2.3 The Main Development Site was acquired in 2008 for “general strategic purposes” prior to the new combined court and police station proposals being contemplated. It was not therefore acquired for planning purposes related to the Development (being the building work now contemplated).
- 2.4 An appropriation of the Main Development Site for the planning purpose of facilitating the Development would result in Section 203 being engaged in respect of the entirety of the Development Site.
- 2.5 Section 12 authorises the City to appropriate land belonging to it to for any purpose for which it is authorised to acquire land if it is not required for the purpose for which it was acquired.
- 2.6 Court of Common Council resolved on 1 December 2011 that the determination of whether or not to proceed with acquisitions or appropriations should be delegated to your Committee (which may delegate matters to the Town Clerk in consultation with the Chairman and Deputy of your Committee). This was affirmed by Court of Common Council on 8 December 2016 (following changes to the relevant statutory provisions) in resolving that acquisitions and appropriations may be considered by your Committee on a case by case basis “*to allow developments to proceed (where they would otherwise be inhibited by injunctions or threats of injunctions prohibiting infringements of rights of*

² The 4 conditions are that: the land has become vested in or acquired by a specified authority or appropriated by a local authority for planning purposes after 13 July 2016 or is other qualifying land; there is planning consent for the building; the authority could acquire the land compulsorily for the building; the building is used for purposes for which the land was vested in acquired or appropriated

³ See footnote 4 in respect of conditions (a) to (c) and footnote 1 and paragraph 2.2 in respect of condition (d)

light) subject to: (i) such development being in the public interest, such public interest being sufficient to justify interference with any private rights and proportionate; (ii) the relevant criteria [listed at paragraph 3.2 below] being met; and (iii) where feasible and appropriate in the circumstances of the case, prior consultation being carried out by rights holders being appropriately advised of the proposed resolution, made aware of any report, and provided with a contact at the City Corporation to whom they can direct comments.”

- 2.7 The relevant criteria (as referred to in paragraph 2.4 above) were set out in Appendix 1 to the report from your committee to the Court of Common Council which was presented on 8th December 2016. Those criteria are set out in paragraph 3.2 below, and their application is considered in **Appendix 1** to this report.

3. Considerations

- 3.1 In order to appropriate the Main Development Site for the planning purpose of facilitating the carrying out of the Development pursuant to Section 12 of the 1949 Act the City Corporation must be satisfied that the land is no longer required for the purposes for which it was acquired, and that the purpose for which the land is to be appropriated is one for which the City Corporation is authorised to acquire land.
- 3.2 In order to resolve to appropriate the Main Development Site in order to engage the Section 203 statutory override provisions your Committee must be satisfied there is a compelling case in the public interest that justifies authorising interference with relevant rights in order to allow the building or maintenance work or use proposed to be carried out within a reasonable time, and in particular, that:
- 3.2.1 There is planning consent for the proposed development;
- 3.2.2 Acquisition or appropriation and consequent engagement of Section 203 will facilitate the carrying out of development, redevelopment or improvement on or in relation to land, and in particular the proposed development for which planning consent has been obtained, or similar development;
- 3.2.3 The development, redevelopment or improvement will contribute to the promotion or improvement of the economic, social or environmental wellbeing of the City’s area and those benefits could not be achieved without giving rise to all of some of the infringements - therefore it is in the public interest that the land be appropriated

by the City for planning purposes, so as to facilitate the development proposed or similar development;

- 3.2.4 There will be infringements of one or more relevant rights or interests as defined in section 205(1) of the Housing and Planning Act 2016 or breach of a restriction as to user of land which cannot reasonably be avoided;
 - 3.2.5 The easements to be interfered with cannot reasonably be released by agreement with affected owners within a reasonable time (and adequate evidence of satisfactory engagement, and where appropriate negotiation, has been provided for consideration by your Committee);
 - 3.2.6 The ability to carry out the development, including for financial or viability reasons, is prejudiced due to the risk of injunction, and adequate attempts have been made to remove the injunction risks;
 - 3.2.7 A decision to appropriate in order to engage Section 203 would be broadly consistent with advice given in the DLUHC Guidance on Compulsory Purchase so far as relevant;
 - 3.2.8 The use of the powers is proportionate in that the public benefits to be achieved outweigh the infringement of human rights;
 - 3.2.9 Rights holders have been consulted regarding the engagement of section 203 wherever feasible and appropriate in the circumstances of the case.
 - 3.2.10 The authority could acquire the land compulsorily for the purposes of the building or maintenance work or the use of the land (and where the land in issue is currently owned by the authority it is to be treated for these purposes as not currently owned by the authority).
- 3.3 The issues are evaluated at **Appendix 1**. It is considered, on the basis of the evaluation at **Appendix 1**, that the criteria for appropriation of the Main Development Site are fully met (subject to consideration of any consultation responses, which will be reported to your Committee).

4. Legal Implications

- 4.1 The specific “Separation of Functions” considerations which applied to the determination of the application for planning permission (whereby members and officers involved in promoting the proposal should not also be involved in determining the planning application) are not engaged in considering whether or not to appropriate the Main Development Site for the planning purposes of the Development. The appropriation decision is for the City Corporation as local authority landowner (not as local planning authority). Other than for the determination of planning applications the usual principle applies that involvement in other committees does not give rise to conflicts, and Members are well used to wearing different “hats” and in only applying the considerations relevant to the decision before them.
- 4.2 Any appropriation would be recorded by a Memorandum of Appropriation prepared by the Comptroller and City Solicitor and placed on the Deed Packet for the redevelopment Site.
- 4.3 All other legal implications are included in the body of the report and Appendix 1.

5. Financial Implications

None

6. Consultees

On 21 September 2023 a letter was sent from the City to 14 affected rights holders advising that appropriation was being considered (**Appendix 6**). Affected rights holders were invited to contact the City Surveyor, Paul Wilkinson, within 14 days of the letter should they have any comments. Four responses were received seeking further negotiations, and challenging the lawfulness of appropriation including on the basis it would be premature (particularly since the City had made a single offer at the time of sending the 21 September letter and S.203 should be a last resort). In an open letter, one respondent refers to an injunction as being the primary remedy, and later (in the same letter) states “We are very concerned that if the City proceeds as set out in the City Letter at this stage, and in advance of having meaningfully engaged to reach agreement on release of rights, our client will have to consider its legal remedies.” In response to the three letters, replies were sent and further negotiations invited. Any further progress in reaching agreements will be reported to your Committee. The contents of the three responses are not considered to undermine the justification for appropriation. In particular, the criteria at 3.2.5 above that **“the easements to be interfered with cannot**

reasonably be released by agreement with affected owners within a reasonable time” is considered to be met (notwithstanding the contents of the three responses) for the reasons set out at paragraphs 3.2.5.3 and 3.2.5.4 of Appendix 1. In brief, this is largely because it is not realistic to envisage that agreements will be reached with all 14 rights holders within the critical path for the new combined court building and police station. In addition there remains a risk that rights holders may seek an injunction. Rights holders have been further advised of this report and its proposals, and notified that they can provide comments to the City Surveyor

Your Committee will be made aware of any further representations received from them.

7. Conclusions

It is considered that the appropriation of the Main Development Site for the planning purposes of the Development in order to engage the Section 203 statutory override provisions should be approved (subject to consideration of any consultation responses). The relevant criteria have been evaluated and the outcome of the evaluation supports the Recommendations. The Recommendations will facilitate the carrying out of the Development. Those with Rights of Light that are infringed will be entitled to compensation and negotiations to settle compensation will continue.

Background papers: Planning Report

Appendices:

- 1. Evaluation**
- 2. Site Plan**
- 3. Image of Development**
- 4. List of affected properties**
- 5. Letter from Delva Patman Redler**
- 6. Consultation Letter from the City to affected rights holders**

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APPENDIX 1 – EVALUATION OF CRITERIA

The criteria for appropriation set out at Paragraph 3 of the Report are considered below (following the paragraph numbers in the Report):

3.1 **Is the Appropriation power in Section 12 engaged**

3.1.1 It is considered that the Main Development Site is no longer required for the purpose for which it was acquired.⁴ The acquisition was intended to secure the future provision of Grade A floorspace which was rare in the vicinity at that time. However, it has since been determined, both in the City Corporation’s landowner capacity and in the City Corporation’s local planning authority capacity, that strategic objectives and the public interest can be achieved by the Development. As such, the Main Development Site is no longer required for the purpose for which it was acquired.

3.1.2 The City Corporation would be authorised to acquire the Main Development Site for the purposes of the Development (under Sections 226 and 227 of the Town and Country Planning Act 1990).

3.1.3 By reason of 3.1.1 and 3.1.2 the City Corporation’s power to appropriate the Main Development Site for the purposes of the Development is engaged.

3.2 **In order to resolve to appropriate the Main Development Site your Committee must be satisfied there is a compelling case in the public interest** for the powers conferred by section 203 to be engaged in order that the Development can be carried out within a reasonable time, and in particular, that:

3.2.1 **There is planning consent for the proposed development:** Planning consent was granted on 30 July 2021 under reference 20/00997/FULEIA

3.2.2 **The appropriation and consequent engagement of Section 203 will facilitate the carrying out of the Development:**

⁴The Finance Committee report of 23/9/2008 seeking support for the potential acquisition stated that “*this particular acquisition has a number of strategic advantages*”. The Urgency report to Court of Common Council of September 2008 stated that it was “*a large site capable of accommodating a substantial redevelopment scheme in this pivotal midtown location. It is envisaged that any redevelopment scheme would provide grade A space on substantial floorplates which are, at present, rare in the immediate vicinity*”

3.2.2.1 Demolition has occurred. The construction programme is for the main works contract to be delivered by Mace to achieve Practical Completion on 28 September 2026. Occupation of the new City of London Law Courts is planned within 3 months of Practical Completion i.e. by end December 2027 and for the City of London Police by the expiry of the lease for 21 New Street, 31 March 2027.

3.2.2.2 Given the indication from Delva Patman Redler outlined below that there are injunctable Rights of Light which are most unlikely to be released by agreement within a reasonable time, it does not appear that the Rights of Light issues can be resolved without use of Section 203, and appropriation is therefore considered to be necessary to facilitate the carrying out of the Development.

3.2.3 The development, redevelopment or improvement will contribute to the promotion or improvement of the economic, social or environmental wellbeing of the authority's area:

3.2.3.1

- a) The proposed new combined court will allow court services to be relocated from the City of London Magistrate's Court (currently at 1 Queen Victoria Street) and the Mayor and City of London Court (a County Court, currently at Guildhall Yard) to the Development Site. The City Corporation (as landowner), in liaison with HMCTS is working to provide combined court accommodation for the Magistrate's Court and County Court to provide modern facilities which can harness modern technology to provide outstanding customer service, both virtually and through fewer, more suitable buildings better able to accommodate the necessary infrastructure. It is considered this will enhance the administration of justice, including in high-profile fraud and economic crime cases (including, potentially, international cybercrime). This will also help maintain the City's role as an international business centre by helping to consolidate the legal hub in the Fleet Street vicinity.

- b) The proposed new police station will support the vision to modernise and upgrade the justice system such that it works for everyone, doing so through the use of new technology, infrastructure, services, processes and ways-of-working. The police station will provide headquarters for the City of London Police including in its role as lead force for economic and cyber-crime and deliver operational efficiencies. Alongside the Court, the introduction of the Police Station would offer a substantial public benefit and contribute to reinforcing the area as a legal quarter.
- c) The commercial office building proposed for the eastern part of the Development Site will ensure the retention of some office space and contribute to meeting demand for new Grade A office space compliant with modern energy efficiency requirements, and contribute to the assembly of mixed uses at the Development Site.
- d) The Development includes public realm enhancements such as an extended new amenity space in Salisbury Square and generously proportioned accessible new east-west public routes through the site. This would connect Whitefriars with Salisbury Court with approximately 100% increase of dedicated public realm across the development. In addition, Salisbury Square would increase in size by 42%. There would be enhanced pedestrian permeability with generous, wider routes between Fleet Street, Whitefriars Street, Primrose Hill and Salisbury Square, and a new, significant view of St Bride's Church Spire from the north passage.
- e) The London Plan includes the following policies:
- i. Policy SD4 The Central Activities Zone – (CAZ) sets out the strategic priorities for the CAZ including the following:
 - The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced.
 - 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

- The distinct environment and heritage of the CAZ should be sustained and enhanced.
 - The CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.
- ii. Policy GG5 (Growing a good economy) states that those involved in planning and development must:
- Promote the strength and potential of the wider city region
 - Seek to ensure that London’s economy diversifies and that the benefits of economic success are shared more equitably across London
 - plan for sufficient employment and industrial space in the right locations to support economic development and regeneration
 - ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London’s growth
 - ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning
- iii. Policy E1 (Offices) states that the unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, should be developed and promoted, and 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

3.2.3.2 London Plan Policy S1 supports the development of London’s “social infrastructure”. Paragraph 5.1.1 provides that for the purposes of Policy S1 “social infrastructure” includes “*criminal justice and emergency facilities*”.

3.2.3.3 The City of London Local Plan states:

Strategic Objective 1 – To maintain the City’s position as the world’s leading international financial and business centre

3.2.3.4 Paragraph 1.15 of the Local Plan states “It [the City Corporation] will, where necessary, use its land and property ownership to assist with site assembly and use its compulsory purchase powers to enable the high quality development the City needs”

3.2.3.5 In conclusion the appropriation of the Main Development Site to enable the operation of Section 203 will facilitate the carrying out of the Development which will contribute to the achievement and improvement of the economic well-being of the City by helping consolidate the legal business cluster and the City’s role as a business centre. The environmental and social well-being of this part of the City will be promoted through the improvement of public realm and provision of accommodation for the better administration of justice and the City of London Police Force.

3.2.4 **There will be infringements of one or more relevant rights or interests which cannot reasonably be avoided:** Delva Patman Redler, the Rights of Light advisers appointed by the City Corporation in its capacity as landowner, have analysed the impact of the Development at the Main Development Site on the adjoining properties. Based on that advice there are 13 properties and 14 owners, with injunctable rights of light (See List of Affected Properties attached at **Appendix 4** to this Report). This is made up of 12 commercial properties and 1 residential property. Two owners have reached agreement. As regards the impacts in planning terms, issues of daylight sunlight and overshadowing were fully considered when the committee resolved to approve the consented scheme on 14 June 2021. That evaluation set out in the Planning Report concluded that there are a small number of major and moderate adverse impacts, but for many windows and rooms the impact is considered to be minor adverse or negligible. When considered against the wider benefits of the scheme, including the substantial improvements to Salisbury Square and sunlight to the square, these impacts are considered to be acceptable and in line with policy DM10.7 of the Local Plan.

3.2.5 The easements to be interfered with cannot reasonably be released by agreement with affected owners within a reasonable time:

3.2.5.1 Delva Patman Redler advise that it is not possible to make any further small alterations to the size or shape of the Development at the Main Development Site such as to have any meaningful impact on the rights of light position.

3.2.5.2 The exacting requirements of the combined court and the need to comply with the HMCTS design guide includes multiple stair cores, controlled and public circulation and a disposition of internal accommodation that has been carefully designed with an external envelope within the constraints of the London View Management Framework. This resultant design averts the risk of interference between judicial, jury staff, witnesses and the public that could result in contamination and hearings being adversely affected .

There are similar, exacting operational requirements of the City of London Police force that determine the disposition of internal accommodation and separation of specialised units, economic crime department, forensics, vulnerable witnesses etc within the blast hardened structure that defines the shape and massing of the building.

For these reasons any further shouldering of the upper floors of the court building and police headquarters is not possible without impacting the operational effectiveness of this infrastructure of national importance.

3.2.5.3 In deciding whether it is necessary to appropriate the Main Development Site so as to rely on Section 203 and thereby facilitate the carrying out of the Development, consideration should be given to whether agreements to permit infringement can be reached with owners of affected properties with rights of light on reasonable terms and within reasonable timeframes.

3.2.5.4 The history of the negotiations between the City Corporation (as landowner) and persons whose rights of lights are infringed by the Development is that Delva Patman Redler were appointed in September 2019 to analyse the impact of the Development on 22 adjoining properties. 20 freehold owners and one long leaseholder of 20 impacted properties were approached. The owners of the other two properties were not approached because the City of

London Corporation own the freehold titles and it is understood no other party enjoys a right to light over the development site. Following surveyor appointment internal layouts were confirmed and the technical assessments updated. 6 properties were deemed to not be impacted by the development. Of these 7 properties, 6 adjoining freehold owners' surveyors have been notified the negotiation is closed. No further comment or concern has been raised by those neighbours and it is not expected they will do so in the future. The mutual release is being sought with the 7th property because it is also being redeveloped. The 14 remaining property owners, who are likely to suffer a material loss of light, have all been made an offer of compensation. The offers were calculated using the industry standard book value methodology with a multiplier. Delva Patman Redler have successfully agreed settlements with two rights holders. Delva Patman Redler refer to one counter offer made and state that the figure is "...grossly outside what we would advise is reasonable." Delva Patman Redler state that in the foreseeable future negotiations are most unlikely to result in agreements to release rights of light. Delva Patman Redler draw attention to the fact that it would be open to the owner of a neighbouring property to seek an injunction. Delva Patman Redler also draw attention to the fact that a firm of solicitors acting for a rights holders has stated that their client will have to consider their legal remedies. The remedies are not identified in that letter and could include making an application for judicial review of the decision to appropriate, or bringing a private law action for damages and/or an injunction. There is little or no incentive for rights holders to prioritise or commit resources (even where paid for by the developer) on promptly progressing settlements, whereas the developer's interests are in securing settlements promptly within the project programme, otherwise construction works are at risk of being halted by injunction Any injunction resulting in the suspension of construction works would significantly impact the public benefit that the development will provide and would exacerbate the backlog of judicial cases that the Ministry of Justice is seeking to recover. Delay to construction works would further impact the City of London Police force's effectiveness in fighting crime within the Square Mile in fighting fraud and economic crime where COLP are the nation's leading force. The new

headquarters for COLP will provide a resilient, state of the art headquarters that consolidates the facilities that existed at Snowhill, Wood Street and the ageing Bishopsgate station that does not provide the infrastructure and facilities for effective policing in the 21st century. These existing facilities were designed and built where national policing encountered completely different threats and potential risks to infrastructure in providing crime prevention. The new headquarters for the force will be designed to withstand a range of risks to policing including blast, chemical and biological threats and potential terrorist threats. The new headquarters will incorporate a completely modern custody suite designed to the latest Home Office standards. The remaining provision of internal accommodation will combine a co-location of different departments working across the force both nationally and locally in effectively and efficiently fighting major crime, particularly in the specialist areas of cyber, fraud and economic crime.

3.2.5.5 The need for the new City of London Law Courts to become operational at the earliest time is of also of importance. The ageing Mayor's and City of London Court, and the City of London Magistrates' Court currently provide a total of eight hearing rooms. The City of London Law Courts that will replace these sites will provide a total 18 hearing rooms, ten additional hearing rooms compared with existing court capacity, of which eight will be new additional Crown Court rooms. The new court building combines magistrates, civil courts and Crown courts which brings also operational efficiencies for HMCTS, by locating staff and resources into a single large location. It will also provide more modern facilities for court users, including lifts, wide corridors, access for wheelchairs and a range of other measures to make it more accessible for people with disabilities. Any suspension of construction works would delay access to the benefits of ten additional courtrooms and improved facilities for court users, placing a potential risk on future court performance for HM Courts & Tribunals Service who are currently committed to reducing the number of outstanding cases in the criminal justice system.

As reported by the Law Society, data released in April 2023 shows that problems in the criminal justice system are persisting, the Law Society of England and Wales has said. From February 2022 to February 2023 there was a 6% increase in the Crown Court backlog of outstanding cases, despite a 1% fall from January – February 2023 where the Crown Courts outstanding caseload rose by 3,539 cases from 57,539 in February 2022 to 60,898 February 2023. The continuing lack of progress to reduce the backlog makes it unlikely the government will achieve its target of cutting the number of cases waiting to come to court to 53,000 by March 2025. HMCTS management information reveals that there was an increase in the number of outstanding cases in the Magistrates' Court, undermining suggestions from government that the situation is improving.

3.2.5.6 In this case, Delva Patman Redler consider that there is a risk that a neighbouring owner/s may seek an injunction. The risk that an injunction may be sought causes great uncertainty and undermines the prospect of the scheme being delivered. On the basis of the Delva Patman Redler report there is also a very considerable risk that negotiations with affected owners will not be completed within a reasonable time, and that the programme for provision of much needed court and police facilities will be delayed or frustrated. In addition Delva Patman Redler advise that there are counter offers beyond reasonable market figures. The quantum of the counter offers is another indicator that agreement is not likely to be reached within a reasonable period.

3.2.5.7 That being the case, Delva Patman Redler consider it most unlikely that, in the foreseeable future, negotiations will result in agreements to release Rights of Light. For the reasons set out at paragraph 3.2.5.6, it is virtually inevitable that there will be extant Rights of Light in place long after the date when (if the critical path programme is adhered to) the construction of the Development would infringe such Rights.

3.2.5.8 The matters referred to by Delva Patman Redler at paragraphs 3.2.5.4, 3.2.5.6 and 3.2.5.7 of this report are set out in their letter of 12 September 1993 at **Appendix 5** of this report.

3.2.6 **The ability to carry out the Development is prejudiced due to the risk of injunction, and adequate attempts have been made to remove the injunction risks:** This criteria is considered met for the reasons set out at 3.2.5

3.2.7 **A decision to acquire or appropriate in order to engage section 203 of the Housing and Planning Act 2016 would be broadly consistent with government advice** given in the Department of Levelling Up, Housing and Communities Guidance on Compulsory Purchase (2019): the principles set out in the guidance as to whether a compulsory purchase order is justified reflect the criteria adopted by Court of Common Council and evaluated in this Appendix. It is considered that the evaluation and recommendation are consistent with the principles in the guidance; in particular there is a compelling case in the public interest for the provisions of section 203 to be engaged in order to facilitate the carrying out of a development which is desirable in the public interest.

3.2.8 **The use of the powers is proportionate in that the public benefits to be achieved so as to outweigh the infringement of human rights:**

3.2.8.1 The Human Rights Act 1998 requires the City Corporation to act in accordance with the European Convention on Human Rights (ECHR) in deciding whether or not to agree the Recommendations. Article 1 of the First Protocol of the ECHR provides that every natural or legal person is entitled to peaceful enjoyment of their possessions. Appropriation which engages Section 203 to allow interference with rights of light involves interference with a person's rights under this Article. As these rights are enjoyed by corporate bodies as well as individuals all of those whose rights will be affected can claim an infringement.

3.2.8.2 However, the rights to peaceful enjoyment of possessions this Article is a qualified rather than absolute right, as the wording of Article 1 of Protocol 1 permits the deprivation of an individual's possessions where it is in the public interest and subject to the conditions provided for by law, and (in relation to the right to respect for private and family life and a person's home) Article 8(2) allows for interference which is "in accordance with the law and

is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the protection of health and morals, or for the protection of the rights and freedoms of others”.

3.2.8.3 There must therefore be a balancing exercise between the public interest and the individual’s rights whereby any interference in the individual’s rights must be necessary and proportionate. “Proportionate” in this context means that the interference must be no more than is necessary to achieve the identified legitimate aim. A “fair balance” must be struck between the rights of the individual and the rights of the public. It is for members to consider the issues raised in this report and to strike that “fair balance” in coming to its decision.

3.2.8.4 In the present case it is considered that the public interest in facilitating the redevelopment outweighs the rights of the individuals to peaceful enjoyment of their possessions and that the proposed appropriation in order to engage the Section 203 statutory override provisions amounts to a proportionate interference in all the circumstances. In this regard the fact that infringements cannot feasibly be reduced and the availability of compensation to those who are deprived of their Rights of Light are of relevance to the issue of proportionality. As regards the compensation sums, it is intended that all negotiated settlements and, where there is no settlement, all existing offers made to rights holders (as set out at **Appendix 5**), will continue to be honoured after any appropriation resolution made by your Committee. This matter is addressed in at Recommendation 3.

3.2.8.5 The public benefits arising from the redevelopment are set out above. The key benefits of the Development need to be balanced against the infringements are set out at paragraph 3.2.4 above and **Appendix 4**. The Development cannot be feasibly altered to avoid right of light infringements. If the Development does not proceed, the benefits identified above will not be delivered.

3.2.8.6 The planning implications of the Development have been fully considered and the Development has been deemed acceptable.

3.2.9 The developer has consulted with rights holders regarding the engagement of section 203 wherever feasible and appropriate in the circumstances of the case: consultation has taken place as set out at paragraph 6 of the Report.

3.2.10 The authority could acquire the land compulsorily for the purposes of the Development: if the City Corporation did not already own the land, it would be able to acquire it using compulsory acquisition powers under Section 226 of the Town and Country Planning Act 1990

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NO DIMENSIONS TO BE CALLED FROM THIS DRAWING

- Site Land Boundaries (Indicative Only)
- Main Development Site
- 69-71 Fleet Street

SOURCE DATA:
 Ordnance Survey
 Existing and surrounding buildings:
 - OS 1:10,000

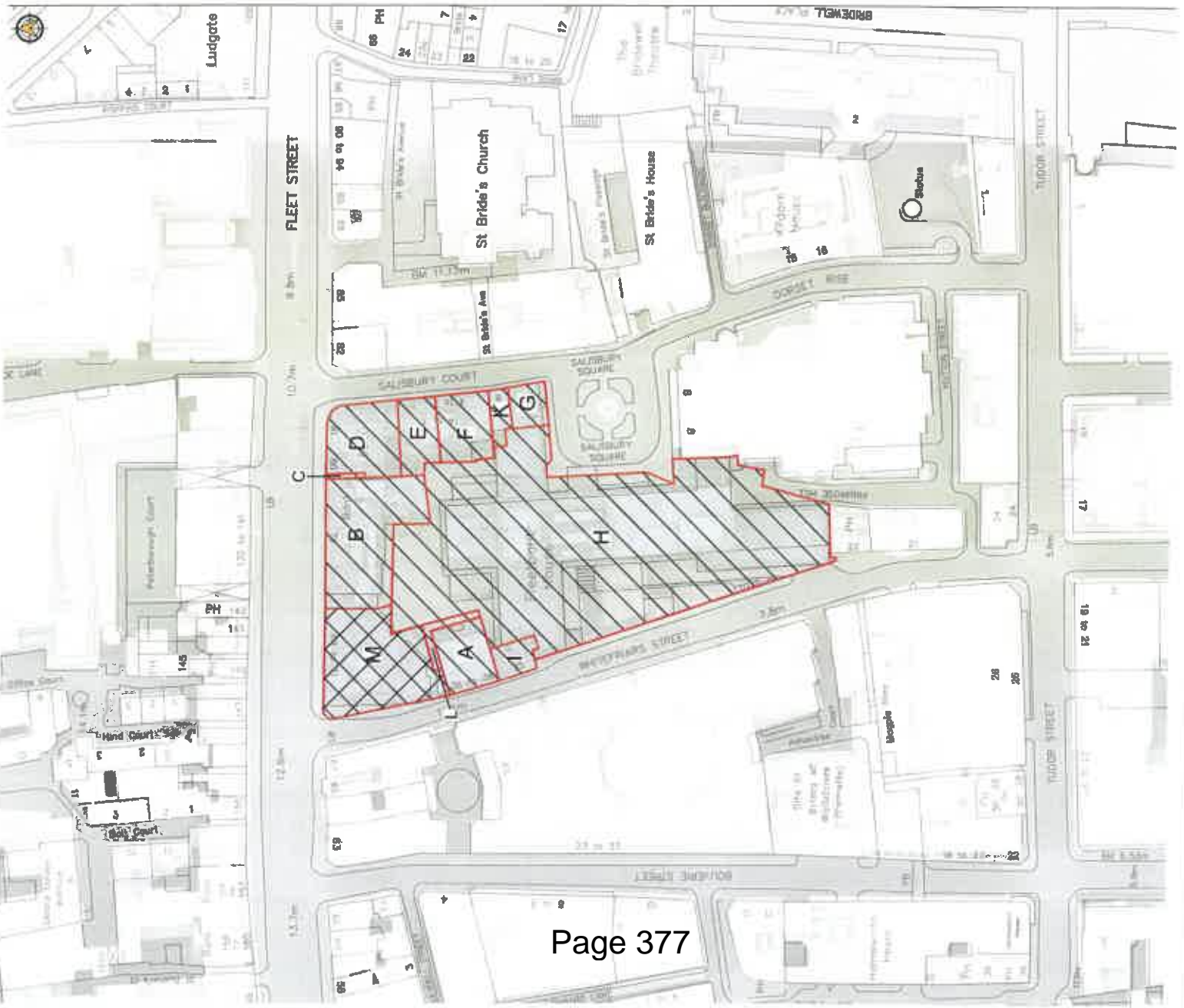
APPENDIX 2

DEVELOPMENT SITE:

- A:** 36, 37 And, 38 Whitefriars Street
- B:** Chronicle House:
- C:** Land on the South side of Fleet Street:
- D:** 80/81 Fleet Street
- E:** 2 and 3 Salisbury Court
- F:** 4 to 7 Salisbury Court
- G:** 1 Salisbury Court
- H:** Fleetbank House:
- I:** Coach & Horses PH:
- K:** 8 Salisbury Court
- L:** Land on the east side of 36-38 Whitefriars Street:
- M:** 69, 70 & 71 Fleet Street:

KEY:

- Site Land Boundaries (Indicative Only)
- Main Development Site
- 69-71 Fleet Street



DELVA PATMAN REDLER
 Chartered Surveyors

London EC4A 3DF
 100 Abchurch Lane
 Building 17-18 2018

DATE: 15/03/2024
 PROJECT: 68-71 FLEET STREET, 80-81 FLEET STREET, 8 SALISBURY COURT, 1 COACH & HORSES PH, 1 FLEETBANK HOUSE, LONDON, EC4A 3DF

DRAWING:
 LOCATION PLAN
 Regula of Light
 Highlighting Main Development Site
 Land Boundaries

NUMBER: 19433
 DATE: 15/03/2024
 DRAWN BY: [Name]

LOC_ROL_003_A

APPENDIX 3



APPENDIX 4

DELVA PATMAN REDLER

Development	Fleet Street - COL
Job Number	19433
Date	25th September 2023

#MAP REF	Property Address	Freehold (FH) or / Leasehold (LH)	Registered Proprietor owner	Commercial or Residential
Page 379	150 and 151 Fleet Street, London, EC4A 2DQ	NGL788746	Kayne Properties UK Limited	Commercial
		FH		
8	146 Fleet Street, London, EC4A 2BU	NGL802373	David Alan Pearlman and Susan Pearlman	Commercial
		FH		
9	143 Fleet Street and 144 Fleet Street, London, EC4A 2BP	81176	Alma Terra Mater UK LTD	Commercial ground floor, Residential upper floors
		FH		
10	142 Fleet Street, London, EC4A 2BP	LN204323	City Building Company Limited	Commercial ground floor, Residential upper floors
		FH		
10	131, 132, 134-139 & 141 Fleet Street, London, EC4A 2BJ	NGL495896	Fleet Street Investments III Limited	Commercial
		FH		

DELVA PATMAN REDLER

Development	Fleet Street - COL
Job Number	19433
Date	25th September 2023

#MAP REF	Property Address	Freehold (FH) or / Leasehold (LH)	Registered Proprietor owner	Commercial or Residential
11	130 Fleet Street, London, EC4A 2BH	NGL599232 FH	Leafgreen Estates Limited	Commercial
13	82 to 85 Fleet Street, London, EC4Y 1AE	89382 FH	Stenville Holdings Limited	Commercial
14	St Brides House, 10 and 11 Salisbury Square, London, EC4Y 8JD	LN191111 FH	Rreef St Bride's Limited	Commercial
15	3 Dorset Rise, London, EC4Y 8EN	LN43899 FH	Oval Properties 1701 Limited	Commercial
20	24 Tudor Street, London, EC4Y 0AY	NGL723128 FH	24 Tudor Street Limited	Residential
21	26-28 Tudor Street, London, EC4Y 0AY	NGL785620 LH	DWS Grundbesitz GMBH	Commercial

DELVA PATMAN REDLER

Development	Fleet Street - COL
Job Number	19433
Date	25th September 2023

#MAP REF	Property Address	Freehold (FH) or / Leasehold (LH)	Registered Proprietor owner	Commercial or Residential
26	Land and buildings on the South side of fleet Street (65 Fleet Street)	NGL763302 FH	Whitefriars Limited	Commercial

Ref: 19433/jr

One George Yard
London EC3V 9DF

12th September 2023

020 7936 3668

City of London Corporation
Gulldhall
PO Box 270
London
EC2P 2EJ
Care of: Tim Cutter of Avison Young

info@delvapatmanredler.co.uk
www.delvapatmanredler.co.uk

Private and confidential

Dear Tim,

**Rights of light progress to date considering the redevelopment of Salisbury Square
Planning reference: 20/00997/FULEIA**

Delva Patman Redler LLP (DPR) have been commissioned to conduct a comprehensive review and assessment of the potential light loss that could arise from the consented Salisbury Square development, particularly concerning its impact on adjacent properties.

Following the identification of 20 potentially impacted properties, DPR has been further instructed to engage with the relevant neighbouring owners with a view to cultivating an amicable resolution in the form of a deed of release and appropriate compensation.

Initial letters went to 21 relevant neighbouring owners on the 17th January 2022. Following which, all owners have since appointed an advisor to act and advise on their behalf. All technical assessments have been updated based on the agreed layouts from the respective internal surveys. These updated technical assessments have since been agreed upon with the respective advisors for each of the properties considered.

Where the updated analysis shows no material loss, a letter has been sent to the neighbour's advisors to confirm that no infringement will occur, and the matter is, therefore, closed. There have been no objections to these letters to date, and none are expected in the future. There were also results that show a likely material reduction in light in the post-development scenario. It was and remains DPR's recommendation to seek a deed of release from the relevant owners of these properties. Subsequently, an offer of compensation and request for a deed of release entered into was made to those owners between October and December 2022.

A small percentage of owners have accepted the compensation offer made, demonstrating the reasonable nature of these. These are in the process of being finalised by way of the deed of release.

However, there are a number of properties where we have not yet concluded matters, and these remain outstanding. Based on comments from the neighbouring owner's surveyors and the lack of any meaningful response to any offers, it is DPR's understanding that there is a desire from neighbouring owners to wait to progress any further discussions until they receive clarity on whether the development site will be appropriated in accordance with Section 203 of the Housing and Planning Act 2016 (s203).

In many instances, it has been communicated that there is an assumption that this will be adopted. Therefore, from the neighbouring owners' perspective, clarity of this is key before their respective advisors assist them in making a decision on the next steps. A single response from a neighbouring owner's representative has been received. It has been clearly communicated that no settlement will be achieved unless a revised offer of at least x33 of the book value is made. This is beyond the scope of what could be considered a reasonable offer, and therefore, DPR has concluded they cannot recommend this is accepted.

Also at:
Delva Patman Redler
The Quay
12 Princes Parade
Liverpool L3 1BG

Delva Patman Redler
40 Berkeley Square
Bristol
BS8 1HP

Delva Patman Redler LLP. Registered in England & Wales OC335699.
A list of members can be inspected at our Registered Office above.

12 September 2023

Although it is the intended strategy to continue discussions with the relevant neighbours to reach amicable conclusions, there is a risk that a neighbour may seek an injunction. It is understood that in this worst-case outcome, there is a negative and potentially costly impact on the successful completion of the development. By seeking the protective powers of s203, the development may proceed as planned, allowing for the public benefit to be realised with no undue delay caused by outstanding rights of light discussions. In parallel, the discussions with the relevant neighbours can proceed in a fair and reasonable manner unhindered by time constraints and focusing the discussions on reasonable compensation offers and terms on which any deed of release will be based.

It is hoped this letter provides clarity on the matter to date and DPR's view on the application for S203.

Yours sincerely

Delva Patman Redler

Delva Patman Redler LLP

APPENDIX 6

City Surveyor's Department
Paul G Wilkinson MSc, BSc, MRICS
The City Surveyor



Telephone 020 7332 1502
Email Paul.Wilkinson
@cityoflondon.gov.uk

Date 21 September 2023

Dear Sirs

Redevelopment of Salisbury Square, Planning ref: 20/00997/FULEIA, Rights of Light

I am writing to you in respect of the proposed development at Salisbury Square.

I am aware that you have been written to by the City's retained Right of Light consultants, Delva Patman Redler, acting on behalf of the City Corporation as property owner, with a view to agreeing an appropriate level of compensation for the loss of light to your property at 150 and 151 Fleet Street and that to date no agreement has been documented.

The scheme has received planning permission and would deliver acknowledged planning, economic, and social benefits. The scheme is moving forward with delivery due in December 2026 (in respect of the Courts) and March 2027 (in respect of the police station).

Due to these pressing timescales and the lack of any agreement, consideration is being given to appropriating the Salisbury Square site for planning purposes in order to engage powers under S203 of the Housing and Planning Act 2016 to facilitate the carrying out of the development. The information received from Delva Patman Redler regarding the need for appropriation is set out in their attached letter.

This is being provided to you in advance of finalising any report. Should you have any comments please let me know within 14 days of the date of this letter.

Yours faithfully

Paul Wilkinson
City Surveyor

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Agenda Item 9

Committee(s)	Dated:
Planning & Transportation Committee	12/12/2023
Subject: Revenue and Capital Budgets 2024/25	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	n/a
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: The Chamberlain Interim Executive Director Environment	For Decision
Report author: Dipti Patel, Chamberlain's Department	

Summary

This report presents for approval the revenue and capital budgets for the Planning & Transportation Committee for 2024/25.

Overall, the proposed revenue budget for 2024/25 totals (£18.364m), an increase in net expenditure of (£1.797m) compared to the 2023/24 Original Budget of (£16.567m).

The proposed budget for 2024/25 has been prepared within the provisional resource envelopes allocated to the Interim Executive Director Environment by Resource Allocation Sub-Committee in October 2023, including an inflation increase of 3% and the full year impact of pay increases to staff arising from the pay deal effective from July 2023. The proposed budget includes £110,000 in unidentified savings and a £155,000 vacancy factor to be achieved during 2024/25.

The resource envelope must be adhered to, as failure to do so will impact Finance Committee's ability to set Council Tax rates for the year ahead and the requirement in law for the City to set a balanced City Fund budget.

Recommendation(s)

Members are asked to:

- i) review and approve the proposed revenue budget for 2024/25 for submission to Finance Committee;

- ii) review and approve the proposed capital budgets for 2024/25 for submission to Finance Committee;
- iii) agree that amendments for 2023/24 and 2024/25 budgets arising from changes to recharges or any further implications arising from subsequently approved savings proposals, changes to the Cyclical Works Programme, or changes to the resource envelope be delegated to the Chamberlain in consultation with the Interim Executive Director Environment.

Main Report

Background

1. This report sets out the latest budget for 2023/24 and the proposed revenue and capital budgets for 2024/25 for your Committee and under the control of the Interim Executive Director Environment, analysed between:
 - **Local Risk budgets** – these are budgets deemed to be largely within the Chief Officer’s control.
 - **Central Risk budgets** – these are budgets comprising specific items where a Chief Officer manages the underlying service, but where the eventual financial outturn can be strongly influenced by external factors outside of their control or are budgets of a corporate nature (e.g. interest on balances and rent incomes from investment properties).
 - **Support Services and Capital Charges** – these cover budgets for services provided by one activity to another. The control of these costs is exercised at the point where the expenditure or income first arises as local or central risk.
2. In the various tables, income, increases in income, and reductions in expenditure are shown as positive balances, whereas brackets will be used to denote expenditure, increases in expenditure, or reductions in income. Only significant variances (generally those greater than £50,000) have been commented on.
3. The latest 2023/24 budget and provisional 2024/25 budgets are summarised in Table 1 below and further analysed by risk, fund and Chief Officer in Appendix 1.

Table 1 Summary Revenue Budgets 2023/24 and 2024/25	Original Budget 2023/24 £'000	Latest Budget 2023/24 £'000	Original Budget 2024/25 £'000
Expenditure	(35,498)	(39,137)	(38,668)
Income	29,052	31,336	31,283
Support Services & Capital Charges	(10,121)	(10,137)	(10,979)
Total Net Expenditure	(16,567)	(17,938)	(18,364)

Latest Revenue Budget 2023/24

4. Appendix 2 provides details on budget movements between the 2023/24 original budget and 2023/24 latest budget. Overall, the 2023/24 latest budget is net expenditure of (£17.938m), an increase in net expenditure of £1.371m compared to the 2023/24 original budget. Main reasons for this net expenditure increase are:

Budget Increases:

- A decrease in unidentified savings allocations, (£1.728m).
- Net impact of pay increases to staff arising from the pay deal effective from July 2023, (£506,000).
- Additional Highways repairs & maintenance funding agreed at RASC from the On-Street Parking Reserve Account (£600,000).
- Approved carry-forwards from 2022/23 for Transport Strategy Review and Night-time /motorcycle parking review, (£50,000).
- A net increase in departmental recharges, (£16,000).

Budget Decreases:

- Net increased income from planning performance agreements (PPA), planning fees, building control fees, Thames Tideway SLA and Minorities car park rent, £1.197m.
- Increase in net transfers from the On-Street Parking Reserve Account, £290,000.
- Reduction to the City Surveyor's Building Repairs & Maintenance budget, £32,000.
- Reduced cost for festive lighting £10,000.

Proposed Revenue Budget for 2024/25

5. The proposed 2024/25 budget is net expenditure of (£18.364m), an increase of (£1.797m) in net expenditure compared to the 2023/24 original budget.
6. For 2024/25 budgets include:
- 3% uplift for inflation.
 - The full year effect of pay increase from July 2023.

The resulting resource envelope must be adhered to, as failure to do so will impact Finance Committee's ability to set Council Tax rates for the year ahead and the requirement in law for the City to set a balanced budget.

7. The budget has been prepared within the resource envelope allocated to the Interim Executive Director Environment, with the following exceptions and assumptions:
- The proposed budget includes of £110,000 of unidentified savings and £155,000 vacancy factor required to remain within the resource envelope. The Interim Executive Director Environment is continuing to develop proposals to deliver these savings. As a result, the savings

required have been incorporated into the 2024/25 proposed budget as “Savings to be Applied” and will be revised as necessary throughout the year.

- Members should note that the Cyclical Works Programme (CWP) figures included in this report relate only to elements of previously agreed programmes, which will be completed in 2023/24 and 2024/25. The separate bid for CWP works in 2024/25 has not been included in this report. The report will be submitted to Projects and Procurement Sub-Committee in January 2024 and will then require approval by Resource Allocation Sub-Committee to agree the funding. Once both Sub-Committees have agreed the 2024/25 programme, Members will be advised of the outcome and Members are asked to authorise the Chamberlain to revise the budgets to allow for these approvals.
- Support services and capital charges budgets reflect the attribution and cost of central departments. However, the full budgets for these departments have not yet been finalised, so further changes to these budgets may be required. Members are asked to agree that the decision as to the changes required to these budgets are delegated to the Chamberlain in consultation with the Interim Executive Director Environment.

8. Appendix 3 provides details on budget movements between the 2023/24 original budget and the 2024/25 proposed budget. Overall, there is an increase in net expenditure of (£1.797m). Main reasons for this net expenditure increase are:

Budget Increases:

- Increases in employee cost due to full year effect of July 2023 pay award and provision for pay increases due to estimated July 2024 pay award, incremental and career grade progression, (£1.734m)
- A decrease in unidentified savings allocations, (£1.618m).
- Reduction in net transfers from the On-Street Parking Reserve Account, (£1.250m).
- Additional Highways repairs & maintenance costs and increase in energy prices, partly offset by reduced car park rates costs and other premises expenses (£946,000).
- Increase in capital charges for Highways infrastructure asset depreciation costs, (£858,000).
- Net income reduction for staff costs recharged to capital projects, (£155,000).
- Other small increases to supplies & services, (£20,000).

Budget Decreases:

- Increased income from planning performance agreements (PPA), planning fees, building control fees, Off-Street car park fees, Minorities car park rental income and traffic management fees, £2.557m.
- Decrease in the cost of the CWP due to changes in planned works and phasing, £1.626m.

- Net increase in On-Street parking income from increased pay & display and suspension income £994,000 partly offset by shortfall in PCN income, (£522,000).
- BIDs contribution to fund new Head of BID's post and S106/CIL funding towards increase in employee admin costs £129,000.

Staffing Statement

9. Table 2 below shows the movement in manpower and related staff costs.

Table 2 Staffing Summary	Original Budget 2023/24		Original Budget 2024/25	
	Manpower Full-time Equivalent	Estimated Cost £000	Manpower Full-time Equivalent	Estimated Cost £000
Executive Director Environment				
Town Planning	59.3	(3,856)	64.3	(4,478)
City Property Advisory Team	5.0	(332)	6.0	(428)
Planning Obligations	8.2	(490)	8.2	(542)
Transportation Planning	35.3	(2,662)	33.7	(2,859)
Road Safety	2.0	(130)	1.7	(131)
Building Control	26.4	(1,890)	26.4	(2,121)
Structural Maintenance/Inspections	6.1	(482)	5.1	(514)
Highways	24.8	(1,618)	20.2	(1,552)
Traffic Management	15.7	(910)	20.1	(1,302)
On-Street Parking	19.5	(1,018)	18.6	(1,100)
Off-Street Parking	0.7	(56)	1.0	(85)
Drains & Sewers	8.2	(501)	7.6	(529)
Directorate	28.0	(1,919)	25.0	(1,957)
Vacancy Factor		155		155
Total P&T Committee	239.2	(15,709)	237.9	(17,443)

Draft Capital and Supplementary Revenue Budgets

10. The latest estimated costs of the Committee's current capital and supplementary revenue projects are summarised in Appendix 4.
11. Pre-implementation costs comprise feasibility and option appraisal expenditure which has been approved in accordance with the project procedure, prior to authority to start work.
12. The latest Capital and Supplementary Revenue Project forecast expenditure on approved schemes will be presented to the Court of Common Council for formal approval in March 2024.

Conclusion

13. This report presents the proposed budgets for 2024/25 for the Planning & Transportation Committee for Members to consider and approve.

Appendices

- Appendix 1 – Committee Summary Budget – by Risk, Fund and Chief Officer
- Appendix 2 – 2023/24 Original Budget to 2023/24 Latest Budget
- Appendix 3 – 2023/24 Original Budget to 2024/25 Original Budget
- Appendix 4 – Draft Capital and Supplementary Revenue Budgets

Report author

Dipti Patel

Chamberlain's Department

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Committee Summary Budget – by Risk, Fund and Chief Officer

Analysis by Service: City Fund by Chief Officer	Original Budget 2023/24 £'000	Latest Budget 2023/24 £'000	Original Budget 2024/25 £'000
CITY FUND			
Executive Director Environment			
Town Planning	(2,648)	(2,150)	(2,467)
City Property Advisory Team	(542)	(564)	(570)
Transportation Planning	(1,474)	(1,616)	(1,481)
Road Safety	(297)	(302)	(288)
Street Scene	(70)	(70)	0
Building Control	(915)	(874)	(1,012)
Structural Maintenance/Inspections	(720)	(663)	(767)
Highways	(3,311)	(3,358)	(3,519)
Traffic Management	1,207	1,179	979
Off Street Parking	480	828	1,712
On Street Parking	(3,622)	(3,673)	(3,603)
Drains & Sewers	(381)	(402)	(409)
Contingency	1,883	155	265
Built Environment Directorate	(2,089)	(2,066)	(2,118)
LOCAL RISK	(12,499)	(13,576)	(13,278)
City Surveyor – All Services	(1,978)	(1,946)	(352)
TOTAL LOCAL RISK	(14,477)	(15,522)	(13,630)
CENTRAL RISK			
Executive Director Environment			
Town Planning	748	733	783
Transportation Planning	773	773	430
Structural Maintenance/Inspections	60	60	60
Highways	2,399	2,399	2,324
Off Street Parking	146	(215)	(1,251)
On Street Parking	3,920	3,971	3,899
Contingency	(15)	0	0
TOTAL CENTRAL RISK	8,031	7,721	6,245
TOTAL SUPPORT SERVICES AND CAPITAL CHARGES	(10,121)	(10,137)	(10,979)
COMMITTEE TOTAL NET EXPENDITURE	(16,567)	(17,938)	(18,364)

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APPENDIX 2

Latest Revenue Budget 2023/24	Local or Central Risk	Original Budget 2023/24 £'000	Latest Budget 2023/24 £'000	Movement Better/ (Worse) £'000	Para Ref
Analysis of Service Expenditure					
Expenditure					
Employees	L	(15,709)	(16,245)	(536)	1
Premises Related Expenses	L	(4,652)	(5,500)	(848)	2 (a-b)
Premises Related Expenses	C	(72)	(72)	0	
City Surveyor – Repairs & Maintenance	L	(1,978)	(1,946)	32	
Transport Related Expenses	L	(31)	(31)	0	
Supplies & Services	L	(2,214)	(2,824)	(610)	3
Supplies & Services	C	(118)	(133)	(15)	
Third Party Payments	L	(3,614)	(3,614)	0	
Savings to be Applied (unidentified savings)	L	1,728	0	(1,728)	4
Contingencies	C	(15)	0	15	
Transfer to Reserve	C	(8,599)	(8,548)	51	5
Capital Charges	C	(224)	(224)	0	
Total Expenditure		(35,498)	(39,137)	(3,639)	
Income					
Grants, Reimbursements & Contributions	L	586	1,484	898	6
Grants, Reimbursements & Contributions	C	224	224	0	
Customer, Client Receipts	L	9,348	10,495	1,147	7
Customer, Client Receipts	C	13,447	13,447	0	
Transfer from Reserves	L	0	600	600	2(a)
Transfer from Reserves	C	2,111	1,750	(361)	8
Recharges to Capital Projects	L	2,059	2,059	0	
Recharges to Capital Projects	C	1,277	1,277	0	
Total Income		29,052	31,336	2,284	
Total Expenditure/(Income)		(6,446)	(7,801)	(1,355)	
Recharges					
Central Support & Capital Charges		(12,142)	(12,142)	0	
Recharges within Fund		972	964	(8)	
Recharges Across Funds		1,049	1,041	(8)	
Total Recharges		(10,121)	(10,137)	(16)	
TOTAL NET EXPENDITURE/(INCOME)		(16,567)	(17,938)	(1,371)	

Notes:

1. Impact of pay increases to staff arising from the pay deal effective from July 2023 (£593,000) and TfL contribution for cycle training (£30,000) which is fully offset by matching income contributions (see note 6), partly offset by unidentified savings achieved from Business Service Operations £87,000.
2. Increase relates to:
 - a) Additional Highways repairs & maintenance funding agreed at RASC from the On-Street Parking Reserve Account fully matched by additional expenditure (£600,000) and reduced cost for festive lighting £10,000.
 - b) Local Implementation Plan Programme (£162,000) and Street Scene works (£96,000) which is fully offset by matching income contributions (see note 6).
3. Local Implementation Plan Programme (£338,000) and Street Scene works (£272,000) which is fully offset by matching income contributions (see note 6). Plus approved carry forwards from 2022/23 (£50,000) towards the Transport Strategy Review and Night-time /motorcycle parking review, which is offset by a reduction in City Centre provision costs £50,000.
4. Unidentified savings allocated to services as a result of savings achieved elsewhere in the Department, mainly from additional income (see note 7).
5. Decrease in transfer to reserves available due to increase in net On-Street Parking operating costs £51,000.
6. Local Implementation Plan Programme contributions £530,000 and third party contributions for Street Scene works £368,000.
7. Additional income from services:
 - a) Planning Performance Agreements £400,000
 - b) Minorities car park rental income £350,000
 - c) Planning fee income £225,000
 - d) Thames Tideway SLA £112,000
 - e) Building Control Fees £110,000
 - f) Decrease in City Centre catering recharges, (£50,000)
8. Reduction in transfer required from On-Street Parking Reserve Account due mainly to new additional rental income from Minorities car park.

APPENDIX 3

Latest Revenue Budget 2024/25 Analysis of Service Expenditure	Local or Central Risk	Original Budget 2023/24 £'000	Original Budget 2024/25 £'000	Movement Better/ (Worse) £'000	Para Ref
Expenditure					
Employees	L	(15,709)	(17,443)	(1,734)	1/6
Premises Related Expenses	L	(4,652)	(5,598)	(946)	2
Premises Related Expenses	C	(72)	(72)	0	
City Surveyor – Repairs & Maintenance	L	(1,978)	(352)	1,626	3
Transport Related Expenses	L	(31)	(31)	0	
Supplies & Services	L	(2,214)	(2,234)	(20)	
Supplies & Services	C	(118)	(133)	(15)	
Third Party Payments	L	(3,614)	(3,614)	0	
Third Party Payments	C	0	0	0	
Savings to be Applied (unidentified savings)	L	1,728	110	(1,618)	4
Contingencies	C	(15)	0	15	
Transfer to Reserve	C	(8,599)	(9,077)	(478)	5
Capital Charges	C	(224)	(224)	0	
Total Expenditure		(35,498)	(38,668)	(3,170)	
Income					
Grants, Reimbursements & Contributions	L	586	715	129	6
Grants, Reimbursements & Contributions	C	224	224	0	
Customer, Client Receipts	L	9,348	11,905	2,557	4/7
Customer, Client Receipts	C	13,447	13,919	472	8
Transfer from Reserves	L	0	600	600	2
Transfer from Reserves	C	2,111	739	(1,372)	9
Recharges to Capital Projects	L	2,059	2,312	253	10
Recharges to Capital Projects	C	1,277	869	(408)	10
Total Income		29,052	31,283	2,231	
Total Expenditure/(Income)		(6,446)	(7,385)	(939)	
Recharges					
Central Support & Capital Charges		(12,142)	(13,016)	(874)	
Recharges within Fund		972	971	(1)	
Recharges Across Funds		1,049	1,066	17	
Total Recharges		(10,121)	(10,979)	(858)	11
TOTAL NET EXPENDITURE/(INCOME)		(16,567)	(18,364)	(1,797)	

Notes:

1. Increase in staff costs relates to:
 - a) Full year effect of July 2023 pay award (£893,000).
 - b) Provision for pay increases due to estimated July 2024 pay award, incremental career grade progression and additional Planning Performance Agreement posts & Head of BIDs post (£841,000).
2. Increase in Premises expenses relates to:
 - a) Energy prices (£631,000).
 - b) Additional Highways repairs & maintenance funding agreed at RASC from the On-Street Parking Reserve Account fully matched by additional expenditure (£600,000).
 - c) Offset by decrease in car park rates £210,000 and other premises expenses £75,000.
3. Changes to planned works and phasing of the CWP.
4. Unidentified savings re-allocated to services due to additional income projected (see note 7).
5. Increased transfer to reserves due to reduction in overall On-Street Parking net operating costs.
6. BIDs contribution to fund new Head of BIDs post and S106/CIL funding towards increase in employee admin costs £129,000.
7. Additional income from services that will help offset unidentified savings (see note 4):
 - a) Increase in fees from emissions based car park tariffs, residential car park season ticket increases and increases in trade volumes £1,167,000
 - b) Planning Performance Agreements £724,000
 - c) Minorities car park rental income £238,000
 - d) Planning fee income £225,000
 - e) Traffic Management fees £169,000
 - f) Building Control fees £110,000
 - g) Off set by other reductions in fees (£76,000)
8. Increase in On-Street parking pay & display and suspension income £994,000 offset by shortfall in PCN income (£522,000).
9. Decrease in transfer from reserves required due to increase in Off-Street car park income.
10. Net reduction in overall staff costs recharged to capital projects reflects the staff time allocations on local risk budgets for increases in direct salary costs and central risk budget changes show a reduction in overall overhead costs (£155,000).
11. Mainly relates to an increase in capital recharges due to increase in Highways infrastructure asset depreciation costs (£858,000) and other increases to central support & recharges (£16,000).

Draft Capital and Supplementary Revenue Budgets

Project	Exp. Pre 01/04/23 £'000	2023/24 £'000	2024/25 £'000	2025/26 £'000	Later Years £'000	Total £'000
<u>Schemes over £1m</u>						
<u>Pre-Implementation</u>						
West Smithfield Area Public Realm & Transportation	923	352	0	0	0	1,275
St Pauls Gyratory Transformation	791	1,233	1,204	0	0	3,228
Sub Total Pre-Implementation Schemes > £1m	1,714	1,585	1,204	0	0	4,503
<u>Authority to start work</u>						
2-6 Cannon Street Public Realm Improvements	720	372	0	0	0	1,092
22 Bishopsgate Phase 2 S278	848	410	0	0	0	1,258
40 Leadenhall Street S278 Highway Works	114	231	940	0	0	1,285
Bank Junction Improvements	2,664	3,141	1,436	87	23	7,351
Beech Street Transport & Public Realm Improvements	1,906	73	0	0	0	1,979
City Cluster Vision - Well-being & Climate Change	187	786	202	0	0	1,175
City Greening & Biodiversity Project	108	386	1,303	403	0	2,200
Crossrail Broadgate - Arts Programme	1,033	930	0	0	0	1,963
Cultural Hub Public Realm Projects	1,898	230	104	42	0	2,274
HVM Security Programme	2,318	1,010	1,837	647	0	5,812
Moor Lane Environmental Enhancements S106	350	1,111	0	0	0	1,461
Moor Lane Environmental Enhancements S278	78	1,202	110	0	0	1,390
Museum of London S278	0	85	965	760	5,190	7,000
Pedestrian Priority Programme	653	1,282	4,222	2,253	0	8,410
St Pauls Area Enhancements	1,671	84	0	0	0	1,755
Sub Total Authority To Start Work >£1m	14,548	11,333	11,119	4,192	5,213	46,405
<u>Schemes less than £1m</u>						
Sub Total Pre-Implementation	2,488	923	1,859	735	220	6,225
Sub Total Authority to start work	6,526	3,686	1,157	0	0	11,369
Sub-Total < £1m schemes	9,014	4,609	3,016	735	220	17,594
Total Planning & Transportation Committee	25,276	17,527	15,339	4,927	5,433	68,502

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Committee(s): Planning & Transportation Committee – For Decision	Date:12 th December 2023
Subject: Information Requirements for the Validation of Planning Applications	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1,2,4,5,11 & 12
Does this proposal require extra revenue and/or capital spending?	No
Report of: Planning & Development Director	
Report author: David Horkan – Assistant Director Planning Development	

Summary

The information required with planning applications is in two parts: a national list that applies in all cases and a local list produced by the Local Planning Authority. The content of the local list is at the discretion of the Local Planning Authority.

The City’s local list was published in February 2016 and is available on the Corporation’s website.

The local list is required to be reviewed and updated regularly. A number of areas of change in the information required to support planning applications has been identified. In addition the GLA has requested that all Local Planning Authorities include the new Planning Data Standard within their validation criteria and it is therefore proposed that this be added to the requirements for applications submitted to the City.

Recommendation

Members are asked to agree to consultation with the local community, including applicants and agents, on the local list of information required with planning and other applications as set out in Annexe A of this report and that if no significant comments are received that you authorise the Planning & Development Director to adopt the list.

Main Report

Background

1. Local Planning Authorities (LPAs) are required to publish information listing what information is required to accompany and validate planning applications. This also enables LPAs to decline to validate an application that is not accompanied by the relevant information.
2. The required information is in two parts; a national list that applies in all cases and a local list selected by the LPA. The content of the local list is at the discretion of the LPA.
3. The current version of the local list was published in February 2016 and is available on the Corporation's website. LPAs are required to review their local lists regularly against a range of principles and criteria and to identify policy drivers for requiring the information.
4. A report was presented to this Committee in December 2019 setting out an updated validation checklist with the intention of going out to consultation. However, due to the delays in the adoption of the London Plan until 2021 and the series of subsequent new and emerging policy guidance and planning advice notes since that time, the updated checklist was not finalised and it was considered appropriate to consult at a later time to consolidate all the relevant changes in planning policy and guidance. It should be noted that the proposed additional validation requirements have continued to be requested and have been submitted with new applications throughout this period.
5. Government guidance states that information requested with a particular planning application must be:
 - reasonable having regard, in particular, to the nature and scale of the proposed development; and
 - about a matter which it is reasonable to think will be a material consideration in the determination of the application
6. Government guidance states that where a LPA considers changes are necessary, the proposal should be issued to the local community for consultation. If no changes are needed the list should be re-published.
7. A review of the information required by the City's local list has been carried out. Many of the existing categories have just been updated to reflect new policy and guidance but there are also sixteen areas of additional information that is needed to assist consideration of various types of applications. These are:
 - Circular Economy Statement – to demonstrate that the proposal is sustainable in respect of its use and re-use/recycling of materials.

- Community Infrastructure Levy Form – To identify where a proposal results in an uplift in floorspace and is CIL liable
 - Cultural Plan – To demonstrate how the scheme will contribute to enhancing the City’s cultural offer.
 - Digital 3D model – to enable the City to import a 3D model of a proposed development to assess the impact of a scheme in its context.
 - Draft construction logistics and environmental management plan – To demonstrate how the construction impacts will be minimised and mitigated.
 - Fire Safety Statement – To demonstrate that fire safety is integral to the design of a building.
 - Fire Statement Gateway One - To demonstrate that fire safety is integral to the design of a building for relevant sites in accordance with the Government guidance on Fire Statements.
 - Health Impact Assessments – To demonstrate how potential health risks are mitigated.
 - Lighting Strategy and Concept – To address the potential impacts of internal and external lighting.
 - Microclimate modelling – To be carried out in accordance with the City’s Wind Microclimate Guidelines (August 2019) and Thermal Comfort Guidelines (December 2020).
 - Risk Assessment for high level external terraces – To provide details of safety measures in the design of terraces.
 - Security and Structural Safety Statement – To demonstrate that safety and security measures have been integrated into the proposal.
 - Statement of Community Involvement (updated) – To ensure community engagement & consultation is undertaken to include a requirement for applicants to explore opportunities to use a form of digital platform engagement to ensure all elements of a community are consulted on proposal at the pre-application stage.
 - Urban Greening Factor – To demonstrate that the urban greening element of a scheme meets the policy requirements.
 - Ventilation/extraction Statement – To provide details of means of extraction/ventilation, particularly in food premises.
 - Whole Lifecycle Carbon Assessment – To provide the WLC options and assessment.
8. Although the local list appears to be extensive it is applied in a proportionate way. Different types and sizes of application require different levels of information and supporting documentation. It is not possible to define, in general guidance, precisely what will be required when there is a wide diversity of types of proposal and circumstances. Information is only requested when it is needed to explain a proposal to enable an application to

be properly considered and public consultation to be carried out. Experience shows that a considerable amount of officer and applicant time is saved when the required information accompanies the application, and this can lead to quicker, fully considered decisions.

London Development Database

9. The Mayor of London has introduced a new Planning Data Standard which contains the additional data that is required to be submitted as part of any planning application in the GLA area within the application form. This information is required to enable a London wide planning register for the monitoring of development taking place and enable efficient spatial planning to take place.

10. The Planning Data Standard and updated application form is currently in operation and it is therefore proposed to include it within the validation criteria. The information requested largely focuses on residential development and comprises a series of questions about the proposed development.

11. The City is also working on the digital capture of data submitted with planning applications in respect of sustainability information e.g. urban greening factor, biodiversity net gain etc. A form is being developed which will form part of the forthcoming consultation process to enable the efficient submission and monitoring of sustainability data.

Next Steps

12. Subject to Member's approval it is intended to undertake a 6 week consultation period during January/February.

Gwyn Richards

Planning & Development Director
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ANNEXE A – Proposed Local List Requirements (Tracked change version)

ANNEXE B – Proposed Local List Requirements (Clean version)

ANNEXE A – PROPOSED LOCAL LIST REQUIREMENTS (TRACKED CHANGE VERSION) – DECEMBER 2023

APPLICATIONS FOR FULL PLANNING PERMISSION

VALIDATION CHECKLIST December 2023

Applications for planning permission should be submitted in accordance with the requirements in this checklist. If not, the application may be declared invalid and not determined or processing may be delayed.

The application should be submitted electronically and one copy of the form and each of the drawings, plans and documents will be required. If the application is submitted in paper format, two copies (one original and one copy) will be required. If samples of materials are submitted, one sample of each material will be required.

Any alternative submission requirements (e.g. USB) should be discussed with Officers if required.

NATIONAL LIST OF REQUIREMENTS

Information Item	Notes
1. Completed application form and the completed Ownership Certificate and Agricultural Land Declaration (A, B, C or D – as applicable) as required by Article 14 of the Town and Country Planning (Development Management Procedure) Order 2015	Where Ownership Certificates B, C or D have been completed, notice(s) as required by Article 13 of the Town and Country Planning (Development Management Procedure) Order 2015 must be given and/or published in accordance with this Article. The application form should include data required by the Greater London Authority Planning London Datahub as set out in the Planning Portal 1APP form.
2. A location plan and a site plan are required. The site should be edged red; other land in the applicant’s ownership should be edged blue.	N/A
4. Design and Access Statement	Many planning and listed building applications and most applications within a Conservation Area must be accompanied by a Design and Access Statement. The Design and Access Statement must contain a

	<p>proportionate level of information in line with NPPG guidance. Information on when a D&AS is required is set out in the Design and Access Statement guidance note.</p> <p>For major applications a separate Access Statement should be submitted and an Equalities Impact Assessment may be required for appropriate major schemes.</p>
5. The appropriate fee	N/A

LOCAL LIST OF REQUIREMENTS

Information Item	Policy Driver	Types of application	When or what information is required
<p>Plans and drawings including:</p> <ul style="list-style-type: none"> Existing and proposed floor and roof plans Existing and proposed elevations Existing and proposed sections and finished floor and site levels <p>At an appropriate scale e.g. 1:50, 1:100 or 1:200.</p>	<p>PPG Guidance: https://www.gov.uk/guidance/making-an-application#Plans-and-drawings.</p>	<p>All applications</p> <p>Applications involving building work, alterations to buildings or open space or display of advertisements.</p> <p>Section 73 removal or variation of a condition including minor material alterations.</p>	<p>Plans should be proportionate to the nature and size of the proposal, drawn at an identified standard metric scale and titled and numbered.</p> <p>They should show clearly the proposed works in relation to what is already there, highlighting any structures to be demolished, changes to levels, relationship with neighbouring buildings and land, details of foundations and the appearance of new work including materials to be used.</p> <p>Applications for change of use must identify the area(s) involved but elevations and sections will not be needed if there are no alterations or building work.</p>

Access Statement	London Plan Policy D5 Local Plan policy CS10	Applications involving alterations to building entrances and open spaces, changes of levels and changes of use.	Not required if a Design and Access Statement is submitted (except for major applications). It should deal with all the access aspects normally covered in a Design & Access statement proportionate to the scale of the development

Acoustic Report	NPPF London Plan Policy D14 Local Plan policy CS15	Planning applications involving new plant or uses that may create noise disturbance. Section 73 variation of a condition including minor material alterations.	May be required for developments that could affect noise sensitive properties (e.g. residential or educational uses).
Affordable Housing and Viability Statement	London Plan Policy H4 Local Plan policy CS21	Planning applications proposing 10 or more new residential units.	A report demonstrating how it is intended to comply with London Plan/Local Plan policies on the provision of affordable housing.
Air Quality Impact Assessment	Local Plan policy DM15.6.	For development that proposes to use biomass or biofuel or for major development (1000sq.m non-residential or 10 or more residential units).	Needed when the site is adjacent to a 'sensitive building' e.g. school or hospital. An assessment of the impact of the development on air quality.
Air Quality Neutral Assessment	London Plan Policy SI 1 Mayor's Air Quality Neutral guidance. Local Plan policy DM15.6	Planning permission for major new buildings or extensions (1000sq.m non-residential or 10 or more residential units) including minor material alterations.	Demonstration that development is at least air quality neutral and mitigation if necessary.
Biodiversity and Ecological Survey and Report	NPPF London Plan Policy G6 Local Plan Policy DM19.2	Planning permission for the demolition of existing buildings or construction of new buildings. If a proposal is likely to affect either protected or priority species or designated sites and priority habitats.	Survey of existing biodiversity on site, impact and proposed measures to protect and enhance biodiversity. Should include a Biodiversity Net Gain (BNG) calculation and requirements set out in Government legislation and guidance.
Circular Economy Statement	London Plan Policy SI7. Mayor's Circular Economy Statement Guidance. Local Plan Policy CS15	All major applications.	To demonstrate: how all materials arising from demolition and remediation works will be re-used and/or recycled;

			<p>how the proposal's design and construction will enable building materials, components and products to be disassembled and re-used at the end of their useful life;</p> <p>opportunities for managing as much waste as possible on site; adequate and easily accessible storage space to support recycling and re-use;</p> <p>how much waste the proposal is expected to generate, and how and where the waste will be handled.</p> <p>The statement should include the GLA Circular Economy template spreadsheet in Excel format. To include a Pre-demolition Audit.</p>
<p><u>Community Infrastructure Levy Form 1</u></p>	<p><u>Community Infrastructure Levy Regulations 2020 (as amended)</u></p> <p><u>GLA Guidance</u></p> <p><u>Local Plan Policy CS4</u></p> <p><u>CoL Planning Obligations SPG</u></p> <p><u>CoL CIL Charging Schedule</u></p>	<p><u>For relevant development in accordance with CIL Regulations.</u></p>	<p><u>Completed CIL form 1 for all relevant development.</u></p>

<u>Cultural Plan</u>	<u>London Plan Policy HC5</u> <u>Local Plan Policy CS11</u>	<u>For all major development and large extension and refurbishment schemes.</u>	<u>To submit Cultural Plans for all major development, setting out how the scheme will contribute towards enriching and enhancing the City's cultural offer, facilitate public access and interpretation of heritage assets, provide permanent or temporary space for creative enterprises and incorporate public art either within the design of the building or as freestanding structures.</u>
Daylight/Sunlight assessment	Local Plan policy 10.7 Site layout for planning for daylight and sunlight, BRE 2022.	Planning permission for the construction of a new building or extension.	Required if the development is near to existing or approved residential premises or open spaces.
<u>Digital 3D model</u> & GIS file	<u>LVMF</u> <u>London Plan Policy D4</u> <u>Local Plan Policies CS10,</u> <u>CS13, CS14</u>	<u>Planning permissions for new buildings or extensions.</u>	<u>An fbx 3D model or equivalent of the proposal is required to import into the City's 3D model.</u> For major applications geospatial information may be required to identify elements of the proposal e.g. viewing galleries, new routes, green roofs.
<u>Draft Construction Logistics and Environmental Management Plan</u>	London Plan Policies SI4, T4 and T7 Local Plan Policies DM15.6, DM16.1 and DM17.2 CoL Code of Practice	Planning permission for the construction of a new building or large extensions and other relevant schemes.	<u>Should demonstrate how the environmental and transport impacts will be minimised for the construction phase of the development.</u>
Energy Statement	London Plan Policy SI2 and SI4 Mayor's Energy Assessment Guidance, and 'Be Seen' Energy Monitoring Guidance	All major applications.	Should demonstrate through an energy strategy how proposal will reduce the potential for internal overheating and reliance on air conditioning systems in

	Local Plan policies for sustainable development and climate change.		accordance with the cooling hierarchy.
Environmental Statement	Town and Country Planning (Environmental Impact Assessment) Regulations.	Planning permission for redevelopment. Section 73 removal or variation of a condition including minor material alterations.	An Environmental Impact Assessment (EIA) is required in the circumstances set out in the Environmental Impact Assessment Regulations. Applicants can request a 'screening opinion' to determine whether an EIA is required before submitting a planning application.
<u>Fire Safety Statement</u>	<u>London Plan Policies D5 and D12</u>	<u>All major developments.</u>	<p><u>The statement should detail how the development proposal will function in terms of:</u></p> <ul style="list-style-type: none"> <u>The building's construction: methods, products and materials used, including manufacturers' details</u> <u>the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach</u> <u>features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans</u> <u>access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water</u>

			<p><u>supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these</u></p> <ul style="list-style-type: none"> • <u>how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.</u>
<u>Fire Statement – Gateway One</u>	<u>The Town & Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment Order 2021</u>	<u>For applications meeting the criteria set out in the 2021 Order.</u>	<u>A Completed form published by the Secretary of State (or a form to substantially the same effect) with relevant attachments and in accordance with the Government guidance on Fire Statements.</u>

Flood Risk Assessment and sequential test evidence	NPPF Local Plan policy CS18	All planning applications including change of use, removal or variation of conditions and minor material alterations.	Required for all planning applications in the Flood Risk Area shown on the Local Plan Policies Map B (as amended by the Strategic Flood Risk Assessment) and for Major development elsewhere. Technical Guidance to the National Planning Policy Framework sets out the required information.
<u>Health Impact Assessment</u>	<u>London Plan Policy GG3</u> <u>CoL's Health Impact Assessment Guidance Note 2021</u>	<u>All major development, and developments where potential health issues are likely to arise.</u>	<u>For all major development, and developments where potential health issues are likely to arise, to submit a Healthy City Planning Checklist. A Rapid or Full HIA to be submitted for larger-scale development proposals.</u> <u>The details should be in accordance with the CoL's Health Impact Assessment Guidance Note.</u>

Heritage Assets - Listed Buildings	NPPF London Plan Policy HC1 LVMF Local Plan policy CS12	Planning permission for redevelopment or alterations affecting a listed building or its setting.	A description of the significance of the historic assets affected by the proposal and the contribution of their setting to that significance. The level of information should be proportionate to the importance of the heritage asset and be sufficient to give an understanding of the potential impact of the proposal on the significance of the heritage asset. This information is required with an assessment of the impact of the proposal and an explanation of the design concept. The assessment of significance and impact should be set out in the Design & Access Statement where one is required.
Heritage Assets –Conservation Areas	NPPF London Plan Policy HC1 Local Plan policy CS12	Planning permission for redevelopment or alterations affecting a conservation area or its setting.	See above under Heritage Assets Listed Buildings
Heritage Assets – Archaeological remains and Scheduled Ancient Monuments	NPPF London Plan Policy HC1 Local Plan policy CS12	Applications for planning permission or removal or variation of a condition (including minor material alterations) where the proposal involves ground works.	See above under Heritage Assets - Listed Buildings. The information should include a desk based assessment, an assessment of the impact of the proposal, and where appropriate, on-site evaluation.

Heritage Assets – Tower of London World Heritage Site	NPPF London Plan Policy HC2 LVMF Local Plan policy CS12 World Heritage Site Management Plan Historic Royal Palaces Local Setting Study	Planning permission for new buildings or major extensions.	Impact assessment required if there could be an impact on views of the Tower of London or the Outstanding Universal Value of the World Heritage Site. The assessment of significance and impact should be set out in the Design & Access Statement where one is required.
Heritage Assets – St Paul's Heights assessment	NPPF London Plan Policy HC1 Local Plan policy CS12	Planning permission for new buildings or extensions including minor extensions at roof level in the designated area.	Development in the designated area to demonstrate that the proposal would not infringe the St Paul's Heights Limits. The assessment of significance and impact should be set out in the Design & Access Statement where one is required.
Heritage Assets - Registered Parks and Gardens	NPPF London Plan Policy HC1 LVMF Local Plan policy CS12	Planning permission for new buildings or alterations affecting a Registered Park or Garden.	See above under Heritage Assets - Listed Buildings
Heritage Assets – Non-designated Assets	NPPF London Plan Policy HC1 Local Plan policy CS12	Planning permission for new buildings or extensions including minor extensions.	A description of the significance of the heritage asset affected and the impact of the proposal, set out in the Design & Access Statement where one is required.
Housing design	London Plan housing policies. Local Plan policies CS1(5), DM21.1, DM21.3	Planning permission for new housing.	Demonstrate compliance with housing design policies and guidance.
Land Contamination assessment	NPPF Local Plan policy DM15.8	Planning permission for the construction of a new buildings or extensions.	Required if application site is known to be or is suspected of being contaminated. City of London Interactive Map

Landscaping details	Local Plan policies CS10 and CS19	Planning permission for new buildings or major extensions where open space is affected or provided.	Drawings showing any proposed landscaping including structures, paving types, plant species and drainage. This should follow the design concept in the Design and Access Statement.
<u>Lighting Strategy and-Concept</u>	<u>NPPG</u> <u>Local Plan Policy DM10.1 and DM15.7</u> <u>CoL Lighting SPD</u> <u>CoL Lighting Strategy 2018</u>	<u>For major development and for proposals for new lighting schemes including for the public realm and building facades.</u> All other applications including refurbishment, alteration, extension, new build and illuminated advertisements, should address how lighting has been considered as part of the submission (in line with the SPD).	<u>The Concept should address the impact of a lighting scheme in respect of design, amenity, light pollution, biodiversity and sustainability having regard to the Lighting SPD. It should build on the Strategy submitted at pre-application stage if relevant. A Strategy should also be submitted if not already done so.</u> <u>The strategy should include the details of the proposed lighting system and include a management strategy to demonstrate how a PIR system would be operated to achieve its optimal efficiency.</u>
Microclimate impact assessment(s) including: <ul style="list-style-type: none"> • Wind Assessment • Thermal Comfort Assessment 	London Plan Policy D9 Local Plan policies CS14 and CS15	Planning permission for new buildings or extensions.	Required if proposal is likely to have an adverse effect upon microclimate, in particular wind. <u>An assessment should be carried out in accordance with the criteria set out in Wind Microclimate Guidelines August 2019 and the Thermal Comfort Guidelines December 2020.</u>

Office viability report	Local Plan policy DM1.1.	Planning permission involving the loss of existing office accommodation and sites, other than where complementary uses are proposed for part of a building (see policy DM1.5) and pre-application discussions suggest the use could be acceptable.	Evidence to demonstrate that the building has depreciated such that office use would not be viable or suitable in the long term, having regard to the physical state of the building and its functional and locational obsolescence. Marketing evidence will be required to show that there is no recent or likely future demand for continued office use of a site or building.
Open Space assessment	NPPF London Plan Policy G4 Local Plan policies CS15 and CS19	Planning permission for new buildings or major extensions.	If proposal is for development within or neighbouring an open space an assessment of the impact and provision of replacement space is required.
Parking Provision	London Plan parking policies. Local Plan policy CS16	Planning permission for new buildings or major changes of use or major extensions. Section 73 removal or variation of a condition including minor material alterations.	Required if proposal affects existing car, motorcycle or bicycle parking spaces (including on-street parking bays) and/or is likely to create changes in the demand for parking on site or on surrounding streets. Details of all proposed parking should be shown on the drawings.

Photographs and Verified rendered montages	LVMF Local Plan policies CS10, CS13, CS13, CS14	Planning permission for new buildings, extensions or alterations. Section 73 removal or variation of a condition including minor material alterations.	Should be provided where necessary to support the application. Required in support of large redevelopment schemes and where proposals would involve the demolition of an existing building or affect the settings of listed buildings or conservation areas. Useful to support applications for alterations to buildings including shopfronts.
Planning obligations – Draft Head(s) of Terms	NPPF Local Plan policy CS4. CoL Planning Obligations SPD GLA SPG - Use of Planning Obligations.	Planning permission for new buildings, major changes of use or major extensions and removal or variation of a condition including minor material alterations.	Required if proposal will result in a requirement for a legal agreement to secure planning obligations and affordable housing.etc
Planning Statement / Supporting Information	NPPF	All applications.	Provision of a planning statement is optional. To include an area schedule with Gross Internal Area (GIA) and Gross External Area (GEA) in metres. Should take into account the Equality Act.
<u>Risk assessment for external terraces</u>	CoL Preventing Suicides in High Rise Buildings and Structures Planning Advice Note Local Policy CS3	<u>All development creating new external terraces.</u>	<u>Consideration of suicide risks and how to mitigate them is encouraged as part of the planning application process where new developments or refurbishments are proposed.</u>

<u>Security and structural safety statement</u>	<u>London Plan Policy D5 and D11</u> <u>Local Plan Policy CS3, DM 3.2 and 3.3</u>	<u>All major developments and refurbishments of potentially high profile buildings.</u>	<u>An assessment should demonstrate how 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.</u>
Servicing facilities	Local Plan policy DM16.5	Planning permission for new buildings, changes of use or major extensions.	To be shown annotated on drawings.
Statement of Community Involvement	NPPF Statement of Community Involvement, 2023 <u>CoL's Developer Engagement Guidance, 2023</u>	Planning permission for new buildings, major changes of use or major extensions and removal or variation of a condition including minor material alterations.	Required where community involvement has been arranged prior to making an application <u>which should include exploring opportunities to use a form of digital platform engagement to ensure all elements of a community are consulted on proposals.</u>
Sustainability Statement	NPPF London Plan policies on climate change. Local Plan policy CS15	All applications.	Demonstration of sustainability standard to be achieved and minimisation of carbon emissions. Submission of a digital sustainability form to capture sustainability data e.g. WLCA % retention, UGF and BNG. Major development should include a BREAAAM Pre-Assessment and

			details for climate resilience.
Sustainable Urban Drainage Systems (SuDS) / Drainage Plan	NPPF. London Plan Policy S113.	All major applications	Details of SuDS designs showing compliance with SuDS technical standards.
Town Centre Uses – Evidence to accompany applications	NPPF London Plan Policy SD7 Local Plan policy CS20	Planning permission for major shopping proposals.	Proposals for major shopping uses require evidence to demonstrate a sequential approach to site selection.
Transport Assessment	NPPF London Plan transport policies Local Plan policy CS16	Planning permission for new buildings, major changes of use or major extensions and removal or variation of a condition including minor material alterations.	Required if proposal is likely to have significant transport implications. For major applications the TA should include an indicative scope of works plan for proposed highway works secured via the S106 and S278 agreements.
Travel Plan	NPPF London Plan transport policies Local Plan policy CS16	Planning permission for new buildings or major extensions and removal or variation of a condition including minor material alterations.	A draft strategy for managing all travel and transport within the development. It should seek to improve access to the site by sustainable modes of transport.
Tree survey/Arboricultural implications	Local Plan policy CS19 Open Spaces in City of London SPG.	Planning permission for new buildings or major extensions. Householder and removal or variation of a condition including minor material alterations.	Required if proposal is likely to affect trees within the application site or adjacent to the site including street trees. This must include survey drawings showing the position of any existing trees and their canopy spread, trees to be felled and any pruning

			required during and after construction.
Urban Greening Factor Calculation	London Plan Policy G5 Local Plan Policy DM15.5 City of London Urban Greening Factor Study July 2018 SPG	All major development and refurbishments.	An urban greening proposal should be submitted having regard to the City of London Urban Greening Factor Study July 2018 and the Mayor of London Guidance: Living Roofs and Walls: From Policy to Practice. The proposal shall include an Urban Greening Factor as set out London Plan Policy G5 and in the GLA publication Urban Greening Factor for London July 2017.
Ventilation/Extraction Statement	Local Plan Policy DM10.1 & DM21.3	Required to accompany all applications for the use of premises for purposes within Use Classes: <ul style="list-style-type: none"> o Class E (Restaurants and cafes) (Offices) o Sui generis (Drinking establishments) o Sui generis (Hot food takeaways). 	May also be required for significant retail, industrial or leisure or other similar developments where substantial ventilation or extraction equipment is proposed to be installed.
Views assessment	London Plan policies HC1, HC2, HC3 and HC4. Local Plan policies CS10, CS12, CS13, CS14. LVMF. Riverside Appraisal of the Thames Policy Area SPG. St Paul's and Monuments Views SPG.	Planning permission for new buildings or major extensions and removal or variation of a condition including minor material alterations.	Studies showing existing and proposed views. Required if the development could affect protected vistas, panoramas, views and prospects identified in the London Plan, LVMF and Local Plan or the settings of listed buildings or conservation areas.
Waste storage and recycling facilities	London Plan policy SI8 . Local Plan policy CS17.	Planning permission for new buildings, changes of	To be shown annotated on drawings.

		use or major extensions.	
Whole Life-Cycle Carbon Assessment	<u>London Plan Policy SI2</u> Mayor's Whole Life-Cycle Carbon Assessments LPG <u>CoL's Carbon Options Guidance Planning Advice Note</u>	<u>All applications referable to the Mayor of London and major applications involving substantial demolition.</u>	<u>The assessment should follow The Mayor of London Draft Whole Life Cycle Carbon Assessment guidance which should be used prior to the publication of the finalised document.</u>
Whole Life-Cycle Carbon Options Assessment	CoL's Carbon Options Guidance Planning Advice Note	<u>All applications referable to the Mayor of London and major applications involving substantial demolition.</u>	Submission should provide details in line with the CoL's Carbon Options Guidance including the Dashboard. WLCA template should be in Excel format.

ANNEXE B – PROPOSED LOCAL LIST REQUIREMENTS (CLEAN VERSION) – DECEMBER 2023

APPLICATIONS FOR FULL PLANNING PERMISSION

VALIDATION CHECKLIST December 2023

Applications for planning permission should be submitted in accordance with the requirements in this checklist. If not, the application may be declared invalid and not determined or processing may be delayed.

The application should be submitted electronically and one copy of the form and each of the drawings, plans and documents will be required. If the application is submitted in paper format, two copies (one original and one copy) will be required.

If samples of materials are submitted, one sample of each material will be required.

Any alternative submission requirements (e.g. USB) should be discussed with Officers if required.

NATIONAL LIST OF REQUIREMENTS

Information Item	Notes
<p>1. Completed application form and <u>the completed Ownership Certificate and Agricultural Land Declaration (A, B, C or D – as applicable) as required by Article 14 of the Town and Country Planning (Development Management Procedure) Order 2015</u></p>	<p>Where Ownership Certificates B, C or D have been completed, notice(s) as required by Article 13 of the Town and Country Planning (Development Management Procedure) Order 2015 must be given and/or published in accordance with this Article.</p> <p>The application form should include data required by the Greater London Authority <u>Planning London Datahub</u> as set out in the Planning Portal 1APP form.</p>
<p>2. A location plan and a site plan are required. The site should be edged red; other land in the applicant's ownership should be edged blue.</p>	<p>N/A</p>
<p>3. Design and Access Statement</p>	<p>Many planning and listed building applications and most applications within a Conservation Area must be accompanied by a Design and Access Statement.</p> <p>The Design and Access Statement must contain a proportionate level of information in line with NPPG guidance. Information on when a D&AS is required is set out in the <u>Design and Access Statement</u> guidance note.</p>

	For major applications a separate Access Statement should be submitted and an Equalities Impact Assessment may be required for appropriate major schemes.
4. The appropriate fee	N/A

LOCAL LIST OF REQUIREMENTS

Information Item	Policy Driver	Types of application	When or what information is required
<p>Plans and drawings including:</p> <ul style="list-style-type: none"> Existing and proposed floor and roof plans Existing and proposed elevations Existing and proposed sections and finished floor and site levels <p>At an appropriate scale e.g. 1:50, 1:100 or 1:200.</p>	<p>PPG Guidance: https://www.gov.uk/guidance/making-an-application#Plans-and-drawings.</p>	<p>All applications</p> <p>Applications involving building work, alterations to buildings or open space or display of advertisements.</p> <p>Section 73 removal or variation of a condition including minor material alterations.</p>	<p>Plans should be proportionate to the nature and size of the proposal, drawn at an identified standard metric scale and titled and numbered.</p> <p>They should show clearly the proposed works in relation to what is already there, highlighting any structures to be demolished, changes to levels, relationship with neighbouring buildings and land, details of foundations and the appearance of new work including materials to be used.</p> <p>Applications for change of use must identify the area(s) involved but elevations and sections will not be needed if there are no alterations or building work.</p>

Access Statement	London Plan Policy D5 Local Plan policy CS10	Applications involving alterations to building entrances and open spaces, changes of levels and changes of use.	Not required if a Design and Access Statement is submitted except for major applications). It should deal with all the access aspects normally covered in a Design & Access statement proportionate to the scale of the development.
Acoustic Report	NPPF London Plan Policy D14 Local Plan policy CS15	Planning applications involving new plant or uses that may create noise disturbance. Section 73 variation of a condition including minor material alterations.	May be required for developments that could affect noise sensitive properties (e.g. residential or educational uses).
Affordable Housing and Viability Statement	London Plan Policy H4 Local Plan policy CS21	Planning applications proposing 10 or more new residential units.	A report demonstrating how it is intended to comply with London Plan/Local Plan policies on the provision of affordable housing.
Air Quality Impact Assessment	Local Plan policy DM15.6.	For development that proposes to use biomass or biofuel or for major development (1000sq.m non-residential or 10 or more residential units).	Needed when the site is adjacent to a 'sensitive building' e.g. school or hospital. An assessment of the impact of the development on air quality.
Air Quality Neutral Assessment	London Plan Policy SI 1 Mayor's Air Quality Neutral guidance. Local Plan policy DM15.6	Planning permission for major new buildings or extensions (1000sq.m non-residential or 10 or more residential units) including minor material alterations.	Demonstration that development is at least air quality neutral and mitigation if necessary.
Biodiversity and Ecological Survey and Report	NPPF London Plan Policy G6 Local Plan Policy DM19.2	Planning permission for the demolition of existing buildings or construction of new buildings. If a proposal is likely to affect either protected or priority	Survey of existing biodiversity on site, impact and proposed measures to protect and enhance biodiversity. Should include a Biodiversity Net Gain (BNG) calculation and

		species or designated sites and priority habitats.	requirements set out in Government legislation and guidance.
Circular Economy Statement	<u>London Plan Policy SI7.</u> Mayor's Circular Economy Statement Guidance. <u>Local Plan Policy CS15</u>	<u>All major applications.</u>	To demonstrate: how all materials arising from demolition and remediation works will be re-used and/or recycled; how the proposal's design and construction will enable building materials, components and products to be disassembled and re-used at the end of their useful life; opportunities for managing as much waste as possible on site; adequate and easily accessible storage space to support recycling and re-use; how much waste the proposal is expected to generate, and how and where the waste will be handled. The statement should include the GLA Circular Economy template spreadsheet in Excel format. To include a Pre-demolition Audit.
<u>Community Infrastructure Levy Form 1.</u>	<u>Community Infrastructure Levy Regulations 2020 (as amended)</u> <u>GLA Guidance</u>	<u>For relevant development in accordance with CIL Regulations.</u>	<u>Completed CIL form 1 for all relevant development.</u>

	<u>Local Plan Policy CS4</u> <u>CoL Planning Obligations SPG</u> <u>CoL CIL Charging Schedule</u>		
<u>Cultural Plan</u>	<u>London Plan Policy HC5</u> <u>Local Plan Policy CS11</u>	<u>For all major development and large extension and refurbishment schemes.</u>	<u>To submit Cultural Plans for all major development, setting out how the scheme will contribute towards enriching and enhancing the City's cultural offer, facilitate public access and interpretation of heritage assets, provide permanent or temporary space for creative enterprises and incorporate public art either within the design of the building or as freestanding structures.</u>
Daylight/Sunlight assessment	Local Plan policy 10.7 Site layout for planning for daylight and sunlight, BRE 2022.	Planning permission for the construction of a new building or extension.	Required if the development is near to existing or approved residential premises or open spaces.
<u>Digital 3D model & GIS file</u>	<u>LVMF</u> <u>London Plan Policy D4</u> <u>Local Plan Policies CS10, CS13, CS14</u>	<u>Planning permissions for new buildings or extensions.</u>	<u>An fbx 3D model or equivalent of the proposal is required to import into the City's 3D model.</u> For major applications geospatial information may be required to identify elements of the proposal e.g. viewing galleries, new routes, green roofs.
<u>Draft Construction Logistics and Environmental Management Plan</u>	London Plan Policies SI4, T4 and T7 Local Plan Policies DM15.6, DM16.1 and DM17.2	Planning permission for the construction of a new building or large extensions and other relevant schemes.	Should demonstrate how the environmental and transport impacts will be minimised for the construction phase of the

	CoL Code of Practice		development.
Energy Statement	London Plan Policy SI2 and SI4 Mayor's Energy Assessment Guidance, and 'Be Seen' Energy Monitoring Guidance Local Plan policies for sustainable development and climate change.	All major applications.	Should demonstrate through an energy strategy how proposal will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
Environmental Statement	Town and Country Planning (Environmental Impact Assessment) Regulations.	Planning permission for redevelopment. Section 73 removal or variation of a condition including minor material alterations.	An Environmental Impact Assessment (EIA) is required in the circumstances set out in the Environmental Impact Assessment Regulations. Applicants can request a 'screening opinion' to determine whether an EIA is required before submitting a planning application.
<u>Fire Safety Statement</u>	<u>London Plan Policies D5 and D12</u>	<u>All major developments.</u>	<u>The statement should detail how the development proposal will function in terms of:</u> <ul style="list-style-type: none"> • <u>The building's construction: methods, products and materials used, including manufacturers' details</u> • <u>the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach</u> • <u>features which reduce the risk to life: fire alarm systems,</u>

			<p><u>passive and active fire safety measures and associated management and maintenance plans</u></p> <ul style="list-style-type: none"> • <u>access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these</u> • <u>how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.</u>
<p><u>Fire Statement – Gateway One</u></p>	<p><u>The Town & Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment Order 2021</u></p>	<p><u>For applications meeting the criteria set out in the 2021 Order.</u></p>	<p><u>A Completed form published by the Secretary of State (or a form to substantially the same effect) with relevant attachments and in accordance with the Government guidance on Fire Statements.</u></p>

Flood Risk Assessment and sequential test evidence	NPPF Local Plan policy CS18	All planning applications including change of use, removal or variation of conditions and minor material alterations.	Required for all planning applications in the Flood Risk Area shown on the Local Plan Policies Map B (as amended by the Strategic Flood Risk Assessment) and for Major development elsewhere. Technical Guidance to the National Planning Policy Framework sets out the required information.
<u>Health Impact Assessment</u>	<u>London Plan Policy GG3</u> <u>CoL's Health Impact Assessment Guidance Note 2021</u>	<u>All major development, and developments where potential health issues are likely to arise.</u>	<u>For all major development, and developments where potential health issues are likely to arise, to submit a Healthy City Planning Checklist. A Rapid or Full HIA to be submitted for larger-scale development proposals.</u> <u>The details should be in accordance with the CoL's Health Impact Assessment Guidance Note.</u>

Heritage Assets - Listed Buildings	NPPF London Plan Policy HC1 LVMF Local Plan policy CS12	Planning permission for redevelopment or alterations affecting a listed building or its setting.	A description of the significance of the historic assets affected by the proposal and the contribution of their setting to that significance. The level of information should be proportionate to the importance of the heritage asset and be sufficient to give an understanding of the potential impact of the proposal on the significance of the heritage asset. This information is required with an assessment of the impact of the proposal and an explanation of the design concept. The assessment of significance and impact should be set out in the Design & Access Statement where one is required.
Heritage Assets –Conservation Areas	NPPF London Plan Policy HC1 Local Plan policy CS12	Planning permission for redevelopment or alterations affecting a conservation area or its setting.	See above under Heritage Assets Listed Buildings
Heritage Assets – Archaeological remains and Scheduled Ancient Monuments	NPPF London Plan Policy HC1 Local Plan policy CS12	Applications for planning permission or removal or variation of a condition (including minor material alterations) where the proposal involves ground works.	See above under Heritage Assets - Listed Buildings. The information should include a desk based assessment, an assessment of the impact of the proposal, and where appropriate, on-site evaluation.

Heritage Assets – Tower of London World Heritage Site	NPPF London Plan Policy HC2 LVMF Local Plan policy CS12 World Heritage Site Management Plan Historic Royal Palaces Local Setting Study	Planning permission for new buildings or major extensions.	Impact assessment required if there could be an impact on views of the Tower of London or the Outstanding Universal Value of the World Heritage Site. The assessment of significance and impact should be set out in the Design & Access Statement where one is required.
Heritage Assets – St Paul’s Heights assessment	NPPF London Plan Policy HC1 Local Plan policy CS12	Planning permission for new buildings or extensions including minor extensions at roof level in the designated area.	Development in the designated area to demonstrate that the proposal would not infringe the St Paul’s Heights Limits. The assessment of significance and impact should be set out in the Design & Access Statement where one is required.
Heritage Assets - Registered Parks and Gardens	NPPF London Plan Policy HC1 LVMF Local Plan policy CS12	Planning permission for new buildings or alterations affecting a Registered Park or Garden.	See above under Heritage Assets - Listed Buildings
Heritage Assets – Non-designated Assets	NPPF London Plan Policy HC1 Local Plan policy CS12	Planning permission for new buildings or extensions including minor extensions.	A description of the significance of the heritage asset affected and the impact of the proposal, set out in the Design & Access Statement where one is required.
Housing design	London Plan housing policies. Local Plan policies CS1(5), DM21.1, DM21.3	Planning permission for new housing.	Demonstrate compliance with housing design policies and guidance.
Land Contamination assessment	NPPF Local Plan policy DM15.8	Planning permission for the construction of a new buildings or extensions.	Required if application site is known to be or is suspected of being contaminated. City of London Interactive Map

Landscaping details	Local Plan policies CS10 and CS19	Planning permission for new buildings or major extensions where open space is affected or provided.	Drawings showing any proposed landscaping including structures, paving types, plant species and drainage. This should follow the design concept in the Design and Access Statement.
<u>Lighting Strategy and-Concept</u>	<u>NPPG</u> <u>Local Plan Policy DM10.1 and DM15.7</u> <u>CoL Lighting SPD</u> <u>CoL Lighting Strategy 2018</u>	<u>For major development and for proposals for new lighting schemes including for the public realm and building facades.</u> All other applications including refurbishment, alteration, extension, new build and illuminated advertisements, should address how lighting has been considered as part of the submission (in line with the SPD).	<u>The Concept should address the impact of a lighting scheme in respect of design, amenity, light pollution, biodiversity and sustainability having regard to the Lighting SPD. It should build on the Strategy submitted at pre-application stage if relevant. A Strategy should also be submitted if not already done so.</u> <u>The strategy should include the details of the proposed lighting system and include a management strategy to demonstrate how a PIR system would be operated to achieve its optimal efficiency.</u>
Microclimate impact assessment(s) including: <ul style="list-style-type: none"> • Wind Assessment • Thermal Comfort Assessment 	London Plan Policy D9 Local Plan policies CS14 and CS15	Planning permission for new buildings or extensions.	Required if proposal is likely to have an adverse effect upon microclimate, in particular wind. <u>An assessment should be carried out in accordance with the criteria set out in Wind Microclimate Guidelines August 2019 and the Thermal Comfort Guidelines December 2020.</u>

Office viability report	Local Plan policy DM1.1.	Planning permission involving the loss of existing office accommodation and sites, other than where complementary uses are proposed for part of a building (see policy DM1.5) and pre-application discussions suggest the use could be acceptable.	Evidence to demonstrate that the building has depreciated such that office use would not be viable or suitable in the long term, having regard to the physical state of the building and its functional and locational obsolescence. Marketing evidence will be required to show that there is no recent or likely future demand for continued office use of a site or building.
Open Space assessment	NPPF London Plan Policy G4 Local Plan policies CS15 and CS19	Planning permission for new buildings or major extensions.	If proposal is for development within or neighbouring an open space an assessment of the impact and provision of replacement space is required.
Parking Provision	London Plan parking policies. Local Plan policy CS16	Planning permission for new buildings or major changes of use or major extensions. Section 73 removal or variation of a condition including minor material alterations.	Required if proposal affects existing car, motorcycle or bicycle parking spaces (including on-street parking bays) and/or is likely to create changes in the demand for parking on site or on surrounding streets. Details of all proposed parking should be shown on the drawings.

Photographs and Verified rendered montages	LVMF Local Plan policies CS10, CS13, CS13, CS14	Planning permission for new buildings, extensions or alterations. Section 73 removal or variation of a condition including minor material alterations.	Should be provided where necessary to support the application. Required in support of large redevelopment schemes and where proposals would involve the demolition of an existing building or affect the settings of listed buildings or conservation areas. Useful to support applications for alterations to buildings including shopfronts.
Planning obligations – Draft Head(s) of Terms	NPPF Local Plan policy CS4. CoL Planning Obligations SPD GLA SPG - Use of Planning Obligations.	Planning permission for new buildings, major changes of use or major extensions and removal or variation of a condition including minor material alterations.	Required if proposal will result in a requirement for a legal agreement to secure planning obligations and affordable housing etc.
Planning Statement / Supporting Information	NPPF	All applications.	Provision of a planning statement is optional. To include an area schedule with Gross Internal Area (GIA) and Gross External Area (GEA) in metres. <u>Should take into account the Equality Act.</u>
<u>Risk assessment for external terraces</u>	CoL Preventing Suicides in High Rise Buildings and Structures Planning Advice Note <u>Local Policy CS3</u>	<u>All development creating new external terraces.</u>	<u>Consideration of suicide risks and how to mitigate them is encouraged as part of the planning application process where new developments or refurbishments are proposed.</u>

<u>Security and structural safety statement</u>	<u>London Plan Policy D5 and D11</u> <u>Local Plan Policy CS3, DM 3.2 and 3.3</u>	<u>All major developments and refurbishments of potentially high profile buildings.</u>	<u>An assessment should demonstrate how 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.</u>
Servicing facilities	Local Plan policy DM16.5	Planning permission for new buildings, changes of use or major extensions.	To be shown annotated on drawings.
Statement of Community Involvement	NPPF Statement of Community Involvement, 2023 <u>CoL's Developer Engagement Guidance, 2023</u>	Planning permission for new buildings, major changes of use or major extensions and removal or variation of a condition including minor material alterations.	Required where community involvement has been arranged prior to making an application <u>which should include exploring opportunities to use a form of digital platform engagement to ensure all elements of a community are consulted on proposals.</u>
Sustainability Statement	NPPF London Plan policies on climate change. Local Plan policy CS15	All applications.	Demonstration of sustainability standard to be achieved and minimisation of carbon emissions. Submission of a digital sustainability form to capture sustainability data e.g. WLCA % retention, UGF and BNG. Major development should include a BREAAAM Pre-Assessment and

			details for climate resilience.
Sustainable Urban Drainage Systems (SuDS) / Drainage Plan	NPPF. London Plan Policy S113.	All major applications	Details of SuDS designs showing compliance with SuDS technical standards.
Town Centre Uses – Evidence to accompany applications	NPPF London Plan Policy SD7 Local Plan policy CS20	Planning permission for major shopping proposals.	Proposals for major shopping uses require evidence to demonstrate a sequential approach to site selection.
Transport Assessment	NPPF London Plan transport policies Local Plan policy CS16	Planning permission for new buildings, major changes of use or major extensions and removal or variation of a condition including minor material alterations.	Required if proposal is likely to have significant transport implications. For major applications the TA should include an indicative scope of works plan for proposed highway works secured via the S106 and S278 agreements.
Travel Plan	NPPF London Plan transport policies Local Plan policy CS16	Planning permission for new buildings or major extensions and removal or variation of a condition including minor material alterations.	A draft strategy for managing all travel and transport within the development. It should seek to improve access to the site by sustainable modes of transport.
Tree survey/Arboricultural implications	Local Plan policy CS19 Open Spaces in City of London SPG.	Planning permission for new buildings or major extensions. Householder and removal or variation of a condition including minor material alterations.	Required if proposal is likely to affect trees within the application site or adjacent to the site including street trees. This must include survey drawings showing the position of any existing trees and their canopy spread, trees to be felled and any pruning

			required during and after construction.
Urban Greening Factor Calculation	<u>London Plan Policy G5</u> <u>Local Plan Policy DM15.5</u> <u>City of London Urban Greening Factor Study July 2018 SPG</u>	<u>All major development and refurbishments.</u>	<u>An urban greening proposal should be submitted having regard to the City of London Urban Greening Factor Study July 2018 and the Mayor of London Guidance: Living Roofs and Walls: From Policy to Practice. The proposal shall include an Urban Greening Factor as set out London Plan Policy G5 and in the GLA publication Urban Greening Factor for London July 2017.</u>
<u>Ventilation/Extraction Statement</u>	<u>Local Plan Policy DM10.1 & DM21.3</u>	<u>Required to accompany all applications for the use of premises for purposes within Use Classes:</u> <u>o Class E (Restaurants and cafes) (Offices)</u> <u>o Sui generis (Drinking establishments)</u> <u>o Sui generis (Hot food takeaways).</u>	<u>May also be required for significant retail, industrial or leisure or other similar developments where substantial ventilation or extraction equipment is proposed to be installed.</u>
Views assessment	London Plan policies HC1, HC2, HC3 and HC4. Local Plan policies CS10, CS12, CS13, CS14. LVMF. Riverside Appraisal of the Thames Policy Area SPG. St Paul's and Monuments Views SPG.	Planning permission for new buildings or major extensions and removal or variation of a condition including minor material alterations.	Studies showing existing and proposed views. Required if the development could affect protected vistas, panoramas, views and prospects identified in the London Plan, LVMF and Local Plan or the settings of listed buildings or conservation areas.
Waste storage and recycling facilities	London Plan policy SI8 . Local Plan policy CS17.	Planning permission for new buildings, changes of	To be shown annotated on drawings.

		use or major extensions.	
Whole Life-Cycle Carbon Assessment	<u>London Plan Policy SI2</u> <u>Mayor's Whole Life-Cycle Carbon Assessments LPG</u> <u>CoL's Carbon Options Guidance Planning Advice Note</u>	<u>All applications referable to the Mayor of London and major applications involving substantial demolition.</u>	<u>The assessment should follow The Mayor of London Draft Whole Life Cycle Carbon Assessment guidance which should be used prior to the publication of the finalised document.</u>
Whole Life-Cycle Carbon Options Assessment	CoL's Carbon Options Guidance Planning Advice Note	<u>All applications referable to the Mayor of London and major applications involving substantial demolition.</u>	Submission should provide details in line with the CoL's Carbon Options Guidance including the Dashboard. WLCA template should be in Excel format.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

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